

David McPeak  
Principal  
International Accounting Education Standards Board  
International Federation of Accountants

*28 February 2019*

Dear David McPeak

**Exposure Draft: Proposed Revisions to IESs 2, 3, 4, and 8 – Information and Communications Technologies and Professional Skepticism**

ACCA (The Association of Chartered Certified Accountants) welcomes the opportunity to comment on the above Exposure Draft. ACCA is the global body for professional accountants. We aim to offer business-relevant, first-choice qualifications to people of application, ability and ambition around the world who seek a rewarding career in accountancy, finance and management.

We support our 208,000 members and 503,000 students in 179 countries, helping them to develop successful careers in accounting and business, with the skills required by employers. We work through a network of 104 offices and centres, more than 7,300 Approved Employers worldwide, who provide high standards of employee learning and development and more than 500 Approved Learning Partners, who provide recognised quality tuition and support to our students. Through our public interest remit, we promote appropriate regulation of accounting and conduct relevant research to ensure accountancy continues to grow in reputation and influence.

ACCA is supportive of the proposed revisions to the International Education Standards outlined in the exposure draft. We are pleased to be able to contribute and ACCA's answers to the four questions put forward in the exposure draft can be found in the enclosure.

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If you have any further queries or wish to discuss our responses, please do not hesitate to contact Katrina Smyth, Head of Education Recognition, at the e-mail address [katrina.smyth@accaglobal.com](mailto:katrina.smyth@accaglobal.com).

Yours sincerely

A handwritten signature in black ink that reads 'J Bennett'. The signature is written in a cursive style with a large, stylized 'J'.

Judith Bennett  
**Director - Professional Qualifications**

Enc. 'ACCA Response to IAESB Exposure Draft; International Education Standards 2, 3, 4, and 8 - Information and Communications Technologies and Professional Skepticism'.

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## **ACCA Response to IAESB Exposure Draft; International Education Standards 2, 3, 4, and 8 - Information and Communications Technologies and Professional Skepticism**

- 1. Do you support the proposed revisions to learning outcomes related to the areas of Information Communications & Technologies (“ICT”) and Professional Skepticism provided in Appendices A, B, C, and D? If not, what changes would you suggest?**

ACCA supports the proposed revisions to learning outcomes related to the areas of ICT and Professional Scepticism; this has been well researched, consulted and clearly implemented. ACCA believes that these changes are needed to reflect the modern professional accountant's roles and responsibilities with the ever increasing availability of data and the emergence of sophisticated tools with which to use the data to support decisions. However, with these new opportunities and freedoms, accountants must exercise a high degree of responsibility and accountability, including having a sceptical mind when analysing such data and acting ethically when accessing, storing and using data, particularly personal data.

- 2. Are there additional ICT and professional skepticism learning outcomes that you would expect from aspiring and professional accountants (See Appendix E)?**

It was noted that there are a number of examples of how a candidate might develop scepticism. ACCA's own research and that of a number of other professional bodies, has identified '*engaging and hence learning from others, specifically peers*' as being a key, as such this could be included as another example.

In addition to this, in IES 2 ACCA would welcome the addition of a section regarding the use of third party suppliers and the need to evaluate levels of data security. Initial Professional Development – Technical Competence. IES 2, (f), (vi) could potentially be updated to “Assess the adequacy of systems, processes and controls for capturing, transmitting, reporting and safeguarding data and information, *including suppliers.*”

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- 3. Do you support the new definitions of Information and Communications Technologies, Intellectual Agility, and Professional Judgment added to the IAESB Glossary of Terms? If not, what changes would you suggest?**

### **Information and Communications Technologies**

ACCA supports the addition of Information and Communications Technologies to the IAESB Glossary of Terms. In addition to the verbs “*capture, manage, transform, and communicate*”, ACCA proposes “*analyse and evaluate*” also be included.

### **Intellectual Agility**

ACCA queries the addition of intellectual agility, as it is felt that this is not specific to ICT or scepticism. ACCA feel that, like the general intelligence quotient, intellectual agility, is too broad a capability to add much value. IAESB may wish to consider using the term Innovation, adaptability and open-mindedness, which are the more precise professional skills which make the most capital from new ICT opportunities and recognise both the opportunities and threats that such new technologies bring.

If it is to be added then ACCA proposes that it includes something about the way thoughts are developed so with breadth, and in a manner best suited for the situation the individual is in.

### **Professional Judgment**

ACCA agrees that professional judgement is a worthwhile addition to the IAESB Glossary of Terms, this is an important complementary professional skill when using and analysing data, which strongly links to the scepticism and ethical skills needed to manage data and data technology effectively and responsibly.

#### **ACCA**



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- 4. Are there any terms within the new and revised learning outcomes of IESs 2, 3, 4, and 8, which require further clarification (See Appendix E)? If so, please explain the nature of the changes?**

ACCA believes that the terms within the new and revised learning outcomes are clear and that the wording changes that have been made are an improvement to the existing outcomes.

