



Continuing Professional Development (CPD) Policy

**Harvest Property Loans Pty Ltd
ACL 392260**

Responsible Manager:

Alex Isaias, Director

Background

1. Introduction

1.1 Summary

- a) Harvest Property Loans Pty Ltd (**HPL**) has certain obligations in relation to continuing professional development, training and competency under its Australian Credit Licence (**ACL**), specifically in relation to ASIC RG 206.
- b) In addition to these requirements, some representatives may also hold professional qualifications and/or registrations that have additional ongoing CPD requirements. Each representative must ensure that, if applicable, any such additional CPD requirements are met.

1.2 Our commitment to ongoing CPD

- a) HPL believes that a strong compliance culture is key to ensuring the best outcomes for our clients. It is also key to making sure HPL continue to remain eligible to hold its ACL. All Representatives must take ongoing training seriously and ensure that they meet all of the requirements of this policy.

2. Purpose

- a) This Policy outlines HPL's CPD, training and competency requirements. This includes:
 - (i) Assisting all employees to be aware of what their ongoing CPD obligations are and how to meet them;
 - (ii) Which roles and functions require certain qualifications and/or authorisations before they can be performed;
 - (iii) How CPD training records will be maintained and monitored; and
 - (iv) Who is responsible for ensuring employees have met any applicable training obligations.

3. Scope

- a) This policy specifically applies to all Representatives.

4. Consequences of breaching this policy

- a) Non-compliance with this Policy may result in disciplinary action up to and including termination.

Our Obligations

5. General obligations for ACL holders

- a) As an ACL holder, HPL must, among other things:
 - (i) Maintain and demonstrate ongoing competence to provide credit services;
 - (ii) Ensure representatives are adequately trained and remain competent to provide credit services at all times;
 - (iii) Ensure credit services are provided efficiently, honestly and fairly;
 - (iv) Take reasonable steps to ensure its representatives comply with credit services laws; and
 - (v) Maintain organisational competency including the appointment of Responsible Managers.

6. Regulatory basis for this Policy

- a) This Policy is based on relevant regulatory guidelines including:
 - (i) *National Consumer Credit Protection Act 2009 (Cth)* (**NCCP Act**)
 - (ii) ASIC Regulatory Guidelines:
 - (a) RG 206 – Credit Licensing: Competence and training
 - (iii) AML/CTF Act

Expectations and Obligations of Representatives

7. Obligations on Representatives

7.1 Conduct

- a) All Representatives must:
 - (i) Comply with all rules, regulations, legislation and policies (as set out and amended from time to time);
 - (ii) Conduct themselves efficiently, fairly and honestly; and
 - (iii) Meet all reasonable standards of performance that clients and the business are entitled to expect of them.

7.2 Knowledge

- a) Representatives must maintain ongoing competency and adequate knowledge of in relation to the activities they are authorised to undertake on behalf of HPL as well as any other skill and knowledge required to perform their role and function. This includes, but is not limited to adequate knowledge of:
 - (i) The Corporations Act;
 - (ii) Other relevant regulations and legislation;
 - (iii) Developments within your areas of authorisation;
 - (iv) Any relevant conditions attached to HPL's ACL;
 - (v) HPL's policies and procedures that apply to your conduct;

Assessment of qualifications and skills

8. Determination of requirements

- a) HPL must assess and determine what qualifications and experience are necessary for the duties the Representative is to undertake on behalf of the HPL having due regard for regulatory minimum requirements and the demands and scope of each role.

9. Assessment of prospective Representatives

9.1 Prospective Representatives

- a) The skills, experience and qualifications of any prospective Representative must be assessed prior to a job offer being presented. The assessment must have due regard for the scope and level of authorisation. This assessment must be approved by the Head of Compliance in conjunction with the Directors.

9.2 Transfers and promotions

- a) All transferred or promoted Representatives that are subject to RG206 must have their skills, experience and qualifications assessed having regard to the scope and duties of the role. This assessment must be approved by the Head of Compliance in conjunction with the Directors.
- b) Where there is a minor gap in competencies, the Representative may be suitable for appointment at the sole discretion of the Directors, subject to the following:
 - (i) The Representative must agree to a remediation plan which includes timeframes for any competency gaps to be obtained. This includes an agreement by the Representative to undertake any additional training and/or qualifications required by HPL. Financial assistance may be provided with these requirements at the sole discretion of the Directors and the Representative is not to assume any entitlement to such support unless approved by the Directors in writing;
 - (ii) The Representative must not engage in any authorised activities until it has obtained the relevant competencies.

CPD Requirements

10. CPD Year

- a) HPL's CPD year will be from 1 July to 30 June of the following calendar year.

11. Our approach to CPD

- a) Our approach to CPD will be to:
 - (i) set reasonable CDP requirements for each Provider relevant to the scope and nature of the authorisations of that provider; and
 - (ii) actively assess the performance of each provider against their requirements throughout the CPD year.

12. CPD Plans

- a) Each Representative will be issued an annual CPD Plan outlining the ongoing CPD requirements for the CPD Year.

13. Mandatory CPD

- a) A total minimum of 30 hours of CPD must be completed each year of which a minimum of 15 must be specifically related to the provision of credit assistance.
- b) A minimum of 15 hours of the above CPD Activities must be **Structured CPD**. Structured CPD activities are activities that require a formal assessment component. Evidence of successful completion is required.

14. Restrictions

14.1 Professional and Technical Reading

- a) A maximum of **4 hours** of professional and technical reading may be counted towards CPD hours in any given CPD Year.

14.2 Formal Relevant Education

- a) A maximum of 30 hours of formal relevant education (i.e. further studies) may be counted towards CPD hours in any given CPD Year.

15. Qualifying CDP Activities

- a) At least 70% of CPD activities each CPD Year must constitute Qualifying CPD Activities. A Qualifying CPD Activity must:
 - (i) Have clearly defined aims and learning outcomes;
 - (ii) Have a clearly defined and logical structure that following adult learning principles;
 - (iii) Be current, accurate and up-to-date;
 - (iv) Is at the appropriate learning level with appropriate technical or practical content;
 - (v) Deal primarily with matters that are relevant to the provision of financial product advice, financial advice services or the conducting of a financial advice business;
 - (vi) Be conducted by one or more persons with appropriate expertise, academic qualifications and practical experience;
 - (vii) Enhance the Representative's knowledge and skills in areas relevant to the provision of financial advice;
 - (viii) Include one or more of the following: workshop, face to face presentation, multimedia, worked examples, activities, case studies, tips, warnings and if appropriate, references to relevant legislation and regulation;
 - (ix) Issue a proof of attendance/completion (which must be provided to HPL by the Representative) which specifies as a minimum:
 - (a) Name of activity and provider;
 - (b) Date of activity/completion;
 - (c) Overview of activity;
 - (d) Overview of conducting entity/person;
 - (e) The CPD area/s to which it relates;
 - (f) Duration in minutes/hours/CPD points of the activity (1 CPD point is to be considered as 1 CPD hour).

16. Approval of CPD

- a) HPL must approve 70% of each Representative's CPD for them to complete as part of their CPD Plan. For Relevant Providers, this means that 21 hours of CPD must be approved each CPD Year.

16.2 Kaplan OnTrack

- a) Kaplan OnTrack is the system used by HPL to provide access to CPD training content as well as log and monitor Representative's CPD activity. Any CPD completed through Kaplan OnTrack is deemed to be approved by HPL. As such, a Representative could meet all qualifying CPD activities hours by completing the required hours via Kaplan OnTrack.

16.3 Other activities

- a) Activities other than those completed through Kaplan OnTrack may be approved by HPL at its sole discretion. Representatives wishing to count such activities towards their annual CPD requirements must apply for approval for the activity in question by logging it in Kaplan OnTrack portal and providing all of evidence that satisfies all of the requirements outlined in section 15 of this Policy.

17. Monitoring and assessment

- a) An RP's progress towards meeting their CPD requirements will be assessed quarterly.
- b) If HPL forms the view that the AP is not making sufficient progress towards meeting the requirements of their annual CPD Plan, the RP will be issued with a caution and the RP's progress will be monitored monthly in the quarter following the caution.

18. Update this CPD Policy

- a) An annual review and assessment of this CPD Policy will be completed to ensure it remains compliant with the requirements of the Legislative Instrument as amended from time to time. HPL will update this policy if and when required.

19. Primary Responsibility for meeting CPD requirements

- a) Representatives are primarily responsible for meeting the requirements of their annual CPD Plans.
- b) Managements is primarily responsible for setting annual CPD Plans and monitoring progress towards these throughout the CPD Year.

20. Maintenance of required records

20.1 Requirements of Representatives

- a) HPL has engaged Kaplan (via Kaplan OnTrack) to record the CPD of Representatives and perform the function of HPL's CPD Training Register. As such, Representatives must add all CPD activities to Kaplan.
- b) Representatives will need to provide complete evidence in support of all CPD activities added to their Training Register.

20.2 HPL's requirements

- a) HPL will ensure that all records required by the Legislative Instrument are completed and maintained. These records include:
 - (i) All CPD Plans;
 - (ii) Details of CPD Assessments
 - (iii) Details of CPD Activities
- b) For Relevant Providers, HPL must record on that Representatives Financial Adviser Register entry, any CPD Year for which that Representative fails to meet their CPD requirements.

21. Publication of CPD Policy

- a) HPL will publish a copy of this CPD Policy on its website and will ensure that all Representatives have access to a copy of it.

Definitions

Director means any director of HPL or any Corporate Credit Representative of HPL.

Employee means any employee or contractor of HPL or any Corporate Credit Representative of HPL.

HPL means Harvest Property Loans Pty Ltd (ACL 392260).

Officer means any company officer of HPL or Corporate Credit Representative of HPL.

Representative means, for the purposes of this Policy, any Director, Employee or Officer.

Relevant Provider means a Representative authorised to provide personal advice to retail clients in relation to financial products.

Revision History

Date of Revision	Responsible	Summary of change
30/04/2019	Board	Policy Created