

Record-Keeping Policy

Policy Owner	Sarah's Solutions
Approver	Sarah Searle
Review Time Frame	Annually
Next Review Date	21 June 2023

Document History

Version 1	Created 21/06/2022	Approval of Initial Policy
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1. Purpose

One of the conditions of our Financial Advice Provider (FAP) Licence is that we are able to demonstrate to the Financial Markets Authority (FMA) that we maintain adequate written records in relation to our Financial Advice Service. These records must evidence that we have complied with the required regulations and the Code of Professional Conduct for financial Advice Services (the Code)

We need to ensure good record keeping to ascertain what has taken place and that the Code standards are met.

Our records must be kept in a form (which may be electronic) and manner that ensures the integrity of the information and enables it to be conveniently inspected and reviewed by the FMA as required.

This policy sets out our approach to meet these requirements and should be read in conjunction with our adviser guidelines, which set out the type of information that needs to be retained.

2. Our Policy

- a. To use approved advice templates and advice processes that help facilitate documentation for record-keeping, ensuring important information relating to the advice we provide is retained (as set out in the adviser guidelines)
- b. To retain records that include the documentation provided to clients, and notes made relating to client conversations, as part of the advice process
- c. To ensure that all advice is recorded in a manner that will allow a third party to understand what advice was provided and why, after a period of seven years from the later of:
 - i. The date the record is made; and
 - ii. The date the financial advice to which the record relates is given; and
 - iii. The date any later record is made that refers to or relies upon information in the record.
- d. To ensure that client records are in a form that they can be provided to a regulatory body (within 10 days as a maximum) as soon as practicable. If they are securely stored with a third party then that third party will be able to provide access as required.
- e. To record and/or retain, or selectively record important information that evidences implementation of the advice process.
- f. To only use templates/methodologies to record client information that are approved
- g. To never rely on our ability to “recollect” a client conversation that formed part of the advice process.
- h. Only record and/or store client notes in a form that can be easily understood or retrieved in a timely manner
- i. To Keep records for the required retention period.

3. Implementation

All advisers and employees receive induction and annual retraining on the contents of this policy.

To use advice process templates and approved processes

To provide secure and accessible storage (physical and/or digital) that enables document storage.

4. Ensuring Compliance

Review as part of our advice monitoring process.

Ongoing management and periodic review of record storage facilities (physical and/or virtual)