

24 April 2026

OSCA 2027 Update Consultation
Australian Bureau of Statistics
occupation@abs.gov.au

Dear Sir/Madam

Occupation Standard Classification for Australia (OSCA) 2027 update – FAAA response ID ANON-N7C4-29MT-8

The Financial Advice Association Australia (FAAA)¹ welcomes the opportunity to provide input into the Australian Bureau of Statistics (ABS) OSCA 2027 Update Consultation.

We welcome the change from the ANZSCO to the OSCA in 2024, which included an update to the occupation of ‘financial adviser’ (2121) to more closely reflect the current legal requirements to practice in the profession. We would encourage all government departments to adopt the OSCA as soon as possible to ensure consistency in the data sets that inform policy decisions.

However, we have the following concerns about the current OSCA occupations of ‘financial adviser’ (2121) and ‘financial adviser’ (212131). The descriptions for these occupations do not:

- separately identify different types of financial advisers that can be licenced under the Corporations Act, or
- accurately describe the skill level for financial advisers to be legally licensed.

Different types of ‘financial advisers’

There are two main types of financial advisers under the Corporations Act that are legally permitted to use the title ‘financial adviser’ under s923A of the Act. However, there are significantly different qualification standards and licensing obligations set under the law to be permitted to practice for each type of ‘financial adviser’. These two types are as follows:

- Financial advisers licensed/authorised to provide personal financial product advice to retail clients.
- Financial advisers licensed/authorised to provide financial product advice to wholesale clients.

The Corporations Act and Regulations define a set of criteria under which a client can be assessed as a wholesale client, relating to the scale of their investment, their level of income and/or net assets and whether they are sophisticated or not.

Very different obligations apply in terms of the education standard and the regulatory requirements that these two types of advisers must meet in the provision of financial advice. Financial advisers, who are authorised to provide personal financial product advice to retail clients, need to provide disclosure documents (Financial Services Guide, Statement of Advice, Product Disclosure Statement), comply with the Best Interests Duty, comply with a Code of Ethics, avoid the receipt of conflicted

¹ The Financial Advice Association of Australia (FAAA) is the largest association representing the financial advice profession in Australia, with over 10,000 members. FAAA advocates for the interests of financial advisers and their clients across the country.

remuneration and be a member of the Australian Financial Complaints Authority (AFCA). None of these obligations apply to financial advisers who only provide advice to wholesale clients.

The education and professional standards for these two types of advisers are described at a high level in the following table.

| Type of 'financial adviser' (2121) | Minimum education standard | Other professional standards |
|---------------------------------------|---|--|
| 'retail client financial adviser' | <p>s921B Corporations Act</p> <ul style="list-style-type: none"> complete a bachelor or higher degree, or equivalent qualification, approved by the Minister. <p>s921BB Corporations Act</p> <ul style="list-style-type: none"> if the person also provides tax (financial) advice services, additional minimum practice requirements set by the Minister are a course (unit of study) in both commercial and taxation law at AQF5 level or higher. | <p>s921B Corporations Act</p> <ul style="list-style-type: none"> Pass the financial adviser exam (administered by ASIC). Complete legislated professional year, including training (set by Minister). Meet Continuing Professional Development (CPD) requirements (set by the Minister). Comply with Financial Advisers Code of Ethics (set by the Minister). Subject to disciplinary action under the Financial Services and Credit Panel (administered by ASIC). <p>Other Corporations Act Obligations</p> <ul style="list-style-type: none"> Be registered on ASIC's Financial Adviser Register (FAR) as a relevant provider that meets all the professional standards and is authorised by an AFS licensee if the person also provides tax (financial) advice services, be registered with ASIC as a Qualified Tax Relevant Provider (QTRP) or register with the TPB. |
| 'wholesale client financial advisers' | <p>Comply with ASIC Regulatory Guide 146:</p> <ul style="list-style-type: none"> "broadly equivalent to the AQF 5 Diploma level". <p>Tax Agent Services Regulations - Schedule 2</p> <ul style="list-style-type: none"> if the person also provides tax (financial) advice services, additional minimum TPB registration requirements². | <p>Not applicable unless:</p> <ul style="list-style-type: none"> registered with the Tax Practitioners Board (TPB) to provide tax (financial) advice services must comply with the TPB Code of Professional Conduct. <p>Other Corporations Act Obligations</p> <ul style="list-style-type: none"> Authorised by an AFS licensee. |

ASIC *Regulatory Guide 146 - Licensing: Training of financial product advisers*, has not been updated since the introduction of the *Corporations Amendment (Professional Standards of Financial Advisers) Act 2017* in 2017. Training requirements equivalent to AQF level 5 set in RG146 continue to apply to 'wholesale client financial advisers'; whereas 'retail client financial advisers' must meet the minimum bachelor degree (AQF 7), higher or equivalent standard under s921B of the Act.

As there are significant difference in the provisions in the law for minimum education and ongoing professional standards/regulatory obligations between 'retail client financial advisers' and 'wholesale client only financial advisers', ensuring this difference is appropriately and separately identified

² [Qualifications and experience to provide tax \(financial\) advice services | Tax Practitioners Board](#)

through different types of 'financial advisers' in the OSCA is critical to ensuring the accuracy of data sets that rely on the occupation classifications.

Implications of the current OSCA occupations

'Retail client financial advisers' must be registered on the ASIC FAR to legally be permitted to provide financial advice to retail clients. This provides a clear and unequivocal data set, based on the legal requirements for practice. As the ASIC FAR is a publicly available register, the number of 'retail client financial advisers' is well known. 'Wholesale client financial advisers' are not included on the ASIC FAR and their details are not publicly available. The current financial adviser occupations under 2121 and 212131 evidently capture both types of 'financial adviser' providing an inaccurate picture of the state of the market.

The methodology used by government agencies and other organisations, including job advertising sites, if relying on the current 'financial adviser' occupations under 2121 and 212131 would not differentiate between these two types of 'financial adviser'. This risks confusion and inaccurate data used for informing critical government policy decisions. For example, as at 12 March 2026, there were 15,135 'retail client financial advisers' registered on the ASIC FAR, down from ~28,900 advisers registered at the start of 2019.³ This provides clear data, collected under the legal registration obligations, that shows a 48% reduction of 'retail client financial advisers' in Australia in less than eight years, at a time of strong consumer demand and an ageing population. Inadvertently capturing 'wholesale client financial advisers' through methodologies reliant on the OSCA, taints this data and contradicts the clear evidence of the ASIC register.

FAAA Recommendation

The FAAA recommends the OSCA be amended to separately include the two main types of financial advisers under the Corporations Act that are legally permitted to use the title 'financial adviser' under s923A of the Act, represented by the following occupations:

- 'financial adviser' – 2121
- 'retail client financial adviser' – 212131
- 'wholesale client financial adviser' – 212132

Description of skill level for 'financial advisers' (2121)

The OSCA occupation 'financial adviser' (2121) currently includes:

- Skill Level 1: Bachelor Degree, higher qualification, or at least five years of relevant experience

'Financial adviser' (212131) does not include any additional clarification regarding the skill level for the occupation.

³ <https://wealthdata.com.au/> cited 12 March 2026

FAAA Recommendation

The FAAA recommends the skill level information be updated to reflect the legal requirements set out in the table above for the following occupations:

- 'financial adviser' (2121) – summary that encompasses both types of 'financial adviser'. This should be kept at skill level 1
- 'retail client financial adviser' (212131) – skill level 1: Bachelor Degree or higher qualification
- 'wholesale client financial adviser' (212132) – skill level 2: Diploma or higher qualification.

We would welcome the opportunity to work with the ABS to determine the appropriate wording for the three occupations of 'financial adviser', and to discuss the feedback provided in our submission in more detail. If you have any questions, please contact me on phil.anderson@faaa.au or 02 9220 4500.

Yours sincerely,



Phil Anderson
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