

# Financial Advice File Reviews

ASIC  
RegTech Symposium

August 22nd 2019

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## About Advice RegTech

- 1 Award winning RegTech specialist
- 2 Founding member of the RegTech Association
- 3 Domain expertise - Committed founders with deep industry experience in Australia & globally
- 4 Scalable, integrated 'compliance tech', not limited to SoAs

Advice RegTech is at the forefront of regulatory compliance tech for the financial advice sector



## Solution - SAMI

Subjective Analytics Monitoring Intelligence

Automated assistance for  
financial advice file reviews



Improving the **efficiency** and **effectiveness** of compliance,  
supporting experts to **scale** their expertise, **quality** and  
**consistency** with machine learning RegTech

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## SAMI - Principles

Transparent

**Verifiable,**  
Not hidden  
from auditors  
behind a  
'black box'

Trackable

**Look  
through,**  
drill-down to  
the input and  
outputs

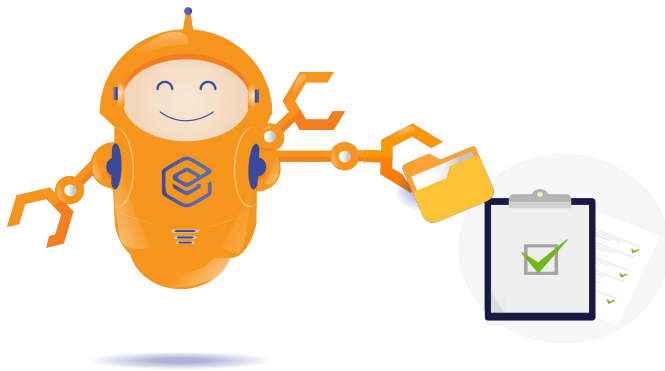
Concious  
Design Thinking

**Continuous  
tracking**  
And audit logs  
of permission-  
based  
overrides

**Current &  
compliant**  
with privacy  
and capture  
regulatory  
obligations

**Fit for  
purpose,**  
initial and  
ongoing to  
mitigate bias,  
unintended  
consequences

## SAMI - Methodology



**By design,  
SAMI is a fusion solution**  
combining  
automated capability,  
supporting  
human judgement

# How SAMI works - fusion solution

combining automated capability, supporting human judgement

Prepares

Bulk load documents



Classifies documents

- SoA
- Fact Find
- FSG
- Risk Profile
- File Notes
- Other relevant documents for advice file review

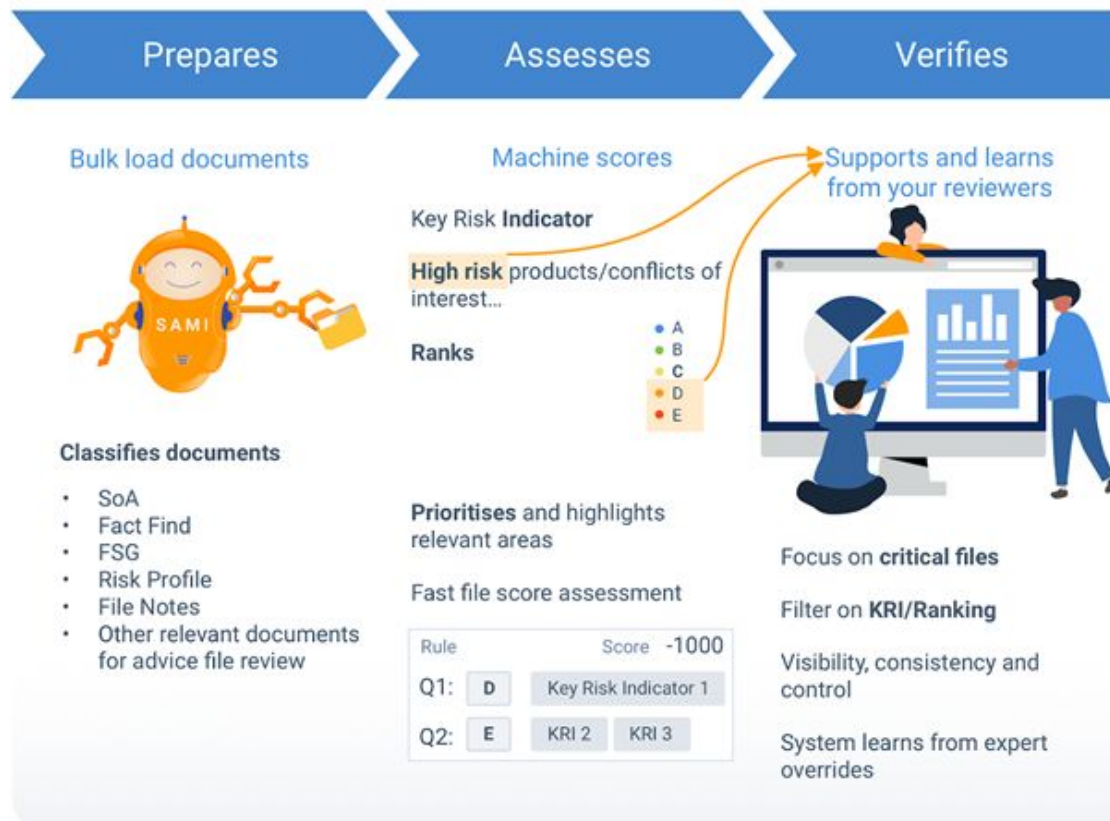
# How SAMI works - fusion solution

combining automated capability, supporting human judgement



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# ASIC File Outcomes

Results, Insights, Successes, Challenges:

- ID and extract key info
  - Analyse client files, indicate risk factors, advice quality, value & usefulness
  - Features and functionality for key metrics and support of file assessments
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- DEMO of SAMI

## Key Risk Indicators identified across the files

Risk issues aggregated and detailed across the files for:

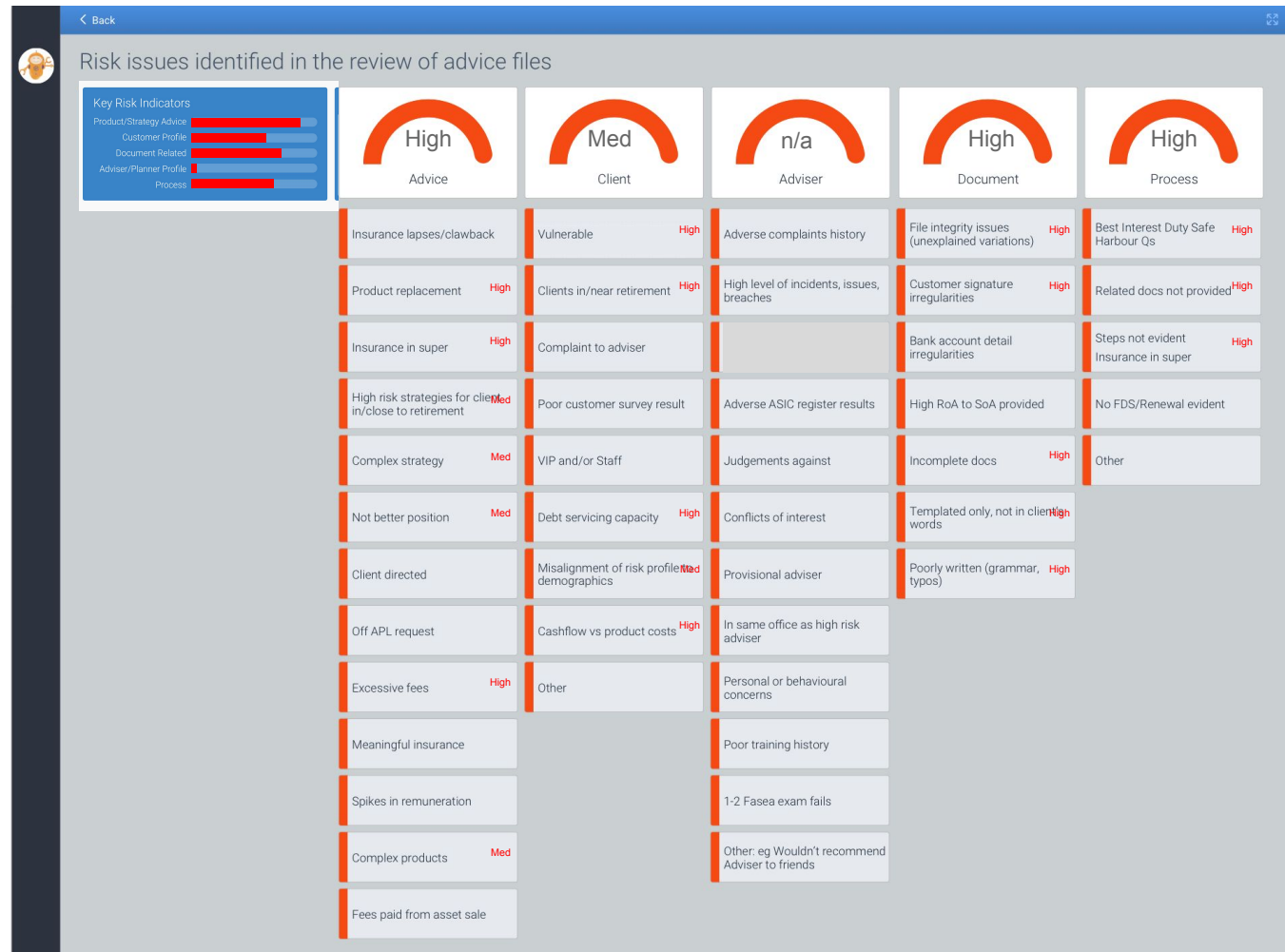
Product/Strategy related risks

Customer profile related risks

Adviser/Planner profile risks

Document related risks

Process related risks



## Insights - Advice RegTech's SAMI

Successes	<ul style="list-style-type: none"> <li>• Advice RegTech's SAMI can successfully parse information from a variety of file types including .doc, .docx and .pdf files</li> <li>• SAMI's fast configuration functionality enables pilots and production-ready usage</li> <li>• SAMI can identify and extract key info from configured templates across SOAs, Fact Finds, Risk Profiles, FSGs, File Notes etc as relevant for advice file reviews</li> <li>• Key risk indicators at the question-set rule level enables effective aggregation at the aggregated 'helicopter' risk oversight level for systemic risk identification and for proactive, pre-emptive decision making to mitigate / manage risks.</li> <li>• Identifies category of strategy / recommendations, common and specific for the client's objectives, and where a strategy is not linked with objectives</li> <li>• Transparent 'fusion' approach of Advice RegTech with in-built human override/control functionality (i.e. not being an auto black-box tick-only proposition) supports efficacy and adoption.</li> </ul>
Insights	<ul style="list-style-type: none"> <li>• Sentiment analysis on the content of SoAs not that valuable for assessing the quality of advice files</li> </ul>
Challenges	<ul style="list-style-type: none"> <li>• Text processImages and pie chart legends can present readability challenges</li> <li>• Handwriting conversion can be challenging</li> </ul>

## 1. Advice RegTech SAMI identifies and extracts key info

ASIC outcome sought	SAMI Features & Functionality
1. Where investment recommendations made, types of financial products or asset classes	<ul style="list-style-type: none"> <li>IDs and extracts recommendations, products &amp; alternatives</li> <li>IDs, extracts and compares target asset class mix with risk profile categorisation and parameters.</li> </ul>
2. Client's goals and objectives	<ul style="list-style-type: none"> <li>IDs and categorises goals</li> <li>Captures priority of goals</li> <li>Checks if goals are quantified</li> </ul>
3. Asset values, income, financial returns	<ul style="list-style-type: none"> <li>IDs and extracts client profile information such as assets, income</li> <li>IDs and extracts asset values, returns and projection comparisons</li> </ul>
4. Cost of advice	<ul style="list-style-type: none"> <li>IDs and extracts upfront cost</li> <li>Ongoing cost</li> <li>Calculates fee as % net assets</li> </ul>

## 2. Advice RegTech SAMI analyses client files, indicates risk factors, advice quality, value & usefulness

ASIC outcome	SAMI Features & Functionality
1. Risk factors indicated	<ul style="list-style-type: none"> <li>• Risks tagged and identified as per Report 515</li> <li>• Specific risks linked to each compliance question, reported at file level and aggregated for systemic trend insights</li> </ul>
2. Advice quality, value and usefulness	<ul style="list-style-type: none"> <li>• Rules and logic uses key information extracted from client files to assess advice quality, value and usefulness Eg match of client circumstances, goals &amp; recommendations; fee extracts and comparisons; impact of insurance premiums on super balance projections.</li> </ul>

### 3. Advice RegTech SAMI Key Features & Functionality

ASIC outcome	SAMI Features & Functionality
1. Realised or projected financial returns/benefits from taking up advice	<ul style="list-style-type: none"> <li>• Highlights key data and content from table, charts, images</li> <li>• Supports identification of 'better off' net position</li> <li>• Supports identification of quantifiable net benefits of implementing the advice</li> </ul>
2. ID whether the client's goals and objectives were met.	<ul style="list-style-type: none"> <li>• Goals and objectives identified and categorised</li> <li>• Supports assessment of whether goals and objectives addressed by advice recommendations</li> <li>• Supports assessment of whether the product recommendations are based on the strategy</li> <li>• Supports assessment of whether the recommended strategies are linked to the client's objectives.</li> </ul>

### 3. Advice RegTech SAMI Key Features & Functionality continued

ASIC outcome	SAMI Features & Functionality
3. Cost of advice	<ul style="list-style-type: none"> <li>IDs and extracts upfront fees; Ongoing fees; % of net assets</li> <li>Supports assessment and comparison within and across docs</li> </ul>
4. Insurance and superannuation considerations	<ul style="list-style-type: none"> <li>Insurance affordability - related to impact on funding source - superannuation balance value / cashflow</li> <li>Supports assessment of whether switching to new products is justified - basis, risks, cost comparison</li> <li>IDs and extracts alternative products</li> </ul>
5. Templated vs non-templated text	<ul style="list-style-type: none"> <li>IDs whether SOAs contain required warnings and disclaimers, or where there are gaps</li> <li>IDs whether templated information is relevant to the advice - i.e. where required to be linked to a strategy</li> <li>IDs whether to-be-inserted references have been removed prior to finalisation of SoA</li> </ul>

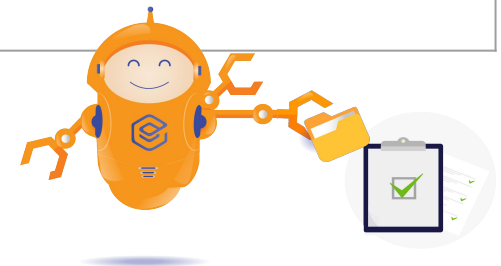


### 3. Advice RegTech SAMI Key Features & Functionality continued

ASIC outcome	SAMI Features & Functionality
6. Document length and linguistic complexity	<ul style="list-style-type: none"> <li>• Parses relevant files for document full length viewability, search and relevant section identification</li> <li>• Enables source file view inclusive of images, tables, charts</li> <li>• IDs and assesses sentiment of content</li> </ul>
7. Advisers' basis or reasoning for a product recommendation	<ul style="list-style-type: none"> <li>• IDs and extracts text segments for the basis / reasons linked to specific recommendations</li> <li>• IDs and extracts client goals, product types and alternatives</li> </ul>
8. Consistency in asset classes, financial products, client objectives and themes across documents	<ul style="list-style-type: none"> <li>• Identifies themes and categories covered by a set of documents or a specific client to calculate the similarity or difference between the content of each document</li> <li>• Eg compares / contrasts the Fact Find and SOA for client circumstances such as age, salary/wages, assets, dependents, health etc</li> <li>• Eg compares / contrasts the Risk Profile and SOA content for Risk Profile categorisation for appropriateness of asset mix.</li> </ul>

## Demo capability on Client Files

<b>Lebron Jones</b> (Template A)	<ul style="list-style-type: none"> <li>• IDs fee errors</li> <li>• Incorrect calculations</li> <li>• Inconsistencies in/across docs</li> <li>• Extracts information for review</li> </ul>
<b>Roves</b> (Template B)	<ul style="list-style-type: none"> <li>• IDs missing signatures</li> <li>• IDs missing information eg alternatives</li> <li>• IDs incorrect risk profile, extracts for review</li> </ul>



# SAMI Demo



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**More  
info**



For more information, please contact  
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