



Learning Pathways followed by Financial Planners and Financial Advisors

Joint research by SAQA and FPI October 2017

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PURPOSE AND STATUS OF THIS DOCUMENT

This study aims to inform the discussion on Learning Pathways followed by Financial Planners and Financial Advisors in becoming professional members of the Financial Planning Institute of Southern Africa (FPI), and to share its findings and recommendations with the reader of this document.

The document is the product of a partnership between the South African Qualifications Authority (SAQA) and FPI. It will be tabled at the FPI Professionals Convention in October 2017, but will also be distributed to other role players.

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ABSTRACT

With the ever-increasing emphasis on articulation in the Post School Education and Training System (PSET) in South Africa, it has become important to examine how learners navigate the National Qualifications Framework (NQF). Of particular interest is mapping learning pathways in specific fields of study. This paper examines the specific learning pathways followed by professional members of the Financial Planning Institute of Southern Africa (FPI). This empirical study is based on the learning achievements of over 18 000 FPI members as recorded on the National Learners' Records Database (NLRD). The findings show that about 80% of FPI members follow the conceptualised and standard pathway to becoming a designated professional. The data also shows that legislation has a substantial impact on the movement of learners within the NQF as more individuals obtained full qualifications after 2010 compared to qualifications obtained before 2007. The main policy implications are that SAQA and FPI need to reconsider its Recognition of Prior Learning (RPL) policies to detail what is needed in terms of how learners can navigate the NQF utilising RPL. The articulation policy by the Department of Higher Education and Training (DHET) also needs to be reviewed to consider not just qualifications, but the movement of learners between professional designations and clarify what the role and responsibilities of professional bodies are in terms of the policy.

Keywords:

Articulation; Financial planning; Learning pathway; National Qualifications Framework (NQF); National Learners' Records Database (NLRD); Professional designation; Legislation; Department of Higher Education and Training (DHET)

1. INTRODUCTION

In recent times, a key focus of the Post School Education and Training System (PSET) in South Africa has been to understand how learners are moving across the National Qualifications Framework (NQF). Various studies and research have been conducted and documented about this issue. An example of this is the 4th National Learners' Records Database (NLRD) Trends report launched by the South African Qualifications Authority (SAQA) in March 2017. The report explored broad movement across the NQF Sub-Frameworks, NQF Fields and NQF Levels, and provided insights into some aspects of articulation and learning pathways. Following this, there was a call for similar research to be done in specific fields of study, to understand learner movement. One such area is the financial planning profession.

Financial planning in South Africa has come a long way, and evolved significantly over the last 30 years. International standards were set by professional bodies such as the Financial Planning Institute of Southern Africa (FPI), and there have been many changes to legislation and best practice during this time that has forced the industry to be more professional and more transparent. In addition, various regulatory bodies changed the way the industry and its people run their processes and business with the focus on treating customers fairly and professionalising the sector. Despite the significant strides made in this time however, there are still some challenges in achieving true

professionalism within the financial service industry. A case in point is the plethora of qualifications developed over time to meet specific short-term legislative and workplace needs, without careful consideration for developing and adopting well researched qualifications and designations to provide aspiring professionals with an optimal learning pathway in the financial planning and advice space.

This paper explores the learning pathways followed by financial planners and financial advisors, with a view to understanding if the people with qualifications in this field have followed the suggested pathways. The paper seeks to answer three key questions:

- Are learners following the conceptualised/ standard pathways for the profession, or are there other pathways they are following?
- What effect does legislation have on the learning pathways?
- What possible policy implications are highlighted from the findings of this study?

The next section provides a background to the evolution of financial planning qualifications in South Africa, and the changes over time in the industry. This is followed by the research methodology, limitations and a summary of the data and analysis. The paper concludes with the potential for future research, and recommendations for various stakeholders.

2. BACKGROUND

To understand the current pathway to becoming a professional financial planner or advisor, it is important to look at the history and development of financial planning qualifications in South Africa, as well as the key role players in that space.

2.1 The Development of Professional Oualifications

The development of professional qualifications in the financial industry in South Africa is led by several role players, one of which is the Financial Planning Institute of Southern Africa (FPI). FPI originally started out as the Institute of Life and Pension Advisors (ILPA) within the life insurance industry. ILPA was formed through engagements between the Life Offices Association (LOA); the Life Underwriters Association of South Africa (LUASA); the Institute for Pension Consultants and Administrators (IPCA) and the South African Insurance Brokers Association (SAIBA). In May 1980, discussions began between these parties on the need to develop a professional qualification for the life insurance industry. The parties felt that the academic level for financial planners should be at a university level, and that the qualification must have a combination of academic as well as practical components.

Years later, in 1996, it was agreed that there was a need to professionalise financial planning and to recognise ILPA's qualifications internationally. It also become clear that there was a pathway needed to raise professional standards, as there was no longer just a focus on life and pension advisors, but holistic financial planning that included retirement planning, risk planning, as well as other disciplines such as estate planning and investment planning.

When ILPA was authorised to grant the CERTIFIED FINANCIAL PLANNER®/CFP® designation in South Africa in 1998, the institute started drawing a much wider range of industry players that included lawyers, accountants, actuaries, employee benefits advisors and was in the process of becoming a profession. A name change was needed as the institute no longer just dealt with Life and Pension funds. The name of ILPA was subsequently officially changed to the Financial Planning Institute of Southern Africa in March 2000.

In the years that followed, FPI continued to set itself out to further professionalise the industry by improving professional standards for the development of financial planning qualifications within South Africa. The education standards are set in FPI's Financial Planner Competency Profile and Financial Planner Curriculum Framework. FPI's standards are benchmarked against Financial Planning Standards Boards (FPSB) standards and localised to the South African territory. It is against these standards, that FPI as an affiliate of FPSB and recognised SAQA professional body, recognise the qualifications of education providers within South Africa. The recognition indicates that the qualification as developed by the education provider, meets the professional standards as set by FPI.

The importance of FPI becoming a recognised professional body in 2012 as it relates to qualification development is that a professional body must recognise suitable education and training providers, and be involved in the curriculum development of learning programmes offered by education and training providers.

BRIEF HISTORY OF THE FINANCIAL PLANNING INSTITUTE OF SOUTHERN AFRICA (FPI)



1980

Institute of Life and Pension Advisors(ILPA) has first recorded meeting on 26 May 1980 to discuss the need to develop a professional qualification for the life insurance industry

1996

Realisation that there was a need to professionalise financial planning and recognise ILPA's qualifications internationally (e.g CFP Board Standards)



1998

ILPA affiliated with the CERTIFIED FINANCIAL PLANNER Board of Standards in the United States to ensure that financial planners in South Africa, met international standards such as education, experience, exam and ethics standards

1999

ILPA council discusses need to change the institute's name to the Financial Planning Institute of Southern Africa as the Institute now no longer just dealt with life insurance but other components of financial planning





2000

ILPA's name is officially changed to the Financial Planning Institute of Southern Africa NPC(FPI)

2012

The Financial Planning Institute becomes a South African Qualifications Authority (SAQA) recognised Professional Body as defined in the National Qualifications Framework Act (NQF Act)



source: www.fpi.co.za

Figure 1: The history of the Financial Planning Institute (FPI)

2.2 Other role players

The other four key role players in the development of qualifications that relate to financial planning as well as financial advice in South Africa are:

SAQA: SAQA is the statutory body that is the custodian of the South African NQF and oversees the further development and implementation of the NQF that includes, but is not limited to the development of qualifications across the three Sub-Frameworks. SAQA is also mandated by law to develop and implement policy and criteria for recognising a professional body and registering a professional designation.

FPSB: Financial Planning Standards Board Ltd. (FPSB) is a non-profit association that manages, develops and operates certification, education and related programs for financial planning organisations so they may benefit the global community by establishing, upholding and promoting worldwide professional standards in financial planning. It is in short, the global standards setting body for financial planning. FPI is an affiliate and founding member of FPSB and the only institution licensed to promote the CFP® mark within Southern Africa, and has localised its Financial Planner Curriculum to FPSB's global standard.

INSETA: The Insurance Sector and Education Training Authority (INSETA) was established in 1999. INSETA performs two main functions: it fulfils the function of sector skills development within the financial services industry, and the delegated function of quality assurance within the Occupational Qualification Sub-Framework (OQSF) of the NQF. FPI together with other professional bodies form part of the Community of Expert Practitioners (CEPS) that is assisting INSETA with the alignment of skills programmes for the financial sector to occupational qualifications and

learning programmes that fit into the OQSF which is managed by the Quality Council for Trades and Occupations (QCTO).

FSB2: The Financial Services Board (FSB) is an independent institution, established by statute to oversee the South African financial services industry in the public interest, and fully funded by fees and levies imposed on the industry. FSB also licenses Financial Services Providers (FSP) to provide financial services within South Africa. The licensing requirements are set out in legislation3 and FSB regulations called Board Notices (BN). One such board notice, is BN106 of 2008 which provides for the fit and proper requirements that a Financial Service Provider (FSP), Key Individual (KI) and/or representative must comply with it in order to be granted a license. The redraft of this BN is due to come out in the last quarter of 2017. This study focuses on the qualification requirements per licensing category as per BN 106 of 2008.

In terms of the qualifications requirement, there are a couple of considerations:

- The more complex the financial product linked to the licencing category is, the higher the NQF level qualification the FSP and/or representative must obtain in order to provide financial services for that licencing category.
- When the first fit and proper regulations came in (BN 91 of 2003), individuals were either "grand fathered" into the system, or they had to obtain a minimum number of NQF credits. If they applied for a new licence or additional license category after a certain date, they had to obtain a full qualification by a certain future date.

¹Annexure A and B

²In the near future, FSB will no longer exist as the Financial Sector Regulations Act (FSR) establishes the Financial Sector Conduct Authority (FSCA) in its place

³The Financial Advice and Intermediary Services Act 37 of 2002 (FAIS Act)

These points are illustrated by the regulators' timelines and NQF level per licensing category in Figure 2 and Table 1:

REGULATOR TIMELINE TO OBTAIN A QUALIFICATION

The fit and proper requirements as per the FAIS Act and Board Notices stipulate which qualifications must be obtained by Key Individuals (KI's) and Representatives and by when (Depending on your Date of First Appointment (DOFA))

APPOINTED UP TO 2007

30 or 60 credits, depending on licence category, in a registered skills programme by 31/12/2009

APPOINTED IN 2008 AND 2009

Options:

Qualification consisting of 30 or 60 credits by 31/12/2011 **OR** a Full Qualification as recognised by the Registrar by 31/12/2013

NEW ENTRANTS JANUARY 2010 ONWARDS

Entry level matric / grade 12 or school leaving certificate at NQF 4 (excl Cat 1.1 and 1.19 - min ABET level 1)

A representative may only work for a period not exceeding six years after DOFA under supervision, whilst obtaining the required examination and recognised qualification



Figure 2: Regulator's timeline to obtain a qualification

NQF level or skills programme

Table 1: NQF Level per licensing category

Category No Sub Category No		Description	NQF level	Skils programme	
		CATEGORY 1			
1	1	Long-Term Insurance: Category A	ABET level 1	30	
1	2	Short-Term Insurance: Personal Lines	4	30	
1	3	Long-Term Insurance: Category B1	4	60	
1	4	Long-Term Insurance: Category C	5	60	
1	5	Retail Pension Benefits	5	60	
1	6	Short-Term Insurance: Commercial Lines	4	60	
1	7	Pension Funds Benefits (excluding retail)	5	60	
1	8	Securities and Instruments: Shares	6	60	
1	9	Securities and Instruments: Debentures and securitised debt	6	60	
1	10	Securities and Instruments: Warrants, certificates and other instruments	6	60	
1	11	Securities and Instruments: Bonds	6	60	
1	12	Securities and Instruments: Derivatives instruments	6	60	
1	13	Participatory interests in Collective Investment Schemes	5	60	
1	14	Forex investment Business	6	60	
1	15	Health Service Business	5	60	
1	16	Deposits Defined in the Banks Act - exceeding 12 months	4	60	
1	17	Deposits Defined in the Banks Act - 12 months or less	2	30	
1	18	Friendly Society Benefits	ABET level 1	30	

A timeline showing the summary of all role players is in Appendix C. Together, these bodies either set standards for a profession, regulate qualifications, determine the skills needed for a sector or sets competency requirements as a regulator in order to be licenced to provide financial services.

2.3 Financial planning vs. Financial advice

Financial planning is the process of developing strategies to assist clients in managing their financial affairs to meet life goals through the proper management of their finances and includes Financial Management, Investment Planning, Risk Planning, Tax Planning, Retirement Planning and Estate Planning. Financial advice on the other hand, is defined in legislation as any recommendation, guidance or proposal of a financial nature furnished

in respect of the purchase of any financial product or the investment in any product⁴.

2.4 Professional membership: Financial planners and financial advisors

Since most consumers do not have the ability to perform their own financial planning, there is a need for professional financial advisors and planners to assist the consumers in drafting and executing their financial plan, and this is where FPI comes in. There are different membership levels within FPI, and they are broadly grouped into two: a) Designated members (professional members) and b) Affiliate members who are not professional members, but are on the path towards achieving a professional designation.

⁴For full definition see section 1 of the FAIS Act

Table 2: Membership levels within FPI

Category	Criteria	Validity Period	
CFP® professional	NQF Level 8 qualification, PCE and 3 years' experience	Infinite time period	
FSA™ professional	NQF Level 6/7 qualification, PCE and 2 years' experience	Infinite time period	
AFP™ professional	NQF Level 6 qualification, PCE and 2 years' experience	Ceases December 2018	
RFP™ professional	NQF Level 5 qualification, PCE and 1 year experience	Ceases December 2018	
Affiliates (includes students, candidates and representative advisors employed by FSPs)	On the pathway to CFP® certification but does not meet all 5Es criteria yet	Infinite time period	

2.5 Learning pathway

A learning pathway is the sequencing of qualifications that allows learners to move vertically, diagonally and horizontally through NQF levels, giving learners recognition for full or partially completed qualifications or part-qualifications as well as access to professional designations registered on the NLRD. In the case of

FPI, a pathway for financial planners and advisors also includes the achievement of its certification requirements. To become a professional member of FPI, applicants need to meet the certification standards, which are built on the five Es: Education, Experience, Examination, Ethics and Enforcement.

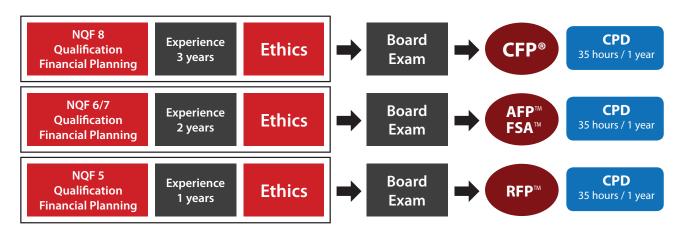


Figure 3: Learning Pathway to becoming a professional financial planner

The current learning pathway to becoming a professional member as prescribed by FPI is illustrated in Figure 3, and further outlined in Appendix A and B.

⁵Professional Competency Examination ("Board Exam")

⁶SAQA's NQFpedia at http://hr.saqa.co.za/glossary/index.php#

3. METHODOLOGY

The data used in the paper was extracted from the NLRD. The NLRD is the electronic management information system of the South African NQF. With more than 18 million people currently recorded in the system, the NLRD is used for providing policy makers and decision makers with comprehensive information on education and training, and on labour market supply, as well as for tracking the paths of individual learners, providing them and their employers with proof of qualifications obtained. The information on the NLRD comes via two "streams": The first stream consists of qualifications and part-qualifications (including unit standards) and all of the NQF resources that support them. The second stream consists of learners and their achievements and all of the resources that support them, such as education and training providers, quality assurance functionaries (including Quality Councils and SETAs), registered assessors, recognised professional bodies and their professional designations.

Although the NLRD was developed between 1997 and 1999, the data stored on it dates as far back as 1900, and it continues to be a key national resource in the education and training landscape as data is continually loaded on it. Professional bodies and other institutions that provide data to the NLRD are required to do so by law and FPI is one such body. It is important to note that FPI has, since its recognition, uploaded data onto the NLRD as required by section 31 of the NQF Act. It is the same data that is used for the purposes of this study. FPI provided data on its registered members, which includes affiliate categories

(students, candidates and representative advisors) and professionals with designations registered on the NQF.

Learner achievements (of qualifications and part-qualifications) were extracted for each member, summarised, and ordered chronologically by the year of achievement. Registration on a professional designation (in FPI or any other professional body) was counted as an "achievement" or step along the member's pathway. The achievements were summarised by Sub-Framework, NQF Level, Provider and NQF Organising Field, with tables and graphs produced accordingly. The date range of qualification achievements was very wide, with the first qualification dating all the way back to 1919 and up to 2017.

3.1 Data limitations

The data was restricted to registered members of FPI; however, there may be practising professionals who are not listed with the Institute. Not all learning achievements for individuals were available at the time of data extraction. This could be attributed to a number of factors, some of which are the non-existence of electronic records of some achievements (they exist in paper form only), as well as the delayed submission of datasets by various providers to the quality councils and in turn to SAQA. SAQA, in particular the NLRD, continues to partner with quality councils to work through these issues through interventions such as the recent digitisation project, and the frequent, ongoing communication with data suppliers.

4. RESULTS

The number of qualifications obtained by more than 18 000 individuals from 1919 to 2017 was analysed. The analysis focused on the data in two sections:

 A summary of the data received for all FPI members, including student affiliates, candidates/ representative advisors and professional designates; About 70% of the membership base are not designated professionals, even though they have obtained qualifications and in some cases, experience to move beyond their current status. This raises an interesting thought as to why these members are not progressing to the next level. The question is, how many of the 70% are individuals that hold a relevant qualification, and are perhaps already on the pathway in becoming a professional

Financial Planners and Advisors Registered with FPI Affiliates and Professional members

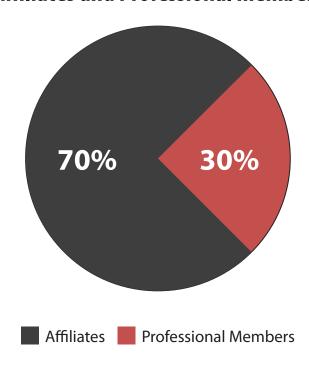


Figure 4: Total number of Financial Planners and Advisors

 A detailed analysis of pathways for professional members only - these are the designated members as recorded on the NLRD.

4.1 Summary – All members

From the total FPI members, 12 973 (70%) are affiliates of FPI, and 5 483 (30%) are professional members.

member of FPI? FPI must assist these individuals to obtain the needed experience via a mentorship programme, or assist them to prepare for the applicable Professional Competency Examination. A recommendation for FPI is that there must be a focused campaign to encourage the employers in the financial services industry and all affiliate members of FPI to promote and explain the value of RPL mechanisms in place at FPI. RPL appears to

be quite a new concept to learners and employers. SAQA should ensure that more is done to promote SAQA policies such as the RPL Policy to the public at large, with a focus on the learner in the system. The policy should perhaps be broken down in many forms to speak/be attractive to the different audiences.

4.1.1 Demographics

The demographic characteristics of all FPI members are compared in Table 2. The classification by gender and race in this section is in line with the Employment Equity Act. It must also be noted that there is an element of self-classification, which means that individuals have classified themselves voluntarily into one of the population groups. Across all instances, the majority of the members were male,

while a third of them were female. Over two thirds of the total membership base (68%) was White, while 16% were Black African. The professional members showed a different pattern, with 85% being White, and 5% Black African. The largest age group in both cases is age group 40 - 49, followed by age 30 - 39 in the total membership base, and age 50 - 59 in the professional members.

The population is largely white, male and aging. The demographics also speak to the number of learners coming through the educational system, especially the higher education space as most of the designations are linked to a NQF Level 5 to 8 which sits on the Higher Education Qualification sub-framework (HEQSF). While FPI recognises various education providers across South Africa (see Appendix A), more should be done to recognise

Table 3: FPI members' demographics

All FPI Members %		%	Affiliate members and students	%	Professional members (CFP®, RFP, AFP)	%
Gender						
Female	6400	35%	4 696	36%	1 704	31%
Male	12 056	65%	8 277	64%	3 779	69%
Population Group)					
Black African	3 006	16%	2 738	21%	270	5%
Coloured	732	4%	555	4%	177	3%
Indian	1 446	8%	968	7%	478	9%
White	12 499	68%	7 974	61%	4 525	83%
Unknown	773	4%	738	6%	33	1%
Age						
20 - 29	1 948	11%	1 720	13%	228	4%
30 - 39	4 617	25%	3 355	26%	1 262	23%
40 - 49	5 213	28%	3 337	26%	1 876	34%
50 - 59	3 975	22%	2 617	20%	1 358	25%
60 - 69	2 075	11%	1 416	11%	659	12%
70+	628	3%	528	4%	100	2%
TOTAL 18 456		12 973		5 483		

providers in all provinces to ensure inclusivity of a broader quota of individuals into the profession.

It is recommended that FPI review its policy in recognising education providers with the view to ensure that the policy supports diversity, transformation and inclusion principles. It also needs to ensure that its current Board - approved FPI Diversity and Inclusion Strategic Plan, and its linked activities, considers recognising a wider variety of providers. Employers should also ensure that their recruitment practices take RPL practices into consideration, as this too will assist in diversification in the financial services sector.

4.1.2 Achievements and Qualifications

While there were over 34 000 qualification achievements for the learners in the study, most of the learners achieved more than one qualification. The earliest qualification achieved for any known member can be traced back to 1919 and is the "Hoër Onderwys Diploma" (National Higher Diploma). There is an increase in the number of qualifications achieved per decade, across affiliate members and professionals as shown in Figure 5.

Between 1998 and 2007, there are a similar number of qualification achievements between the affiliate

FPI Members: Achievements by Achievement year

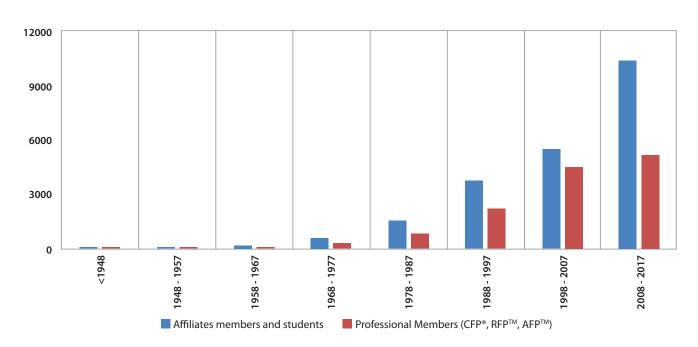


Figure 5: Learning Achievements by achievement years for FPI members

members and the professional members. This can be attributed to the CFP® professional designation being brought to South Africa in 1998 by FPI. In those early years of the designation, FPI allowed the Professional Competency Examination (PCE) ("board exam") to be written at the education providers. It was therefore easier to gain access to the designation as the final exam at the provider, was also seen as the board exam (the case study module). In later years, FPSB made it clear that the CFP® PCE may not be written at the providers of the educational programme (the B. Com Honours in Financial Planning or a Postgraduate Diploma in Financial Planning both on NQF Level 8). This decision clearly had an impact on the growth of the CFP® designation within South Africa as is evident from the next timeframe (2008 - 2017): currently, the candidate, must obtain the qualification at the education provider and then write an additional "board exam" at FPI. This decision, not to allow the board exam to form part of the educational component, should perhaps be reconsidered as the PCE appears to be a barrier to growth into the profession. By this, we are by no means suggesting that the PCE must be waived - but perhaps reconsider where the PCE fits into the certification programme.

FPI furthermore decided to phase out its RPL™ and AFP⁷ designations by 2018 as there appeared to be no relevance for the designations in 2012/2013, which also speaks to the decline in professional members during this time frame.

The number of affiliates obtaining a qualification almost doubled from 2008 to 2017, as shown in Figure 5. This supports the information about FSB as a role player and speaks to the above timeline as to when a qualification had to be obtained. Legislation had a positive impact on the learning pathways followed by learners as more individuals obtained either part-qualifications (prior to 2010) and, in later years, full qualifications. This confirms that when a regulation is set, that compliance with it does follow. The idea of regulation is to create certainty in times of chaos for the benefit of the protection of the society at large. There was a time in the industry when a "broker" was seen as a "salesman" and not as someone who had the best interest of the customer at heart. It is comforting to observe that the industry is complying to a great extent with the regulations set by the regulator and that society can trust an individual who has gone through the process of upskilling him/herself via this process.

The number of professional members for the same timeframe reflects that the number of professional members did increase, but about 47% of the individuals who obtained a qualification did not become professional members of FPI. There is definitely room for FPI to continue to develop support programmes for individuals, practices and corporates to follow the pathway to a professional designation as mentioned already.

The number of qualifications and partqualifications achieved from 1994 to 2016 is shown in Figure 6. There were 647 related partqualifications achievements considered. Of the 18 456 members, 7 257 members achieved these in the process of obtaining a full qualification, as well as learning providers or SETAs recording the attainment of unit standards against the learner's name as the learner navigates through the learning programme. It is evident from the data that SETAs

Qualification and Part-Qualification Achievements 1994-2016

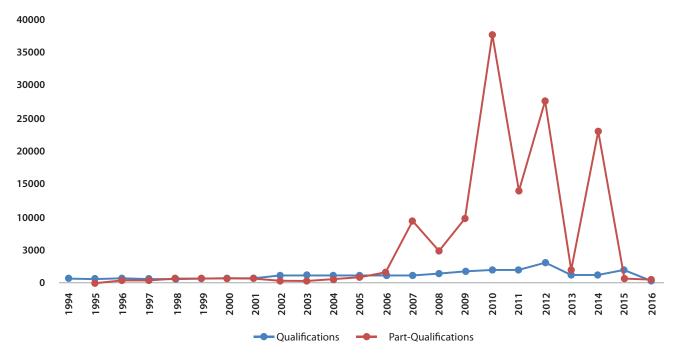


Figure 6 Qualifications and Part-qualification achievements

part-qualifications, and 1 892 were professional members while 5 365 were not. This indicates that a big percentage of the individuals who obtained part-qualifications – did not continue to attain full qualifications.

From FSB's timeline, many individuals obtained part-qualifications pre-2010, as that was the requirement of FSB. It was also a requirement for individuals who were licensed after 2010 to obtain a full qualification within six years from their Date of First Appointment (DOFA). The fluctuation of part-qualification achievements, descending post 2010, is possibly due to the individuals who are

and learning providers are not timeously uploading the needed information to the NLRD, which leads to the NLRD not being able to record the achievement of the qualifications. This has serious implications for the learner as the learner could be debarred⁸ by the regulator for not meeting the fit and proper requirements to be a licenced FSP or KI or representative of the FSP. This is something that SAQA should observe much more closely as it literally has an effect on the bread and butter of the individuals within the Financial Services Industry. It is recommended that a closer study is conducted into the fluctuation of the attainment of part-qualifications post 2010.

⁸ Section 14 of the FAIS act

4.1.3 Achievements by NQF Sub-Framework

The number of learning achievements in each NQF Sub-Framework is shown in Figure 7. The Higher Education Qualifications Sub-Framework (HEQSF) is the highest at 63%, with over

22 000 achievements. It is important to note that all SETA learning programmes are reflecting in the Occupational Qualifications Sub-Framework (OQSF). It is not surprising that most of the learner achievements are in the HEQSF as most

of the qualifications needed for the licensing categories are at NQF Level 5 to 7. Qualifications in the GFETQSF range from NQF Level 1 to 4; qualifications in the HEQSF range from NQF level 5 to 10 whereas, qualifications in the OQSF range from NQF Level 1 to 8. It should be noted that, during 2016, INSETA initiated a process to align its learning programmes to the requirements of the QCTO for occupational qualifications.

Learner Achievements by Sub-Framework: Affiliates and Professional members

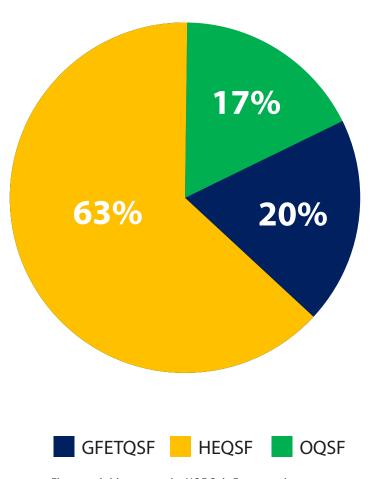


Figure 7: Achievements by NQF Sub-Framework

4.1.4 Achievements by NQF Level:

A summary of learning achievements by NQF Level is shown in Figure 8. Almost a third (29%) of all qualifications achieved was at NQF Level 8. About 21% of all achievements were at NQF Levels 4 and 7; and 18% were at NQF Level 5. For the affiliate members, most of the qualifications were achieved at NQF Levels 4 and 5, while the professional members had most of their achievements at Level 8. An observation is that the higher the NQF Level, the more members become professionally designated. A question to ask is whether there should be a designation for each NQF Level – or is affiliate membership to a professional body acceptable as the individual moves through the

learning pathway towards a professional designation on a higher NQF level. Having said that, one needs to be very careful not to create the perception that you can only professionalise on an NQF Level 7 or 8 for instance. What if the individual only wants to or can only study towards a NQF Level 5 or 6 qualification – does that mean that he/she cannot belong to a professional community or professionalise? Professionalisation implies that an individual has achieved a certain standard of competency requirements; is adhering to a higher code of ethics and is committed to lifelong learning via continuous professional development for instance.

Learner Achievements by NQF Level: Affiliates and Professional members

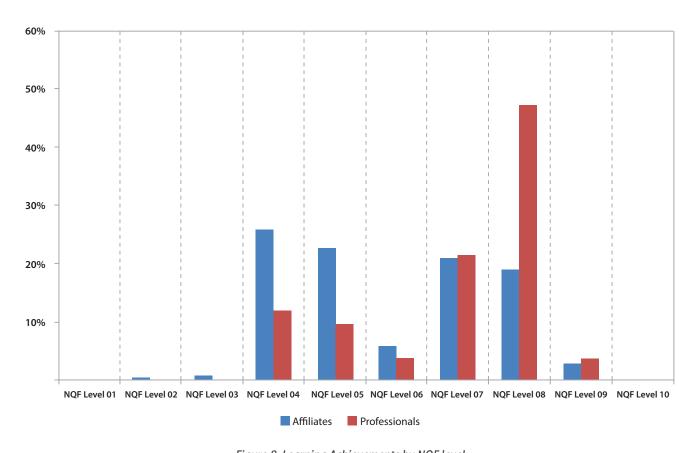


Figure 8: Learning Achievements by NQF level

4.1.5 Achievements by Provider:

The top 20 providers or institutions with the highest number of students are shown in Figure 8. It is important to note that a learner can achieve qualifications from more than one provider as they follow the pathway to becoming professionals. University of Free State (UFS), University of Stellenbosch Business School (USB), Moonstone Business School of Excellence (MBSE), Milpark Education (Pty) Ltd, Nelson Mandela University (NMU) and University of Johannesburg (UJ) are recognised providers of FPI, as reflected in Appendix A.

From Figure 9, it is evident that the most learners studied through UFS. It is important to mention the historic relationship between FPI and UFS. Initially FPI ran the ILPA programme which was not a registered qualification on the NQF at the time (pre-2001). Through partnering with the UFS at the time (1998), UFS was the first university to develop the ILPA programme into the Postgraduate Diploma in Financial Planning. UFS then ran the educational programme on behalf of FPI. It was only in later years (approximately 2005) that FPI started recognising

Learning Achievements by Institution

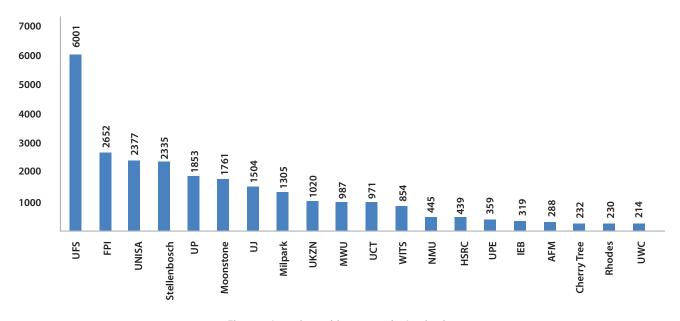


Figure 9 Learning achievements by Institution

The University of KwaZulu-Natal was recognised as an FPI Education Provider during October 2017 after working very close with FPI for approximately three years in aligning its qualification with the learning outcome statements as contained in the financial planner curriculum framework and competency profile. FPI is currently going through the same process with Tshwane University of Technology (TUT) and University of the Western Cape (UWC).

the educational programmes (B. Com Honours in Financial Planning and Postgraduate Diploma in Financial Planning) as meeting the standard of the educational programme needed towards CFP® professional certification.

Although FPI recognises education providers across South Africa (see Appendix A), more can be done to recognise providers across all provinces of South Africa to ensure inclusivity of a diverse

quota of individuals into the profession. A definite recommendation coming out of this study is that FPI must do more to recognise more universities' educational programmes as they relate to the education component of the financial advice

and financial planning designations at FPI. This must be done to assist in promoting and ensuring transformation, inclusion and diversity within the financial services sector.

Field of study: Affilates and Professional members

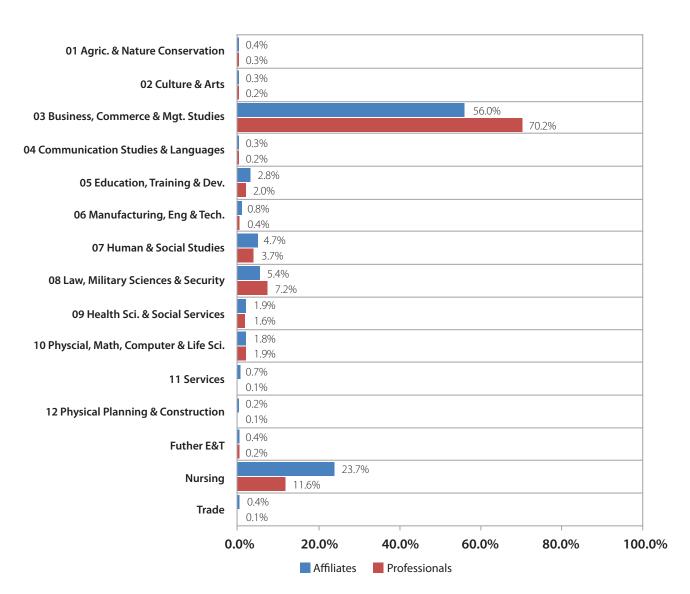


Figure 10: Learning Achievements by Field of Study

4.1.6 Achievements by Field of Study

Expectedly, Figure 10 shows that the most popular field of study for members was Field 03 (Business, Commerce and Management Studies); with 61% of the learning achievements. This was followed by the Nursing field, which had 19% which in itself seems surprising but is actually not, as nursing is relevant to health and medical underwriting in the life insurance industry, and this shows that individuals move across different occupations within the financial services sector. What is something to consider for future study is building learning pathways between occupations within the financial services sector (moving from an underwriter to a financial planner for instance or a financial advisor to a claims assessor specialist)

The highest number of qualifications achieved is 9; and this was achieved by two professional members. An example of the observed pathway as seen in the data is: National First Degree (NQF Level 07) > Honours Degree (NQF Level 08) > Honours Degree (NQF Level 08) > Post Graduate Diploma (NQF Level 08) > Master's Degree (NQF Level 09) > Honours Degree (NQF Level 08) > CFP® - CERTIFIED FINANCIAL PLANNER® (Designation) > Postgraduate Diploma (NQF Level 08). Over 98% of the affiliate members have obtained at least four qualifications but have no professional designations. Assuming they meet the rest of the certification standards, these are potential AFP™ and RFP™ practitioners of FPI. There are also over 3 000

Table 4: Number of Qualifications achieved by member type

	Number of Qualifications Achieved					
Membership Type	<=4	5	6	7	8	9
Professional members	4 444	757	220	51	10	2
RFP™ professionals	577	8	5	0	0	0
AFP™ professionals	302	9	4	0	0	0
CFP® professionals	3 565	740	211	51	10	2
Affiliates	12 796	137	29	10	0	0
<nqf 5<="" td=""><td>2 573</td><td>2</td><td>0</td><td>0</td><td>0</td><td>0</td></nqf>	2 573	2	0	0	0	0
Potential RFP™ professionals	3 757	2	0	0	0	0
Potential AFP™ professionals	3 131	4	1	0	0	0
Potential CFP® professionals	3 335	129	28	10	0	0
TOTAL	17 240	894	249	61	10	2

4.1.7 Steps taken

Each qualification achieved by a learner is regarded as a step in the learner's pathway. This means that if a learner has four qualifications for example, they have taken four steps along their learning pathway. For the purposes of this paper, a professional designation is counted as a step in a learner's pathway. Thus, a learner who took four steps would have achieved three qualifications, plus their professional designation, which forms the fourth step. The number of steps taken (qualifications achieved) by all members is shown in Table 4.

individuals who could be potential CFP® professionals as they have obtained qualifications at NQF Level 8 or higher, however they still remain at affiliate level and have not moved further in their pathway.

FPI has a major role to play in professionalising the individuals on its current database. Many of the individuals in the affiliate categories are representative advisors of the corporate members of FPI. It is recommended that FPI moves closer to the training and development departments of the corporate partners to see how FPI can assist them to professionalise their representative advisors.

4.2 Summary – Professional members only

This section gives a short summary of the qualification achievements of the professional members of FPI. The number of people with financial planning designations as recorded on the NLRD is shown in Table 5. Over 83% of professional members are CFP® professionals; 11% are RFPTM professionals and 6% are AFPTM professionals.

A typical pathway for a CFP® professional as seen from the data is: National Certificate (NQF Level 04) > National First Degree (NQF Level 07) > Postgraduate Diploma (NQF Level 08) > CFP® - CERTIFIED FINANCIAL PLANNER® (Designation). Of the 4 578 CFP® professionals, about 80% followed the prescribed pathway on their way to becoming

Table 5: Number of Designations:

Professional Designation	Number
ASSOCIATE FINANCIAL PLANNER™/AFP™ designation	315
CERTIFIED FINANCIAL PLANNER® /CFP® designation	4578
REGISTERED FINANCIAL PLANNER™ /RFP™ designation	590
Total	5483

The number of RFPTM and AFPTM professionals appears low, as FPI announced in 2014 that it plans to phase out the two designations. This decision was taken after a study conducted in 2013 indicated that the said designations lost their relevance due to the regulator putting in place fit and proper requirements and that the individuals did not see the need to be professional members of FPI.

It is recommended that FPI rethinks this strategy as there has been a lot of movement towards professionalising the financial services sector and not just the members of the professional body. The Retail Distribution Review (RDR) specifically points out the need to professionalise the "sales forces" distributing financial products. One definite way to professionalise is to ensure that the individual complies with certification requirements, standards, Continuing Professional Development (CPD) and regulations such as a professional code of ethics set by a professional body.

4.2.1 Pathways

The number of designated professional members who follow the prescribed learning pathway compared to those who do not is shown in Figure 11.

a designated member of FPI. The other 20% achieved more than six qualifications, sometimes at the same NQF level, and other times at higher levels. An example of this is see in the pathway: National Certificate (NQF Level 04) > National First Degree (NQF Level 07) > Honours Degree (NQF Level 08) > Postgraduate Diploma (NQF Level 08) > Postgraduate Diploma (NQF Level 08) > CFP® - CERTIFIED FINANCIAL PLANNER® (Designation). This could mean that as they progress in their learning path, they chose to specialise in specific niches of the finance sector.

Of the 590 REGISTERED FINANCIAL PLANNER™ professionals, over 80% of them followed the prescribed pathway of: National Certificate (NQF Level 04) > National Certificate (NQF Level 05) > RFP™ - REGISTERED FINANCIAL PLANNER™ (Designation). A similar pattern is seen for the 315 ASSOCIATE FINANCIAL PLANNER™ professionals with a typical pathway of: National Certificate (NQF Level 04) > National Certificate (NQF Level 05) > First Degree (NQF Level 07) > AFP™ - ASSOCIATE FINANCIAL PLANNER™ (Designation).

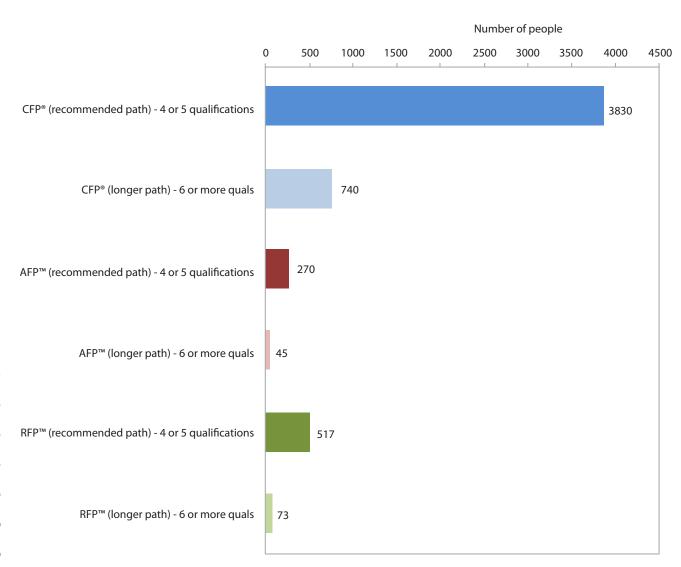


Figure 11: Number of members in recommended pathways

5. KEY FINDINGS

5.1 The learning pathway

While there is a standard learning pathway towards becoming a professional member of FPI, it seems that this path is not taken by many members as only 30% of its base have been designated. (A full pathway INCLUDES someone taking up the designation - hence, the standard learning pathway is not followed). Of its professional members, only 17% are REGISTERED FINANCIAL PLANNER™ and ASSOCIATE FINANCIAL PLANNER™ professionals (RFP™ and AFP™ professionals). The data suggests that there is a need for members to professionalise more at certain levels, especially at NOF Levels 5 and 6. The data also shows that there is insufficient movement of learners between the OOSF and the HEOSF. It is evident that the OOSF is not a utilised option in the financial services sector. It is recommended that further research is conducted into possible reasons why. Factors to consider in the recommended research are the availability and utilisation of learnerships/ internships made available by for instance SETAs as well as the availability of QCTO qualifications within the financial services sector.

The data further shows that even though not a lot of the members follow the learning pathway in becoming professional members of FPI, the ones who did become professional members followed the learning pathway as outlined by FPI. What appears to be time-consuming in becoming a designated member of FPI, is complying with all the certification requirements (education, experience, examination and ethics). As per the recommendations below, more should be done to inform the learners and the employers about the value of RPL practices.

5.2 The regulator and legislation

It is clear that the introduction of the competency requirements via regulations is having a positive impact on the sector in terms of professionalising individuals who are providing financial services, as the data captured on the NLRD reflects that the attainment of a registered qualification has doubled since the time period 2008 – 2017 (see 4.1.4 above). At the heart if this is consumer protection, and the data on the NLRD shows that the industry can be trusted to follow and comply with regulation in most instances.

pathways, the interconnectedness between the Sub-Frameworks and the availability of a lot of qualifications, especially in the HEQSF on the NQF, must be considered by professional bodies in the Financial Services Sector, to assist the regulator in mapping proper learning pathways for individuals who seeks to be licenced by the regulator. In fact, not just for individuals who want to be licensed, but also individuals who wish to move from one license category to another or who want to add another license category to their profile at the regulator. In adding and/ or changing the categories, additional competency requirements are needed (higher qualification/s, additional time under supervision, etc.). It should be noted that the regulator is currently in discussion with professional bodies, SETAs and Quality Councils such as QCTO who is assisting the regulator to achieve the above.

5.3 Possible policy implications

For FPI—The Institute should review its certification standards and other relevant FPI regulations to see if there are any possible barriers to entry into the profession as only 30% of members on the FPI database are designated members. See recommendations 1 – 6.

For SAQA – In reviewing its RPL Policy, CAT Policy and Policy for Professional Bodies, SAQA should take into consideration the findings of this paper as it appears that articulation between designations is not included in SAQA's definitions of "articulation" and "learning pathways".

See recommendations 7 – 11.

For the employer – RPL practices and articulation are concepts that employers should take into consideration for their employment and development practices. See recommendations 12 – 14.

For the regulator – the regulations have a big impact on the learning pathways followed by individuals in the sector and changing regulations as it pertains to the attainment of qualifications should be carefully considered as to not have a ripple effect into a further proliferation of qualifications across the NQF.

See recommendations 15 - 16.

6. RECOMMENDATIONS

For FPI

Recommendation 1

FPI should reconsider its decision to phase out the RFP™ designation.

Recommendation 2

FPI should conduct a study on establishing why members are not becoming professional members of FPI. A survey must accompany this study as well as face-to-face interviews with individuals as well as professional financial planning practices and corporates.

Recommendation 3

FPI, together with other affiliates and perhaps FPSB, should reconsider the format of the Professional Competency Examination component as to how and where it fits into the certification programme.

Recommendation 4

FPI must run an active campaign to recognise more education providers' qualifications that meet the professional standard of the financial planner and advisor curriculum framework and competency profiles.

Recommendation 5

FPI must liaise more with training and development departments of FPI Corporate Partner™ companies to see how FPI can assist corporates to professionalise their representative advisors.

Recommendation 6

FPI must review all FPI regulations to ensure that they support the principles of transformation, diversity and inclusivity.

Recommendations for SAQA

Recommendation 7

This research should be extended into a study to understand RPL practices within SETAs, training providers and other role-players as the data seems to indicate that a lot of individuals achieved loose-standing **unit standards**, but not full qualifications.

Recommendation 8

SAQA should conduct further joint research with FPI and other professional bodies on part-qualifications and foreign qualifications and how these lead to the attainment of professional designations.

Recommendation 9

SAQA should consider the findings of this paper when reviewing specifically its RPL Policy, CAT Policy and Policy for professional Bodies to ensure that articulation includes movement between designations as well.

Recommendation 10

SAQA should inform DHET of the importance of including Professional Bodies and the role Professional Bodies play in assisting and ensuring articulation across the NQF Sub-Frameworks including professional designations as it relates to the DHET Articulation Policy.

Recommendation 11

SAQA should add to its NLRD guidelines the specific timeframe for education and training providers to upload data to the NLRD (see future research below).

Recommendations for employers

Recommendation 12

Employers should ensure that their recruitment policies and procedures take RPL practices into consideration if an individual does not have the specific qualification stipulated in the job advert and/or job profile.

Recommendation 13

Employers should take note of the pathways followed to inform the personal development plans for aspiring CFP® professionals and FSA™ professionals.

Recommendation 14

Employers should take the learning pathways into consideration when submitting their training and skills plan to any SETA or similar body/funding mechanism.

Recommendation for the regulator

Recommendation 15

When developing qualification standards for the sector, it is important to know that compliance does follow – this is clear from the findings and results above. If is therefore very important that the NQF Level for each licensing category is set at the right level, taking the NQF Level Descriptors and the complexity of the financial product and/ or service, into consideration.

Recommendation 16

The Regulator should continue to work closely with all professional bodies in the financial services sector to assist with mapping learning pathways for individuals moving between occupations and licensing categories across the sub-frameworks of the NOF.

Recommendation 17

The Regulator should partner with professional bodies in the sector to assist in the development of curriculum, body of knowledge and learning outcomes that are relevant to the role and functions of licenced individuals and/or partner with professional bodies to assist with the recognition of qualifications relevant for the sector.

7. FUTURE RESEARCH

The study examined qualification achievements only, and does not look at part-qualifications or short courses achieved. Future studies can include this to get a holistic view, especially with regard to FAIS credits. Further research can be done to see what the impact of the decision of FPSB on education programmes was on the growth of the CFP® mark globally. The study was restricted to registered members of FPI; however there may be practising professionals who are not listed within the Institute. There is an underlying importance of timeous loading of data to the NLRD. Examples of these are seen in certain instances, where some pathways show that learners were designated before proceeding to obtain lower level qualifications, or previous qualifications achieved do not reflect on the NLRD.

8. CONCLUSION

The NLRD is a powerful tool that can be used to assist role players like professional bodies to, among other things, establish what learning pathways learners are following and whether what is prescribed mirrors reality in the profession and the sector.

Furthermore, it is evident that players in the NQF space are all working collectively and responsibly to ensure that we create a single integrated national framework for learning achievements; facilitate access to, and mobility and progression within, education, training and career paths; enhance the quality of education and training and accelerate the redress of past unfair discrimination in education, training and employment opportunities and contribute to the social and economic development of the nation at large.

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Shapiro, Y. (2010), How the National Learners' Records Database of the South African Qualifications Authority contributes to excellent information management among its data suppliers

Websites:

https://www.thesouthafrican.com/returning-to-south-africa-financial-planning-explained/www.fpi.co.za

Appendix A – FPI Approved Qualifications



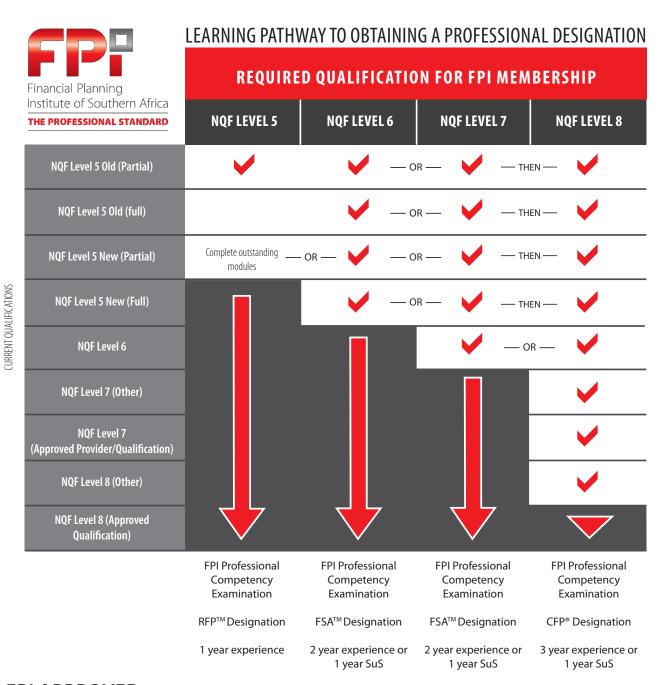
FPI APPROVED QUALIFICATIONS

NQF Level	Qualification Type	Provider	Qualification	Credits	Experience Requirements	Professional Designation
		University of Johannesburg	Bachelor of Commerce Honours: Financial Planning (SAQA 88872)	120	Three years	CFP.
8	Postgraduate Qualification	Nelson Mandela University	Postgraduate Diploma in Financial Planning (SAQA 71633)	120	Three years	CFP.
		University of the Free State	Postgraduate Diploma in Financial Planning Law (SAQA 97622)	160	Three years	CFP.
		University of Stellenbosch	Postgraduate Diploma in Financial Planning (SAQA 71690)	120	Three years	CFP.
		Milpark Education (Pty) Ltd	Postgraduate Diploma in Financial Planning (SAQA 76943)	160	Three years	CFP.
		University of Johannesburg	Bachelor of Commerce: Finance (SAQA 73774)	432	Two years	FSA
7	B Degrees	Nelson Mandela University	Bachelor of Commerce: Financial Planning (SAQA 87056)	366	Two years	FSA
		Milpark Education (Pty) Ltd	Bachelor of Commerce (SAQA 90509)	370	Two years	FSA
		Other	B-Degree FSB approved		Two years	FSA [™]
		Milpark Education (Pty) Ltd	Advanced Certificate in Financial Planning (SAQA 96750)	120	Two years	FSA
6	Advance Certificates	Moonstone Business School of Excellence (Pty) Ltd	Advanced Certificate in Financial Planning (SAQA 83347 recorded against 66612)	120	Two years	FSA
	certificates -	Milpark Education (Pty) Ltd	Higher Certificate in Financial Planning (SAQA 96751)	120	One year	RFP™
5	Certificates <u></u>	Moonstone Business School of Excellence (Pty) Ltd	Higher Certificate in Wealth Management (SAQA 83346 recorded against 66611)	120	One year	RFP™
		Sanlam Distribution Academy	Higher Certificate in Wealth Management (SAQA 57608 recorded against 66611)	120	One year	RFP™

Note: Experience requirements can be achieved within one (1) – see'mentoring professional of tomorrow'.

Source: FPI

Appendix B – FPI Learning Pathway



FPI APPROVED EDUCATION PROVIDERS













Source: FPI

Appendix C – Key role players in financial services sector

ROLE PLAYERS

The role players in developing qualifications in the financial services sector as it relates to financial planning and financial advice.

TIMELINE

1991 - FSB

Financial Services Planning Board (FPSB) was established in 1991 based on recommendations by the Van der Horst Committee

1980 - ILPA

The Financial Planning Institute of Southern Africa (FPI) initially started out as the Institute of Life and Pension Advisors (ILPA)

2000 - FPI

ILPA changed its name to the Financial Planning Institute of Southern Africa (FPI) during March 2000

1995 - SAQA

The South African Qualifications Authority (SAQA) was established in 1995 via the SAOA Act

2004 - FPSB

In the early 2000s the CFP Board agreed to create a new entity to set global standards for financial planning and administer CFP® certification internationally. Financial Planning Standards Board (FPSB) began in 2004

2000 - INSETA

Insurance Sector Education Training Authority (INSETA) is one of the SETAs that was established via the Skills Development Act

Appendix D – Acronyms

Acronym	Description
А ГР ^{ТМ}	ASSOCIATE FINANCIAL PLANNER™
CEP	Community of Expert Practitioners
CFP®	CERTIFIED FINANCIAL PLANNER®
DOFA	Date of First Appointment
ETQA	Education and Training Quality Assurer
FAIS	Financial Advisory and Intermediary Services
FPI	Financial Planning Institute
FPSB	Financial Planning Standards Boards
FSA™	FINANCIAL SERVICES ADVISOR™
FSB	Financial Services Board
FSP	Financial Services Provider
HEQSF	Higher Education Qualification Sub-Framework
KI	Key Individual
NLRD	National Learners' Records Database
NQF	National Qualifications Framework
OQSF	Occupational Qualification Sub-Framework
RFP™	REGISTERED FINANCIAL PLANNER™
SAQA	South African Qualifications Authority
SETA	Sector Education and Training Authority

Appendix E – Glossary

Access

Opportunity to pursue education and training, including relevant qualifications and part-qualifications, for all prospective learners

Credit accumulation and transfer (CAT)

An arrangement whereby the diverse features of both credit accumulation and credit transfer are combined to facilitate lifelong learning and access to the workplace

Integration

An approach to education and training in which relevant components of the education and training system are not isolated, but rather relate to each other to enhance learner access to the system, progression within the system, and lifelong learning

Learning pathway

The sequencing of qualifications that allows learners to move vertically, diagonally and, in some cases, horizontally, through NQF levels, giving learners recognition for full or partially completed qualifications or part-qualifications

National Qualifications Framework

The comprehensive system, approved by the Minister: HET, for the classification, coordination, registration, and publication of articulated and quality-assured national qualifications and part-qualifications. The South African NQF is a single integrated system comprising three co-ordinated qualifications Sub-Frameworks for: General and Further Education and Training; Higher Education; and Trades and Occupations

NQF level10

One of the series of levels of learning achievement arranged in ascending order from one to 10 according to which the NQF is organised and to which qualification types are linked

Portability

The transfer of learning from one context to another

Progression

The means by which individuals are permitted to move through NQF levels by accumulating appropriate combinations of credits

Professional designation

A title or status conferred by a professional body in recognition of a person's expertise and/or right to practise in an occupational field

Recognition of Prior Learning (RPL)

The principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development

Sub-Framework

The three integrated sub-frameworks managed by three quality councils:

- The Occupational Qualifications Sub-Framework (OQSF) managed by the
 Quality Council for Trades and Occupations (QCTO);
- The Higher Education Qualifications Sub-Framework (HEQSF) managed by the Council for Higher Education (CHE); and
- The General and Further Education Qualifications Sub-Framework (GFETQSF)
 managed by Umalusi.

 $^{^{10}}$ Higher Education: Level 5 - 10; General and further Education and training: Level 1-4; Trades and Occupations: Level 1 - 8



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