

Incidents, Complaints, and Consequence Management

re-released 6 November 2023

Overview

This Licensee Standard sets out your obligations relating to the identification and management of Incidents and Complaints, and how Consequence Management may apply in practice. Count Financial uses information from client complaints, incident reports and Key Risk Indicator (KRI) monitoring to understand issues and root causes, in order to rectify and prevent recurrence. This Licensee Standard is applicable to all Authorised Representatives of Count Financial.

Any questions regarding this Licensee Standard should be directed to [Professional Standards](#).

What has Changed in this Update?

6 November 2023	ASIC has made modifications to the reportable situations regime to provide further exemptions on the 'deemed significant' threshold and to extend reporting timeframes. These changes were effective 20 October 2023.
4 May 2023	<p>ASIC has released updated guidance for AFS licensees regarding notifications to them under the reportable situations regime (formerly breach reporting).</p> <ul style="list-style-type: none">• The changes mostly address frequently asked questions (from Licensees) about how to complete ASIC's reportable situations form.• In addition to the additional guidance on making a breach report, ASIC has clarified that for ongoing matters, they expect updates from licensees at least every six months. <p>A new section on Reportable Situations has been included to explain</p>
10 October 2022	Count Financial Client Remediation Guide released as a supporting Tool to this licensee standard
5 September 2022	<p>Inclusion of information regarding the Financial Services and Credit Panel (FSCP), including:</p> <ul style="list-style-type: none">•<ul style="list-style-type: none">• What is the Financial Services and Credit Panel?• Types of matters that can be referred to a Panel• What actions can a Panel take?• Warnings and reprimands

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| | <ul style="list-style-type: none"> • Your rights |
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Guiding Principles

- If an incident or complaint occurs, we will look to assess and resolve it fairly and quickly.
- Where a client is involved, we will at all times seek to keep the client well informed through the complaints process, regarding expected timelines and their rights.
- We follow best practice regulatory guidance and operate in good faith and with transparency, should a systemic or reportable issue occur.

What this Licensee Standard covers

- [Incidents](#)
- [Reportable Situations](#)
- [Complaints](#)
- [Consequence Management](#)
- [The Financial Services and Credit Panel \(FSCP\)](#)
- [Warnings and Reprimands](#)
- [Your Rights](#)
- [Tools and Guidance](#)

Incidents

This section sets out your obligations in relation to the identification and remediation of Incidents. An Incident is a potential or actual failure to comply with our Licensee Standards, industry standards including code of ethics, as well as any failure of business processes or systems. It is any concern that you have regarding an action or process not being appropriately carried out by yourself or others.

It is important that you report all potential Incidents, so that Count Financial can make an assessment, ensure the correct action is taken where necessary, and reduce the risk of recurrence.

You are required to

1. Identify and report all incidents within outlined timeframes.

- Incidents should be reported by raising an incident via the [Incident Notification Form](#).
- Incidents should be raised within 48 hours of the incident being identified including incidents relating to a data breach or a suspected data breach (these should also be reported directly to your PDM or the [Professional Standards](#) team).
- The reporting of an incident may be done by you, your Practice Development Manager (PDM), a Manager, Advice Compliance, Coaching & Governance (Quality Advice Assurance Manager (QAA)) or another member of the Licensee.
- You may be requested to provide additional information relating to the incident if necessary.

<p>Note: You are required to notify Count Financial of any failure of ongoing service obligations regardless of fault. For example, if you are notified of the death of a client and were unable to provide ongoing services during their relevant service period prior to their death, you will need to</p>

raise an incident for review by Professional Standards.

2. Work with the Licensee to remediate any identified incidents.

- Incidents raised will be sent to the Professional Standards team for validation. The Professional Standards team will validate the Incident and contact you to provide remediation steps if required.
- When the remediation actions have been communicated to you, all remediation must be completed as a matter of priority (in accordance with the timelines in the instructions you receive). Failure to remediate your incidents adequately can result in consequence management which may include a financial penalty or loss of fees.
- Possible remediation may include but is not limited to:
 - an explanation and/or apology to the client;
 - provision of information to the client, to remediate a disclosure failure;
 - offer of remedial advice;
 - a goodwill payment or commercial settlement;
 - compensation to put the client back into the position they would have been had the error or issue not occurred (which may include interest);
 - changes to processes, procedures, or controls to ensure the incident does not re-occur; or,
 - additional training requirements.
- Where required, further training, development and the management of consequences may be delivered by your PDM.
- Where you have proactively raised and remediated an Incident prior to notification of your QAA Review or the request for a file being received from your QAA, the Incident will not be taken into consideration as part of the QAA assessment process.

Please refer to the [Count Financial Remediation Guide](#) for reference to remediation principles and processes.

Important: Some incidents may result in payments to clients which may include an interest component as required by regulatory guidance. Count Financial will calculate any interest payable.

ASIC RG277 - ASIC has previously provided guidance about the Reserve Bank of Australia (RBA) cash rate plus 6% being acceptable—particularly in the context of financial advice or investment type remediations where licensees are unable to calculate the actual foregone returns or interest. Licensees may continue to use this rate if it is beneficial to consumers and justified in the circumstances.

You must not

- Escalate any incident to ASIC. This is managed by Count Financial.
- Fail to report known incidents.
- Attempt to resolve incidents without informing Count Financial.
- Contact Count's Professional Indemnity Insurer (Count Financial will manage PI engagement where necessary).
- Offer or pay any compensation without Count Financial's approval.

Best practice

If you are unsure whether to report an incident, it is always best to err on the side of caution and report it to Count Financial. The licensee will work with you to resolve the matter, or close it, if it is not deemed of concern. However, if you fail to report potential incidents, which are later identified by Count Financial through other means, this is a breach of your agreement with Count Financial and can result in the termination of your Authorised Representative agreement.

Note: All incidents are investigated by the Count Financial Professional Standards team to determine if the incident has resulted in a 'reportable situation' (as defined by ASIC RG 78) and if the breach needs to be reported to ASIC.



Reportable Situations

Count Financial must report to ASIC a range of conduct that the law describes as 'reportable situations'. These types of situations include:

- significant breaches or likely significant breaches of 'core obligations';
- investigations into whether there is a significant breach or likely breach of a 'core obligation' if the investigation continues for more than 30 days;
- the outcome of such an investigation if it discloses there is no significant breach or likely breach of a core obligation; and
- conduct that constitutes gross negligence or serious fraud.

Exclusions List

Breaches that meet the following conditions are exempt from being deemed significant and therefore are not reportable:

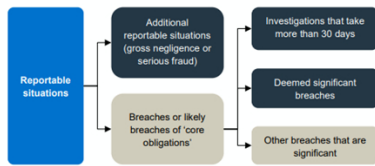
- Failing to provide an FSG;
- Failing to provide an FDS by the anniversary date;
- Arranging to/accepting deduction of fees without consent;
- Failing to implement/confirm a variation or withdrawal of a fee consent;
- Failing to provide a PDS;
- Preparing a defective disclosure document;
- AFSL ensuring a disclosure doc is provided by an AR; and
- Failing to comply with an approved Code.

On 20 October 2023 ASIC released further amendments to the 'deemed significant' thresholds to also include the following:

- The breach does not give rise to, and is unlikely to give rise to, any other reportable situation, and
- Only one person is impacted or, if it relates to a jointly held financial product, it effects those

joint holders, and

The breach does not result in, and is unlikely to result in, any financial loss or damage to any person, regardless of whether remediation is required.



Timeframes for Reporting Breaches

Licensees must lodge their reports to ASIC within 30 days after the licensee first knows that, or is reckless with respect to whether, there are reasonable grounds to believe that a reportable situation has arisen.

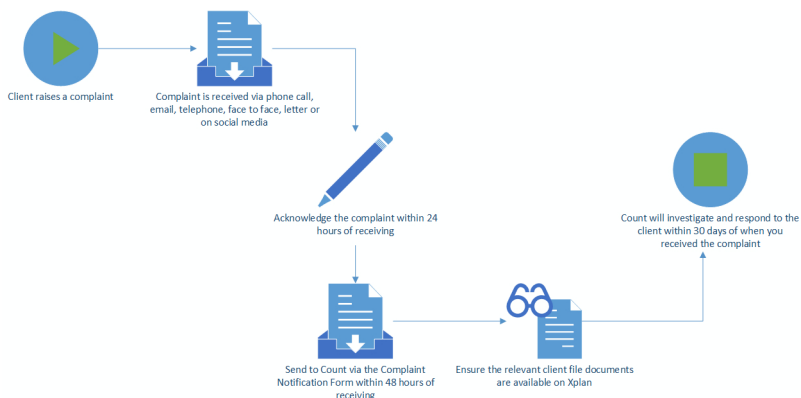
Licensees have up to 90 days to report “related reportable situations” to ASIC. For example, if Count identifies a contravention that has followed from or because of a previously reported breach, Count has 90 days to report the breach and this starts from when Count is first aware that a related reportable situation has arisen. All other reportable situations must continue to be reported within 30 days.

Complaints

In managing client [Complaints](#), we aim to create a quick, fair, and consistent process for our clients that is sensitive to their personal circumstances. We use client complaint information to understand root causes, identify issues and put things right.

Your Financial Services Guide (FSG), as well as our publicly available [Count Financial Complaints Handling Policy](#) outlines our complaints handling process and sets out the steps a client should take if they have a complaint. You must ensure clients are aware of their right to lodge a complaint, how to do this, and that the process is at no cost to them.

If you are unsure whether a complaint has been made, contact your Practice Development Manager (PDM) or the Professional Standards team to discuss.



You are required to

1. Lodge all complaints received within 48 hours of occurrence.

- Lodge all complaints using the Online [Complaints Notification Form](#).
- Monitor your social media accounts for any client complaints (that might include an expression of dissatisfaction) and notify Count Financial within 48 hours of occurrence.
- Clients may lodge complaints directly with Count Financial at reportcomplaints@count.au
- Ensure that all relevant documentation is uploaded to the electronic client file for Professional Standards to assess the complaint.
- It is important that you do not infer or provide any admission of liability (whether in relation to yourself or another Authorised Representative) during these communications.

Note: You are responsible for monitoring any complaints received via your financial adviser(s) or financial firm's social media accounts and notifying Count Financial within 48 hours.

2. Ensure the client is kept informed throughout the process

- On receipt of a complaint, you must acknowledge the person's complaint, within 48 hours of receipt (e.g., by way of a phone call or email). You should have regard to the client preference when acknowledging, for example, if you receive a verbal complaint then a verbal acknowledgement is acceptable. You must file note your acknowledgement and the method provided.
- You must ensure the client understands their rights, and the complaints process as outlined in the FSG and the [Count Financial Complaints Handling Policy](#).
- Where appropriate, you may be required to keep the client informed of the progress of any complaint investigation.

Note: If the complaint is received via a social media platform you must be mindful of protecting the client's privacy. Count Financial recommends offering an email address to the complainant to direct their concerns. Complaints raised via social media must be addressed where the client is 'identifiable' and 'contactable', however these details should not be made public.

3. Work with the Licensee to manage the complaint and remediate any identified incidents.

- It may be suitable in some limited circumstances for advisers to resolve or attempt to resolve a complaint within 48 hours. If you manage to resolve a complaint directly with the client you must still report the complaint to Count Financial, within 48 hours of receiving it.
- In most cases, a written response to the client is required to be provided within 30 days. The exception is where the complaint is resolved to the complainants' complete satisfaction within 5 business days of receipt **or** if an explanation/apology is agreed where no further reasonable action can be taken. Irrespective of the 5-day rule, if the client requests a written response, one must be provided.
- The 30 days **commences** from the date the complaint is received by you, not the date you notify Count Financial.
- The written response will be prepared by Count Financial and must include:
 - the final outcome of the complaint investigation (either confirmation of actions taken by the firm to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
 - their right to take the complaint to AFCA if they are not satisfied with the IDR response; and
 - the contact details for AFCA.
- You should follow any instructions from Count Financial with regard to remedial action, or requests for further information.
- A copy of the complaint response prepared by Count Financial, which may include supplementary documentation, will be provided to you for your records.

- Where there is agreement to provide monetary compensation, this must be paid within 30 days (or in line with terms outlined in a deed of settlement).
- Where a complaint cannot be resolved within 30 calendar days, the client must be notified in writing, with the reasons for the delay, and provided with information on their right to refer the matter to AFCA. Count Financial will manage this for you.
- Count Financial is required to report all complaints periodically to the Professional Indemnity Insurer, and where an insurance claim is likely to occur, the Insurer may become involved in the resolution process.
- The Licensee may be required to report complaint data to ASIC periodically.
- If the complaint is about a specific product, then in accordance with the Design & Distribution Obligations regime, Count Financial will be required to notify the Issuer of that product about the complaint.

4. Maintain documentation throughout the complaint

- Keep a record of all complaints by way of a file note describing all actions taken in relation to a complaint and the outcome; and retain this on the client's file.

You must not

- Infer or provide any admission of liability.
- Notify Count's PI Insurer of a complaint on behalf of Count Financial.
- Offer any compensation, determine remediation etc. without Count Financial's authorisation.
- Notify AFCA of the complaint on behalf of Count Financial.

Best Practice

Like incidents, it is always better to take a conservative approach and report complaints if you think one is being made. Count Financial will work with you to address any issues and resolve fairly and quickly.

The success or outcome of complaint resolution invariably comes down to the quality of information held on the client file (both physical and electronically), so a signed client fact find, detailed and tailored file notes, signed Authority to Proceed and an SOA reflecting the conversation and the recommendations will go a long way to ensuring you are in a strong position to defend complaints if they arise.

The contemporaneous nature of documentation is critical, so ensure that you upload all documents and supporting file notes as soon as possible, in accordance with your Record Keeping Obligations.

Consequence Management

Consequence Management forms part of the Supervision and Monitoring Framework and is a process whereby actions may be enforced upon Authorised Representatives (ARs) where they breach business rules, policies, standards, laws, or regulations. Please refer to the [Count Financial Consequence Matrix](#) for an overview. This section describes your obligations in relation to the Consequence Management process.

You are required to

1. Understand the Consequence Management triggers and outcomes

- Consequence management can be triggered by a number of events relating to non-compliance with your obligations as an Authorised Representative of Count Financial. These include (non-exhaustive):
 - identification of non-compliance with Licensee Standards, Policies, processes, or your Authorised Representative Agreement with Count;
 - failure to take steps to raise or remediate incidents and complaints in accordance with Licensee requirements;
 - identification of issues of non-compliance through Supervision and Monitoring activities;
 - non-compliance with the Financial Planners and Advisers Code of Ethics;
 - customer or staff complaints;
 - negligence or other misconduct;
 - fraud or any other illegal activity; and,
 - any activity that places the clients at risk of harm.
- Where you are subject to consequence management, Count Financial will notify you.
- Consequences are determined by appropriate individuals within the licensee.
- Consequences will be applied consistently based on the nature and severity of the respective Incident. Potential consequences can include (not exhaustive):
 - Formal notification and warning (verbal and/or written);
 - Increase in the number and frequency of QAA reviews,
 - Additional supervision via PDM visits; and,
 - Additional mandatory training.

For more information on Consequence Management triggers and outcomes see [Consequence Management Information](#). and the [Count Financial Consequence Management Action Matrix](#).

2. Comply with the Consequence Management process, and requests made by Count Financial.

- You may dispute the consequence management actions proposed against you by emailing the Chief Advice Officer (CAO). In the email, you should clearly articulate your reason for the dispute and provide as much information and documentation (if available) to support your dispute.
- You will be engaged during the dispute resolution process and the outcome of the dispute will be communicated to you after a thorough re-assessment of the consequence actions.
- The CAO of Count Financial has the final decision in applying the consequence actions.

You are not required to

- Manage the consequence management process
- Manage the process of assessing consequences and remedial action

Best practice

To avoid consequence management, ensure that you comply with the [Financial Planners and Advisers Code of Ethics](#), while focusing on delivering and documenting high quality advice which meets Best Interests requirements. Ensure data is up to date and clients are serviced in accordance with Client Service Agreements.

The Financial Services and Credit Panel (FSCP)

What is the Financial Services and Credit Panel (FSCP)?

The Financial Services and Credit Panel (FSCP) is a pool of industry participants, appointed by the Minister, that ASIC draws upon when forming individual sitting panels (sitting panels). Each sitting panel comprises an ASIC staff member and at least two members of the FSCP. A sitting panel will be convened by ASIC to consider certain suspected misconduct by, or circumstances relating to, a financial adviser. A sitting panel acts separately from but alongside ASIC's own administrative decision-making processes and has a range of powers to enable it to consider and respond to a range of misconduct.

What types of matters can be referred to a Panel?

Prescribed Circumstance	Explanation
Insolvency	A financial adviser becomes an insolvent under administration and ASIC is aware of the insolvency.
Fraud	A financial adviser is convicted of fraud and ASIC is aware of the conviction.
Not a fit and proper person	ASIC reasonably believes that the financial adviser is not a fit and proper person to provide personal advice to retail clients in relation to relevant financial products.
Contravention of education and training standards	ASIC reasonably believes that the financial adviser has contravened the education and training standards (excluding CPD).
Failure to approve Statement of Advice (SOA)	ASIC reasonably believes that the financial adviser has contravened s921F(4) of the Corporations Act (a supervisor must approve any SOA provided by a 'provisional relevant provider' to a retail client)
Provision of personal advice by unregistered financial adviser	ASIC reasonably believes that the financial adviser has contravened s921Y of the Corporations Act (unregistered financial advisers are not to provide personal advice)
Serious contravention of a financial services law	<p>ASIC reasonably believes that the financial adviser has contravened a financial services law (including a restricted civil penalty provision) and that contravention is serious</p> <p>Note 1: A contravention of the Financial Planners and Advisers Code of Ethics 2019 (Code of Ethics) constitutes a contravention of a financial services law.</p> <p>Note 2: A contravention is 'serious' if it:</p> <ul style="list-style-type: none">· has resulted, or is likely to result, in material loss or damage to a client of the financial adviser;· has resulted, or is likely to result, in a material benefit to the financial adviser; or· involves dishonesty or fraud.

Involvement in serious contravention of a financial services law	The financial adviser has been involved in the contravention of a financial services law (including a restricted civil penalty provision) by another person and ASIC reasonably believes that contravention is serious.
Refusal or failure to give effect to Australian Financial Complaints Authority (AFCA) determination	<p>The financial adviser has, at least twice, been linked to a refusal or failure to give effect to a determination made by AFCA relating to a complaint Note: A financial adviser is linked to a refusal or failure to give effect to a determination made by AFCA if they are a party to the complaint (e.g. they are the AFS licensee) or if they are an officer or substantially or significantly involved in the management of the financial firm that is party to the complaint.</p> <p>In addition, ASIC reasonably believes that the refusal or failure:</p> <ul style="list-style-type: none"> · has resulted, or is likely to result, in material loss or damage to a client of the financial adviser; · has resulted, or is likely to result, in a material benefit to the financial adviser; or · involves dishonesty or fraud.

What actions can a Panel take?

A sitting panel may take a range of actions against a financial adviser who has contravened a specified provision.

Prescribed circumstances	Actions the sitting panel may take
A financial adviser becomes an insolvent under administration.	Give a warning/reprimand
A financial adviser is convicted of fraud.	Direct the financial adviser to:
A sitting panel reasonably believes that the financial adviser is not a fit and proper person to provide personal advice to retail clients in relation to relevant financial products.	<ul style="list-style-type: none"> · undertake specified training
A sitting panel reasonably believes that the financial adviser has contravened a financial services law (including a restricted civil penalty provision) regardless of whether that contravention is serious.	<ul style="list-style-type: none"> · receive specified counselling · receive specified supervision; and/or
A financial adviser has been involved in the contravention of a financial services law (including a restricted civil penalty provision) by another person.	<ul style="list-style-type: none"> · report specified matters to ASIC
The financial adviser has, at least twice, been linked to a refusal or failure (regardless of whether the refusal or failure is serious) to give effect to a determination made by AFCA relating to a complaint that relates to:	Suspend a financial adviser's registration

<ul style="list-style-type: none"> · a financial services business; or · credit activities (within the meaning of the National Credit Act). 	<p>Prohibit the registration of a financial adviser</p> <p>Note: Financial advisers will not be required to be registered until 1 January 2023</p> <p>Accept an enforceable undertaking</p>
<p>A sitting panel reasonably believes the financial adviser has contravened a restricted civil penalty provision, namely:</p> <ul style="list-style-type: none"> · qualification requirements · exam requirement · work and training requirements · CPD requirements for financial advisers · CPD requirements for financial advisers who provide tax (financial) advice services · requirement to comply with the Code of Ethics · supervision requirements in relation to persons who are undertaking work and training, or · the prohibition on unregistered financial advisers providing personal advice. 	<p>Give a warning/reprimand</p> <p>Direct the financial adviser to:</p> <ul style="list-style-type: none"> · undertake specified training · receive specified counselling · receive specified supervision and/or · report specified matters to ASIC <p>Suspend a financial adviser's registration</p> <p>Prohibit the registration of a financial adviser</p> <p>Accept an enforceable undertaking from a financial adviser</p> <p>Give an infringement notice to the financial adviser</p> <p>Recommend that ASIC issue civil penalty proceedings against the financial adviser.</p>

Review ASICs [RG263 Financial Services and Credit Panel](#) for full details on the FSCP including the types of matters that can be referred to a sitting panel and the full range of actions a panel can take.

Warning and Reprimands

A warning or reprimand is a letter sent by ASIC to a financial adviser to warn or reprimand them

where ASIC reasonably believes that specified circumstances (the [warning or reprimand circumstances](#)) exist.

The circumstances generally relate to less serious misconduct (warning or reprimand circumstances) where a panel has not been convened.

At the same time that ASIC gives the warning or reprimand, and statement of reasons, to the financial adviser, they must also give a copy to the AFS licensee(s) that currently authorises the financial adviser to provide personal advice to retail clients on relevant financial products.

Generally, a **warning** will warn a financial adviser against continuing the conduct or circumstances that led to us giving the warning, whereas a **reprimand** will admonish the financial adviser in relation to the conduct or circumstances that have already ceased.

Review ASICs [INFO 270 Warnings and Reprimands](#) for full details.

Your Rights

You may apply to ASIC for a variation or revocation of a decision made by a sitting panel to direct you to undertake specified training, supervision, counselling or reporting, or to make an order suspending or cancelling your registration.

You may have a right to seek a review of the decision by the Administrative Appeals Tribunal (AAT). The AAT is an independent body which can review some decisions made by sitting panels. The AAT can, among other things:

- confirm the sitting panel's decision
- vary the sitting panel's decision, or
- set aside the sitting panel's decision and replace it with its own decision.

Review ASIC's [INFO 273 FSCP decisions: Your Rights](#) for more information.

Glossary of Terms

Incident	An Incident is a failure to comply with our internal measures, Licensee Standards, industry standards, as well as any failure of our business processes or systems. It is any concern that you have regarding an action or process not being properly applied. For example, an application form incorrectly completed or not providing an FSG when required.
Complaint	<p>The definition of a complaint, adopted from the International Standard: 'Customer satisfaction – Guidelines for complaints handling in organisations' as documented in ASIC's Regulatory Guide RG 271, is:</p> <p><i>“An expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.</i></p>

	<p>This means that:</p> <p>IF a client expresses their dissatisfaction about a Group product, service, staff member and/or the complaint handling process itself</p> <p>AND the client is explicitly expecting a response or resolution i.e., the client is specifically asking you to respond or take action to address their dissatisfaction</p> <p>OR the client is implicitly expecting a response or resolution i.e., the client is not specifically asking you to respond or take action to address their dissatisfaction however their choice of words suggests they are seeking a response or action</p> <p>THEN the client is making a complaint.</p>
FSG	Financial Services Guide - A guide that contains information about the entity providing a client with financial advice. It should explain the financial service offered, the fees charged and how the person or company providing the service will deal with complaints.
<u>AFCA</u>	The Australian Financial Complaints Authority – a combined financial services complaints authority (a combination of the previous Financial Ombudsman Service, the Credit and Investments Ombudsman and the Superannuation Complaints Tribunal)

Supporting Tools and Guidance

Document	Purpose
<u>Count Financial Client Remediation Guide</u>	Count Financial's principles and process for conducting a remediation review and arranging payments to clients
<u>Incident Notification Form</u>	An online form which must be used for reporting the details of an incident
<u>Complaint Notification Form</u>	An online form which must be used for reporting the details of a complaint
<u>How to lodge a complaint support tool</u>	Describes the process to lodge a complaint using our e-tool
<u>Count Financial Complaints Handling Policy</u>	Describes the process for clients to lodge a complaint with Count and what to expect
<u>Count Financial Consequence Action Matrix</u>	This matrix is a reference document outlining the appropriate action to be taken according to the level of risk the actions of the Adviser pose to Count Financial
<u>RG 271 Internal Dispute Resolution</u>	This guide explains what licensees and financial firms must do to have an internal

	dispute resolution (IDR) system in place that meets ASIC's standards and requirements.
RG 78 Breach reporting for AFS licensees: An ASIC guide	Guidance on a licensee's obligation to report certain breaches to ASIC
Reportable situations: Overview of changes to RG 78	A guide to reporting breaches using the ASIC Reportable Situations Form.
ASIC INFO 270 Warnings and Reprimands	ASIC regulation effective 1 January 2022 regarding Warnings and Reprimands
ASIC RG263 Financial Services and Credit Panel	The role of the FSCP, the types of matters that can be referred to a sitting panel and the full range of actions a panel can take
ASIC INFO 273 FSCP decisions: Your Rights	Your rights where a sitting panel has made a decision about you
Regulatory Guide 277: Consumer Remediation	Guidance to Australian Financial Services licensees and Australian Credit licensees to assist them to "achieve the right remediation outcomes on their own".
Count Financial Incident Assessment Guidance	A Matrix for Count Financial to assess the Consequence Rating of an incident
AFCA Rules and Guidelines	AFCA's Rules and Guidelines

This standard should be read in conjunction with:

- Licensee standard - [Financial Planners and Advisers Code of Ethics](#)
- Licensee standard – [Best Interest Duty](#)
- Licensee standard – [Continuing Professional Development](#)
- Licensee standard – [Record Keeping](#)

Any questions on this Licensee Standard should be directed to the Professional Standards team at professional.standards@count.au