

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 adoption¹ and implementation² 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 Compliance Program website.

ACTION PLAN

IFAC Member:	Portugal–Ordem dos Contabilistas Certificados (OCC)
Approved by Governing Body:	Board
Date Approved:	December 2016
Last Update:	January 2017
Next Update:	January 2019

¹ *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.

² *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

CC	Contabilista Certificado
CDCC	Código Deontológico dos Contabilistas Certificados
CMVM	Comissão do Mercado de Valores Mobiliários
CNC	Comissão de Normalização Contabilística
CNCE	Comité de Normalização Contabilística Empresarial
CNCP	Comité de Normalização Contabilística Pública
CNSA	Conselho Nacional de Supervisão de Auditoria
CPD	Continuing professional development
EU	European Union
GAAP	Generally accepted accounting principles
IAASB	International Auditing and Assurance Standards Board
IAESB	International Accounting Education Standards Board
IASB	International Accounting Standards Board
IES	International Education Standards
IESBA	International Ethics Standards Board for Accountants
IFAC	International Federation of Accountants
IFRS	International Financial Reporting Standards
IPSAS	International Public Sector Accounting Standards
IPSASB	International Public Sector Accounting Standards Board
ISA	International Standards on Auditing
ISAE	International Standard on Assurance Engagements
ISQC	International Standard on Quality Control
OCC	Ordem dos Contabilistas Certificados
OTOC	Ordem dos Técnicos Oficiais de Contas
OROC	Ordem dos Revisores Oficiais de Contas
QA	Quality Assurance
SMO	Statements of Membership Obligations
SNC-AP	Sistema de Normalização Contabilística para as Administrações Públicas
TOC	Técnico Oficial de Contas
WG	Working Group

Action Plan Subject: SMO 1–Quality Assurance

Action Plan Objective: *OCC quality assurance review program evaluation and convergence within IFAC quality assurance standards.*

Background:

Within Portuguese jurisdiction, accountancy profession is regulated under two separate bodies: *Ordem dos Contabilistas Certificados (OCC)*, covering professional activity of preparation and signing the financial statements; and *Ordem dos Revisores Oficiais de Contas (OROC)*, covering professional activity of auditing the financial statements. Supervising body on audit activity, including assuring quality control and review systems, is *Comissão do Mercado de Valores Mobiliários (CMVM)*. ISQC 1 is applicable to Portuguese audit regulatory jurisdiction as set on law nr. 148/2015, of September 9.

OCC is the Portuguese professional accountancy body, state law created for representing and overseeing all aspects related to the accountancy regulated profession designated as Contabilista Certificado (CC). Only OCC members can be entitled as CC and within Portuguese jurisdiction, no one but a CC qualified professional accountant is allowed to present financial statements complying with the Portuguese Generally Accepted Accounting Principles (GAAP). OCC and CC designations correspond to former ones OTOC and TOC, respectively (due to professional law framework amendment issued by law nr. 139/20115 of September 7).

Although no audit, review and assurance engagements / services are provided by CC professionals As OCC statutes require, a mandatory Quality Assurance (QA) review program in place that covers all its members in practice. Applicable rules are in place since the year of 2004 (as announcement nr. 131/2004, published on Official Journal nr. 175 of July 27).

OCC ongoing QA review program sets out requirements and procedures that covers, among others, review body existence and attributions, peer review selection criteria, review manual, reviewers admittance and registration and minimum attendance hours on Continuing Professional Development (CPD) courses, those found to be in line to the scope and standards in attendance for this SMO 1. The Quality Control committee, designated by OCC Board, is responsible for conducting QA reviews.

Quality Control for OCC member accountants – general overview:

1. applicable to all accountants in practice; 2. peer review based; 3. focused on accountant resources to work and accountant work delivered; 4. guide based review process and procedures; 5. selection criteria based on yearly random selection, risk-based conditioned random selection and also complaints and alerts; 6. minimum hours compliance to CPD under OCC recognized programs; 7. disciplinary actions for observed lack of quality.

Within this SMO 1, OCC has no direct responsibility with regards to QA review of the audits of financial statements, it has; however, direct responsibility in the context of the above expressed, OCC intends primarily to achieve detailed comparison of both OCC and IFAC QA standards and requirements, for future convergence actions towards IFAC requirements.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Quality Control Standards and Guidance</i>					
1.	Ongoing	OCC quality assurance review program, evaluation and optimization.	Ongoing	Quality Control body; Board	Board and Quality Control body members, Senior technical staff
2.	4 th Q 2015	OCC quality assurance standards and requirements adaptation to new professional statute.	4 th Q 2017	Bastonária (Chief Executive)	Board and Quality Control body members Senior technical staff, Other staff, website
<i>Maintaining Ongoing Processes</i>					
3.	Ongoing	CPD courses on quality assurance standards.	Ongoing	Board	Senior technical staff, Other staff, Outsource
4.	Ongoing	Review, add, delete or replace, if necessary, online information and guidance provided for the benefit of OCC's members in practice.	Ongoing	Bastonária(Chief Executive)	Quality Control body, Staff, website
<i>Review of OCC's Compliance Information</i>					
5.	Ongoing	Complete periodic review of IFAC Compliance Self-Assessment questionnaire and update sections relevant to SMO – 1 as required. Keep IFAC Compliance staff up to date about any updated information.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff

Action Plan Subject: SMO 2–International Education Standards for Professional Accountants and Other Pronouncements Issued by the IAESB
Action Plan Objective: OCC education and CPD requirements maintenance or improvements towards IFAC education area standards.

Background:

To become a qualified accountant OCC member in Portugal, applicant must comply with prequalification requirements such as:

- Minimum three years university level business areas related course diploma, issued or recognized by Portuguese higher-education entity,
- Undergraduate or postgraduate courses units approval to meet the accounting education program contents and quantities required by OCC,
- Monitored practical experience formal process. Exempts applicable to in-work experience situation declared by CC qualified accountant and to OCC validated undergraduate or postgraduate courses units on professional accountant simulated practice,
- Prequalification completes with professional examination that accesses applicant’s knowledge on financial and management accounting, taxation, professional ethics and OCC’s Constitution and Bylaws.

In order for OCC members to remain in good standing (post qualification), it is required for them to meet continuing professional development program based upon minimum amount of hours cumulative attendance on training courses and lectures, within a two years cycle.

OCC finds it has shared responsibility for the areas covered within this SMO 2 as some IPD and practical experience requirements (such as (definition admissible area of knowledge of required higher degree courses; and maximum of 18 months to period of practical experience) are set by Portuguese framework law on public professional associations (law nr. 2/2013 of January 10) and also by OCC statutes (law nr. 139/20115 of September 7).

Within Organization, Regulatory Framework and SMO Self-Assessment Questionnaire, SMO 2 related answers, OCC self-assessed strong convergence between its education requirements and the one set through SMO 2. Due to the process of revision of the IES as published on last edition of International Education Pronouncements Handbook, OCC intends to perform a new self-assessment on the convergence between both OCC and IFAC education standards and requirements.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Improving the Continuous Professional Education and Development</i>					
6.	Ongoing	OCC education and CPD requirements, evaluation and optimization.	Ongoing	Board	Board members, Senior technical staff, Universities
7.	4 th Q 2015	OCC education standards and requirements adjustment to new professional statute.	2 nd Q 2017	Board	Board members, Senior technical staff, Outsource

#	Start Date	Actions	Completion Date	Responsibility	Resource
8.	Ongoing	Maintain OCC education and CPD requirements adherence and convergence towards SMO 2.	Ongoing	Bastonária (Chief Executive)	Senior technical staff
9.	1 st Q 2017	The participation in the international standard-setting by providing comments to the Exposure Drafts and participating in other public consultations.	Ongoing	Board	Senior technical staff
<i>Maintaining Ongoing Processes</i>					
10.	Ongoing	Review, add, delete or replace, if necessary, online information and guidance provided for the benefit of OCC's members in practice.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff, Other staff, Outsource, website
<i>Review of OCC's Compliance Information</i>					
11.	Ongoing	Complete periodic review of IFAC Compliance Self-Assessment questionnaire and update sections relevant to SMO – 2 as required. Keep IFAC Compliance staff up to date about any updated information.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff

Action Plan Subject: SMO 3—International Standards and Other Pronouncements Issued by the IAASB
Action Plan Objective: Continue to use best endeavors to support the relevant standard-setting bodies in Portugal.

Background:					
<p>Areas covered within this SMO 3 aren't applicable to OCC, as by Portuguese law no audit, review and assurance engagements / services (as set by the International Auditing and Assurance Standards Board – IAASB) are provided by CC professional accountants. Consequently, OCC has no direct responsibility for setting auditing standards in Portugal. Although with no direct responsibility, OCC support the audit and assurance standard setting bodies in Portugal, encouraging and promoting where possible adoption and ongoing convergence to the International Standards on Auditing (ISAs).</p> <p>Within Portugal jurisdiction ISA is adopted under application of European Union directive Directive 2006/43/EC (amended by Directive 2014/56/EU) and Regulation (EU) No 537/2014. Portuguese law nr. 148/2015, of September 9, which sets the framework of auditing supervision in Portugal, includes SMO 3 related standards, as the standard in use.</p> <p>For more information about the process for setting of auditing standards in Portugal, please refer to the SMO Action Plan of Portuguese IFAC member <i>Ordem dos Revisores Oficiais de Contas</i> (OROC) and to the audit standards supervisory bodies in Portugal, as <i>Comissão do Mercado de Valores Mobiliários – CMVM</i> (http://www.cmvm.pt).</p>					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Maintaining Ongoing Processes</i>					
12.	Ongoing	Continue to support the relevant standard setting bodies in Portugal, encouraging and supporting where possible ongoing convergence to the International Standards on Auditing (ISAs).	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board
<i>Review of OCC's Compliance Information</i>					
13.	Ongoing	OCC recognizes the need for it to perform periodic reviews of responses to the OCC Compliance Self-Assessment questionnaires, and to update sections relevant to each SMO. It undertakes to inform IFAC Compliance staff, insofar as resources permit, about the updates necessary to enable re-publication of updated information.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff

Action Plan Subject: SMO 4—IESBA Code of Ethics for Professional Accountants
Action Plan Objective: Ethics standards for OCC members' evaluation and convergence with IESBA Code of Ethics.

Background:

Professional ethical requirements for OCC members are set by national state law: "Código Deontológico dos Contabilistas Certificados" (CDCC), published on the official journal as appendix 2 of the Law 139/2015, of September 7. The Ministry of Finance is responsible for setting the Code of Ethics to be followed by OCC members in the course of their activities. Within this framework OCC has no direct responsibility for the areas covered in SMO 4, as establishing ethical requirements results of parliament legislative competencies.

General description of code of ethics applicable to CC professional accountants: ethical principles: determines terms and concepts as independence, conflict of interest, responsibility and competency; relates to the appliance of the GAAP; how to relate with the professional body, the professional accountants and third parties; confidentiality, fee setting, among other related issues.

While there is no specific reference to the IESBA Code of Ethics, the CDCC requirements seem to be no less stringent than those of IESBA.

Although few principles, concepts and guidance in the IESBA Code are not exactly addressed like the national ethical requirements (such as second opinions; gifts and hospitality; financial interests; and inducements), the whole set of professional framework (statue, code of ethics, related by laws) allow those specific concepts to be integrated and therefore related risks and threats also to be eliminated or safeguarded.

In essence, Portuguese CC professional accountants are required to comply with similar or equivalent principles found on 2015 Handbook of the Code of Ethics for Professional Accountants, namely Integrity, Objectivity, Professional Competence / Due Care, Confidentiality. Professional Behavior is not evidenced on the CC applicable ethical code, although this principle is sought by other Portuguese professional accounting ethics principles, mainly loyalty, equity and responsibility ones.

As IFAC full membership OCC process evolves and becomes effective, our organization would be able to open discussion on this issue with the governmental entities, in order to comprehend the needs and benefits on related law changes.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Continuous Ethical Behavior</i>					
14.	Ongoing	OCC ethical requirements, process and procedures, evaluation and optimization.	Ongoing	Bastonária (Chief Executive)	Board members, Senior technical staff

#	Start Date	Actions	Completion Date	Responsibility	Resource
15.	1 st Q 2016	Best endeavor action. Meeting arrangement with government and or parliament to present up to date information on professional accountants. IESBA Code of ethics / SMO 4 requirements to be included on meeting agenda.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive). Board members, Senior technical staff
16.	1 st Q 2017	Participation in the international standard-setting by providing comments to the Exposure Drafts and participating in other public consultations.	Ongoing	Board	Senior technical staff
<i>Maintaining Ongoing Processes</i>					
17.	Ongoing	CPD courses on OCC ethical standards and requirements and on IFAC standards.	Ongoing	Board	Senior technical staff, Other staff, Outsource, website
18.	Ongoing	Review, add, delete or replace, if necessary, online information and guidance provided for the benefit of OCC's members in practice.	Ongoing	Bastonária (Chief Executive)	Senior technical staff, Other staff
<i>Review of OCC's Compliance Information</i>					
19.	Ongoing	Complete periodic review of IFAC Compliance Self-Assessment questionnaire and update sections relevant to SMO – 4 as required. Keep IFAC Compliance staff up to date about any updated information.	1 st Q 2017	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff

Action Plan Subject: SMO 5—International Public Sector Accounting Standards and Other Pronouncements Issued by the IPSASB
Action Plan Objective: Activities to promote IPSASB standards and pronouncements.

Background:

The Government is responsible for the adoption of public sector accounting standards in Portugal. Standards changes are proposed to the Government by the Comissão de Normalização Contabilística (CNC), the independent accounting regulator, within both public and private sectors accounting standards.

CNC structure comprehends a public accounting standards committee on which OCC has a seat. Therefore OCC has shared responsibility for the areas covered within this SMO 5.

Within Portuguese jurisdiction, public sector accounting standards are applicable. Reflecting sectorial framework law change in 2015 (Decree-Law nr. 192/2015 of September 11 (amended by Decree-Law nr. 85/2016 of December 21), public sector accounting standards issued are now based on / converging to International Public Sector Accounting Standards (IPSAS). The new standards are designated as SNC-AP (Sistema de Normalização Contabilística para as Administrações Públicas) will be adopted 2016 forward, first by several pilot-project entities, then mandatory to all public entities in 2018.

The recent public accountant standards refers OCC as the partner entity for the definition of the specialized education and training to be set as minimum to qualify as an accountant within public entities.

OCC structure maintains a permanent Working Group (WG) on public accounting issues, that issues regular study papers on accounting and reporting status of several public sector entities (mainly municipalities and state owned companies), provides guidance and consultation support to OCC's representative person within CNC's public accounting standards committee and also recommends on contents of the training programs OCC provide to its members.

Within this SMO 5, OCC intends to actively participate on the process of implementation of the new public sector Portuguese GAAP based upon IPSAS.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Implementing Public Sector GAAP Based upon IPSAS</i>					
20.	1 st Q 2017	IPSASB publications and resources recommended to be attended on the qualification and CPD of the public accountant curriculum.	Ongoing	Bastonária (Chief Executive)	OCC representative on CNCP, Senior technical staff

#	Start Date	Actions	Completion Date	Responsibility	Resource
21.	1 st Q 2016	Within OCC seat on Portuguese public accounting standards committee (CNCP), issues on pilot entities first adoption of standards will be close followed.	Ongoing	Bastonária (Chief Executive)	OCC representative on CNCP, Senior technical staff
22.	1 st Q 2017	Participation in the international standard-setting by providing comments to the Exposure Drafts and participating in other public consultations.	Ongoing	Board	Senior technical staff
<i>Maintaining Ongoing Processes</i>					
23.	Ongoing	OCC participation on CNC overall actions and activities.	Ongoing	Bastonária (Chief Executive), Board	Board members, Outsource experts, Senior technical staff
24.	Ongoing	OCC public sector Working Group (WG) activities, mainly workshops, seminars and technical documentation issuing, assuring IPSAS theme approach.	Ongoing	Bastonária (Chief Executive), Board, Public sector WG	Board members; Public sector WG members, Outsource experts, Senior technical staff
25.	Ongoing	Review, add, delete or replace, if necessary, online information and guidance provided for the benefit of OCC's members in practice.	Ongoing	Bastonária (Chief Executive)	Senior technical staff, Other staff, website
<i>Review of OCC's Compliance Information</i>					
26.	Ongoing	Complete periodic review of IFAC Compliance Self-Assessment questionnaire and update sections relevant to SMO – 5 as required. Keep IFAC Compliance staff up to date about any updated information.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff

Action Plan Subject: SMO 6—Investigation and Discipline
Action Plan Objective: Continuous development of OCC Investigation and Disciplinary System.

Background:					
<p>Within SMO 6 section of IFAC Compliance Program Questionnaire, OCC self-assessed proximity between its investigation and disciplinary (I&D) system and the one set through SMO 6. Please refer to IFAC’s website published OCC answers to questionnaire on SMO 6, for systematic and summarized knowledge on current OCC investigation and discipline mechanisms: such as the existence of a dedicated discipline body, info on how violations are learnt by the body, the process and resources for investigating violations, types of sanctions, info on appealing disciplinary decisions and more. In the year of 2015, 1013 I&D cases were concluded and 1054 kept ongoing (in majority the cases relates to membership fees due).</p> <p>OCC founds it has shared responsibility for the areas covered within this SMO, as applicable requirements and procedures are state law established, although OCC is law mandated to conduct investigation and disciplinary processes through an OCC internal disciplinary body.</p> <p>In accordance with the legal requirements, OCC has established an I&D mechanism that incorporates SMO 6 requirements.</p> <p>According to the requirements of the Law 139/2015, OCC has established mechanisms for investigating and disciplining (I&D) its members for misconduct and breaches of the rules. The I&D mechanisms established by OCC incorporate the major requirements of SMO 6. OCC intends to continue to converge to IFAC investigation and disciplinary systems and standards and requirements.</p>					
#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>Comparison of Requirements SMO 6</i>					
27.	1 st Q 2016	Best endeavor action. Meeting arrangement with government and or parliament to present up to date professional info. Accountants investigation and disciplinary requirements as SMO 6 prescribed.	2 nd Q 2017	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board members, Senior technical staff
<i>Maintaining Ongoing Processes</i>					
28.	Ongoing	OCC investigation and disciplinary system, process and procedures, evaluation and optimization.	Ongoing	Bastonária (Chief Executive)	Board members, Senior technical staff
29.	Ongoing	CPD courses on OCC investigation and disciplinary systems and on difference and proximity facing IFAC standards.	Ongoing	Board	Senior technical staff, Other staff, Outsource, website

#	Start Date	Actions	Completion Date	Responsibility	Resource
30.	Ongoing	Review, add, delete or replace, if necessary, online information and guidance provided for the benefit of OCC's members in practice.	Ongoing	Bastonária (Chief Executive)	Senior technical staff, Other staff, website
31.	Ongoing	OCC as a daily newsletter and a monthly magazine with a section to inform members of I&D procedures.	Ongoing	Board	Senior technical staff, Other staff, website
<i>Review of OCC's Compliance Information</i>					
32.	Ongoing	Complete periodic review of IFAC Compliance Self-Assessment questionnaire and update sections relevant to SMO – 6 as required. Keep IFAC Compliance staff up to date about any updated information.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff

Action Plan Subject: SMO 7–International Financial Reporting Standards and Other Pronouncements issued by the IASB
Action Plan Objective: *Activities to promote IFRS standards and pronouncements.*

Background:

In accordance with the EU Regulation concerning the application of International Accounting Standards and as endorsed by the European Commission, International Financial Reporting Standards (IFRS) are mandatory for the preparation of financial statements of consolidated financial statements of listed entities. In addition, non-listed entities are permitted to apply IFRS for their consolidated financial statements.

The Government is responsible for the adoption of accounting standards in Portugal. Standards changes are proposed to the Government by CNC, the independent accounting regulator, within both public and private sectors accounting standards.

Within CNC structure, a private sector/ business accounting standards committee is established (CNCE) on which OCC seats. Therefore OCC has shared responsibility for the areas covered within this SMO 7.

Portuguese accounting standards for a private sector/ business has given the designation of SNC (Sistema de Normalização Contabilística). The standards are included within national legal framework and last amendment was issue by Decree-law Nr. 98/2015 of July 13. SNC is IFRS based. Financial reporting of banks, other financial institutions and insurance companies are set by correspondent sectorial regulators and they have to comply with IFRS as adapted by those authorities.

Within this SMO 7, OCC intends to promote IFRS standards and other pronouncements by the IASB, either through its seats representation rights on CNC, either through other actions, CPD courses, projects and representation on expert groups and forums.

#	Start Date	Actions	Completion Date	Responsibility	Resource
<i>IFRS Based Accounting Framework</i>					
33.	Ongoing	Portuguese private sector accounting standards (different frameworks applicable/available for large/medium, small and micro entities) enforcement activities and standards improvement, through OCC participation on CNC private sector / business accounting standards committee, within IFRS as endorsed by EU and EU accounting directives review process.	Ongoing	Bastonária (Chief Executive)	OCC representative on CNCE, Senior technical staff

#	Start Date	Actions	Completion Date	Responsibility	Resource
34.	1 st Q 2017	Participation in the international standard-setting by providing comments to the Exposure Drafts and participating in other public consultations.	Ongoing	Board	Senior technical staff
<i>Maintaining Ongoing Processes</i>					
35.	Ongoing	OCC participation on CNC overall actions and activities.	Ongoing	Bastonária (Chief Executive), Board	Board members, OCC representative on CNCE, Outsource experts, Senior technical staff
36.	Ongoing	OCC participation on European accounting expert groups meetings, round tables, seminars and forums, whereas IFRS, and EU IFRS adaption theme is approached and discussed.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board members, Senior technical staff
37.	Ongoing	Training on National GAAP and IFRSs for OCC members through ongoing regular CPD training activities.	Ongoing	Bastonária (Chief Executive), Board	Board , Senior technical staff, Outsource experts, Other staff, website
38.	Ongoing	Review, add, delete or replace, if necessary, online information and guidance provided for the benefit of OCC's members in practice.	Ongoing	Bastonária (Chief Executive)	Senior technical staff, Other staff, website
<i>Review of OCC's Compliance Information</i>					
39.	Ongoing	Complete periodic review of IFAC Compliance Self-Assessment questionnaire and update sections relevant to SMO – 7 as required. Keep IFAC Compliance staff up to date about any updated information.	Ongoing	Bastonária (Chief Executive)	Bastonária (Chief Executive), Board, Senior technical staff