

Association of Accounting Technician's response to the IESBA consultation on Proposed strategy and workplan, 2019-2030

The Association of Accounting Technicians (AAT) is pleased to have the opportunity to respond to this consultation.

AAT is always supportive of attempts to raise the bar on ethics in the profession and expanding adoption and implementation.

Maintaining and growing public trust are crucial if the profession is to thrive in a rapidly evolving technological and regulatory landscape, and organisations like IESBA have the potential to shape and develop the principles that will help to build that trust.

Q1: Do you agree with the proposed criteria to determine its actions and priorities over the strategy period?

AAT generally agrees with the proposed criteria but would strongly emphasise the public interest and public trust elements. In the UK, at least, there is growing concern over money laundering and the volumes of monies of dubious origins flowing into the UK system. Also, there has recently been some severe criticism of large audit firms, particularly in the wake of the collapse of the construction giant, Carillion. It is important to strive for a position whereby the public believe that accountants work in the public interest and not solely in the interest of their clients.

The timeline restraints are noted and understood although 36 months seems excessive for all but the most complex of projects. There is a danger that a lack of agility will mean large international organisations being left behind by rapid change and risking the loss of relevance. It is important to recognise that pace of change may require regular 'patching' or updates rather than wholesale re-evaluations and change.

Q2: Do you support the actions that have been identified with respect to each strategic theme? If not, please explain why.

AAT generally supports the actions identified, and has some specific comments on certain sections:

Section 46 – AAT notes that ensuring ethical conduct throughout supply chains is a key consideration. Members should not be contracting with anyone unwilling to confirm adherence to ethical principles.

Section 51 – AAT feels that this is a key issue to be addressed in terms of public trust, and acceptance of tax avoidance is fast disappearing, regardless of legality.

Q3: Recognising that this proposed SWP is ambitious, do you believe IESBA should accelerate or defer any particular stream(s)? If so, please explain why.

AAT supports the work streams as laid out but also would emphasise the need to be able to re-prioritise at short notice. This needs to be coupled with an ability to act quickly and, perhaps, with an acceptance that 100% consensus cannot always be achieved.

Q4: Do you have comments on any other matters addressed in this consultation paper or any significant matters not covered in this consultation paper that you believe the IESBA should address?

AAT believes that it is generally important for IESBA to be seen as a bold and progressive voice speaking for the public interest, and not solely in the narrow interest of the profession.

About AAT

AAT is a professional accountancy body with approximately 50,000 full and fellow members and over 90,000 student and affiliate members worldwide. Of the full and fellow members, there are more than 4,250 licensed accountants who provide accountancy and taxation services to over 400,000 British businesses.

AAT is a registered charity whose objectives are to advance public education and promote the study of the practice, theory and techniques of accountancy and the prevention of crime and promotion of the sound administration of the law.

Further information

If you have any queries, require any further information or would like to discuss any of the above points in more detail, please contact Aleem Islan, AAT Technical Consultation Manager, at:

E-mail: consultation@aat.org.uk

Telephone: 020 7397 3088

Association of Accounting Technicians, 140 Aldersgate Street, London, EC1A 4HY

