

**Submission to the Code Committee
on
Consultation on Code of Professional Conduct for AFAs**

Submission by:

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Total pages: **3**
Date: **20-Nov-15**

Question #	Submission	Suggestion for improvement (if any)
1	Agree	
2	Agree	
3	Agree	
4	Agree	
5	Agree	
6	Disagree	See next page
7	Disagree	See next page
8	No comment	
9	No comment	
10	No comment	

Confidentiality:

Our submission does not have to remain confidential

Question 6: Do you agree with the proposed changes to the Competence Alternatives Schedule?

No. We do not agree. We were pleased to be invited to participate in the mapping project between our PFP papers and current Level 5 Certificate components. Having Massey's PFP Diploma recognised again as an appropriate alternative qualification for the core components and investment strand (post 2013) will be of tremendous help to future students at the university.

However, it is unfortunate that there was not adequate feedback in meeting the perceived 'gaps' between our PFP Diploma and the Level 5 certificate. It is still challenging to communicate to current and incoming students that after completing our Level 7 Diploma, students will not only have to sit for the Set B requirements but the financial advice strand. This is in effect de-incentivising students to obtain a university level qualification that is more appropriate (and on par with global standards) for those in the field practising wealth management.

In determining competency alternatives, we urge the Code Committee to not only consider topics and learning objectives from each institution but to also consider the actual content and qualifications of those who are providing said education to fully assess credibility and viability of proposed alternatives. Our Graduate Diploma (at Level 7) is more in depth than Level 5. For example, the Level 5 Certificate takes about 9 months to complete with focused study. Our Level Grad Dip takes 2 years, therefore has a more comprehensive coverage of each financial planning area.

There's a difference between and a 'Degree' and a 'Graduate Diploma.' However, there is no sound reason to treat our Grad Dip as different in terms of major curriculum. A degree is usually 24 papers and a grad diploma is 8 papers. The Grad Dip includes years 2 and 3 university papers, similar to what 'Degree' candidates would need to complete prior to graduation. So moving on from a Grad Dip to a degree is also more feasible for students seeking to obtain a degree (and perhaps having a 'Financial Planning' focus).

After reviewing the current Level 5 Certificate papers, we are uncertain of the direction of the New Level 5 certificate. Specifically, how will the content of the current providers change given the provisions under the New Level 5 certificate? This is very important. At present, the content (study materials and examinations) from providers seems barely adequate in serving as a refresher course for someone with a lot of industry experience. We do not believe that new entrants to the financial advice field are best served with the content provided by current Level 5 providers. The basic content alongside tax testing does not adequately prepare those with little or no financial planning knowledge or experience to aid consumers in wealth management. The content of Level 5 does not address out of the norm or exceptional financial planning dilemmas many people might encounter. This again attests to the difference between the current Level 5 Certificate and our Level 7 Graduate Diploma.

It further begs the question of a fair comparison between Massey's PFP Diploma and the current and New Level 5 Certificate.

Question 7: Do you agree with the Code not recognising specified sets of finance degree papers? If not, what approach to recognising combinations of degree-level papers would you support?

No. We do not agree. Finance degree papers in general are not created with the AFA market in mind. Non-Massey Finance degrees do not discuss any concepts around customers but are focused on training finance industry participants in areas like running mutual funds or company CFO's. Massey papers have been created with some of this content in mind, though we run parallel major and Diploma papers. Therefore content needs to be mapped. We are happy to provide detailed feedback once we have obtained full information on the teaching content of the New Level 5 Cert.