

Mr David McPeak  
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International Federation of Accountants  
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Dear Mr McPeak

**Comments on Proposed Revised International Education Standard IES 4,  
Professional Values, Ethics, and Attitudes**

Chartered Accountants Ireland welcomes the opportunity to comment on the proposed changes to IES 4. This matter was considered by the Institute's Education Training and Lifelong Learning Board recently.

In overall terms we commend the IAESB for the proposed revision which we believe reflects the aims of the new *Framework* and the desire to apply the envisaged "clarity" approach.

In terms of the questions raised we have a number of comments as follows:

**Question 1: Is the proposed requirement for reflective activity in relation to ethics education appropriate?**

The requirement to document and to reflect on the lessons from ethical dilemmas in the workplace or in the classroom is welcomed. However the proposed standard does not consider any issues of confidentiality and the challenges that the inclusion of such a record in a training diary might create.

**Question 2: Does this requirement raise implementation issues?**

The key issue as noted under Question 1 is the issue of confidentiality given that any record may be open to inspection by a professional body or potentially a regulator.

**Question 3: Is the objective to be achieved by a member body, stated in the proposed revised IES 4, appropriate?**

The stated objective in Paragraph 6 is clear.

**Question 4: Have the criteria identified by the IAESB for determining whether a requirement should be specified been applied appropriately and consistently, such that the resulting requirements promote consistency in implementation by member bodies?**

The proposed revised standard does meet the identified criteria.

**Question 5: Are there any terms within the proposed IES 4 which require further clarification? If so, please explain the nature of the deficiencies.**

Based on our review of the proposed standard we have a number of relatively minor areas where additional clarification could be provided:

- In Paragraph 10 the use of the verb “compare” is questioned as the learning outcome does not indicate what this should be compared to. It is suggested that the verb “explain” or equivalent might be used.
- In relation to Paragraph 11 the matter of maintenance of confidentiality should be stated.
- In Paragraph A7 it states that “Learning and development may address (a) particular issues faced by all professional accountants, and also (b) those ethical issues more likely to be encountered by professional accountants in the workplace”. It is suggested that additional wording might be added (to item (b)) which clarifies that this is in reference to those members interacting with capital markets.
- In paragraph A8 it indicates a desire to distinguish between ethical education and the development of an appropriate ethical environment. This does not distinguish who is responsible for the latter and what actions or responsibilities are expected. Some additional clarification would assist this.
- In Paragraph A15 reference is made to “a variety of approaches”, presumably the list in Paragraph A14 addresses what is envisaged. A cross reference to this would clarify expectations.
- The term “critical incident diary” is not explained nor are the expectations around who might have access to this.

We trust that these comments are helpful to you. Should you require any additional clarification or information on this please feel free to contact us.

Kind regards

Yours sincerely



Ronan O'Loughlin  
Director of Education and Training  
On behalf of Chartered Accountants Ireland Education Training and Lifelong Learning Board