

# FAQs:

## Undertaking RDR qualification gap fill

Our frequently asked questions are answered within this document. These are divided into six sections:

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These are updated as new queries are received and answered. *Last updated 09.01.12.*



CII

## General questions

### **1. Why, if I have completed a CII qualification (Advanced Financial Planning Certificate, Associateship or Diploma/Advanced Diploma in Financial Planning) which the FSA recognise as meeting the RDR qualification requirements, do I now need to undertake additional qualification gap fill activity?**

The FSA recognises these qualifications as ‘transitional qualifications’ (FSA Consultation Paper 10/14 which can be viewed at [www.fsa.gov.uk](http://www.fsa.gov.uk)). While they meet the RDR requirement for advisers to hold a Level 4 qualification, they do not (in almost all cases) meet the new exam standards in full, thereby, creating a knowledge gap that needs to be filled. The CII/PFS qualification gap fill tool is designed to help advisers do just this.

### **2. What is qualification gap fill?**

This is defined as development activity conducted in a structured learning environment with clear learning aims and outcomes, which meet one or more of the FSA’s RDR learning points. Examples include seminars, face-to-face tuition or distance learning (e.g. course book study or e-learning).

### **3. I am studying for the CII’s new Diploma in Regulated Financial Planning. Will I have to do qualification gap fill?**

No, this qualification was specifically created to meet the new RDR qualification requirements, requiring the completion of 6 mandatory examinations, and in doing so meets the examination standards in full.

### **4. I am studying for the CII’s existing Diploma in Financial Planning. Will I have to do qualification gap fill and do I need to wait until I have passed the qualification before commencing this?**

Depending upon your choice of units, you may have to undertake a certain amount of qualification gap fill activity to ensure you meet the new standards in full.

It is worth noting that new Diploma in Regulated Financial Planning R0 units can be used towards completing the existing Diploma in Financial Planning, and that passing units R01–R04 satisfies all the potential knowledge gaps in their respective RDR gap fill subject areas.

We would recommend that you simultaneously study for your qualification and address any gap fill. In this way you will be better placed to ensure that you meet all the RDR qualification requirements in advance of the end of 2012 deadline. Remember, in many cases it is likely that the personal development activity you undertake in your job role will help you address gaps that you have.

## 5. Is there a deadline for me to complete any qualification gap fill? And what will happen if I don't fill any gaps by this date?

Advisers deemed competent by the FSA on or before 30 June 2009 must address identified knowledge gaps and have this verified by their accredited body by 31 December 2012.

It is important to note, however, that adviser members need to allow up to 60 days for their gap fill to be verified by the CII. Therefore, as a minimum, it is strongly recommend you submit your completed gap fill record to the CII for verification no later than 1 October 2012 (includes some contingency time for resubmission in case your gap fill record cannot be verified in the first instance).

The FSA have confirmed that if you have not addressed identified knowledge gaps and had this verified by your accredited body by the 31 December 2012 deadline, your qualification will not meet the appropriate qualification requirements for your role going forward.

Different rules apply to advisers deemed competent after 30 June 2009. Access our 'Professional Direction' paper on RDR qualifications for details: [www.thepfs.org/pfsfiles/rdr/Qualifications-for-Advisers-Paper.pdf](http://www.thepfs.org/pfsfiles/rdr/Qualifications-for-Advisers-Paper.pdf)

## 6. I hold the Associateship (ACII), what appropriate life and pensions modules are required in order for this to be classified by the FSA as a 'transitional qualification'?

Anyone holding an Associateship that includes two of the units listed in the table overleaf is classified as holding a transitional qualification.

Unit code	Unit title	Start year	End Year
23A	Life assurance underwriting	1964	1972
25A	Staff pension and assurance schemes	1964	1972
26A	Life assurance law and claims	1964	1972
27A	Mortality and elements of valuation	1964	1972
58A	Life assurance, its applications and underwriting	1973	1981
59A	Taxation, social security and business insurance	1973	1981
60A	Legal aspects of life assurance	1973	1981
61A	Mathematical basis of life assurance	1973	1981
62A	Staff pension and assurance schemes	1973	1981

022	Life Assurance Law	1982	1991
041	Pens & Related Benefits	1982	1991
061	Life Assurance Practice	1982	1991
062	Pensions design & Admin	1982	1991
071	Life Ass Law & Taxation	1982	1991
072	Pension Law & Taxation	1982	1991
081	Financial Aspects (Life)	1982	1991
082	Financial Aspects (Pens)	1982	1991
090	Life Ass Law & Practice	1982	1991
100	Pens & Related Benefits	1990	1991
120	Life Assurance Practice	1990	1991
130	Life Ass Law & Taxation	1990	1991
140	Financial Aspects (Life)	1990	1991
150	Financial Aspects (Pens)	1990	1991
160	Pension Law & Taxation	1990	1991
170	Pensions design & admin	1990	1991
2B	Technical Aspects: Life Assur & Pensions	1990	1991
735	Life assurance	1990	2011
910	Life Assur Salesmanship	1990	1991
555	Life and disability underwriting	1992	2011
560	Life Assurance Practice & Admin	1992	1998
565	Life Assurance Law & Taxation	1992	1998
575	Pension Law & Taxation	1992	1998
580	Pension Planning & Administration	1992	1998
P45	Life Assurance	1993	1998
P50	Pensions	1993	1998
561	Life Assur Practice & Admin (ref Irish)	1994	1998
566	Life Assur Law & Taxation(ref Irish Law	1994	1998
G60	Pensions	1995	2006
G80	Long-term care, life & health protection	1997	2004

740	Pensions law administration and taxation	1999	2004
K10	Retirement options	2001	2005
K20	Pension investment options	2001	2005
556	Life and disability claims	2002	2011

In addition, advisers holding any Associateship/Advanced Diploma (ACII) together with FPC or Certificate in Financial Planning or equivalent will satisfy the RDR qualification requirements irrespective of the specific individual units held.

## 7. As a holder of a 'transitional qualification', I will need to undertake qualification gap fill to address identified knowledge gaps. How will the CII/PFS help me to address these gaps?

As the holder of a 'transitional qualification' you will be well en route to complying with the FSA's new RDR qualification requirements. To address those knowledge gaps that remain, the CII/PFS has developed a comprehensive member-only gap fill programme, which includes:

- **Diagnostic tool** – this automatically matches your relevant CII exams against the RDR learning points, so you know exactly what areas you need to address.

**Important note:** You will have undertaken additional unrecorded development activity as part of your CPD that may satisfy a gap. Where this is the case, you can record this activity through the tool's '**Log your own activity**' function and in turn update your records.

CII/PFS members can access the tool at [www.cii.co.uk/gap-fill](http://www.cii.co.uk/gap-fill) **Note:** you will be required to login using your CII PIN and current PFS/CII website password.

- **Solutions** – a comprehensive range of gap fill solutions providing members with sufficient free content to satisfy their potential compliance obligations. These include events, online learning and more.

See the [Solutions](#) section of this document for details of what solutions are currently available.

## 8. Regarding my authorised activities, what gap fill must I complete?

If you are a retail investment adviser who holds an FSA specified 'transitional qualification', you must complete qualification gap fill in three 'core' subject areas. These are listed overleaf.

Core' subjects:

- Financial services, regulation and ethics;
- Investment principles and risk; and
- Personal taxation

In addition, you must complete gap fill in one or more specialist subject areas. This will depend purely on the specialist activities you are currently authorised to carry out (note, you are required to hold an FSA specified 'appropriate qualification' applicable to each activity you carry out – these qualifications are listed against activity at: [http://fsahandbook.info/FSA/extra/TC\\_Appendix4E\\_20111001.pdf](http://fsahandbook.info/FSA/extra/TC_Appendix4E_20111001.pdf)).

The specialist subject options are:

- **Pensions and Retirement Planning** (relates to advising on 'packaged products')  
FSA definition available at: <https://fsahandbook.info/FSA/glossary-html/handbook/Glossary/P?definition=G831>
- **Securities**  
FSA definition available at: <https://fsahandbook.info/FSA/glossary-html/handbook/Glossary/S?definition=G1061>
- **Derivatives**  
FSA definition available at: <http://wss.fsa.gov.uk/wss/servlet?page=glossary&glossary=D&term=GL1279>

Please note that PFS/CII gap fill records default to Pensions and Retirement Planning only. This is because the vast majority of PFS/CII members advise on packaged products.

For members who undertake the other aforementioned regulated activities (advising on **or** advising on and dealing in securities and/or derivatives), gap fill records can be amended to include gaps in these subject areas. For more information on how to proceed, see the [Securities and Derivatives](#) section of this document.

The table overleaf shows how CII gap fill tool specialist subjects link to FSA specified activities, as detailed in TC Appendix 1.1.1 R of the FSA handbook (available to view online at: <http://fsahandbook.info/FSA/html/handbook/TC/App/1/1>).

Activity no. (as per FSA TC Appendix 1.1)	Activity description	Specialism available on the CII gap fill tool
4	Advising on packaged products (which are not broker funds)	<b>Pensions and Retirement Planning</b>
6	Advising on friendly society tax-exempt policies	
2	Advising on (but not dealing in) securities (which are not stakeholder pension schemes or broker funds)	Securities
12	Advising on and dealing in securities (which are not stakeholder pension schemes or broker funds)	
3	Advising on (but on dealing in) derivatives	Derivatives
13	Advising on and dealing with or for clients in derivatives	

**Important note:** Advisers must complete all gap fill appropriate to the 'transitional qualification(s)' they hold which in turn relate to the regulated activities they carry out. When applying for an SPS, advisers will be asked to confirm which TC Appendix 1.1 regulated activities they carry out – this should correspond with the gap fill activity an individual has undertaken.

**If you are not sure which activities you undertake, the FSA advises that you check with your firm's compliance officer. Neither the FSA nor the CII holds this information and cannot confirm this for you.**

## 10. Does the gap fill tool automatically record any relevant PFS events that I have or will in future attend?

Members who attend PFS gap fill events will have this activity automatically matched against the relevant learning point(s) in their gap fill record, and gap(s) marked as complete. Please note, details of PFS gap fill event attendance will be added within 14 days of the event taking place.

**Important note:** to ensure you gap fill record is updated you will need to include your CII/PFS PIN when registering for the event. We are also in the process of determining which historic PFS events relate to FSA learning points.

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## Using the qualification gap fill tool (for a user-guide visit [www.cii.co.uk/gap-fill-walkthrough](http://www.cii.co.uk/gap-fill-walkthrough))

### 1. How do I access the qualification gap fill tool?

Go to [www.cii.co.uk/gap-fill](http://www.cii.co.uk/gap-fill) Once logged in, using your CII password (see question 3 below), we recommend that you first read our 4-step guide to using this service and also view the 'walkthrough'. These explain the different features on offer and will help you get the most from the service.

### 2. Is there a fee for using the qualification gap fill tool?

No, there is no charge for using this service. However, it is only available to members of the Personal Finance Society/CII, who also hold a relevant unit (see the [Mapping](#) section of this document for a full list), as this has been developed as a member service.

In addition to the diagnostic tool, enabling members to identify any gaps between exams held and the new exam standards, members are also given access to a range of free solutions enabling them to address any gaps identified.

Developing, delivering and maintaining this service is expensive and was funded out of membership revenues. For this reason, the qualification gap fill tool is being delivered as an exclusive member-only service.

### 3. How do I see the actual gaps I have still to address?

To see all of your gaps click on the '**View or amend your record**' link under '**RDR overall completion status**' on the home screen.

To see the gaps for just one of the subject areas click on the relevant subject in the '**Gap fill completion status by subject**' section of the home screen.

### 4. What do the ticks and crosses mean on the details screen?

A tick indicates that there is evidence (from an exam pass or through other development activity undertaken) recorded against that element of the exam standard. A cross indicates that you do not have any activity recorded as addressing the 'Learning point' in question.

## 5. Can I get a print out of my gap fill details?

Yes, within the '**Subject**' area select the specific subject you are interested in, or '**All**' to list all of them.

The '**Filter By Status**' area then allows you to select the specific information you require:

- **All** – showing learning points already met (ticks) and gaps (crosses) still to be addressed;
- **Complete** – just those learning points already met (ticks); or
- **Incomplete** – only the gaps still to be addresses (crosses).

Then click on '**Print this view**'. This will open a second window with the details formatted for printing.

## 6. How do I add some evidence to one of the gaps?

If you complete a CII exam that matches any of the 'learning points' listed in the new exam standards this will automatically be uploaded to your record (this is completed fortnightly so please allow up to 14 days for your results to be uploaded).

In respect of other development activity you may have undertaken, you can enter details yourself as follows:

- Identify the '**Learning Point**' gap that your development activity addresses
- Click on the '**Details**' button to its right.
- Then click on the '**Log your own activity**' link.

A pop-up screen will appear within which you can add details.

**Important note:** Providing the appropriate information when self-recording your own gap fill activity is essential and will ensure that when it comes to verification of your gap fill record, we have all the information we need. If you have documentary evidence supporting your entry such as an event attendance certificate, you can upload this.

Visit [www.cii.co.uk/gap-fill-guidance](http://www.cii.co.uk/gap-fill-guidance) to access our best practice guidelines.

## 7. What types of documentary evidence can I attach?

In terms of types of evidence you can attach any that you feel are appropriate. This could be a course attendance certificate, evidence of an exam pass and/or syllabus, or the course programme for an event you attend.

In terms of format the system will accept documents in Word, PowerPoint, PDFs and most picture formats.

## 8. Is there a minimum amount of information that I need to give when evidencing that I've addressed a gap?

When using the tool's self-recording function to log your own activity which you feel satisfies gaps, the following guidance should be followed:

- Give the activity an appropriate title.
- Provide a meaningful description that summarises what the activity involved and how it satisfied the learning point(s).
- Ensure you fully evidence the activity, e.g. upload all relevant supporting documentary evidence that you have to the tool (please be careful to ensure the document you intend to attach is submitted).

**Important note:** Providing the appropriate information when self-recording your own gap fill activity is essential and will ensure that when it comes to verification of your gap fill record, we have all the information we need. If you have documentary evidence supporting your entry, such as an event attendance certificate, you can upload this.

Visit [www.cii.co.uk/gap-fill-guidance](http://www.cii.co.uk/gap-fill-guidance) to access our best practice guidelines.

## 9. Where can I find gap fill solutions on the gap fill tool?

Please refer to the [solutions](#) section of this document.

## Mapping

### 1. Which units did the CII map to the gaps?

The following CII units have been mapped against the new exam standards for those authorised to advise on packaged products. Holders of these units will have their gap fill record automatically pre-populated, where a match exists.

Unit code	Unit title
41	Pensions and related benefits
61	Life assurance policies
62	Pension scheme design and administration
71	Life assurance law and taxation
72	Pension law and taxation
81	Financial aspects of life business
90	Life assurance law and practice
120	Life assurance practice
130	Life assurance law and taxation
140	Financial aspects of life business
160	Pension law and taxation
170	Pension scheme design and administration
550	Personal investment and the financial services industry
551	Personal investment and the financial services industry (Irish law and practice)
565	Life assurance law and taxation
566	Life assurance law and taxation (Irish law and taxation)
570	Financial aspects of long-term business
571	Financial aspects of long-term business (Irish law and taxation)
575	Pension law and taxation
580	Pension planning and administration

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735	Life assurance
740	Pensions law, taxation and administration
AF1	Personal tax and trust planning
AF3	Pension planning
AF4	Investment planning
AF5	Financial planning process
CF1	UK financial services, regulation and ethics
CF2	Investment and risk
CF3	Financial protection
CF4	Retirement planning
CF5	Integrated financial planning
CF6	Mortgage advice
CF8	Long term care insurance
CF9	Pensions Simplification Update Programme
F00	Regulatory
F02	Life assurance and other investments
F03	Pensions
F10	Taxation and trusts
F20	Personal investment planning
F30	Corporate investment planning
FA1	Life office administration
FA2	Pensions administration
FP1	Financial services and their regulation
FP2	Protection, savings and investment
FP3	Business financial planning
G10	Taxation and trusts
G20	Personal investment planning
G30	Business financial planning

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G60	Pensions
G70	Investment portfolio management
G80	Life and health protection
H25	Holistic financial planning
J01	Personal tax
J02	Trusts
J03	The tax and legal aspects of business
J04	Pension funding options
J05	Pension income options
J06	Investment principles, markets and environments
J08	Financial planning practice
K10	Retirement options (half credit)
K20	Pension investment options (half credit)
L10	Taxation and trusts
L20	Personal investment planning
L30	Corporate investment planning
MAQ	Mortgage advice
P12	An introduction to long-term business
P50	Pensions
R01	Financial services, regulation and ethics
R02	Investment
R03	Personal taxation
R04	Pension and retirement planning principles and risk
R05	Financial protection
R06	Financial planning practice
SV1	Savings and Investments

If you have sat other exams, CII or non-CII, that you believe match against any gaps you have, you can record these details yourself.

## 2. I hold a pass in a CII unit that isn't listed. Why is this?

This is likely to be because when we reviewed the unit against the new exam standards, we found that there wasn't any match between the two (see overleaf for a list of these exams).

If you think you/it covered one or more of the gaps then add it using the '**Log your own activity**' function.

CII units compared to the new exam standards but for which no match existed:

Unit code	Unit title
J07	Supervision
CF6	Mortgage advice
CF7	Lifetime mortgages
ER1	Equity release
GR1	Group risk
HR1	Home reversion plans
F50	Marketing
561	Life assurance practice and administration (Irish law and taxation)
935	Principles and practice of management in insurance
945	Marketing
TC1	CITIP
MAQ	Mortgage advice qualification

### 3. Who decided what the gaps were?

The FSA, in conjunction with the Financial Skills Partnership (formerly known as the FSSC), created the new exam standards, together with the corresponding learning points and consequently the potential gaps. These are listed in the FSA RDR Consultation Paper CP09/31, which can be viewed at [www.fsa.gov.uk](http://www.fsa.gov.uk)

### 4. If I got Recognition of Prior Learning (RPL) for a unit does it get used in this tool?

Yes, where this is mapped against a specific CII unit. This will even be shown where you have applied for RPL but have yet to redeem these credits by submitting the payment due.

### 5. I applied for and received Recognition of Prior Learning (RPL) in the form of 30 non specific credits. Why isn't this mapped against the learning points?

Non-specific credits indicate that you have undertaken relevant prior learning, suitable to attract credits in the CII financial services qualification framework, but with an insufficient match against a specific CII unit. Consequently, we are unable to match this against a particular unit and therefore the learning points within the new exam standards.

However, if you believe that these cover one or more of your gaps then you can record this using the tool's '**Log your own activity**' function.

### 6. How did you decide on which gaps were covered by which units?

We have reviewed the CII units against the new exam standards and within these the learning points listed to see where there was a match. Where a match existed this has been recorded on the system.

### 7. Why doesn't the system record comparable exams from other awarding bodies such as the IFS, CISI, etc?

To match CII exams required us to compare more than 80 units.

It wasn't practical to try to match the wide number of exams offered by other awarding bodies to the new exam standards. Where you hold exams awarded by other bodies we would suggest that you contact them to see how these match against the new FSA exam standards. You can then record this yourself using the tool's '**Log your own activity**' function.

**8. I think my CII exam, which is on your list, maps to more of the gaps than is shown on the system. What can I do about this?**

Following a review of our exam syllabuses and the new exam standards this is the opinion that we reached. However, if you believe that your study matches with the learning outcome gap you can record this using the tool's '**Log your own activity**' function.

**9. Is there a limit to how old the evidence I submit can be?**

No, if you have undertaken activity previously that is relevant then this is suitable to be recorded. The assumption being that in the course of your role you would have kept this knowledge current.

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## Solutions

### 1. What gap fill solutions are available?

CII/PFS members have access to a range of free solutions enabling them to address any gaps identified.

The following free solutions are currently available:

- **PDF learning content** – structured learning reading material applicable to each of the 109 FSA learning points applicable to advising on packaged products. These can be accessed via the online gap fill tool.
- **Technical events** – a national programme of face-to-face PFS gap fill events. Visit [www.thepfs.org/events](http://www.thepfs.org/events) for details.
- **Podcasts** – online recordings of PFS gap fill events. These can be accessed via the online gap fill tool.

We recommend members select solutions which best suit their preferred learning style, in order to maximise learning effectiveness. In most instances, members are finding that the best approach is to use a blend of the available solutions.

### 2. How do I access the gap fill solutions available on the gap fill tool

A user-walkthrough document is available online at [www.cii.co.uk/gap-fill-walkthrough](http://www.cii.co.uk/gap-fill-walkthrough), this demonstrates the tool's key features and functions including how to access solutions and how to mark accessed solutions as complete (which will in turn update your record).

### 3. Can I satisfy all of my gap fill obligations by using the downloadable learning content available free to members on the gap fill tool?

The **FSA RDR Policy Statement PS 11/01**, published in January 2011, included important commentary regarding the suitability or otherwise of certain types of learning activity designed to meet the RDR Gap Fill requirements.

The FSA paper reiterated that Gap Fill activity should be structured, rather than unstructured, and in particular included the following comment: *“[where] structured CPD is not available to fill the gap identified, then an adviser may complete the gap by reading suitable material. We expect that such cases would be for a minority of gaps, if any.”*

This last comment has given rise to concerns from advisers who have used the gap fill solutions provided with the CII Gap Fill Tool, including the downloadable PDF learning material, to meet their learning points.

It is important to note that the FSA's comments relate to unstructured use of reading materials. Reading materials when used correctly, such as those available on the CII Gap Fill Tool, will satisfy the requirement for structured continuous professional development (CPD).

Therefore, if an adviser chooses to use the downloadable PDF learning material to satisfy all of their gaps because, for example, this activity best suits their preferred learning style, then this is perfectly acceptable.

The table below details the classic structured CPD cycle and, mapped against this, the CII Gap Fill Tool. It shows how adopting this approach to the use of the CII solutions provided, can meet the Gap Fill requirements.

Structured CPD	CII gap fill tool
1. Identify a development need	1. Crosses indicate knowledge gaps potentially still needing to be addressed
2. Identify developmental activity(s) to satisfy that need	2. Identify and select solution in the tool from available list or choose other appropriate activity to be undertaken
3. Carry out the activity	3. Read learning material, watch podcast, attend an event, etc.
4. Reflect whether the completion of the activity(s) satisfied the need (i.e. it's no longer a development area). Good idea to record this satisfaction.	4. Consider whether need is met and, if it is, complete the reflective statement and record time spent and mark as complete

#### 4. Is there a need to undertake formal testing of any gap fill activity undertaken, and if so what does this involve?

No formal testing is required. The FSA requirement is that all gap fill activity be structured. So by following the structured CPD process (summarised in the table above) when undertaking gap fill activity you can ensure that you satisfy this requirement. The important thing is that advisers ensure activity undertaken develops full understanding of the gaps they are addressing.

#### 5. Is it absolutely necessary for me to use the reflective questions available within 'in-tool' PDF learning activities prior to submitting my gap fill record to the CII for verification?

Adviser members submitting completed gap fill for verification will need to declare that this has satisfied their knowledge gaps. This declaration is a legal undertaking which places the onus on individual advisers to satisfy themselves that their gap fill activity has been sufficient.

To help, we have added a number of reflective questions to all gap fill solutions provided as **PDF documents in the tool** (the questions relate directly to the learning content and no answers are given).

We would urge all adviser members to use these questions to reflect on their learning and assess whether they have met their learning points.

Clearly, if an adviser is fully confident that their gap filling has satisfied their learning points, then there is no need to go back and use the questions.

**6. When recording completion of an in-tool learning activity, I am asked to complete a reflective statement. What should I include?**

The purpose of the reflective statement is to allow you to record how the activity has met your learning needs for a particular knowledge gap(s). It does not need to be lengthy, for example, the following would suffice:

Studying this learning material has brought my knowledge on this topic up-to-date. The example calculations provided within the learning material have helped me develop a better understanding of time-weighted/money-weighted rates of return. Having undertaken the activity I now feel confident that I have the technical knowledge in this area.

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## Securities and derivatives

### 1. I'm permitted by my firm to advise on securities and derivatives as well as packaged products. How do I address my gap fill obligations in these areas?

In addition to the 109 learning points applicable to advisers who are permitted to advise on packaged products, those who also deal or advise in securities and/or derivatives will need to undertake further gap fill (59 securities and 59 derivatives gaps).

The CII gap fill tool now allows these advisers to amend their gap fill record to include securities and/or derivatives gaps, and therefore satisfy their gap fill obligations in full.

### 2. I'm permitted by my firm to advise on packaged products, but not securities and derivatives. If I use the CII gap fill tool to undertake securities and derivatives gap fill activity, will this enable me to advise on these products?

No. Permission to advise/deal in securities and/or derivatives (or any other activity) is only given to advisers holding an appropriate qualification applicable to this specialist area of advice. Gap fill activity alone will be insufficient, in the same way as it is with packaged products advice.

### 3. I'm unsure whether securities and derivatives gaps are applicable to me. How can I be sure whether or not they are?

Please refer to question 8 in the [General questions](#) section of this document.

### 4. Will the CII/PFS provide free gap fill solutions to members needing to address securities and derivatives knowledge gaps?

The CII/PFS plan to offer free solutions for securities and derivatives knowledge gaps during 2012, and are in the process of sourcing materials that meet our quality standards and comply with the structured learning requirements specified by the FSA.

We plan to offer these solutions well in advance of 1 October 2012, our recommended final gap fill verification submission date, to ensure members' timely compliance with RDR requirements (for more on our recommended final gap fill verification submission date see Q5 in the [General questions](#) section of this document).

In the meantime, relevant CII exams which satisfy securities and derivatives learning points have been automatically populated against members' gap fill records. Also, members who advise or deal in securities and/or derivatives can also self-record any relevant historic structured CPD or third party gap fill activity, which satisfies remaining gaps, against their gap fill record.

Monitor [www.cii.co.uk/gap-fill](http://www.cii.co.uk/gap-fill) for further information.

**5. Although I hold a CII 'appropriate qualification' for advising on packaged products, I also hold a non-CII 'appropriate qualification' allowing me to advise on securities and derivatives. How do I record my non-CII exams against my CII gap fill record?**

The CII gap fill tool does not automatically map non-CII exams against members' gap fill records.

Where you hold exams, current and historical, awarded by other bodies we would suggest that you contact them to see how these match against the new FSA exam standards. You can then record this yourself using the '**Log your own activity**' function.

**6. I only advise on securities and derivatives and not packaged products. Can I use the CII gap fill tool to gap fill in these areas only?**

The gap fill tool allows advisers to amend their area of specialism (and therefore the specialist areas they undertake gap fill in) to only include securities and derivatives, if required.

For further information on the link between your authorised activities and the gap fill subjects you need to complete, please refer to question 9 on page 5 of this document.

## Gap fill verification

### 1. When must my gap fill be verified by?

The FSA stipulate that completed gap fill must be verified by an accredited body, such as the CII, by 31 December 2012.

It is important to note, however, that adviser members need to allow up to 60 days for their gap fill to be verified by the CII. Therefore, as a minimum, it is strongly recommend you submit your completed gap fill record to the CII for verification no later than 1 October 2012 (includes some contingency time for resubmission in case your gap fill record cannot be verified in the first instance).

The FSA have confirmed that if you have not addressed identified knowledge gaps and had this verified by your accredited body by the 31 December 2012 deadline, your qualification will not meet the appropriate qualification requirements for your role going forward.

Different rules apply to advisers deemed competent after 30 June 2009. Access our 'Professional Direction' paper on RDR qualifications for details: [www.thepfs.org/pfsfiles/rdr/Qualifications-for-Advisers-Paper.pdf](http://www.thepfs.org/pfsfiles/rdr/Qualifications-for-Advisers-Paper.pdf)

### 2. What does verification involve?

This involves an FSA appointed accredited body, such as the CII, reviewing the evidence provided to ensure it:

- adequately describes the activity undertaken;
- that the activity clearly relates to the relevant learning point(s); and
- that the member has confirmed that the activity has met the required learning point(s).

Successful verification means that all these requirements have been met.

### 3. How can I submit my gap fill record to the CII for verification?

'Verification' functionality within the gap fill tool allows adviser members to submit their completed gap fill record to the CII for checking. As part of this process, you will be required to make a declaration about your submission.

The wording of that declaration is as follows:

**I confirm that the information contained in this submission is, to the best of my knowledge, a true and accurate record of the activities I have undertaken to complete qualification gap fill and, having undertaken these activities, I have now satisfied all my knowledge gaps.**

**I confirm that I hold, or am in the process of completing, a Level 4 (or higher) 'transitional qualification' from the FSA's list of appropriate qualifications.**

**I also acknowledge that, as a CII/PFS member, any false statements made about activities undertaken to complete qualification gap fill could result in disciplinary action by the CII.**

**I further acknowledge as a CII/PFS member, that any judgement of the CII Disciplinary Panel, whether related to verification of qualification gap fill completion or not, may be notified to the FSA.**

**I also expressly agree that any and all data relevant to the verification of qualification gap fill completion, or which may reasonably have a bearing on my regulatory status, may be exchanged with my employer, the FSA, any FSA-authorized Accredited Body or any other body or person deemed by the CII or FSA to have a legitimate interest in the verification of qualification gap fill completion.**

Upon notification that verification has been successful, members will be able to apply separately for a CII SPS.

For further details on how to apply for a CII SPS, see the [Statement of Professional Standing](#) section of this document.

**Important note:** Providing the appropriate information when self-recording your own gap fill activity is essential and will ensure that when it comes to verification of your gap fill record, we have all the information we need. If you have documentary evidence supporting your entry such as an event attendance certificate, you can upload this.

Visit [www.cii.co.uk/gap-fill-guidance](http://www.cii.co.uk/gap-fill-guidance) to access our best practice guidelines.

#### 4. How will I know if my gap fill record has been successfully verified?

Members are notified by email as to whether their gap has been successfully verified. Where gap fill cannot be successfully verified, guidance is given on which learning points failed verification and why. Members can then address any issues and, when ready, re-submit their record for verification.

Where verification is successful, a copy of the notification email should be retained for use as evidence of gap fill completion. This may be requested by your employer, another accredited body or the regulator.

#### 5. How long does it take for the CII to verify my gap fill record?

Although the time taken for the CII to verify gap fill records varies, members should allow up to 60 days for notification of whether verification of their gap fill record has been successful.

A key factor affecting the time taken is the amount of non-CII/PFS gap fill solutions logged against a record. As these activities will initially be unfamiliar to us, they will take longer to verify than solutions offered by the CII/PFS.

Demand for gap fill record verification, and the volume of submissions at any given time, will also affect the time taken.

#### 6. I am not currently a retail investment adviser but I intend to become one in the future. I hold a transitional qualification from the appropriate qualifications list. Will I be able to complete my gap fill and submit it for verification before becoming an adviser?

Yes. We are able to verify your gap fill completion even though the FSA does not require you to do this in your current role. **Note:** in order to provide retail investment advice, you must be authorised by the FSA. Meeting the RDR exam standards alone is not sufficient.

#### 7. I have realised that I have forgotten to include some important attachments in my submission. Can I amend my submission now that it has been sent for verification?

You can cancel then amend your submission up until midnight on the day of submission. You will see a link on your gap fill record home page that allows you to do this. Once you have cancelled your submission you will be able to make any necessary amendments and then resubmit it. If you do not cancel your submission before midnight, you will need to contact CII Customer Service to cancel this for you.

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## Statement of professional standing (SPS)

### 1. What is a Statement of Professional Standing (SPS)?

An SPS confirms that an adviser has met their individual requirements relating to the RDR compliance rules, i.e. adheres to ethical standards, holds appropriate qualifications for their role (including completion and verification of gap fill) and has undertaken appropriate CPD during the year. The SPS is renewable on an annual basis.

The CII, as an Accredited Body, is authorised to issue SPSs. This service is exclusively to members of the CII/PFS and at no extra cost.

### 2. When does a SPS need to be held by?

Advisers with competent adviser status on or before 31 December 2012 need to obtain a SPS from 1 January 2013, although a 'safety net' 60 day period of grace is available from this date.

Different rules apply to new or trainee advisers who will be deemed competent after 31 December 2012. Access our 'Professional Direction' paper on RDR qualifications for details: [www.thepfs.org/pfsfiles/rdr/Qualifications-for-Advisers-Paper.pdf](http://www.thepfs.org/pfsfiles/rdr/Qualifications-for-Advisers-Paper.pdf)

### 3. How do I obtain a CII SPS?

All applications need to be submitted online at: [www.cii.co.uk/sps](http://www.cii.co.uk/sps) The length of time it will take you to complete the application will vary depending on your individual circumstances, but applications typically take up to 7 days.

**Please note:** Advisers applying for an SPS must demonstrate that they hold the required qualifications for the activities they undertake, including completion of gap fill if relevant. The FSA also requires gap fill to be verified by an accredited body, so this must be done prior to an SPS award being made. See the [Gap fill verification](#) section of this document for further details.

### 4. What information does the SPS application require I provide?

Members applying for a CII SPS we be required to provide the following information:

- Their FSA Individual Reference Number.
- The relevant T&C Appendix 1.1.1R activities (<http://fsahandbook.info/FSA/html/handbook/TC/App/1/1>) they are authorised to undertake as a retail investment adviser.

- Confirmation of the appropriate qualifications they hold (including completion of qualification gap fill if relevant) for each relevant T&C Appendix 1.1.1R activity undertaken. **Note:** If the qualification(s) held were awarded by the CII, we will be able to confirm these from our records.

You will also be required to make a declaration that, in the last 12 months, you have complied with the requirements of APER and have undertaken appropriate CPD.

You will not need to provide this information again at renewal (unless the activities you undertake have changed). You will however be required to make the same declaration each and every time you apply for an SPS.

## 5. When is the latest I can apply for my first CII statement of professional standing?

Although advisers with competent adviser status on or before 31 December 2012 need to hold a statement of professional standing (SPS) from 1 January 2013, there are a number of important points that need to be considered when deciding when to apply:

- Gap fill, if applicable, needs to be completed and verified by the CII before an SPS application is made. For existing advisers (defined by the FSA as advisers deemed competent on or before 30 June 2009) this means gap fill needs to be completed and verified no later than 31 December 2012. **Important note:** Advisers should allow up to 60 days for their gap fill record to be verified. Therefore, as a minimum, you should submit your completed gap fill record to the CII for verification by 1 October 2012.
- Although the FSA rules provide a 60 day grace period from 1 January 2013 within which an adviser must obtain their SPS, we strongly recommend advisers complete gap fill and obtain a CII SPS well in advance of the start-of-2013 deadline to ensure timely compliance with FSA requirements.

## 6. I am a trainee retail investment adviser, not yet assessed as competent. Do I need an SPS?

No. The FSA has stated that pre-competent advisers do not need to obtain an SPS.

## 7. What is the definition of a 'retail investment adviser'?

The FSA Handbook glossary states that a retail investment adviser is "an employee who carries on activities 2, 3, 4, 6, 12 and 13 in TC Appendix 1.1.1 R". For more information, please visit: <http://fsahandbook.info/FSA/html/handbook/TC/App/1/1>

**8. Once I've submitted an SPS application, how long will it take before I receive this?**

As an accredited body, the CII will need to carry out various checks to ensure you are eligible for an SPS. You should allow up to 7 days for the CII to process your SPS application.

**9. How long is an SPS valid for?**

The CII will be issuing initial SPS's with the same expiry date as members' annual membership subscription. For any SPS issued in 2011 this date will be the 2012 membership renewal date, even if the member has a renewal date in 2011. This is to prevent short dated SPS expiry dates.

Once the first SPS has been issued, all future SPSs will be valid for a full 12 months with an expiry aligned to the membership renewal date.

**10. In what format will the SPS be issued to me?**

Successful applicants will receive an electronic SPS (PDF format) by email, which can be downloaded and printed off.

**11. Can I apply for an SPS without being a member of the CII/PFS?**

No. The CII only issues SPSs to adviser members of the CII/PFS. This service is being provided as a complimentary part of the membership package.

**12. How much does it cost to apply for a CII SPS?**

The CII is only providing Statements of Professional Standing to members of the CII/PFS. We are not making any additional charge to issue an SPS, as the service is being provided a part of the overall membership package for retail investment advisers.

**13. How can I adhere to the CPD requirements for getting an SPS as the new rules have yet to be introduced?**

As the new regulatory CPD requirements do not come in to force until 1 January 2013, the CII will issue an SPS on the basis of existing member CPD requirements.

The CII is planning to introduce a new scheme based on the new regulatory requirements in mid-2012. This will allow time for adviser members to transfer to the new regulatory requirements in advance of the deadline.

Further details of the launch of the CII CPD scheme will be communicated to members in the coming months.

**14. Can I apply for a CII SPS if I hold a non-CII qualification that is recognised by the FSA?**

Yes, but please note the CII will not issue membership designations for non CII qualifications.

**15. I hold non-CII transitional qualification. If I obtain a CII SPS, will I automatically get recognition of prior learning?**

No. Recognition of Prior Learning (RPL) will not be granted on the basis of an SPS application. If you require RPL for non-CII qualifications, please use the separate RPL application process. Visit [www.cii.co.uk/prior-learning](http://www.cii.co.uk/prior-learning) for further details.

**16. I hold non-CII transitional qualification. If I obtain a CII SPS, can I use the designatory letters Dip PFS?**

The CII will not issue a membership designation to advisers who have completed a non-CII transition qualification but not met the completion requires for a CII financial planning Diploma.

**17. I completed my qualification gap fill and had it verified by another accredited body but I want to apply for my first SPS from CII. Will CII accept this when I apply for an SPS?**

Yes, but you must be able to provide evidence to support this. Suitable evidence includes written confirmation from the Accredited Body of gap fill verification or a certificate issued by the Accredited Body. You will need to submit this evidence in an electronic format via our online service at [www.cii.co.uk/sps](http://www.cii.co.uk/sps)

**18. I am a CII/PFS member and hold a ‘transitional qualification’ that wasn’t awarded by the CII. Can I apply for a CII SPS?**

Yes. However, before submitting your application, you will need to bridge any potential knowledge gap between your qualification and the full RDR exam standards through qualification gap fill.

There are two options for going about this:

- 1. Complete gap fill with the organisation who awarded the qualification** and get this signed off by another Accredited Body, then submit a CII SPS application via [www.cii.co.uk/sps](http://www.cii.co.uk/sps) – if you were awarded the qualification by an organisation that’s been granted Accredited Body status, we recommend you choose this option.
- 2. Complete gap fill with the CII** and get this signed off by the CII, then submit a CII SPS application via [www.cii.co.uk/sps](http://www.cii.co.uk/sps) – if you don’t hold a relevant CII unit by examination or accreditation, you will not automatically have access to the online gap fill tool, and will need to contact CII Customer Service in order to gain access.

**19. I currently hold an SPS issued by the CII but I am about to go on maternity leave and will not be actively working as a retail investment adviser for the next 6 months. Do I need to cancel my SPS?**

No. It is not necessary to cancel your SPS in these circumstances (or for other reasons of leave from the workplace, e.g. long-term absence due to sickness). The SPS will expire once the renewal date arrives. You can renew your SPS as and when you return to the workplace.

**20. I currently hold an SPS but am leaving the industry. Do I need to cancel my SPS?**

Yes. If you are no longer a retail investment adviser you should destroy any copies you hold of your SPS. You can cancel this by contacting the CII Customer Service team.

**21. What happens if the CII refuses to issue me with an SPS?**

In the first instance you have the option to apply to another accredited body for your SPS. If you cannot obtain an SPS from any accredited body you should notify your employer (or the FSA if self-employed). Be aware that we are also required to notify the FSA and your employer if we refuse to issue you with an SPS.

**22. What happens if the CII withdraws my SPS?**

If we withdraw your SPS we are required to notify you, your employer and the FSA. The FSA will, in conjunction with your employer, decide what action needs to be taken. You also have the option to apply for a new SPS from another accredited body.

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### 23. Does the SPS mean I now have two licenses to trade and two regulators?

No. The FSA retains all control of regulated individuals and firms and is the only body that can grant or revoke your authorisation to trade. Your FSA-approved person status of CF30 continues to be the only legal licence to trade as an adviser. The SPS issued to you by the CII provides evidence that you are adhering to the professional standards required of you.

### 24. Do I have to display my SPS in my office or show it to my clients?

There is no requirement to display your SPS, but you are encouraged to show this to your clients as evidence of your adherence to the regulators new requirements.

### 25. I am a financial adviser licensed by the Isle of Man Financial Supervision Commission (FSC) Do I need to apply for an SPS?

There is currently no requirement for Isle of Man based financial advisers to obtain an SPS in order to continue practising from January 2013. However, the Commission is currently consulting on reflecting the FSA's RDR professional standards. Your PFS Regional Chairman will keep you updated with developments as they occur.

## Statement of professional standing (SPS) – for employers

### 1. Can I apply for SPSs on behalf of my employees?

It is an FSA requirement that an individual must personally declare compliance with the CPD and APER requirements.

### 2. I would like all of my employees to have an SPS, including those who are not retail investment advisers, to show our commitment to professional standards. Can non-retail investment advisers apply for an SPS from CII?

The FSA's rules apply to retail investment advisers only, therefore the CII will not be issuing SPSs to any other type of authorised person.

### 3. Will the CII be checking that the individual has complied with the Statements of Principle for Approved Persons (APER) and CPD requirements?

When the adviser declares that they have complied with these two requirements, this is a legal undertaking that they have done exactly that.

Compliance with the Statements of Principle for Approved Persons (APER) is an existing regulatory requirement which has its own set of rules and procedures for monitoring and reporting. As a regulated firm, you have a duty to monitor this and report any issues to the FSA. Accredited bodies have no powers to monitor compliance with APER or investigate issues - that remains solely with the FSA.

If you become aware of a competence or ethics problem with one of your advisers you should continue to follow your existing procedures for dealing with this. If, however, you feel the matter has a bearing on the SPS issued to the adviser, please also notify the CII and we will review the case and take action as appropriate.

As an accredited body we are required to sample, on an annual basis, the CPD records of 10% of advisers to whom we have issued an SPS. If during that sampling process we discover that an adviser has not complied with CPD requirements we will take action as necessary.

#### **4. Will the CII be checking that the individual has complied with the FSA's Statements of Principle for Approved Persons (APER) and CPD requirements?**

When an adviser declares that they have complied with these two requirements, this is a legal undertaking that confirms they have done exactly that.

Compliance with the Statements of Principle for Approved Persons (APER) is an existing regulatory requirement which has its own set of rules and procedures for monitoring and reporting. As a regulated firm, you have a duty to monitor this and report any issues to the FSA. Accredited bodies have no powers to monitor compliance with APER or investigate issues - that remains solely with the FSA.

If you become aware of a competence or ethics problem with one of your advisers you should continue to follow your existing procedures for dealing with this. If, however, you feel the matter has a bearing on the SPS issued to the adviser, please also notify the CII and we will review the case and take action as appropriate.

As an accredited body we are required to sample, on an annual basis, the CPD records of 10% of advisers to whom we have issued an SPS. If during that sampling process we discover that an adviser has not complied with CPD requirements we will take action as necessary.