

CONTINUING PROFESSIONAL DEVELOPMENT POLICY

Effective date: 1 January 2019

Introduction

Triple C Consulting Pty Limited ABN 45 141 412 106, ("Triple C") is an Australian Financial Services Licensee that is authorised to provide personal financial advice to retail clients. It is required to have a Continuing Professional Development ("CPD") Policy for the representatives who provide personal advice on its behalf. The legislation relating to CPD has very specific requirements and the Policy is designed to address those requirements.

Training Year

Our training year commences on 1 July each year. Each individual representative must have his or her own training plan for the relevant year, which must be approved by Triple C. The representative is required to record completed training and provide it to Triple C for verification when requested to do so. Any representative who does not complete the required training must be reported for non-compliance to ASIC.

Content of training

Training must cover the following competencies and minimum hours in each category:

CPD Area	Minimum hours	Content required for approval
Technical competence	5	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.
Client care and practice	5	The activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients.
Regulatory compliance and consumer protection	5	The activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them.
Professionalism and ethics	9	The activity is designed to enhance participants' capacity to act as an ethical professional.
General	No minimum set	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.

The number of hours to be completed in a training year must total a minimum of 40 hours with a minimum of 28 hours in CPD activities that Triple C has approved.

Representatives are permitted 4 hours of professional reading towards the minimum of 40 hours. The following detail must be recorded for any professional reading:

1. Title of article
2. Publication
3. Date
4. Author
5. Topics covered.

Although each representative is responsible for developing their own training plan, Triple C will provide a training plan which will include areas where we believe improvement is required and it will be based on CPD activities that we have approved. If a representative wants to amend the training plan the representative must seek approval from us and our approval will not be unreasonably withheld as long as the plan meets the minimum requirements as set out in Table 1, sets out the areas for improvement and the overall total of required hours.

Approved CPD Activities

A session must clearly include content specific to the area of competency in Table 1. It must be presented by a suitably qualified person on the subject matter. It must also contain an assessment to confirm the understanding of the subject matter by the representative.

The method of delivery can be face to face (such as the Stockbrokers and Financial Advisers Conference), online through written communication or video/streaming issued by an industry association, where it is approved by Triple C, or an educational institution.

The following will be taken into consideration in assessing a CPD Activity:

- a) the activity is in one of the CPD areas in the table above;
- b) the activity has sufficient intellectual or practical content; Is the appropriate learning level and has appropriate technical or practical content:
 - i. Clearly defined aims and learning outcomes;
 - ii. Clearly defined, logical structure that follows adult learning principles;
 - iii. Is current, accurate and up-to-date;
- c) the activity primarily deals with matters related to the provision of financial product advice and the associated business activities;
- d) the activity is led or conducted by 1 or more persons who are appropriate, and have sufficient standing, expertise, academic qualifications and practical experience;
- e) the activity is designed to enhance relevant providers' knowledge and skills in areas that are relevant to the provision of financial product advice; and,

- f) 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.

For Triple C to consider a CPD Activity, that a representative has completed, which was not previously been approved by it, proof of attendance/completion (e.g. certificate, digital record, transcript) will be required. The following must be provided:

- a) The name of the activity and the provider;
- b) The date the activity was undertaken;
- c) An overview of the activity;
- d) A bio or CV of person(s) who developed or presented the activity including academic qualifications and experience;
- e) The CPD area to which it relates;
- f) The duration in minutes/hours of the activity; and
- g) The letterhead and/or signature of the provider or an appropriate authorised person.

Preference is given to activities with a structured assessment component. Evidence of the successful completion of the assessment is required.

Record Keeping

Each representative is required to retain records of:

- the qualifying CPD activities undertaken;
- when they were undertaken;
- number of hours spent on each activity;
- evidence of completion of the activity and the outcomes of the activity; and
- the progress of implementation of his or her CPD plan.

Triple C will periodically review records of training completed by representatives to track that representatives are completing training that complies with the requirements. Where a representative is found not to be completing training on an ongoing basis, we will require the representative to “catch-up” within a given period of time.

If a representative does not complete the requisite training by the end of the training year, 30 June of each year, Triple C must notify ASIC of the non-compliance. Non-compliance will be recorded on the representative’s record on the ASIC Financial Adviser Register.