



FINANCIAL PLANNING
ASSOCIATION of AUSTRALIA

11 December 2018

Stephen Glenfield
Chief Executive Officer of FASEA
Financial Adviser Standards and Ethics Authority

Email: consultation@fasea.gov.au

Dear Stephen Glenfield

RE: FASEA Consultation Paper - Foreign Qualifications Policy

The Financial Planning Association of Australia¹ (FPA) welcomes the opportunity to provide feedback in response to the Financial Adviser Standards and Ethics Authority's (FASEA) proposed guidance on foreign qualifications.

It is important that FASEA establishes a streamlined process to assess foreign qualifications held by advisers and ensure they receive appropriate credit towards FASEA's new education and training standards. The FPA considers that FASEA's proposed pathways for new and existing advisers with foreign qualifications will achieve this.

While the FPA would prefer a one-stage assessment for foreign qualifications through the Department of Education and Training, the FPA recognises that the provisions of the *Corporations Act 2001* (Cth) require FASEA to assess each adviser's foreign qualifications.

In this context, the FPA recommends that FASEA considers minimising the relevant fees to be paid by advisers through the assessment process, noting that all advisers will incur other compliance costs under the new education and training standards. In particular, FASEA should consider the situation of advisers with multiple foreign qualifications and assess these through a single application, rather than multiple applications requiring multiple fees to be paid.

¹ The Financial Planning Association (FPA) has more than 14,000 members and affiliates of whom 11,000 are practising financial planners and 5,720 CFP professionals. The FPA has taken a leadership role in the financial planning profession in Australia and globally:

- Our first "policy pillar" is to act in the public interest at all times.
- In 2009 we announced a remuneration policy banning all commissions and conflicted remuneration on investments and superannuation for our members – years ahead of FOFA.
- We have an independent conduct review panel, Chaired by Graham McDonald, dealing with investigations and complaints against our members for breaches of our professional rules.
- The first financial planning professional body in the world to have a full suite of professional regulations incorporating a set of ethical principles, practice standards and professional conduct rules that explain and underpin professional financial planning practices. This is being exported to 26 member countries and the more than 175,570 CFP practitioners that make up the FPSB globally.
- We have built a curriculum with 18 Australian Universities for degrees in financial planning. Since 1st July 2013 all new members of the FPA have been required to hold, or be working towards, as a minimum, an approved undergraduate degree.
- CFP certification is the pre-eminent certification in financial planning globally. The educational requirements and standards to attain CFP standing are equal to other professional bodies, eg CPA Australia.
- We are recognised as a professional body by the Tax Practitioners Board.



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The FPA supports the creation of the precedent database as a method of minimising future regulatory costs and recommends that FASEA also considers a method to allow advisers with the same foreign qualification to apply jointly for an assessment.

The FPA would welcome the opportunity to discuss with the FASEA Board the issues raised in our submission.

If you have any questions, please contact FPA's Head of Policy, Ben Marshan (ben.marshan@fpa.com.au) or myself (dante.degori@fpa.com.au) on 02 9220 4500.

Yours sincerely

Dante De Gori
Chief Executive Officer
Financial Planning Association of Australia