

# COMPLIANCE UPDATE

August, 2021

## IN THIS EDITION OF THE COMPLIANCE UPDATE .....

- **NewCo/NLG News**
  - Admin Staff
  - Podium & Lender logins
  - Upload documents at submission to lender
  - Broker Conduct
  - Credit Guies – uploaded to Podium

## NEWCO/NLG NEWS

### Broker Admin Staff

#### Admin Staff

Admin Staff are an important component to the smooth operations of a brokers business. It is important to remember that Admin Staff are ***not allow to under any circumstances engage in credit activities or provide credit assistance.***

Admin Staff who engage in credit activities or credit assistance without being appropriately qualified or authorised would be in breach of the NCCP Act.

If a client is questioned and they indicate that the only person they deal with was a member of your Admin Staff and they believe that it was the staff member who engaged in credit activities and provided credit assistance then the Admin Staff member will be in breach.

**This is not only a breach of the NCCP Act, it will also be a breach of the NewCo or National Lending Group Australian Credit Licence.**

In addition to the above, not only is provision of the SOCA and its contents in question, as noted above, if a loan application is submitted to a lender without your authorisation by a Admin Staff member this means unauthorised credit assistance has been provided it will most likely result in a breach of the Lender agreement with Choice which would lead to your accreditation will be terminated.

***Please ensure at all times staff engagement with clients is purely on an administrative basis and at your direction.***

### Podium and Lender Logins

#### Podium Logins

We would like to remind Brokers of your obligation ***not share your Podium Logins with a 3<sup>rd</sup> party including Admin Staff.*** It is important that client data be secure at all time and that unauthorised access is not allowed.

If you have Admin Staff who require access to Podium please let us know so we can arrange individual logins, the cost per login is a one off \$181.50.

If you have Admin Staff who no longer work for you, their logins must be terminated, if this is the case, please email [brokersupport@nlg.com.au](mailto:brokersupport@nlg.com.au) so we can make the logins inactive.

### **Lender Logins**

Many Lender accreditations come with logins to the Lender portal which will allow you to track the application, as per the previous, you are not allowed to share your Lender logins with Admin Staff, if you do, you may be in breach of your accreditation obligations with the Lender and Choice. Some Lender (eg. CBA) have the ability to issue Admin Logins.

***We urge you to review your internal processes to ensure at all times your login details are secure and are not being used by anyone else.***

**Attachment:  
Business Practices – Involving Staff in Credit Activities – including passwords and software access  
Business Practices – Credit Activity or Not?**

## **Upload document at Submission to Lender**

In May, 2019 we requested all brokers upload all documents to Podium when applications are at the “Submission to Lender” stage in the application process, the client file in Podium was then to be finalised no later than 2 weeks after settlement. The request was made to assist us with answering lender questions, and to assist brokers with their workload so as not to be overwhelmed with finalising files at settlement.

***We once again would like to reiterate that we require all documents (received to date) to be uploaded to Podium at Submission to Lender and then for the whole file to be finalised no later than 2 weeks after settlement.***

A recent review of applications in Podium revealed that some settled deals still did not have documents uploaded, even though they settled months ago. We remind you that this requirement is for ALL applications (Residential Loans, Personal Loans, Car Loans, & Commercial Loans), you are covered under our PI Insurance which means we must be able to access all files and Podium is our chosen medium.

The industry is changing rapidly and we need to have access to this information so that when called upon for a file review or a 3<sup>rd</sup> party the information is available.

## **Broker Conduct**

Earlier this year we had cause to raise an issue regarding the conduct of brokers with external parties. We would like to again remind you that it is important that your conduct should be professional and business like at all times, conduct does not go unnoticed by industry participants, this includes:

- Interactions with Choice Aggregation Services;
- Choice Commissions Team;
- QED Staff
- Lenders, BDM's and Assessors; and
- NewCo/NLG staff members

Please ensure your engagement is courteous and professional at all times.

## **Credit Guides uploaded to Podium**

We have commenced validating QED Self Assessments and it appears that some brokers are forgetting to upload a copy of the Credit Guide to Podium.

Please remember we require a copy of the Credit Guide given to your client on file. One of the easiest ways to avoid duplication of this task is to email the Credit Guide to the client from within Podium, that way a copy of the email and the Credit Guide will be recorded in Podium.

In addition to the above, please ensure the **latest copy** of your Credit Guide is given to clients, we have found on some occasions that Credit Guides over 12 months old are being provided to clients.