

PURPOSE AND SCOPE

This policy sets out the Training & Competence (T&C) framework of Impact Financial Services Limited and explains how the firm ensures that all advisers and relevant staff maintain the appropriate knowledge, skills and competence to perform their roles.

The policy applies to:

- Mortgage Advisers
- Protection Advisers
- Supervisors and Managers
- The T&C Manager

The framework supports compliance with FCA expectations under SYSC and the Training & Competence Sourcebook.

The objective of this policy is to ensure that all advisers deliver competent, compliant and customer-focused advice.

GOVERNANCE AND RESPONSIBILITY

Overall responsibility for the Training & Competence framework rests with the Managing Director. Operational oversight is delegated to the T&C Manager.

T&C Manager
Andželika Dubij

The T&C Manager is responsible for:

- adviser supervision and competence monitoring
- file reviews and advice quality oversight
- adviser onboarding and induction oversight
- granting Competent Adviser Status (CAS)
- ongoing competence monitoring
- maintaining adviser training records
- supporting adviser development through Impact Academy

The T&C Manager reports to senior management on competence risks and training requirements.

ADVISER STATUS FRAMEWORK

Impact Financial Services operates a structured adviser development framework. Advisers progress through the following stages:

3.1 Stage 1 – New Adviser

A newly recruited adviser undergoing induction and training.

Restrictions: cannot provide unsupervised advice; must work under direct supervision.

Requirements include:

- induction training
- product training
- compliance training
- observation of client meetings

3.2 Stage 2 – Supervised Adviser

The adviser begins conducting client meetings under supervision.

Requirements include:

- supervised client meetings
- ongoing file reviews
- regular coaching sessions
- attendance at training sessions

Supervised advisers must demonstrate appropriate knowledge of advice processes, regulatory standards and client communication.

3.3 Stage 3 – Competent Adviser

Competent advisers are authorised to provide advice without direct supervision.

To obtain CAS the adviser must demonstrate:

- completion of induction programme
- successful role-play assessment
- consistent file review outcomes
- sufficient client case experience
- regulatory knowledge

CAS approval is granted by the T&C Manager.

3.4 Stage 4 – Senior Adviser

Senior advisers demonstrate high levels of competence and may support:

- mentoring of junior advisers
- knowledge sharing within the team
- internal training sessions

Senior advisers remain subject to supervision and monitoring.

COMPETENT ADVISER STATUS (CAS)

CAS may be granted when the adviser meets the following criteria:

- Minimum **30 completed client cases**
- Consistent satisfactory file review results

Successful completion of:

- regulatory knowledge assessments
- Impact Academy training modules
- dedicated CAS role-play assessment

Participation in the firm's development activities including:

- minimum **90% attendance** at Adviser Development Academy sessions

Retention standards must also be maintained:

- retention rate not exceeding **10% lapse** over the previous 6 months

Final approval requires:

- recommendation from the adviser's manager
- approval from the T&C Manager

CAS may be withdrawn if competence concerns arise.

MORTGAGE ADVISER CAS REQUIREMENTS

Mortgage advisers must demonstrate competence in:

- mortgage advice process
- affordability assessment
- lender criteria understanding
- documentation and compliance requirements

CAS for mortgage advisers normally requires evidence of:

- minimum **10 completed mortgage cases**

Additional supervision may apply where complex lending scenarios are involved.

FILE REVIEWS AND SUPERVISION

The firm monitors advice quality through regular file reviews.

File reviews assess:

- fact-find completeness
- suitability of recommendation
- documentation standards
- regulatory compliance
- Consumer Duty outcomes

Where issues are identified, actions may include:

- additional supervision
- adviser coaching
- targeted training
- temporary supervision restrictions

TRAINING AND DEVELOPMENT

Adviser training is delivered through:

- internal supervision meetings
- coaching sessions
- regulatory updates
- the firm's **Impact Academy**

Impact Academy provides structured learning covering:

- advice skills
- regulatory requirements

- client communication
- product knowledge

Participation in training forms part of the firm's competence monitoring framework.

HIGHER RISK ADVICE AREAS

Certain advice areas require additional induction and competence assessment due to their complexity. These include:

Protection

- Business Protection
- Private Medical Insurance (PMI)

Mortgage

- Bridging Loans

Advisers must complete additional training and a dedicated role-play assessment before providing advice in these areas.

MONITORING ADVISER PERFORMANCE

The firm monitors adviser performance using a range of indicators including:

- file review results
- policy retention rates
- customer feedback
- complaints
- regulatory compliance

Where performance concerns arise, remedial action may be implemented.

RECORD KEEPING

Training and competence records maintained by the firm include:

- adviser training history
- file review results
- supervision notes
- competence assessments
- CAS approval records

These records are retained in accordance with regulatory requirements.

REVIEW OF THE T&C FRAMEWORK

This policy is reviewed:

- at least annually
- following regulatory changes
- where competence issues are identified

The firm continuously reviews its Training & Competence framework to ensure advisers maintain appropriate professional standards.

COMMITMENT STATEMENT

Impact Financial Services Limited recognises that Training & Competence is fundamental to delivering good customer outcomes and maintaining regulatory compliance.

All advisers must:

- maintain competence appropriate to their role
- engage fully with the firm's training programme
- comply with supervision requirements
- act in the best interests of clients at all times

The firm views Training & Competence as a continuous commitment to improving adviser standards and customer outcomes.