

Self-assessment tool: Record keeping

Why this matters

Keeping accurate records of the financial advice you provide helps maintain a relationship of transparency and trust with your clients. It also ensures you can provide evidence of how you have complied with your licensee obligations as and when required.

Use this self-assessment tool to see if you're ready to complete the record keeping section of your Class 1 or Class 2 FAP full licence application. It should help you identify areas of strength or weakness in your full licence preparation so you can seek further help or advice and address any gaps before you apply. *

Are you ready?	Yes/No	Steps still required
CLIENT FILES		
<p>Do you keep records of the financial advice given to each of your clients (whether the advice is given by you, or someone engaged by you)? These records should give a clear picture of the advice that is given to each client, for example:</p> <ul style="list-style-type: none"> • The nature and scope of the advice. • The information you received from the client and the recommendations made. • The basis on which those recommendations were made. • Benefits and risks to the client of following the advice. • Records to demonstrate that the client understood the advice. • Details of any ongoing reviews of the advice. • Evidence of the disclosures and complaints resolution information you provided to the client. • Evidence of compliance with duties and obligations in relation to giving financial advice. For example: the duty to give priority to the client's interests if there is a conflict of interest. 		
<p>Has each client consented to their records and personal information being viewed by the FMA?</p>		
<p>If you have purchased a book of clients from someone else, do your records show that you:</p> <ul style="list-style-type: none"> • conducted due diligence as to the quality of the client advice records; and • reviewed and updated them within one year of purchase? 		

Are you ready?	Yes/No	Steps still required
COMPLIANCE EVIDENCE		
<p>In addition to client files, do you keep records of how you're fulfilling other aspects of your licensee obligations? For example, records of:</p> <ul style="list-style-type: none"> • Complaints received and how you addressed these. • Key outsourcing arrangements. • How you're meeting Code competency requirements. • Professional development or staff training completed. 		

Are you ready?	Yes/No	Steps still required
FORMAT		
Are your records kept in English?		
If not, will you be able to provide a full translation into English by a translator approved by the FMA?		

Are you ready?	Yes/No	Steps still required
SECURITY AND ACCESS		
Are the records kept in a form that ensures the integrity of the information?		
Are your records well organised, up to date and secure from loss or unauthorised access, use, modification or disclosure?		
If kept in an electronic format, do you have systems and processes in place to ensure your records are secure and retrievable? (For example, from computer system crashes, cyber-attack etc).		
Can you easily access your records and make them available for review and inspection by the FMA within 10 working days if required?		
Are you confident of the above even if your records are kept in the cloud or by someone other than you? (For example, by a storage provider or third party).		

Are you ready?	Yes/No	Steps still required
MAINTENANCE		
Do you keep your records for at least 7 years from the later of: <ul style="list-style-type: none"> the date the record is made; and the date the financial advice to which the record relates is given; and the date any later record is made that refers to or relies upon information in the record; and the date of the conclusion of the life of the financial advice product that the financial advice relates to. 		

Are you ready?	Yes/No	Steps still required
DOCUMENTATION		
Have you documented your record keeping process?		
If not, can you explain how you will ensure you meet the record keeping requirements set out in <u>Standard Condition 1</u> ?		

Are you ready?	Yes/No	Steps still required
REGULAR REVIEW		
Do you regularly review your record keeping process, and update it as needed?		

Ready to take the next step? [Start your draft full licence application online on the FMA website](#)

Remember, you don't have to complete your application in one sitting. Make a start, complete what you can, and then return to fill in any gaps.

Need more help?

- For full details of your record keeping obligations see Standard Condition 1 in the [Standard-Conditions-for-full-FAP-licences.pdf](#)
- For additional information about the steps you are legally required to take in the event of a privacy breach, visit the [website of the Office of the Privacy Commissioner](#)
- For more information about your duties and obligations as a financial advice provider, visit the [FMA website](#)
- Contact us: 0800 434 566 or questions@fma.govt.nz

**Please note that this self-assessment tool is designed to help you prepare to apply for your Class 1 or Class 2 full licence. Completion of this form does not provide any guarantee that you will be granted a full licence. To apply for a licence, you will need to complete the full licence application form on the [FMA website](#). Your application will then be assessed by our licensing team.*