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**From:** Athol Williamson **S 9 (2) (a)**  
**Sent:** 18 April 2018 12:27  
**To:** code secretariat  
**Subject:** RE: Code Working Group - Your submission [UNCLASSIFIED]

Yes that's fine.

Kind regards,

**Athol Williamson | Authorised Financial Adviser ALU, AFP**  
Northcote Office Park, Unit 3, 88 Grey Street | PO Box 1589 Palmerston North  
**S 9 (2) (a)**  
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**From:** code secretariat [mailto:code.secretariat@mbie.govt.nz]  
**Sent:** Wednesday, 18 April 2018 11:44 a.m.  
**To:** **S 9 (2) (a)**  
**Subject:** Code Working Group - Your submission [UNCLASSIFIED]

Dear Athol

Thanks for giving me a call and sharing your thoughts on the development of the Code of Conduct with me.

Here are some of the key messages which I noted down from our conversation:

- The standard of Level 7 (a degree) is too high and prohibitive for financial planning. The existing standard of Level 5 seems appropriate.
- The CWG should ensure any standard set is necessary and likely to contribute to good advice (e.g. not just any degree or qualification)
- Qualifications (and testing) may not test the appropriate skills necessary to be a good adviser (e.g. communication skills)
- On conflict, you believe that advisers should have to disclose when they advise on products (e.g. KiwiSaver or insurance) which they own – this could fall under disclosure
- You believe a better word for scope is “terms of engagement” – and believe both the adviser and the client (as opposed to the burden resting primarily on the adviser) should be involved in setting the expectations regarding the financial advice
- Compliance costs can be high for small business advisers – where there is an ongoing relationship with a client – a full suitability analysis should not be required for every new advice situation

And just one final thing – **are you happy for me to treat this as a formal submission?** All this means is the CWG may publish them proactively at the end of the consultation process for transparency. Not all submissions are long – some have a number of key points like this one.

I also note that you are happy for the Code Working Group to contact you for further discussion. We will be in touch if we need more information.

Have a great day.

Kind regards

**Max Lin**

Secretariat

Financial Advice Code Working Group

[www.govt.nz](http://www.govt.nz) - your guide to finding and using New Zealand government services

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