



7 September 2015

Mr David McPeak
Technical Manager
International Accounting Education Standards Board
International Federation of Accountants
545 Fifth Avenue
14th Floor New York, New York 10017
USA

Dear David,

ICAEW welcomes the opportunity to comment on the Guiding Principles for Implementing a Learning Outcomes Approach as proposed by the IAESB.

ICAEW is a world leading professional membership organisation that promotes, develops and supports over 144,000 chartered accountants worldwide. We provide qualifications and professional development, share our knowledge, insight and technical expertise, and protect the quality and integrity of the accountancy and finance profession.

As leaders in accountancy, finance and business our members have the knowledge, skills and commitment to maintain the highest professional standards and integrity. Together we contribute to the success of individuals, organisations, communities and economies around the world.

ICAEW members operate across a wide range of areas in business, practice and the public sector. They provide financial expertise and guidance based on the highest professional, technical and ethical standards. They are trained to provide clarity and apply rigour, and so help create long-term sustainable economic value.

If you would like to discuss this response in more detail, please do not hesitate to contact Jonathan Jones, Head of Policy and Strategy, Learning and Professional Development, on jonathan.jones@icaew.com or +44 (0) 1908 248 292.

Yours sincerely,

Mark Protherough
Executive Director, Learning and Professional Development

The IAESB seeks comments in response to the following questions:

1. What is your view on the Guiding Principles? Specifically, are they helpful in providing a guide for implementing an effective learning outcomes approach?

Yes, the Guiding Principles are helpful and valuable in highlighting the goals and objectives a professional accountant should achieve. We agree that a learning outcomes approach does serve the public interest by enhancing the development of competence of professional accountants.

While the Guiding Principles may be a useful source of guidance, they may not be particularly beneficial for our organisation, as for many years ICAEW has had a learning outcomes framework firmly embedded within our qualification and CPD programmes and believe such an approach is necessary if the learning process is to have the most effective consequence or result.

ICAEW further believes that this consultation should have been held back as it is difficult to have a complete view of how the learning outcomes are set out in support of the IESs prior to the publication of the implementation guidance for IES 8.

Furthermore, the aim that the Guiding Principles have “broad applicability on a global basis” may not be appropriate for the diversity of national curriculums and may not be in line with the standards and learning outcomes approaches already administered by professional accountancy bodies.

2. How do you see the use of these Guiding Principles benefitting your organisation, or other organisations with which you are familiar?

The Guiding Principles may be a useful source of guidance for checking on or reviewing learning outcomes, but we do not see these as being particularly beneficial for our organisation, as we already have a learning outcomes framework integrated into the ACA qualification, one of the most advanced learning and professional development accountancy programmes.

However, the Guiding Principles may serve as a more useful resource and guidance for professional accountancy bodies that are in the initial stages of designing and putting in place a learning approach for their members. It may therefore be more productive for the Guiding Principles to be developed with the purpose of supporting and mentoring those member bodies which are looking to strengthen their structures and processes and develop high-quality standards, particularly in developing countries.

As suggested in response 1 above, we are concerned that some of the proposed principles may not be in line with an existing learning outcomes approach embedded within the learning programmes of certain professional accountancy bodies, and may therefore not be benefitting our organisation.

It is also noteworthy that some of the descriptions of the Guiding Principles as currently written remain too vague and broad to provide any essential framework. For example, in Table 1– Guiding Principles for a Learning Outcomes Approach, we question what is meant by “feedback on assessment activity performance is provided to individuals”. ICAEW has a process in place to verify the marking of exams and a grievance process for exam candidates however, it is not clear if such activities would constitute such feedback, and the resources to be involved in providing this feedback.

3. What additional Guiding Principles do you recommend to support the implementation of a learning outcomes approach?

As previously mentioned in the ICAEW's and GAA's responses to the IAESB strategy and work plan consultations issued in 2013 and 2014, we do not favour the development of new standards and guidelines by the IAESB, and instead suggest these new work-streams be mothballed at the moment. Therefore, we cannot recommend any additional Guiding Principles to support a learning outcomes approach.

4. What other areas of implementation guidance would you recommend be developed to support a learning outcomes approach?

We do not recommend that any other areas of implementation guidance be developed to support a learning outcomes approach.

ICAEW views these proposed Guiding Principles as non-essential work which should not be taken forward at this time. This underscores our previously expressed and reiterated view that the IAESB should not be developing further work streams or setting additional requirements for IFAC member bodies at this time.

5. Have you implemented a learning outcomes approach?

ICAEW employs a learning outcomes approach and believes such an approach is necessary if the learning process is to have the most effective result. A framework for learning outcomes is integrated into the ACA syllabus at all three levels; certificate, professional, and advanced level and within all four pillars of the qualification. The syllabus presents the learning outcomes for each of the ACA's 15 modules. The learning outcomes in each module are explained in greater detail in the technical knowledge grid and the skills development grid made available to students.

These learning outcomes are re-validated on a periodic basis. Each year the learning materials are reviewed and approved by our examiners, and provide clear guidance on the way in which the syllabus learning outcomes are tested in the exams.

In terms of assessment activities, ICAEW produces reliable evidence to show how well students have done in achieving those learning outcomes. The ACA as a whole provides for continuous feedback for the training and learning development of a student. The six month review completed by the employer when signing off on the student's practical work experience and professional development is an example of such an assessment activity.

Additionally, ICAEW has a long-standing learning outcomes approach embedded in its CPD policy. Our CPD policy focuses on the effectiveness of learning and development in maintaining and extending the professional competence of the individual rather than focussing on the amounts of time spent learning or dictating particular types of learning activity. Our approach requires a member to reflect on the whole range of their learning and development needs (from technical through commercial to interpersonal skills), judge how much CPD and of what types are required, and take the necessary steps. An impact assessment is then required to ensure the CPD has met its intended needs. The impact assessment considers whether the learning and development objectives have been met.

If yes: (a) What recommendations do you have for others yet to implement a learning outcomes approach?

Clearly stated learning outcomes help students and members understand what is expected of them and what they are required to achieve. It may initially be difficult and time-consuming for a member body to design, devise and implement a learning approach, but the returns justify the efforts. It makes it clearer to the aspiring and qualified professional accountants the competencies needed as the product of professional development. It takes the focus away from activity such as rote learning or passive course attendance and onto knowledge mastery and skills application.

(b) Please share an example(s) of your approach – including assessment activities used – which you believe may be useful to assist others implementing a learning outcomes approach.

In principle, we are happy to share our approach, and would be interested to understand more about how the IAESB is intending to use and publish the examples provided. ICAEW's syllabus and assessment criteria are its intellectual property, but can be viewed on our website. Equally, ICAEW's quick guide to CPD, also our intellectual property, is one of our resources available at the [following link](#), which may be useful to assist others implementing a learning outcomes approach.