

## **BACKGROUND NOTE ON ACTION PLANS**

SMO Action Plans are developed by IFAC Members and Associates to demonstrate fulfillment of IFAC Statements of Membership Obligations (SMOs). SMOs require IFAC Members and Associates to support the adoption<sup>1</sup> and implementation<sup>2</sup> of international standards and other pronouncements issued by independent standard-setting boards under the auspices of IFAC as well as by the International Accounting Standards Board (IASB); and to establish a Quality Assurance (QA) review and Investigation and Disciplinary (I&D) systems.

IFAC Members and Associates conduct a self-assessment against the requirements of SMOs and identify areas where improvements are needed. Based on the results of the assessment, Members and Associates develop an SMO Action Plan to (a) demonstrate how they fulfill the requirements of the SMOs and (b) where some requirements are not yet addressed, to present plans towards their fulfillment.

SMO Action Plans are designed to be ever-green documents that provide a comprehensive description of the accountancy profession and its legislative and regulatory environment in the jurisdiction as well as the actions undertaken by IFAC Members or Associates to support adoption and implementation of international standards and best practices.

Regular updates of the SMO Action Plans are required as part of the IFAC Member Compliance Program.

### **Use of Information**

Please refer to the Disclaimer published on the IFAC Member Compliance Program website.

## **ACTION PLAN**

<b>IFAC Member:</b>	Chartered Institute of Management Accountants (CIMA)
<b>Approved by Governing Body:</b>	Executive Director, Governance and Professional Standards, CIMA
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<sup>1</sup> *Adoption* is concerned with the decision that international standards are appropriate for use in specific national financial reporting environments and with the actions necessary to effect those decisions, including incorporation into national requirements or requiring the use of international standards through law. Adoption may include a process to review draft international standards, translation, public exposure of proposed standards, approval, incorporation into national requirements as necessary, and promulgation of final standards, and, where applicable, a convergence process to eliminate or minimize differences between international and national standards.

<sup>2</sup> *Implementation* may include a process to build awareness of the adopted standards, provide relevant education and training, develop or disseminate implementation guidance and any other activities that promote proper understanding and use of the standards in practice.

## **GLOSSARY**

<b>AGM</b>	Annual General Meeting
<b>AICPA</b>	American Institute of Certified Public Accountants
<b>CGMA</b>	Chartered Global Management Accountant
<b>CIMA</b>	Chartered Institute of Management Accountants
<b>CPD</b>	CIMA Professional Development
<b>CPD</b>	CIMA Professional Development
<b>EDCOM</b>	European Institute for Commercial Communications Education
<b>EU</b>	European Union
<b>FEE</b>	The Fédération des Experts Comptables Européens
<b>FRC</b>	Financial Reporting Council
<b>HMRC</b>	Her Majesty's Revenue and Customs
<b>IAASB</b>	International Auditing and Assurance Standards Board
<b>IASs</b>	International Accounting Standards
<b>IESs</b>	International Education Standards
<b>IESBAs</b>	International Ethics Standards Board for Accountants
<b>IFAC</b>	International Federation of Accountants
<b>IFRSs</b>	International Financial Reporting Standards
<b>PC</b>	Personal Computer
<b>SMOs</b>	Statement of Member Obligations
<b>SMPs</b>	Small to Medium Practices
<b>SMT</b>	Senior Management Team
<b>TOPCIMA</b>	Test of Professional Competence in Management Accounting

**Action Plan Subject:** SMO 1–Quality Assurance  
**Action Plan Objective:** As a non-audit body, to highlight CIMA’s commitment to Quality Assurance in relation to its Members in Practice licensing and monitoring scheme.

**Background:**

The online [Licensing Platform](#) reinforces CIMA’s licensing regime and ensures confidence in the high standards of regulatory compliance and professional competence of CIMA members in practice. This is demonstrated through best practice and regulation in the public interest.

Since August 2012 a new [Quality Assurance](#) scheme has been in place involving quality checking mandatory requirement documents. Its purpose is to ensure compliance with the [Member in Practice rules](#) to ensure that members are meeting CIMA’s and IFAC’s quality checking criteria. Following a post pilot review the process and guidelines were amended and have since been embedded into the regulatory and compliance framework.

CIMA have continued to highlight the importance of Quality Assurance, both through the revised Monitoring scheme and through continued work on the value of [Professionalism](#) which places an emphasis on the importance of maintaining professional standards through regulation and compliance.

For more information on the support CIMA provides for Members in Practice please visit the [Members Handbook](#).

#	Start Date	Actions	Completion Date	Responsibility	Resources
<i>Improvements to Process</i>					
1.	January 2013	An audit was carried out on members who had started but not completed all the stages of the online licensing platform and those that appeared as potentially in breach of the regulations were contacted. This was carried out as a one-off initiative but there is a scoping exercise underway to explore the possibility of conducting this on an annual basis in a less resource intensive way.	June 2013	Director of Professional Standards & Conduct	Professional Standards Team
2.	February 2013	CIMA member appointed on FEE SMP Forum.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team

#	Start Date	Actions	Completion Date	Responsibility	Resources
3.	July 2013	A robust content review of the Members Handbook was completed, using analytics data showing site usage and webpage statistics, in order to ensure improved content, navigation and accessibility. This also gave CIMA's Charter, Bylaws and regulations greater prominence and visibility to the membership.	September 2013	Director of Professional Standards & Conduct	Professional Standards Team
4.	January 2014	Development of a downloadable and printable <a href="#">leaflet</a> , promoting the benefits and outlining regulatory responsibilities for current and incoming Members in Practice.	July 2014	Director of Professional Standards & Conduct	Professional Standards Team
5.	February 2014	Following the pilot scheme, a revised Quality Assurance scheme has been adopted with compliance checks carried out annually.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team, Professional Standards Committee, Member in Practice Management Panel, Chairman of the Practising Certificate Assessor Panel
<i>Maintaining Ongoing Processes</i>					
6.	Ongoing	Communicating Anti Money laundering compliance and disseminating information from the Treasury, National Crime Agency and the Home Office to members through articles and web guidance.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team
7.	Ongoing	Member of HMRCs Agent Strategy Group advising on the development of the online Tax filing system, with a view to deliver a fit for purpose tool that meets the needs of Tax agents.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team
8.	Ongoing	Attendance at anti-money laundering supervisors forum to maintain involvement in regulatory and best practice issues.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team

#	Start Date	Actions	Completion Date	Responsibility	Resources
9.	Ongoing	Disseminate information from the IFAC <a href="#">Small and Medium Practices Committee</a> to Members in Practice.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team
10.	Ongoing	Upgrades to internal database and website carried out regularly to improve user experience and regular testing undertaken for Quality Assurance.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team, Operational Delivery Team
11.	Ongoing	<a href="#">CPD resources</a> made available to members and output based scheme adopted and monitored.	Ongoing	Director of Professional Standards & Conduct	Professional Standards Team
<i>Review of CIMA's Compliance Information</i>					
12.	Ongoing	Carry out periodic reviews of compliance with spirit of SMO in relation to quality assurance of Member in Practice licensing and monitoring process.  Inform IFAC Compliance team of any updates to facilitate publication of revised details.	Annually	Director of Professional Standards & Conduct	Professional Standards Team

**Action Plan Subject:** SMO 2–International Education Standards for Professional Accountants and Other Pronouncements Issued by the IAESB

**Action Plan Objective:** To increase student opportunity to sit final examinations using technology enabled methods. To ensure members understand and embrace the CPD requirements for their personal and ongoing professional development.

**Background:**

CIMA is committed to providing students with greater flexibility in successfully progressing through their examinations. As a global organization we need to ensure that we can offer consistent student support for all papers in all markets.

[CIMA Professional Development](#) is the continuing professional development scheme for CIMA members. It is designed primarily to help CIMA members and their employers fulfil their career aspirations and enjoy the benefits of their development activities. It is an output based scheme and is applicable to all members. Unlike input based schemes - where there is a requirement to count hours or units – CIMA’s CPD allows members to focus on learning activities that directly relate to their role and future career aspirations.

CIMA has reviewed the revised IESs, and we believe that CIMA’s approach to the content, assessment and practical experience requirements meets (and in some cases exceeds) the standards required.

#	Start Date	Actions	Completion Date	Responsibility	Resources
<i>IES 6 Assessment of Prof Capabilities and Competence</i>					
1.	July 2009	Online Support added for students, including regular blogs posts, from students and staff. Additional discussion groups solely for students, including specific areas for various papers added to <a href="#">CIMAsphere</a> .	Ongoing	Director, Learning Directorate	Learning Directorate
2.	March 2010	The T4 Part B Case Study examination offered four times a year.  <a href="#">Four Part B Case Studies</a> now provided every year, as part of exam service delivery to students.  Guidance and support for students updated to reflect changes, including example question papers, model answers and post exam guides. This has been further expanded to include all professional papers. At the moment, all papers other than T4 part B case study are offered on a resit basis only, and in certain key markets (please see item 10 below).	Ongoing	Director, Learning Directorate	Learning Directorate

#	Start Date	Actions	Completion Date	Responsibility	Resources
<i>IES 7 CPD – Requirement</i>					
3.	January 2006	All members must follow the <a href="#">CIMA Professional Development</a> cycle which requires not only record keeping, but clear justification of the CPD undertaken.  CIMA CPD requirements communicated to all members via email, magazine articles, letters and workshops/presentations, website and via personal contact by CIMA staff.	Ongoing	Head of Professional Development Products & Services	Learning Directorate Staff
4.	January 2006	Resources to support lifelong learning communicated to CIMA members on an ongoing basis via email, website, magazine articles, CPD resource guide, social media, workshops/presentations and personal contact by CIMA staff.	Ongoing	Head of Professional Development Products & Services	Learning Directorate Staff
5.	January 2010	Business Source Corporate – an e-library resource providing access to over 3,000 full text business and academic journals and 200+ eBooks - made available to all members free of charge.	Ongoing	Head of Professional Development Products & Services	Learning Directorate Staff
6.	January 2010	Harvard Manage Mentor – a business skills e-learning resource covering 42 topics – made available to all members free of charge.	Ongoing	Head of Professional Development Products & Services	Learning Directorate Staff
7.	March 2010	<a href="#">CPD Planner</a> – Online Personal Development tool for self-assessment, to help members plan, analyse, assess and record CPD activities.	Ongoing	Head of Professional Development Products & Services	Learning Directorate Staff
8.	November 2014	CPD animation developed to communicate CIMA's CPD requirements to all members.	Ongoing	Head of Professional Development Products & Services	Learning Directorate Staff

#	Start Date	Actions	Completion Date	Responsibility	Resources
9.	April 2014	CGMA competency framework - designed to help management accountants and their employers understand the knowledge requirements and assess the skills needed for both current and desired roles. The framework is underpinned by the need for objectivity, integrity, and ethical behavior, and includes a commitment to continuously acquire new skills and knowledge.	Ongoing	Executive Director of Education	Joint Venture Project Team
10.	January 2015	Underpinned by the CGMA competency framework, a professional development tool to support the lifelong learning of management accountants will be launched in January 2015.	Ongoing	Head of Professional Development Products & Services	Joint Venture Project Team
<b>Maintaining Ongoing Processes</b>					
11.	2009	<p>A review of all examination processes has been ongoing since 2009 focusing on the opportunity to adopt technology driven solutions to improve efficiency and customer service. In addition to the introduction of the additional exam sessions (detailed in 10 below) there have been a number of other significant process improvements. The key process improvements include:</p> <ul style="list-style-type: none"> <li>• In October 2012, CIMA's Certificate of Business Accounting (CBA) assessments were migrated from the existing provider to Pearson VUE. Doing so significantly increased the geographical reach of the CBA exams, together with offering more modern exams.</li> <li>• Exam marks by question are now routinely issued on examination results statements.</li> <li>• New assessment products have been developed, offering qualifications in the Russian language and in Arabic.</li> </ul>	Ongoing	Director, Examinations	Education Directorate Staff



#	Start Date	Actions	Completion Date	Responsibility	Resources
12.	2010	An additional session of examinations on PC for all three strategic level papers and on paper for papers P1 & P2 was introduced in Sept 2010. A UK re-sit facility was included only for the purpose of the pilot. Due to the success of the pilot, this was extended to include papers E2 and F2 in the March 2011 examination session, and finally to include all papers (E1 and F1) at the September 2011 examination session. This will continue into 2012 and beyond. All ten professional papers are available for re-sitting at selected centres in the UK, Sri Lanka and the Republic of Ireland. (T4 Part B Case Study is also available for first time sittings and at a greater number of exam centres). There are plans to extend this pilot further to include more markets.	Pilot – September 2011 – Now Fully Operational	Director, Examinations	Education Directorate Staff
13.	January 2015	CIMA has developed a revised syllabus for first assessment in 2015. This has been designed following comprehensive global research with a significant number of different organisations. A competency framework has been developed which shows the skills, abilities and competencies that finance professionals require to drive the success of their organisations. This revised syllabus is based on this CGMA competency framework, which comprises four key areas: technical skills, business skills, people skills and leadership skills. This competency framework provides the foundation for CIMA's 2015 syllabus and assessment strategy and methods. Significant changes have been made to the assessment of candidates so that there will be a move away from paper-based examinations to reflect the wider use of technology, both in education and in the workplace. The structure, type, technology and frequency of assessments have changed. A two-tier structure has been introduced, comprising objective tests for each of the nine subjects, and an integrated case study exam at each of the three levels. Both types of assessments are computer-based, and can be taken on demand (for objective tests) and four times per year (for the integrated case study exams).  The focus for tuition partners moved towards ensuring students are competent in the tasks they need to perform in	Ongoing	Assessment – Director, Examinations  Syllabus Head of Syllabus Development  Learning Support – Director of Learning	Education Directorate Staff

#	Start Date	Actions	Completion Date	Responsibility	Resources
		<p>the work place, in addition to having the technical knowledge. Student and tutor support and advise is ongoing to ensure the necessary changes in teaching and learning are in place.</p> <p>Further details on the 2015 CIMA Professional Qualification Syllabus can be found at: <a href="http://www.cimaglobal.com/2015-syllabus/">http://www.cimaglobal.com/2015-syllabus/</a></p>			
<i>Review of Organisation's Compliance Information</i>					
14.	Ongoing	<p>In accordance with the regulations, CIMA Members are required to undertake CPD and must maintain a record, whether or not they are requested for information in one particular year.</p> <p>Annual monitoring cycle runs from October – September; reporting to and review by Panel of CPD assessors and Professional Standards Committee.</p>	Ongoing Mandatory Requirement	Director, Professional Standards & Conduct	Professional Standards Team

**Action Plan Subject:** SMO 3—International Standards and other Pronouncements Issued by the IAASB  
**Action Plan Objective:** To notify CIMA Members of all International Standards, related Practice Statements and other papers issued by the IAASB.

<b>Background:</b>					
CIMA, as a non-audit body, aims to highlight key pronouncements of the IAASB to the extent that they might impact on the work of our members.					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Innovation in Discussion &amp; Debate</i>					
1.	Ongoing	Monthly summary of financial reporting news in online journal <a href="#">“Insight”</a> contains information about relevant pronouncements.	Ongoing	Technical Committee (Oversight)	Education Directorate
2.	Ongoing	Ad hoc specific articles in the online journal <a href="#">‘Insight’</a> and the CIMA magazine <a href="#">‘Financial Management’</a> .	Ongoing	Technical Committee (Oversight)	Education Directorate
3.	Ongoing	<a href="#">CIMAsphere</a> (online communities) – report on and provide discussion facilities on relevant issues.	Ongoing	Technical Committee (Oversight)	Education Directorate
<i>Review of Organisation’s Compliance Information</i>					
4.		CIMA complies with the requirements of the UK Financial Reporting Council.	Ongoing	Technical Committee (Oversight)	Education Directorate

**Action Plan Subject:** SMO 4–IESBA Code of Ethics for Professional Accountants  
**Action Plan Objective:** To ensure members and registered student are fully aware of the provisions of the IFAC Code of Ethics; and, to facilitate and support their compliance with them.

<b>Background:</b>					
<p>The CIMA code of Ethics is based primarily on the IESBA code - which CIMA adopted in 2005, applied from 2006 and revised in 2010, with further changes coming into effect in 2015. CIMA’s code has been widely publicised to both members and students to reflect its status at the core of CIMA’s strategic positioning. CIMA members and students are engaged in ongoing and lively debates around ethics. CIMA encourages a two way conversation to ensure its messaging in support of the code is received, as well as observed and relayed to others within the organisation.</p> <p>For more information about ethics at CIMA, please visit: <a href="http://www.cimaglobal.com/ethics">www.cimaglobal.com/ethics</a>.</p>					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Adopting the IFAC Code of Ethics</i>					
1.	January 2015	Promotion of Code of Ethics, with feedback from key stakeholders encouraged using social network sites, CIMA publications, and ethics events and social media outputs.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
<i>Promoting and Applying the CIMA Code of Ethics to Members and Students</i>					
2.	Current	Regularly consult the IFAC website and review communications to keep up to date on any ongoing regulatory or compliance work.	Ongoing	Professional Standards Support Manager	Governance & Professional Standards Directorate
3.	Current	All <a href="#">resources</a> and outputs relevant to ethics made available to members and students online and are regularly updated to ensure ongoing relevance.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
4.	Current	<a href="#">Thought leadership</a> outputs produced in partnership with external organizations such as a report produced with the <a href="#">Institute of Business Ethics</a> with globally relevant content, distributed via online media, website, e-magazines and CIMA’s Financial Management magazine. This includes but is not exclusive to a report.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate

#	Start Date	Actions	Completion Date	Responsibility	Resource
5.	July 2010	Ongoing communication of importance of UK Bribery Act and related anti-corruption legislation and initiatives. Member/Student support on Bribery Act and guidance produced in various formats and some in partnership with other organisations. <a href="http://www.cimaglobal.com/bribery">www.cimaglobal.com/bribery</a>	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
6.	December 2011	<a href="#">Animation</a> to position code and refer to ethics micro-site.	April 2012	Head of Ethics	Governance & Professional Standards Directorate
7.	2012	Online ethics CPD resource published.	July 2012	Head of Ethics	Governance & Professional Standards Directorate
8.	2013	Ethics CPD e-learning tool: interactive ethical dilemma tool available. <a href="http://www.cimaglobal.com/ethicstool">www.cimaglobal.com/ethicstool</a>	August 2013	Head of Ethics	Governance & Professional Standards Directorate
9.	October 2013	Animation: are you acting ethically? <a href="http://www.cimaglobal.com/newsreel">www.cimaglobal.com/newsreel</a>	January 2014	Head of Ethics	Governance & Professional Standards Directorate
10.	September 2013	Student ethics support tool: interactive e-learning tool which provides an overview of the CIMA code of ethics, the importance of ethics in the workplace, and how ethical considerations may appear in CIMA exams. <a href="http://www.cimaglobal.com/studentethicstool">www.cimaglobal.com/studentethicstool</a>	March 2014	Head of Ethics	Governance & Professional Standards Directorate
<i>Ethics Support Services</i>					
11.	Current	<a href="#">Ethics support</a> in place, including an ethics helpline, UK & European Legal advice line (incl. whistle blowing law), global guidance line alongside a number of other support services.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
12.	Current	<a href="#">Guidance</a> on resolving ethical conflicts on ethics micro-site, including an ethics checklist, and in institute newsletters and magazines.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate

<b>#</b>	<b>Start Date</b>	<b>Actions</b>	<b>Completion Date</b>	<b>Responsibility</b>	<b>Resource</b>
13.	Current	CPD and research /roundtable events (globally) with related press and platforming such as regular surveys of members and students to understand needs.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
14.	Current	<a href="#">Publications, Webcasts and Video</a> including global research on ethics and management accountants with AICPA.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
15.	Current	<a href="#">Case studies and ethics tools</a> revised and made available to members, students and tutors online and via publications.	Ongoing	Head of Ethics	Governance & Professional Standards Directorate
<i>Review of Organisations' Compliance Information</i>					
16.	Current	Review of IFAC Code of Ethics as changed to ensure compatibility of CIMA Code of Ethics.	Ongoing	Professional Standards Committee	Governance & Professional Standards Directorate

**Action Plan Subject:** SMO 5–International Public Sector Accounting Standards and Other Pronouncements Issued by the IPSASB  
**Action Plan Objective:** To facilitate CIMA engagement with issues raised via IPSAS and other guidance issued by the Public Sector Committee (PSC) of IFAC.

<b>Background:</b>					
<p>The UK public sector applies accounting guidance which is broadly consistent with IPSAS though accounts are produced using International Financial Reporting Standards as adopted by the EU. IPSAS, which are relied on where they address issues not covered by the IFRS or IAS, or where they offer guidance on interpretations for the public sector context.</p> <p>This action plan is designed to facilitate CIMA’s contribution to the development of the profession (non audit related) in the international public sector arena through the articulation and dissemination of best practice; and to help address the accounting needs of public sector entities by facilitating an ongoing dialogue and debate.</p>					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Maintaining Ongoing Processes</i>					
1.	Ongoing	Monthly summary of financial reporting news in online journal “ <a href="#">Insight</a> ” contains information about new and amended public sector standards.	Ongoing	Technical Committee (Oversight)	Marketing Directorate
2.	Ongoing	Ad hoc specific articles in the online journal ‘ <a href="#">Insight</a> ’ and the CIMA magazine ‘ <a href="#">Financial Management</a> ’.	Ongoing	Technical Committee (Oversight)	Marketing Directorate
3.	Ongoing	<a href="#">CIMAsphere</a> (online communities) – report on and provide discussion facilities on new public sector reporting issues.	Ongoing	Technical Committee (Oversight)	Marketing Directorate
4.	Ongoing	Extensive work with the UK public sector to embed performance management and finance professionalism.	Ongoing	Technical Committee (Oversight)	Marketing Directorate
<i>Review of Organisation’s Compliance Information</i>					
5.	Ongoing	CIMA complies with the requirements of the UK Financial Reporting Council.	Ongoing	Technical Committee	Marketing Directorate

**Action Plan Subject:** SMO 6—Investigation and Discipline  
**Action Plan Objective:** To continue to use CIMA’s best endeavours to facilitate compliance with the requirements of IFAC SMO 6 towards the maintenance of high professional standards and an effective conduct regime.

<b>Background:</b>					
<p>CIMA is committed to a regulatory system which is open and accountable, with procedures and processes which are fair, timely and effective, and demonstrably so to stakeholders worldwide. We ensure that CIMA's conduct processes are effective in dealing with complaints of professional misconduct, in the interests of the public and all stakeholders, we are dedicated to advancing our regulatory system in line with best practice developments, innovating appropriately without any compromise to transparent decision making.</p> <p>CIMA has reviewed the revised SMO 6 (2012) requirements. CIMA’s I&amp;D system fulfills all of the main SMO 6 requirements. See comparison table following the below plan.</p>					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Incorporation of SMO / Regulatory Recommendations in CIMA Constitution &amp; Rules</i>					
1.	Ongoing	Review and modify byelaws and regulations in accordance with regulators’ recommendations and best practice (Professional Standards Committee, Council and/or Membership at AGM).	AGM Annually in June - Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
<i>Review &amp; Maintain CIMA’s Investigation &amp; Disciplinary Processes in line with SMO 6</i>					
2.	Ongoing	<u>Misconduct:</u> Byelaw provision revised 2009, 2010, 2011, and 2012. Under further review 2014-2015.	AGM Annually-in June - Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
3.	Ongoing	<u>Sanctions:</u> Sanctions available to independent Investigation Committee and Disciplinary Committee – regulation revised 2009 / 2011.  Consent Order process enhanced 2009 and 2011.  Continue monitoring of sanctions imposed by conduct committees, ref: fairness, proportionality and consistency of decision making.	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team



#	Start Date	Actions	Completion Date	Responsibility	Resource
4.	Ongoing	<p><b>Provision of Information &amp; Guidance to Members:</b> Ongoing regular review of conduct related content on CIMA website; augmenting information and guidance on disciplinary processes and protocols to secure greater transparency and accessibility.</p> <p>Full review of relevant web pages in 2014.</p>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
5.	Ongoing	<p>Conduct committee procedures and indicative sanctions guidance posted on website which includes:</p> <ul style="list-style-type: none"> <li>• <a href="#">Information for CIMA respondents - members and registered students;</a></li> <li>• <a href="#">CIMA conduct committees guidance notes and rules;</a></li> <li>• <a href="#">Public hearing and upheld decisions details added to the website regularly.</a></li> </ul>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
6.	Ongoing	<p><b>Liaison with External &amp; Regulatory Authorities:</b> Maintain liaison and information exchange with regulatory bodies and other external authorities during the course of conduct work.</p> <p>Revise regulations to reflect changes in the wider regulatory environment in which CIMA operates and in direct response to recommendations of national/International regulators.</p> <p>2011 Byelaw amendment further facilitated the investigation of cases raising public interest issues - extending timeline for involvement by the relevant independent oversight body (FRC).</p> <p>2011 regulatory change confirmed CIMA's practice that the Investigation Committee sits with a panel comprising more than half lay members, in line with the Disciplinary Committee and Appeal Committee.</p> <p>2011 regulatory clarification confirmed the practice that Disciplinary Committee hearings are public unless in exceptional circumstances.</p>	<p>Ongoing</p> <p>Ongoing</p>	Governance & Professional Standards Directorate	Professional Conduct Team

#	Start Date	Actions	Completion Date	Responsibility	Resource
		2012 Byelaw revisions provide for CIMA's adherence to the processes of the current Article 4 (d) public interest organisation by (i) adding to the definition of "complaint", (ii) explicitly stating that an expulsion recommendation by the Article 4 (d) public interest organisation will result in termination of CIMA membership and (iii) the same for registered student cancellations.			
7.	Ongoing	<p>Revise regulations to reflect changes in the wider regulatory environment in which CIMA operates and in direct response to recommendations of national/International regulators.</p> <p>2011 Byelaw amendment further facilitated the investigation of cases raising public interest issues -extending timeline for AADB involvement.</p> <p>2011 regulatory change confirmed CIMA's practice that the Investigation Committee sits with a panel comprising more than half lay members, in line with the Disciplinary Committee and Appeal Committee.</p> <p>2011 regulatory clarification confirmed the practice that Disciplinary Committee hearings are public unless in exceptional circumstances.</p> <p>2012 Byelaw revisions provide for CIMA's adherence to the processes of the current Article 4 (d) public interest organisation by (i) adding to the definition of "complaint", (ii) explicitly stating that an expulsion recommendation by the Article 4 (d) public interest organisation will result in termination of CIMA membership and (iii) the same for registered student cancellations.</p>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
8.	Ongoing	<p><b>Initiation of Proceedings:</b> Maintain complaints based approach as primary driver of proceedings in line with current regulations. CIMA also raises complaints.</p>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team

#	Start Date	Actions	Completion Date	Responsibility	Resource
9.	Ongoing	<p><b>Investigative Powers &amp; Processes:</b> Maintain adherence to relevant provisions of the Royal Charter and Byelaws to ensure ongoing cooperation with external organisations in respect of public interest issues, and require cooperation from members and registered students in the investigation of complaints.</p> <p>Maintain appropriate expertise plus adequate financial and other resources to ensure effective and efficient management of the conduct process.</p>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
10.	Ongoing	<p><b><u>Disciplinary Process:</u></b> Continue to improve clarity of existing process, for example by revisions to regulations and procedures and by making information available to stakeholders.</p> <p>Maintain rolling program of conduct committee members face to face training, and revisions to reference document made in 2013.</p>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
11.	Ongoing	<p><b>Rights of Representation &amp; Appeal:</b> Continue to ensure relevant regulations and procedures are maintained which permit respondents' rights of representation at Disciplinary Committee hearings and rights of appeal to the Appeal Committee.</p>	Ongoing	Governance & Professional Standards Directorate	Professional Conduct Team
	2009	Regulatory provision formalising the existing practice of suspending sanctions against respondents who appeal.	2009	Governance & Professional Standards Directorate	Professional Conduct Team

#	Start Date	Actions	Completion Date	Responsibility	Resource
12.	Ongoing	<p><b>Administrative Process:</b> Continue to apply benchmarking measures to CIMA case management process (systematic monitoring of case handling and progression over a phased 9 month period). Additional benchmarking measure introduced 2012.</p> <p>Continue to produce regular benchmark reports tracking case progression; continue to review progress &amp; exceptions.</p> <p>Review benchmarking trends and criteria annually to ensure ongoing efficiency of process.</p> <p>Continue to provide regular statistical reports to CIMA committees and Council.</p> <p>Continue to apply confidentiality measures appropriate to conduct process and in relation to the handling, recording and use of conduct data.</p>	Ongoing	Professional Conduct Department	Professional Conduct Team
<i>Review of CIMA's Compliance Information</i>					
13.	Ongoing	Perform periodic review of CIMA's response to the IFAC Compliance Self-Assessment questionnaires; update sections relevant to SMO 6 as necessary.	Annually	Governance & Professional Standards Directorate	Professional Conduct Team

**Main Requirements of SMO 6**

Requirements	Y	N	Partially	Comments
<b>Scope of the System</b>				See answers generally below.
1. A system of investigation, discipline and appeals exists for the accountancy profession. The system is operational.	Y			
2. Information about the types of misconduct which may bring about investigative actions is publicly	Y			For example on our website: <a href="http://www.cimaglobal.com/Professional-">http://www.cimaglobal.com/Professional-</a>

Requirements	Y	N	Partially	Comments
available.				<a href="#">ethics/Conduct/What-is-misconduct/Examples-of-misconduct/</a>
<b>Initiation of Proceedings</b> 3. Both a “complaints-based” and an “information-based” approach are adopted.	Y			A complaint may be made for example by a member of the public, or by the Institute where information is received as to a concern about a CIMA member.
4. Link with the results of QA reviews has been established.	Y			If documentation submitted during the QA process does not reach the standard required, the first step is remediation. In the event that this fails, or that documentation is not submitted at all, disciplinary proceedings are possible.
<b>Investigative Process</b> 5. A committee or similar body exists for performing investigations.	Y			The Investigation Committee considers complaints and determines whether there is a prima facie case to answer, and if so whether to refer a case to the Disciplinary Committee. While there is no formal investigation activity prior to the IC, with the more cogent evidence gathering beginning post referral to the DC, in reaching its determination the IC may require the Institute to obtain further information or undertake inquiries on its behalf.
6. Members of a committee are independent of the subject of the investigation and other related parties.	Y			Committee members are independently appointed and may not be members of CIMA's governance structure. Conflict checks are also undertaken in relation to each case which is considered.
<b>Disciplinary Process</b> 7. A separate disciplinary committee/entity exists to make disciplinary decisions on referrals from the investigation committee.	Y			It is the role of the Disciplinary Committee to decide whether a complaint which has been referred to it is upheld and if so what sanction (if any) should be applied.
8. Members of the committee/entity include professional accountants as well as non-accountants.	Y			Each panel which hears a case comprises a lay chair, a further lay member and a member of the profession.

<b>Requirements</b>	<b>Y</b>	<b>N</b>	<b>Partially</b>	<b>Comments</b>
9. The tribunal exhibits independence of the subject of the investigation and other related parties.	<b>Y</b>			Committee members are independently appointed and may not be members of CIMA's Council. Conflict checks are also undertaken in relation to each case which is considered.
<b>Sanctions</b> 10. The disciplinary system allows imposing an extensive range of penalties. It is particularly important to include (a) loss of professional designation; (b) restriction and removal of practicing rights; and (c) exclusion from membership.	<b>Y</b>			The DC may admonish, reprimand or severely reprimand a member. It may also cancel the registration of a member in practice and order his practicing certificate to be withdrawn.  The DC may in addition impose a fine on a respondent, order his suspension from membership, or expel him from membership. It may also make a respondent's membership subject to conditions.  In relation to registered students, the DC may cancel their registration or make it subject to conditions.
<b>Rights of Representation and Appeal</b> 11. A third appeals body exists which is separate from both the disciplinary committee and investigative committee.	<b>Y</b>			The Appeal Committee considers whether a complaint has been properly heard and whether the rules of natural justice and relevant principles of human rights have been observed.  The AC comprises different members from those on the IC and DC.
<b>Administrative Processes</b> 12. Timeframe targets for disposal of all cases are set.	<b>Y</b>			Targets are in place for disposal of cases at both IC and DC stage.
13. Tracking mechanisms to monitor progress in investigation and discipline and related procedures are established.	<b>Y</b>			New complaints are logged and their progress through the system is monitored regularly and recorded on a tracker used to record all cases being dealt with by the Professional conduct team.
14. Records of investigations and disciplinary processes are established.	<b>Y</b>			Correspondence, decisions of committees, transcripts of meetings and hearings are held in both electronic folders and hard copy folders.

Requirements	Y	N	Partially	Comments
<b>Public Interest Considerations</b>				
15. Activities are supported to ensure that the public is aware that an investigative and disciplinary system exists in the jurisdiction.	Y			Full information on the conduct process is available via the CIMAGlobal website.
16. A process for the independent review of complaints on which there was no follow-up is established.				CIMA has regarded it as adequate up to now for staff to monitor the work of the IC (without having power to overturn any IC decision). Parties also have recourse to the Financial Reporting Council though they do not have appellate authority. The provisions of the SMO in this respect have however been noted and will be borne in mind when considering future enhancements to the process.
17. The results of the investigative and disciplinary proceedings are made available to the public.	Y			Decisions made are posted on the website and printed in the Journal.  A new publication policy is in place which provides for fuller information on decisions to be made available on the website, and for a greater length of time.
<b>Liaison with Outside Bodies</b>				
18. There is an appropriate process for liaison with outside bodies on possible involvement in serious crimes and offences.	Y			Although we are not aware of any situation which has arisen during the course of conduct proceedings which required a notification to, for example, the police, we would give such notification if it did arise. We also provide information where a subject access request is made by the police.  Published conduct decisions are circulated to other accountancy bodies, and CIMA's Charter article 4(d) explicitly provides for cooperation with other bodies in the public interest and in respect of public interest cases/ matters.

Requirements	Y	N	Partially	Comments
<p><b>Regular Review of Implementation and Effectiveness</b></p> <p>19. Regular review of implementation and effectiveness of the system are performed and corrective actions are implemented.</p>	Y			<p>Reviews can and do take place in a number of ways.</p> <p>The system as a whole is under continuous review for improvement by staff to ensure that processes remain up to date and in line with good practice.</p> <p>The conduct process is also reviewed formally under the authority of CIMA's Professional Standards Committee and those it invites to assist - including independent externals and regulatory representatives.</p> <p>External oversight bodies such as the Financial Reporting Council and <i>Irish Auditing and Accounting Supervisory Authority</i> also scrutinize processes and the FRC may review particular cases.</p>



**Action Plan Subject:** SMO 7–International Financial Reporting Standards and Other Pronouncements issued by the IASB  
**Action Plan Objective:** To ensure maximum compliance by CIMA with SMO 7.

<b>Background:</b>					
CIMA, as a non-audit body, aims to highlight awareness of the IFRS regulatory environment to its members and students particularly those management accountants working in multinational firms; and, to facilitate discussion and debate around the content and requirements of key IFRS along with other commonly encountered issues.					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Maintaining Ongoing Processes</i>					
1.	Ongoing	SM07 All IFRSs are logged on the CIMA website.  Material standards are reported through articles in the online journal ' <a href="#">Insight</a> ' and the CIMA magazine ' <a href="#">Financial Management</a> '. A monthly Reporting round up is also published in 'Insight'.	Ongoing	Technical Committee (Oversight)	Brand, Profile & Marketing Directorate
2.	Ongoing	CIMA's Financial Reporting Development Panel consists of a number of senior preparers of corporate reports who meet as required to discuss relevant corporate reporting issues including IASB and IIRC proposals.	Ongoing	Technical Committee (Oversight)	Brand, Profile & Marketing Directorate
3.	Ongoing	<a href="#">CIMAsphere</a> (online communities) – report on and provide discussion facilities on new corporate reporting issues.	Ongoing	Technical Committee (Oversight)	Brand, Profile & Marketing Directorate
<i>Review of Organisation's Compliance Information</i>					
4.		CIMA complies with the requirements of the UK Financial Reporting Council.	Ongoing	Technical Committee	Brand, Profile & Marketing Directorate