

TOTAL PORTFOLIO MANAGEMENT PTY LTD CPD POLICY

Total Portfolio Management Pty Ltd has decided to adopt the Financial Planning Association (FPA) of Australia, CPD policy.

The reason for this is that the FPA's policy meets the requirements for FASEA's CPD policy and as all advisers employed by Total Portfolio Management Pty Ltd are members of the FPA, they must comply with the rules and regulations of the FPA as well.

Therefore, by adopting the FPA's CPD Policy the employees of Total Portfolio Management Pty Ltd will meet their CPD obligations under both FASEA and the FPA.

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Director
21 March 2019



FINANCIAL PLANNING
ASSOCIATION *of* AUSTRALIA

FPA CONTINUING PROFESSIONAL DEVELOPMENT POLICY

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FPA CONTINUING DEVELOPMENT POLICY

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1. Purpose

Continuing Professional Development (CPD) is an integral part of a professional framework. Not only is it a way of maintaining currency of technical knowledge and ensuring members remain professional; it is also a way of growing new knowledge and expanding members' abilities as professionals. It should never be viewed merely as a compliance burden, but instead of a method of improving personal and professional confidence and proficiency.

This FPA policy was designed in 2009 to offer FPA members both a more rewarding and wider range of education options that will assist them to maintain their professional proficiency and status while meeting regulatory and legislative CPD requirements.

The FPA's professionalism framework has always, and continues to demonstrate the financial planning profession's commitment to best practice.

The CPD framework supports the three pillars of the FPA:

1. **Professional membership** – ensuring we get the right people with the right skillsets into the profession and FPA membership
2. **Professional conduct** – ensuring members adhere to the high standards set for the profession and that they are supported in following professional ideals
3. **Professional accountability** – protecting the reputation of all members by putting in place an independent, peer-driven disciplinary mechanism.



Undertaking CPD promotes technical competence and the holistic skills and knowledge required of a well-rounded professional who can think critically and professionally respond to their client's goal-based needs.

2. Summary of Requirements

The following tables summarise the key CPD requirements for practitioner members of the FPA:

Until 31 December 2023

	Financial Planner AFP [®] and Associate	CFP [®] Professional until 31 December 2023
CPD hours	40 hours per CPD year.	40 hours per CPD year.
Accredited CPD	Minimum of 28 hours FPA accredited (70% of minimum hours required by FASEA) with no more than four hours of professional or technical reading.	Minimum of 28 hours FPA accredited (70% of minimum hours required by FASEA) with no more than four hours of professional or technical reading.
Non-accredited CPD	Up to 12 hours may be non-accredited (30% of minimum hours required by FASEA).	Up to 12 hours may be non-accredited (30% of minimum hours required by FASEA).
CPD Area requirements	As per FASEA guidelines: A minimum of five hours each in the CPD areas of technical competence, client care and practice, regulatory compliance and consumer protection; and a minimum of nine hours in the CPD area of professionalism and ethics.	As per FASEA guidelines: A minimum of five hours each in the CPD areas of technical competence, client care and practice, regulatory compliance and consumer protection; and a minimum of nine hours in the CPD area of professionalism and ethics.
ASIC knowledge requirements	Set by the individual or their licensee in a manner that ensures they develop, maintain and apply a high level of relevant knowledge and skills.	Set by the individual or their licensee in a manner that ensures they develop, maintain and apply a high level of relevant knowledge and skills.
Record keeping	The following records must be kept for seven years: <ul style="list-style-type: none"> • CPD record/CPD plan • Additional evidence for non-accredited activities 	The following records must be kept for seven years: <ul style="list-style-type: none"> • CPD record CPD plan • Additional evidence for non-accredited activities

Declaration	Each practitioner member must affirm that they have satisfied the annual CPD hours each CPD year through a declaration. (For extenuating circumstances see Section 8.)	Each practitioner member must affirm that they have satisfied the annual CPD hours each CPD year through a declaration. (For extenuating circumstances see Section 8.)
Audit	Practitioner members selected for audit must comply with audit requests (see Section 7).	Practitioner members selected for audit must comply with audit requests (see Section 7).

From 1 January 2024

	Financial Planner AFP[®] and Associate	CFP[®] Professional from 1 January 2024
CPD hours	40 hours per annum.	150 hours per triennium with a minimum of 40 hours per CPD year.
Accredited CPD	Minimum of 28 hours FPA accredited (70% of minimum hours required by FASEA) with no more than four hours of professional or technical reading.	Minimum of 28 hours FPA accredited (70% of minimum hours required by FASEA) with no more than four hours of professional or technical reading.
Non-accredited CPD	Up to 12 hours may be non-accredited (30% of minimum hours required by FASEA).	The remainder may be non-accredited. The additional requirement for CFP professionals (10 hours per CPD year) may be unstructured and does not have any limitations placed on type of CPD (i.e. can include formal study or professional reading over and above the limits proscribed by FASEA).
CPD Area requirements	As per FASEA guidelines: A minimum of five hours each in the CPD areas of technical competence, client care and	As per FASEA guidelines: A minimum of five hours each in the CPD areas of technical competence, client care and

	practice, regulatory compliance and consumer protection; and a minimum of nine hours in the CPD area of professionalism and ethics.	practice, regulatory compliance and consumer protection; and a minimum of nine hours in the CPD area of professionalism and ethics.
ASIC knowledge requirements	Set by the individual or their licensee in a manner that ensures they develop, maintain and apply a high level of relevant knowledge and skills.	Set by the individual or their licensee in a manner that ensures they develop, maintain and apply a high level of relevant knowledge and skills.
Record keeping	The following records must be kept for seven years: <ul style="list-style-type: none"> • CPD record / CPD register • CPD plan • Additional evidence for non-accredited activities 	The following records must be kept for seven years: <ul style="list-style-type: none"> • CPD record / CPD register • CPD plan • Additional evidence for non-accredited activities
Declaration	Each practitioner member must affirm that they have satisfied the annual CPD hours each CPD year through a declaration. (For extenuating circumstances see Section 8)	Each practitioner member must affirm that they have satisfied the annual CPD hours each CPD year through a declaration. (For extenuating circumstances see Section 8)
Audit	Practitioner members selected for audit must comply with audit requests (see Section 7)	Practitioner members selected for audit must comply with audit requests (see Section 7)

3. Acceptable CPD Content

a. CPD Hours

Associate and Financial Planner AFP® members are required, as a condition of FPA membership, to meet the legislated CPD requirement of 40 hours per CPD year.

CFP® Professionals must earn a minimum of 50 hours each CPD year. This requirement would take effect from 1 January 2024.

CPD hours must be completed in each CPD area (see section 3h) in order to meet CPD requirements.

b. Reduction in CPD hours for part-time advisers

The FASEA standard allows a member who is working on a part time basis for the whole of the CPD year to apply to their licensee for a reduction in minimum hours to 36 hours per annum. This must be done in writing prior to adopting the reduced minimum hours. This reduction in hours does not impact other CPD requirements.

However, the FPA provides no CPD exemption for part-time advisers.

c. Approved / Accredited CPD

A minimum of 28 CPD hours (70% of the FASEA minimum hours required) completed each CPD year must be accredited by the FPA.

Please note that internal programs accredited by FPA authorised CPD accreditors are included under 'Accredited Programs' on a CPD record, and as such there is not a cap on the inclusion of these activities for FPA practitioner members.

No more than four hours can be spent on a CPD activity that consists of professional or technical reading, and no more than 30 hours in study towards a professional qualification or designation for AFP / Associate members and 40 hours for CFP members.

Members may count time spent in the preparation and first delivery of a CPD activity towards their total CPD hours each CPD year.

Whilst minimum CPD requirements have been set by the FPA, it is possible that a licensee will identify that a greater amount of CPD is required for practitioner members to maintain or ensure competence in their advice areas.

d. When there is no requirement for FPA members

There is no CPD requirement for non-voting members as these members will not be providing financial advice. The CPD requirement for those undertaking their Professional year will be the 100 hours of required training, and it is understood they will already have a significant training burden in meeting the standards necessary to become a Relevant Provider.

e. Transfer of CPD hours

CPD hours accrued in excess in one CPD year may not be transferred or brought forward to offset the CPD requirement in an ensuing CPD year.

f. Non-accredited CPD

Members can complete up to 30% of their CPD hours per CPD year on non-accredited CPD. However, the content of the activity must be directly related to the members CPD

plan and be able to be mapped to the CPD areas. In addition, activities should still meet those of a qualifying CPD activity as outlined by FASEA.

Where a member wishes to include non-accredited CPD the member will need to maintain evidence of completion, an outline of course aims and / or objectives, and any assessments undertaken in order to justify the inclusion of such programs on their CPD record.

It is strongly recommended that practitioner members undertake accredited programs to ensure they meet minimum FPA CPD requirements.

g. CPD activities by other Membership Bodies

CPD activities offered by other membership bodies can be included on a member's CPD record.

The FPA works with other professions and associations to consider recognition for Professional Development and offers discounted rates and support to those organisations. In the first instance the FPA encourages members to suggest that the organisation seek to have their programs accredited for CPD hours by the FPA to ensure quality across the industry.

Where the organisation does not have their learning activities FPA accredited, members will need to maintain evidence of completion, an outline of course aims and / or objectives, and any assessments undertaken in order to justify the inclusion of the learning activity on their CPD record.

h. CPD Area Requirements

CPD Area requirements are as follows:

CPD Area	Requirement
Technical competence	Minimum of 5 hours per annum
Client care and practice	Minimum of 5 hours per annum
Regulatory compliance	Minimum of 5 hours per annum
Professionalism and ethics	Minimum of 9 hours per annum
General	No minimum requirement

The CPD Areas as outlined in the Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018 are:

Continuing Professional Development Standard – FASEA CPD area
Technical competence

<p><i>This activity is designed to enhance participant's 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.</i></p> <p>Acting as a technically proficient professional</p>
<p>Client care and practice</p> <p><i>This activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients.</i></p> <p>Acting as a client centric practitioner</p>
<p>Regulatory compliance and consumer protection</p> <p><i>This activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them.</i></p> <p>Acting as a legally compliant practitioner</p>
<p>Professionalism and Ethics</p> <p><i>This activity is designed to enhance participants' capacity to act as an ethical professional.</i></p> <p>Acting as an ethical professional</p>
<p>General</p> <p><i>This 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.</i></p>

i. Relevant Tertiary Study

The FPA recognises the value of relevant formal study with a higher education provider as part of a CPD plan. Members may include relevant study at a Bachelor's degree or higher for any relevant subject that has been passed.

Where there has been no formal FPA assessment, each subject passed can be claimed as accredited CPD at a level of 20 hours for each subject passed. Other hours (with documentation) can be claimed as unaccredited CPD.

Up to thirty hours may be claimed in any CPD year.

j. **The Professional Dimensions Model**

Being a professional is more than being technically competent – it's about being a rounded individual with the ability to think critically and respond to client goals and needs in a professional way.

The Professional Dimensions Model was adopted by the FPA in 2009, in recognition of this fact, and encouraged FPA members to identify development opportunities across the six professional dimensions maintaining a breadth as well as depth of CPD. In 2019 the model has been updated to use the new FASEA CPD areas which will continue to support the FPA goal of members being well rounded individuals, while enabling members to easily meet FASEA, TPB, and FPA CPD requirements.

This model provided a framework against which CPD was accredited and CPD activities by members could be measured. See Appendix E – The FPA Professional Dimensions Model.

From 1 January 2019 the FPA has adopted the FASEA CPD areas.

4. ASIC Knowledge Requirements

ASIC Knowledge Requirements are to be set by each member as part of their annual CPD plan with the approval of their licensee. Members must ensure that the Knowledge Requirements they include in their plan will address the technical, product, and skill competences they require to develop, maintain and apply a high level of relevant knowledge and skills.

The FPA will continue to use the ASIC Knowledge Requirements to accredit CPD alongside the FASEA CPD areas, allowing members to easily identify if particular FPA accredited CPD is relevant to their CPD plan and the areas in which they provide advice.

5. Meeting Tax Practitioners Board (TPB) Continuing Professional Education (CPE) Requirements

As per the Explanatory Paper 042012, the TPB accepts compliance with the FPA CPD policy as compliance with the TPB CPE requirements. The FPA facilitates this by ensuring:

- Members align their CPD with ASIC Knowledge Requirements in addition to the CPD areas ensuring their CPD is relevant to the product areas in which they provide advice;
- CPD activities accredited by the FPA are relevant to the industry and delivered by individuals of appropriate expertise;

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- Total hours required by the FPA in CPD meet or exceed those required by the TPB.

6. Record Keeping

a. CPD plan

Members are required to work with their licensee to prepare a CPD plan on an annual basis. The CPD plan should be comprehensive and include development opportunities across each FASEA CPD area. In addition the CPD plan should take into account the Knowledge Requirements required to support the advice delivered by the member.

The FPA provides a CPD plan template and information to support the planning process through the member portal.

b. CPD record

Members are required to keep a complete and accurate record of CPD completed for each CPD year. The CPD record and supporting documentation must be retained for seven years post completion.

The CPD record should capture the following information:

- Program / education activity title
- Provider
- Date of completion
- Evidence of completion
- Delivery format
- Total CPD hours
- CPD hours against each FASEA CPD Area
- CPD hours against each ASIC Knowledge Requirement
- Accredited / Non-accredited education activities

When claiming CPD hours for accredited professional reading / podcasts / video / non-accredited webinars etc. (capped at four hours per annum) the following information needs to be recorded in a Professional Reading Journal:

1. List in chronological order the author's / presenters name, title, journal or newspaper if relevant, name of publication, place of publication, year of publication and page numbers / web link;
2. Document how the CPD has enhanced your knowledge and skills;
3. Document the date you completed professional reading relating to one or more of the professional dimensions;
4. Record the approximate number of hours spent on professional reading / listening / viewing; and
5. Document the number of CPD hours claimed per year for engaging in Professional reading or listening to podcasts on financial planning issues.

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6. The FPA provides an online tool to support members to maintain their CPD record.

7. Audits and Penalties

Adherence of the CPD Policy is a practitioner member requirement, and members are asked to declare their completion of CPD within the annual renewal process. Failure to comply may ultimately result in suspension of membership.

The FPA will conduct a CPD audit. It is a requirement that practitioner members comply with CPD audit procedure.

8. Suspension of CPD Requirements

Members affected by extenuating circumstances such as medical, disability, or parental leave who are taking a leave of absence from the profession may apply for a suspension of their FPA CPD requirements.

A suspension of CPD requirements may only be given where a member ceases to give financial advice, and must be applied for in writing, along with supporting documentation.

Application for suspension of CPD requirements cannot be sought from the FPA where a member is working part-time hours, or giving advice in any capacity (see Section 3b).

9. Returning from a Leave of Absence or Reinstating Membership

On returning to work the member must first provide a CPD plan to their licensee and the FPA. The CPD plan must clearly detail how they will address the gaps in their technical, knowledge and skill competencies on their first year of return.

The licensee / FPA may require additional CPD hours if it appears that will be needed to ensure a member covers the full range of FASEA CPD areas and ASIC Knowledge Requirements in relation to the advice they are giving.

The FPA adopts the following policy regarding the CPD completion / verification for a return from Leave of Absence.

Reinstatement of CFP® designation after Leave of Absence	Reinstatement of CFP® designation after termination or resignation	Reinstatement of AFP® designation after Leave of Absence	Reinstatement of AFP® designation after termination or resignation
<p>All applicants to complete and submit their licensee approved CPD plan for the next 12 months.</p> <p><i>If membership ceased more than one year ago additional requirements are below for each category of membership.</i></p>			
Leave of absence of more than one year <ul style="list-style-type: none"> • Pass CFP1 (if not completed previously) 	Membership lapsed more than one year <ul style="list-style-type: none"> • Pass CFP1 & CFP Certification examination (if not previously completed) 	Leave of absence of more than one year <ul style="list-style-type: none"> • Nil extra 	Membership lapsed more than one year <ul style="list-style-type: none"> • Reinstatement fee of \$300

10. CPD Accreditation

The FPA operates a robust accreditation service that assesses and accredits for CPD to the FASEA CPD Areas and ASIC RG146 Knowledge Requirements, providing certainty for the licensee and member of the quality of the CPD. CPD assessed by the FPA meets the FASEA standard of qualifying CPD.

In line with the FASEA standard for qualifying CPD education activities, the FPA accredits CPD using the following standards:

- The education activity aligns with at least one of the FASEA CPD Areas and RG146 Knowledge Requirements.
- The education activity is delivered by a reputable provider and is led by an individual / group who have appropriate expertise to talk to the topics outlined.
- The education activity has appropriate topic focus for FPA members improving their ability to deliver best practice financial advice.
- The activity is of an appropriate standard and level of content for FPA practitioner members.

11. FPA CPD Accreditor Program

The FPA has empowered agents of approved providers who hold their own AFSL, referred to as CPD accreditors, to undertake the accreditation of their internal training courses.

CPD accreditors cannot accredit CPD education activities for any organisation but their own, unless the organisation is a subsidiary of an approved provider parent company. The FPA should be approached in instances where this is not clear.

All CPD education activities designed and developed with the intent of marketing to people outside the organisation, for example road shows, conferences, etc must be forwarded to, and accredited by, the FPA.

Programs accredited by CPD accreditors are included under 'CPD Accredited Programs' on a CPD record, and as such there is no cap on the inclusion of these education activities for FPA practitioner members.

a. Becoming registered

To become a CPD accreditor, individuals must meet the criteria as set by the FPA, and successfully complete the Accreditor training program.

Existing accreditors as at 1 January 2019 must redo the Accreditor training program to ensure their familiarity with the new CPD areas.

Approved providers who hold their own AFSL, can nominate as many agents as they feel necessary to become CPD accreditors. If a CPD accreditor moves from one organisation to another they maintain their CPD Accreditor status provided the new organisation is an approved provider. However, they must notify FPA of their new details.

The Accreditor training program need only be completed once to gain CPD accreditor status.

b. Maintaining registration

On becoming a CPD Accreditor, they must submit for review and feedback from the FPA CPD Manager, a minimum of 3 CPD hours of qualifying CPD education activities that they have accredited, prior to their issuing Approval letters.

CPD accreditors must complete a CPD accreditor refresher course on a two yearly basis, in order to maintain their registration as a CPD accreditor.

In addition, skills development and refresher sessions will be available on demand to accreditors through the FPA Learning Management System.

c. Audit of CPD Accreditors

An audit of CPD accreditors will occur annually in conjunction with the CPD audit of FPA practitioner members. In addition, a random audit of the CPD Accreditor Program may occur at any time.

If audited, accreditors will be required to supply examples of CPD accreditations conducted within the audit period. Failure to comply with the audit will result in CPD accreditor status being revoked.

Appendix A Background

In 2009, the FPA's CPD Policy purposely moved beyond the Knowledge Requirements identified in ASIC's RG146 and instead broadened its definition of professional development to encapsulate a more complete and multi-dimensional model of what it means to be a professional.

The Professional Dimensions model was developed by the FPA and released to FPA members, regulators, licensees, and the community in 2009 to encourage broader development and recognition of learning activities for FPA members that aligned to and supported their journey to being a well-rounded professional no matter what stage they may be at in their career.

The policy specifically aimed to encourage members to:

- Consider that CPD is not a compliance challenge but an opportunity to maintain personal and professional confidence and proficiency;
- Broaden the range and type of acceptable CPD activities undertaken;
- Take opportunities to reflect upon their own professional practice;
- Participate in learning activities which meet the legal and ethical obligations of the profession; and
- Pursue opportunities for engagement with the profession and the wider community.

Prior to the introduction of this change the FPA had been concerned for some time that CPD is viewed by many in the industry as a compliance obligation and that quality and choice in the range of CPD available had been limited for too long.

For the 2015-2018 period the policy was updated to acknowledge the Tax Practitioners Board requirements, documenting changes to the CPD audit process and aligning measurement of CPD to hours instead of points.

The focus and direction of FPA's CPD policy, encouraging members to undertake CPD across all professional dimensions, allows a smooth transition when adjusting the policy in 2019 to comply with the Financial Adviser Standards and Ethics Authority (FASEA) Continuing Professional Development Determination and Policy Standard.

Appendix B Scope

This CPD Policy impacts:

- Practitioner members of the FPA (CFP® professional, Financial Planner AFP®, and Associate members);
- FPA Professional Practices;
- Australian Financial Services Licensees;
- Education Service Providers; and
- The broader financial services community

The Policy directly applies to practitioner members of the FPA. It is compliant with relevant regulatory and legislative guidelines, and can be adopted by licensees as their CPD policy.

Appendix C Definitions

Continuing Professional Development (CPD and PD)

The FPA definition of Professional Development is

“Professional Development is about engaging in activities which systematically assist professionals to enhance their knowledge, skills and general life attributes so as to achieve professional and organisational goals.

Professional Development is not an end in itself; it is continuous and directed towards maintaining the knowledge, skills and competence necessary for the diligent and competent practice of the profession of financial planning as well as encouraging acceptance of its status as a profession by the communities it relates to.”

Continuing Professional Education (CPE)

The Tax Practitioners Board uses the term CPE for Continuing Professional Education.

CPD Hours

The FPA requires members to earn CPD hours, in line with FASEA and TPB requirements and current practice with other professional associations. The terms “points” and “hours” can be used interchangeable.

Continuing Professional Development Plan (CPDP and CPD Plan)

A CPD plan sets out the identified learning activities that support the development of technical competencies, professional skills and personal attributes required for effective performance and participation within the financial services industry.

Professional Dimensions Model

The FPA has used a dimensional model to show that professionalism is a holistic combination of many components operating in concert to create a unique whole that describes specific types of professionalism.

Continuing Professional Development Record (CPD record)

A CPD record captures the evidence of CPD activity. It can be tailored to suit individual needs. At a minimum it should show the name, date, CPD value, provider, delivery type and dimensions of the education you have engaged in.

Professional Year

A period of supervised work and training completed by new industry entrants working to become a Relevant Provider.

Relevant Provider

An individual who is an authorised representative of a Financial Services Licensee.

Qualifying CPD Activity

CPD that meets the standard for a qualifying education activity as laid out in the Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018.

Triennium

For CFP® Professionals (from 2024) and FPA audit purposes, the FPA measures CPD hours over a set three year period called a triennium. The triennium dates are:

Start Date:	July 1, 2018	July 1, 2021	July 1, 2024
End Date:	June 30, 2021	June 30, 2024	June 30, 2027

Authorised CPD Accreditor

The FPA has empowered agents of Professional Partners, referred to as CPD Accreditors, to undertake the accreditation of their internal training courses.

In order to become registered, CPD Accreditor will need to undertake the FPA's Accreditor training program, which outlines the CPD Policy, accreditation and audit processes.

ASIC Knowledge Areas: Regulatory Guide 146 (RG146)

Australian Securities and Investments Commission (ASIC) guide to the Training of Financial Product Advisers. RG146 sets out the minimum training standards that apply to advisers and how advisers could meet these training standards prior to FASEA legislative changes. The Knowledge Requirements in RG146 remain relevant to practitioners in identifying product knowledge required to deliver advice.

TPB(EP) 06/2014

The Tax Practitioners Board (TPB) released TPB(EP) 06/2014 Continuing Professional Education policy requirements for tax (financial) advisers in June 2014.

Appendix D References

- FPA Continuing Professional Development Policy 2016
- Regulatory Guide 146 – Licensing: Training of financial product advisers *ASIC – Australia Securities and Investments Commission*
- FPS004 – Continuing Professional Development Policy – *FASEA Standards Authority*
- Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018 – *FASEA Standards Authority*
- Corporations (Work and Training Professional Year Standard) Determination 2018 – *FASEA Standards Authority*
- Explanatory Paper TPB(EP) 04/2012 Continuing Professional Education policy requirements for registered tax and BAS agents from 30 June 2013 – *Tax Practitioners Board*
- FPA Disciplinary Regulation (2019)

Appendix E Professional Dimensions Model



Capability	The technical, legal, product and industry knowledge that it takes to advise clients and run a business.
Professional Conduct	All the skills and knowledge that go into making good, informed and client centred decisions.
Critical Thinking	The skills of how to process complex information and create new solutions.
Reflective Practice	Skills in developing others and yourself - thinking about the professional and personal needs of others as well as your own.
Interdependence	Engagement with the profession, the industry and peers in ways that instil consumer confidence.
Attributes and Performance	Skills in building professional relationships and improving professional performance.