

COMMENTS ABOUT Proposed Statements of Membership Obligations (SMOs)

María de los Angeles Soberanis de Rueda-GUATEMALA

STATEMENT OF MEMBERSHIP OBLIGATIONS 1 QUALITY ASSURANCE

12. Where member bodies have no responsibility they shall use best endeavors to:
- (a) encourage those responsible for the requirements to follow this SMO in implementing them; and
 - (b) assist in the implementation where appropriate.

In these cases, I suggest to assist professionals to adopt a quality assurance code and explain to them the benefits about fulfillment of all quality standards for the prestige and recognition of the profession. Professionals and firms should be required to adhere to the local Code of Ethics, which must be based on IESBA Code of Ethics.

24. Relevant guidance on quality control standards shall be developed and published to assist firms in:
- (a) understanding the objectives of quality control; and
 - (b) implementing and maintaining appropriate systems of quality control.

I agree that to spread knowledge and detail quality control standards to firms in each country's own language and make the information available to professionals through training sessions and conferences, will promote the prompt adoption and continuous improvement of all issues related with quality.

71. The reviewed member shall provide a timely written response to the recommendations and conclusions of the quality assurance review report, including planned actions and expected time of completion or implementation.

It is very important to provide objective and timely feedback to firms reviewed, also including recommendations, to promote a confidence environment with actions focused on the continuous improvement of professional quality.

Recommendations about independence, money laundering and suspicious transactions should be strongly considered, due to changes in

the business community and the increase of risk. Adherence to Ethics Code is essential to overcome doubtful situations.

78. Actions taken as a consequence of unsatisfactory results quality assurance reviews that constitute disciplinary action shall be carried out under a disciplinary system that is established in accordance with the provisions of SMO 6 Investigation and Discipline.

It is very important to send a clear message about the importance to have respect and give recognition to the disciplinary actions, this will promote commitment to adherence to quality standards as part of the daily performance of firms and professionals.

STATEMENT OF MEMBERSHIP OBLIGATIONS 4 IESBA CODE OF ETHICS FOR PROFESSIONAL ACCOUNTANTS

13. In jurisdictions where English is not an official or widely used language, IFAC member bodies shall use best endeavors to have a process established, or otherwise support a process to provide for the timely, accurate, and complete translation of international standards¹⁵ and, to the extent practicable, of related exposure drafts.

I agree it is very important to produce a prompt version in Spanish and distribute it as soon as possible to members, also it is recommended to have a well planned approach to explain in detail the content of the IESBA Code of Ethics and facilitate responses to all member inquiries. I offer to help in the translation process, I have experience translating documents and communications from English to Spanish as member of the International Accounting and Audit Committee of AGN INTERNATIONAL.

STATEMENT OF MEMBERSHIP OBLIGATIONS 6 INVESTIGATION AND DISCIPLINE

20. Initiation of Proceedings

The body responsible for the investigation and disciplinary system shall adopt both an “information based” approach and a “complaints based” approach to investigation and discipline.

I agree with this, if the body responsible for the investigation and disciplinary system only waits for complaints, it will be very difficult to create the culture of discipline actions, because most firms or professionals won't like to get involved in a process against a colleague, but if the responsible body decides to take actions according to information available and gives the first step to get further information and call the professional of firm to communicate details about the failure and its implications, as well as encourage professionals to respect and fulfill the requirements of the Ethics Code.

