

CPD Policy

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THE AIM OF THIS POLICY

Continuing Professional Development (CPD) is an essential component of being a professional and embeds a culture of lifelong learning. This policy embeds a CPD framework and outlines the CPD requirements under *Corporations Amendment (Professional Standards of Financial Advisers) Act 2017* (Cth) and *Corporations (Relevant Participants Continuing Professional Development Standard) Determination 2018*, which requires all individuals identified as 'relevant participants' to meet the requirements for CPD set by the Financial Adviser Standards and Ethics Authority Limited (FASEA).

This document outlines the overarching CPD policy and provides a summary of the relevant provider requirements.

This CPD policy embeds the following principles:

- CPD maintains currency of technical knowledge
- CPD enhances and extends knowledge and skills
- CPD involves critical reflection and development
- CPD is relevant and flexible
- CPD is integral to ethical and professional practice

Definitions

Act: Corporations Amendment (Professional Standards of Financial Advisers) Act 2017

CPD year: The 12-month period beginning on the 1st July each year.

Relevant provider: a person is a **relevant provider** if the person:

- (a) is an individual; and
- (b) is:
 - (i) a financial services licensee; or
 - (ii) an authorised representative of a financial services licensee; or
 - (iii) an employee or director of a financial services licensee; or
 - (iv) an employee or director of a related body corporate of a financial services licensee; and
- (c) is authorised to provide personal advice to retail clients, as the licensee or on behalf of the licensee, in relation to relevant financial products.

Provisional relevant provider: a relevant provider who is undertaking work and training in accordance with subsection 921B(4) of the Act.

Formal relevant education: includes any of the following:

- (a) a degree or equivalent qualification approved under the *Corporations (Relevant Participants Degrees, Qualifications and Courses Standard) Determination 2018*
- (b) a course determined in a legislative instrument under paragraph 1546B(1)(b) of the Act
- (c) education or training provided or approved by a professional association
- (d) formal education or training study towards qualifications or designations relevant to practice as a relevant provider.

Professional or technical reading: reading of relevant magazines, academic readings or journal articles that is unstructured and does not contain an assessment.

CPD Year

CPD Year is 01/07 to 30/06 as per the most recent notice provided to ASIC under section 922HA of the Corporations Act 2001.

CPD obligations of relevant participants

Total minimum target: 40 hours of 'qualifying CPD' per CPD year.

Financial advisers must comply with the CPD requirements set by the Minister. The CPD standard involves financial advisers completing 40 hours of CPD each year, of which 70% must be approved by Insight Investment Partners.

Qualifying CPD activities must include a minimum in the following areas:

| CPD Area | Minimum requirement |
|---|---------------------|
| Minimum Mandatory Categories | |
| Technical Competence | 5 hours |
| Client Care and Practice | 5 hours |
| Regulatory Compliance and Consumer Protection | 5 hours |
| Professionalism and Ethics | 9 hours |
| Additional Categories | |
| *Tax (financial) advice | 5 hours |
| General | 5 hours |

*For financial advisers who provide tax (financial) advice services to retail clients, the minimum hours for CPD across the mandatory categories include *an additional 5 hours of CPD* in the area of tax (financial) advice.

The above minimum mandatory categories accumulate to 34 hours, or 85% of the required 40 hours.

The remaining 6 hours can be done of the advisers choosing, and must be recorded in Kaplan Ontrack.

CPD areas

A CPD activity must relate to one of the following CPD areas:

| Item | CPD area | Definition |
|------|---|--|
| 1. | Technical Competence | The activity is designed to enhance participants' technical proficiency and ability to develop and provide advice strategies that are appropriate to the objectives, financial situations and needs of different classes of retail clients. |
| 2. | Client Care and Practice | The activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients. |
| 3. | Regulatory Compliance and Consumer Protection | The activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them. |
| 4. | Professionalism and Ethics | The activity is designed to enhance participants' capacity to act as an ethical professional. |
| 5. | General | The activity is designed to maintain and extend participants' professional capabilities, knowledge and skills, including keeping up to date with regulatory, technical and other relevant developments, but is not in an area referred to in another item of this table. |

Maximum restrictions

In any CPD year, no more than the specified hours in each activity below may be counted as follows:

- 30 hours of formal relevant education
- 4 hours of professional or technical reading

Assessment and approval of CPD plans

CPD plans are managed using Kaplan Ontrack. Advisers are able to choose a pre-approved CPD plan from the available list of plans.

Approval of qualifying CPD activities

100% of all CPD activities undertaken by relevant participants must be assessed and approved by the licensee.

The following approval process is required:

| Activity | Approval process |
|---|--|
| Kaplan Professional Ontrack content | Automatically approved |
| Kaplan Professional higher education subjects | Automatically approved to a maximum of 30 hours per subject |
| Any External Provider | Submission to Responsible Managers for Approval via Kaplan Ontrack |

Assessment of qualifying CPD activities

A CPD activity must meet and provide evidence of the following requirements to be approved as a 'qualifying CPD activity':

- Clearly defined aims and learning outcomes.
- Clearly defined, logical structure that follows adult learning principles.
- Is current, accurate and up-to-date.
- Relates to one of the FASEA CPD areas.
- Is the appropriate learning level and has appropriate technical or practical content.
- Deals primarily with matters related to the provision of financial product advice, financial advice services and financial advice business.
- Is led or conducted by one or more persons with appropriate expertise, academic qualifications and practical experience.
- Enhances advisers' knowledge and skills, and/or contributes to the maintenance of knowledge and skills in areas relevant to the provision of financial product advice and financial advice services.
- Includes one or more of the following: workshop, face-face presentation, multimedia, worked examples, activities, case studies, tips, warnings, and if appropriate, reference to relevant legislation.
- Preference is given to activities with a structured assessment component. Evidence of the successful completion of the assessment is required.

Evidence requirements

For approval to be granted for a 'qualifying CPD activity' the following evidence is required:

- Proof of attendance/completion (e.g. certificate, digital record, transcript), which includes as a minimum:
 - The name of the activity and the provider
 - The date the activity was undertaken
 - An overview of the activity
 - A bio or CV of person(s) who developed or presented the activity, including academic qualifications and experience
 - The CPD area to which it relates
 - The duration in minutes/hours of the activity
 - The letterhead and/or signature of the provider or an appropriate authorised person.

Insight Investment Partners will approve at a minimum as many activities as will enable a relevant provider to comply with their CPD requirements. However, Insight Investment Partners will not approve an activity unless the activity meets the qualifying CPD activity requirements and evidence requirements set out in this policy.

Allocation of hours

CPD hours will be assessed and allocated on the estimated time taken to complete all content components (including video and/or multimedia) *plus* the completion of the assessment, on the basis of a 'reasonable person', with the appropriate knowledge.

Record keeping

The Kaplan Professional Ontrack platform will be used to record the completion of CPD activities.

CPD plans will specify each relevant provider's:

- individual overall CPD target
- minimum requirements in each CPD area
- any other specific requirements that must be met

The platform will monitor individual progress and provide reporting.

For CPD activities undertaken and completed outside the Ontrack platform, each individual relevant provider is required to upload details into Ontrack and submit evidence for assessment and approval to Anthony.Lyon@insightmp.com.au and Christopher.Fellas@insightmp.com.au

It is the relevant participants' responsibility to maintain complete and accurate records within Ontrack.

Career breaks

If a relevant provider has not been practicing or authorised as a relevant provider for a continuous period of 2 years or more, then they must comply with the following career break requirements. Insight Investment Partners must approve the relevant participants CPD plan for the first CPD year prior to resuming practice. Their first CPD plan may require additional CPD hours be completed to ensure Insight Investment Partners is satisfied that it is appropriate to address gaps in the relevant provider's competence, knowledge and skills arising from the relevant provider's absence from practice.

Extenuating circumstances

Extenuating Circumstances procedure is intended to support you if you experience exceptional, unforeseeable, short-term circumstances which affect your ability to study. There are some guiding principles as to what the Insight Investment Partners considers to be extenuating circumstances.

- They have to be out of your control; you could not have prevented them.
- They must have had a clearly negative impact on your ability to study

To be given consideration for extenuating circumstances you must make a written application to the responsible managers within the Insight Investment Partners. The responsible managers will provide an agreed time frame for the participant to requalify for continuing professional development.

Provisional relevant participants

Provisional relevant participants who are completing their Professional Year are not required to meet CPD requirements.

In the first CPD year as a relevant participant, CPD requirements will be pro-rated for the period between the completion of the professional year and the CPD year.

Existing relevant participants new to Insight Investment Partners

Insight Investment Partners will review existing CPD hours of the participant and will assess the appropriateness of the education or study for transfer of these hours.

Monitoring

Monitoring of the completion of CPD requirements by each relevant provider will be undertaken using the reporting functionality of Ontrack on a quarterly basis.

As part of Insight's Quarterly Responsible Manager Forum, the advisers CPD points are loaded into their Xplan user profile. Adviser are able to view their Xplan profile and Kaplan Ontrack at any time.

Ontrack provides a number of reports to assist with monitoring including the following popular reports/notifications listed below:

Email alerts available in Ontrack:

- *Ad hoc subscriber alert: this email can be sent to subscribers (by CPD plan) to inform them of their progress towards their target*

Reporting available within Ontrack:

- *Completion report: shows CPD completed by each relevant provider*
- *CPD progress report: shows relevant participants progress towards their target*
- *Total requirement report: shows whether or not relevant provider has met requirements*

Non-compliance

A relevant provider *must* comply with the CPD obligations specified in this policy.

Failure to meet the specified requirements requires the Insight Investment Partners to notify ASIC of the relevant participants non-compliance with the continuing professional development standard (922HB, *Corporations Amendment (Professional Standards of Financial Advisers) Act 2017*).

922HB Obligation to notify ASIC of non-compliance with continuing professional development standard

- (1) A notice must be lodged under this section, in accordance with section 922L, in relation to a person if, at the end of a financial services licensee's CPD year:
- (a) the person:
 - (i) is the licensee; or
 - (ii) is authorised to provide personal advice to retail clients, on behalf of the licensee, in relation to relevant financial products; and
 - (b) the person is a relevant provider; and
 - (c) the relevant provider has not complied with section 921D during the licensee's CPD year.
- Note 1:** A financial services licensee may obtain information from a relevant provider under section 922N for the purposes of determining whether to lodge a notice under this section.
- Note 2:** Subsection 921D(1) requires certain relevant participants to meet the continuing professional development standard in subsection 921B(5).
- (2) The notice must state that the relevant provider has not complied with section 921D during the licensee's CPD year.

*Corporations Amendment
(Professional Standards of Financial Advisers) Act 2017*

