



Technology: Exploring Ethics (Including Independence) Issues

This Working Group Briefing Paper has been prepared by the IESBA Technology Working Group.

The purpose of the paper is to provide stakeholders with background information on the IESBA’s multi-workstream technology initiative. It sets out, for informational purposes only, a number of questions which the Working Group plans to explore with a broad range of stakeholders pursuant to its [charge](#) to gather views, insights and other information regarding the ethics implications for [professional accountants in business](#) and [professional accountants in public practice](#) when developing, implementing or using technology as part of their [professional activities](#).

Stakeholders interested in engaging with the Technology Working Group should contact Ms. Kam Leung, IESBA Principal, at kamleung@ethicsboard.org.

Nothing in this document amends or overrides the [International Code of Ethics for Professional Accountants \(including International Independence Standards\)](#) (the Code), the text of which alone is authoritative. This document does not constitute an authoritative or official pronouncement of the IESBA.

The IESBA is a global independent standard-setting board. Its objective is to serve the public interest by setting high-quality ethics standards for professional accountants worldwide and by facilitating the convergence of international and national ethics standards, including auditor independence requirements, through the development of a robust Code.

Contents

I.	Ethics and Technology – The Continued Relevance of the IESBA Code	2
II.	Overview of the IESBA’s Technology Initiative	2
III.	Matters Being Considered by the Working Group	5
Appendix: Summary of Recommendations from Technology Phase 1 Report		9

Technology: Exploring Ethics (Including Independence) Issues

I. Ethics and Technology – The Continued Relevance of the IESBA Code

1. Major developments in technology are having a transformative effect on the global accountancy profession in terms of the types of professional activities undertaken as well as the tools and approaches used by professional accountants when performing their work.
2. The Code's [fundamental principles](#),¹ [conceptual framework](#) and the [International Independence Standards](#)² are relevant in navigating the opportunities and challenges that professional accountants face in this transformative environment arising from the pace of change in the development, implementation and use of technology.

The Code's conceptual framework specifies the approach that all professional accountants, including auditors, are required to use to identify, evaluate and address threats to compliance with the fundamental principles and, where applicable, be independent.

3. In addition, recent revisions to the Code further emphasize the relevance of the Code's provisions in technology-related circumstances. For example, the IESBA's October 2020 Pronouncement, [Revisions to the Code to Promote the Role and Mindset Expected of Professional Accountants](#) that will come into effect as of December 31, 2021:
 - Notes that maintaining professional competence requires a continuing awareness and an understanding of relevant technical, professional, business and **technology-related developments**.³
 - Acknowledges that a professional accountant's exercise of professional or business judgment can be compromised by undue influence of, or undue reliance on, individuals, organizations, **technology** or other factors.⁴
 - Includes new guidance to highlight that conscious or unconscious bias affects the exercise of professional

judgment when identifying, evaluating and addressing threats to compliance with the fundamental principles. In addition, examples of bias are provided. Most relevant is **automation bias**, which is a tendency to favor output generated from automated systems, even when human reasoning or contradictory information raises questions as to whether such output is reliable or fit for purpose.⁵

4. Also, the recent revisions to the International Independent Standards in relation to non-assurance services (NAS) and fees were released in April 2021. In finalizing the [revised NAS provisions](#), the IESBA determined that the general NAS provisions are relevant when a NAS (e.g., a new and emerging service) is not explicitly addressed in the Code.⁶ The revised NAS provisions will become effective for audits or reviews of financial statements for periods beginning on or after December 15, 2022.

II. Overview of the IESBA's Technology Initiative

5. The April 2021 [IESBA Technology Update](#) notes that the IESBA has a dedicated Working Group and a Task Force progressing **multiple work-streams in relation to technology**. These work-streams are intended to:
 - Address stakeholder needs for more technology-related guidance (i.e., non-authoritative materials (NAM)).
 - Develop technology-related revisions to the Code so that the ethics standards, including independence requirements, applicable to professional accountants continue to remain relevant and fit for purpose to address evolving technology-related developments (the Technology Project).
 - Identify the ethics issues that might arise in professional accountants' development, implementation and use of emerging technologies, including with respect to independence (i.e., information gathering).⁷ This will help inform the content of technology-related guidance that will be developed and the forthcoming technology-related changes to the Code.

1. A description of the Code's fundamental principles, its conceptual framework and independence provisions is addressed in Installments 1, 2, 3, 4 and 5 of the [Exploring the IESBA Code](#) publication series.

2. Professional accountants in public practice are required by the International Independence Standards to be independent when performing audits, reviews and other assurance engagements.

3. Para. 113.1 A2 as revised under the Role and Mindset project.

4. Para. 110.1 A1 as revised under the Role and Mindset project.

5. Para. 120.12 A2 as revised under the Role and Mindset project.

6. See April 2021 YouTube Video titled, [New and Emerging Services](#) featuring IESBA and NAS Task Force Member, Ms. Kim Gibson, and paragraphs 54-55 of the NAS [Basis for Conclusions](#).

6. The scope of the IESBA's work on technology is intentionally broad and acknowledges that technology is continually evolving. It is envisaged that the proposed revisions to the Code will be principles-based and consider the implications of today's technological advances and related issues, including with respect to AI, big data, data analytics, blockchain, cyber-crime and cyber-security, Internet of Things (IoT), and data governance. At the same time, this approach will accommodate the evolution of technology.

► **DEVELOPMENT OF GUIDANCE AND OTHER RESOURCES TO SUPPORT THE IMPLEMENTATION OF THE CODE**

7. The Technology Working Group has been commissioned by the IESBA to develop, or to facilitate the development of, technology-related guidance and additional resources (i.e., NAM). The NAM will focus on highlighting the ethical behavior expected of professional accountants (or the role of firms⁸) involved with the development, implementation or use of technologies when undertaking professional activities – specifically in relation to the application of the conceptual framework to comply with the fundamental principles and, where applicable, be independent.
8. The NAM will not amend or override the Code or applicable standards issued by the International Auditing and Assurance Standards Board, the texts of which alone are authoritative. Reading these guidance materials will not be a substitute for reading the Code or other professional standards.
9. Once the NAM are finalized, they will be published on the IESBA and IFAC websites.

► **INFORMATION GATHERING**

10. The Technology Working Group is seeking to engage with a broad range of stakeholders, both formally and informally, to advance an informed dialogue about the ethics (including independence) implications for professional accountants developing, implementing and using technology as part of their professional activities. Specifically, discussions will involve knowledge sharing, including about best practices. The Working Group will

also seek to identify diverse views and perspectives that might inform:

- An understanding of how professional accountants and firms are currently using and applying technologies when undertaking professional activities. Such understanding will help in the development of NAM to provide contextual and explanatory information that will assist professional accountants and firms in applying the Code's conceptual framework to comply with the fundamental principles, and where applicable, be independent.
- The technology-related revisions to the Code.
- What is needed to: (i) assist professional accountants and firms navigate the challenges that might arise in an environment of dynamic technological change; and (ii) promote the IESBA's commitment to maintaining the relevance of the Code in years to come.

Key Outreach Events

- IFAC's Virtual Knowledge Sharing Event
- Jointly hosted Workshop by Institute of Chartered Accountants of Scotland, CPA Canada and IFAC
- Meeting with Committee of European Auditing Oversight Bodies' Int'l Auditing Standards Subgroup
- Discussion with IESBA-National Standards Setters Liaison Group⁹
- Regional multi-stakeholder event hosted by Saudi Organization for Certified Public Accountants

11. Various forms of stakeholder engagement are being undertaken, including participation in panel sessions at industry conferences, webinars, or other meetings such as focus groups. In addition, coordinated efforts are being undertaken with IFAC and professional accountancy organizations to obtain jurisdictional and regional perspectives.

7. The IESBA's work is also being informed by a [2020 Report](#) that sought to explore the impact of artificial intelligence (AI), big data and data analytics on the ethical behavior of professional accountants. The Report notes that "generally, the Code currently provides high level, principles-based guidance for most technology-related ethics issues that professional accountants and firms might encounter." Also, the Report set out seven recommendations to consider in exploring technology-related revisions to the Code. A summary of these recommendations are set out in the Appendix to this document.

8. Firms in this publication refer to accountancy firms.

9. The IESBA-NSS liaison Group comprises organizations with direct responsibility for promulgating ethics (including independence) standards in Australia, Canada, China, France, Germany, Hong Kong SAR, India, Japan, the Netherlands, New Zealand, the Russian Federation, South Africa, the UK, and the US. The IESBA hosts a meeting with this Group at least annually.

Recap of Key Information Gathering Activities

Technology Surveys

12. Two [global Technology Surveys](#) were issued in October 2020 on the topics of *Technology and Complexity in the Professional Environment* and *Technology and Auditor Independence*. The key themes from the survey results underscore areas where prompt guidance to the market is vital in the public interest. The feedback from survey respondents has been essential in focusing the topics to be covered by NAM and in developing the proposed revisions to the Code.
13. The IESBA considered a summary of the responses to the two Technology Surveys during its [March 2021 meeting](#). The Technology Working Group welcomes additional input on the surveys through July 30, 2021.

Technology Virtual Knowledge Sharing Event

14. IESBA representatives participated in an IFAC Virtual Knowledge Sharing (VKS) event in October 2020 and considered the following questions:
 - What might be the potential threats to professional ethics and related safeguards in a digital environment?
 - Do you have any practical examples of technology-related ethics issues you could share?
 - How can the IESBA Code be made more effective to help professional accountants navigate ethics issues arising from increased use of technology, including with respect to independence?
15. A summary of the VKS discussion is provided in an IFAC Knowledge Gateway article titled [Ethics, Technology, and the Professional Accountant in the Digital Age](#). Relevant insights and perspectives are being considered in progressing the development of NAM and potential changes to the Code (e.g., to help in highlighting the broader societal role for professional accountants in promoting ethical behavior as a critical, consistent foundation for business, firms, and other organizations, particularly when developing, implementing and using technology).

Technology Virtual Workshop

16. IESBA representatives participated in a [virtual workshop](#) jointly hosted by CPA Canada, the Institute of Chartered Accountants of Scotland (ICAS), and IFAC in February 2021.

Participants exchanged views and perspectives having considered an exploratory paper titled [Ethical Leadership in an Era of Complexity and Digital Change](#).

17. Discussion questions included:
 - How is complexity in the professional environment impacting the role of professional accountants as ethical leaders and trusted advisors? Are professional accountants being called on to help organizations pursue initiatives in sustainability, climate responsibility, social justice, etc.?
 - How can the profession support professional accountants in understanding and effectively acting on the distinction between complicated and complex problems?
 - To what extent are professional accountants involved in deciding what technologies to implement and how? To what extent should professional accountants be responsible for promoting ethics within technology development, implementation and use in their organizations? Does this answer change depending on whether the technology in question is not directly related to financial reporting/corporate reporting?
 - How can professional accountants better manage and mitigate the impact of bias in their own decisions and influence their teams to make less biased decisions? How does the profession ensure that the information that professional accountants produce or provide is perceived to be trustworthy?
 - To what extent has the profession promoted a mindset in members that includes having an inquiring mind/professional skepticism, professional judgment and strength of character? How can we measure the profession's success in this area going forward?
 - To what extent is the balance between the importance of technical skills and professional skills/enabling competencies changing as a result of the increased use of and reliance on technology?

The IESBA's Technology Working Group continues to monitor technological developments that impact the accountancy profession with a view to providing perspectives about how best to respond to ethics questions such as those discussed at the event (outlined above).

18. A list of the event speakers and a video [recording](#) of the Technology virtual workshop are available on IFAC's website. The event discussions will help inform a forthcoming series of four thought-leadership pieces titled: *Complexity and the Professional Accountant*; *Technology is a Double-edged Sword*; *Identifying and Mitigating Bias and Mis-/Disinformation*; and *Mindset and Enabling Skills*. The IESBA's Technology Working Group will provide input on the forthcoming series.

► **TECHNOLOGY PROJECT TO DEVELOP REVISIONS TO THE CODE**

19. The Technology Task Force is actively progressing its work to develop proposed revisions to the Code, having regard to the recommendations in the [Phase 1 Technology report](#) (refer to the **Appendix** for a summary).
20. The IESBA's meetings are public and agenda materials, including those relating to its Technology Project, are accessible at: www.ethicsboard.org/meetings. Stakeholders are encouraged to register to observe and monitor the IESBA's Technology deliberations.
21. The Task Force anticipates presenting an Exposure Draft (ED) at the IESBA's December 2021 meeting for approval. All stakeholders are encouraged to review the ED and submit comments in due course.

III. Matters Being Considered by the Working Group

22. The Technology Working Group is seeking to engage with a broad range of stakeholders to obtain perspectives about the following general questions.
- (a) What are some examples of emerging technologies that you have observed being developed, implemented and used by professional accountants in business and in public practice in their professional activities?
 - (b) From the perspective of ethics including independence, what are some of the key benefits and potential challenges achieved or expected from the use of emerging technologies. For example:
 - (i) How has or will the use of emerging technologies change the ethics responsibilities of professional accountants in business and in public practice, including firms that audit financial statements?
 - (ii) What are the potential positive and negative impacts of emerging technologies on the ethical behavior and decision making of professional accountants in business and in public practice?
 - (iii) How has the pace of change in technology affected the professional accountant's role and the application of the conceptual framework to comply with the Code's fundamental principles,¹⁰ and where applicable the International Independence Standards?
 - (c) To what extent are professional accountants in business and in public practice involved in deciding on the technologies being implemented or used at their employing organizations or clients?
 - (d) What are your expectations of professional accountants in business and in public practice with respect to data governance and information stewardship?
 - (e) Are you aware of any inspection or enforcement findings regarding ethics violations arising from the development, implementation or use of emerging technologies by professional accountants within their employing organizations or clients, including with respect to independence? If so, please elaborate and be specific as possible about the matters to which they relate.

10. See Section I.

Additional Questions (by Topic)

In addition to the general questions in paragraph 22, the Working Group is also interested in engaging with a broad range of stakeholders to obtain perspectives about the following topic-specific questions. Not all the questions will be relevant to all stakeholders. The Working Group will select or appropriately tailor the questions to the particular audience with whom it will engage.

Data Integrity and Governance

1. How would you characterize the data protection regime applicable in your jurisdiction, e.g., are data considered to be a “state asset,” “commercial asset,” or an “individual asset”?
2. To what extent is “big data” and predictive analytics being used by professional accountants to contribute to business forecasting and analysis; accounting valuations/ provisions; or business and risk modelling?
 - (a) What other emerging technologies and/or data-enabled technologies are being used by professional accountants in your organization, and what are they being used for?
 - (b) In your view, what should be the role of professional accountants in business and in public practice in designing, generating or using such data to inform business decision-making?
 - (c) How are audit committee members (or individuals charged with governance of your entity or organization) assured with regard to the accuracy, relevance and integrity of the data used to inform business decision-making?
 - (d) To what extent are the data inputs, processing and outputs reviewed, benchmarked, or audited, either by an internal auditor or an external auditor?
 - (i) What methodologies and tools are used to audit the inputs, processing, and outputs, either developed internally or procured externally?
 - (ii) If procured externally, how does your organization assess the quality of the services provided by the external service provider?
3. To what extent are professional accountants in your organization or firm involved in the various stages of the data management or data governance life cycle: collection, storage, transmission, processing and destruction?
 - (a) Should the Code provide more guidance in relation to data governance, e.g., to specifically cover the aspects of data and information stewardship that go beyond the use of data?

Role of a Professional Accountant in Ethical Leadership with Respect to the Development, Implementation or Use of Technology

4. Where does the primary responsibility for ethics and compliance reside in your organization?
 - (a) How is an ethical culture promoted in your organization and to what extent is technology used to facilitate it?
 - (b) Does your organization have a code of conduct, code of ethics, or other ethics framework?
 - (i) What evaluation or research work is your organization doing with respect to its code of conduct, code of ethics or other ethics framework and the impact of technologies?
 - (ii) What have been or will be the changes to your organization’s code of conduct, code of ethics or other ethics framework to specifically address the impact of emerging technologies?
5. Do you believe that professional accountants are viewed as ethical leaders who help organizations navigate complex ethical and strategic challenges and opportunities? Please provide a rationale for your response.
6. To what extent should professional accountants be responsible for promoting ethics within the development, implementation and use of technology within their organizations?
 - (a) Does this answer change depending on whether the technology in question is directly related to financial reporting or corporate reporting?

Accountability, including for Activities Undertaken by Technology or Others

7. Do you believe that a professional accountant has an overarching responsibility for the deployment of any technology, whether internally or externally developed, and why?
8. In light of the increasing use of and reliance on external experts and intelligent agents such as artificial intelligence and machine learning when professional accountants undertake a professional activity, on whom do you think accountability ultimately rests?

9. When developing and using disruptive technology tools and systems as part of a professional accountant's work, do you think that accountability should be shared with others, for example, data scientists?

Professional Competence and Due Care

10. Do you believe professional or enabling skills which are not easily replicable by technology should be explicitly described in the Code (e.g., within [revised Subsection 113](#)) and why? If yes:
- (a) Do you believe that adaptive and growth mindsets, sound judgment, critical thinking, leadership, communication and collaboration are examples of such skills?
 - (b) Do you have examples of other professional or enabling skills in this context?
 - (c) How important is it for an individual professional accountant to be able to demonstrate competence of these professional or enabling skills?
11. Within your employing organization or firm, how much focus is there on ethics (including independence) training versus accounting and audit-related training in relation to technology?
12. Is there a proportionate refocusing on the ethical responsibilities of the professional accountant when they use or deploy technologies in support of the audit or in undertaking other professional activities?

Cybersecurity and Cloud-based Services

13. What is the extent of a professional accountant's responsibility to ensure that confidential or private information is protected from cyberattack or other forms of cybercrime?
- (a) Is this strictly an IT responsibility?
 - (b) What about in smaller or less complex employing organizations or firms?
14. Should the Code specifically refer to matters such as cybersecurity to serve as a prompt to remind professional accountants of technology-related threats?
15. Do you think that firms should be prohibited from providing cloud-based services such as hosting to their audit clients? Please explain why.
16. Where cloud-based services are being provided by firms, are you aware of firms fully disclosing the location of the servers on which such services are hosted?
- (a) Do you believe that inadvertent disclosure could cause reputational or other damage to the client/firm?

Confidentiality

17. Do you believe that the fundamental principle of confidentiality, compliance with which is required by the Code, extends to technologies that are under the control of:
- (a) The professional accountant?
 - (b) Third-party service providers, including technology suppliers?
18. Do you believe there is a need to revise [Subsection 114](#) (Confidentiality) of the Code, and why? For example, is there merit in:
- (a) Defining terms such as "data," "information," and "confidential information"?
 - (b) Highlighting the need to give appropriate consideration to privacy-related matters?
 - (c) Highlighting the need to actively protect information acquired versus respect the confidentiality of information acquired?
 - (d) Incorporating a scalability component whereby the degree of required actions to comply with confidentiality depends on the perceived level of sensitivity of the information (e.g., client demographic information vs client financial records)?
 - (e) Incorporating other matters – please specify?
19. How does a firm ensure that when it is holding or hosting client data it is in compliance with the fundamental principle of confidentiality as set out in Subsection 114?

Transparency

20. Do you believe that professional accountants have an overarching responsibility to be transparent when carrying out professional activities, subject to the confidentiality requirements set out in the Code? Please explain the rationale for your response and provide examples of topics that in your view warrant full transparency (i.e., public disclosure) versus those that warrant either limited disclosure (i.e., to those charged with governance of the audit client) or strict confidentiality?
21. Should professional accountants in business and in public practice be permitted, and potentially encouraged or required, to disclose more information as public expectations for transparency continue to increase in the digital age?
- (a) If so, what types of information do you believe this should apply to?

- (b) How should the Code balance the need for appropriate confidentiality, disclosure and transparency in different circumstances? In other words, what specified criteria should guide the determination of which matters warrant full transparency (i.e., public disclosure) versus those that should be disclosed in a private manner (e.g., to those charged with governance and others internal to the employing organization or client, or to a regulator or audit oversight authority)?

Auditor Independence

22. What NAS enabled by technology advances are you aware of that are being offered by firms to their audit clients?
- (a) Do you believe such NAS should be explicitly covered in Revised Section 600, including as appropriate subsections 601-610 (see the [NAS pronouncement](#))? Please explain the rationale for your response.
23. Do you believe that the International Independence Standards are applicable where a firm sells or licenses technology in conjunction with providing a NAS to an audit client? Please explain the rationale for your response.
- (a) Do you have examples of when the selling or licensing technology to an audit client (e.g., developing or customizing software as a NAS) becomes a close business relationship as described in [paragraph 520.3 A2](#) of the Code?
- (b) When do you believe that such services should be prohibited under the Code (e.g., a prohibition such as [paragraph R520.4](#) of the Code)?
24. Do you believe that the independence provisions relating to Information Technology System Services in Revised subsection 606 would benefit from additional clarity? Please explain.
25. Do you agree that the key determining factor as to whether a task is “routine or mechanical” is whether the task requires little or no technical expertise or professional judgement, rather than whether the task can be automated so as to be executed in a “routine or mechanical” manner?
- (a) In your view, when should an automated service, including those enabled by AI or machine learning, be deemed “routine or mechanical?”

Custody of Client Data

26. Do you consider the following to be providing hosting services for a client, and why?
- (a) Providing storage space and access to client data and records?
- (b) Providing storage space and access to a client’s website?
- (c) Being a client’s disaster recovery or business continuity provider?
27. Do you have examples of services that involve or include storage of client data or records, but that you would not consider hosting services for a client?
- (a) For example, do you agree that the following services are not considered hosting services:
- (i) Temporary custody of data that supports a payroll tax return prepared for a client?
- (ii) The exchange of data for the purposes of a professional services delivery?
28. Are you aware of technology-enabled services or software that involve:
- (a) Becoming the sole or primary host of client data or records?
- (b) Becoming a repository of client data or information (however temporary)?
29. Under what circumstances should a firm have custody of a client’s data?
30. To what extent do you believe that issues related to hosting or taking custody of a client’s data is already covered by the Code’s provisions (e.g., subsection 114, *Confidentiality*; Section 120, The Conceptual Framework; or Section 350, *Custody of Assets*)?
- (a) Are there unique ethical considerations related to custody of a client’s data that should be addressed in the Code?
- (b) What are those considerations and how should they be addressed?

Appendix

Overview of Recommendations from Technology Phase 1 Report

(Adapted to reflect revisions arising from Role and Mindset and NAS projects)

Topic	Recommendation
1. The Critical Role of Ethics and Professional Judgment	<ul style="list-style-type: none"> Consider adding new application material in Part 1 of the Code to more clearly highlight a broader societal role for professional accountants in promoting ethical behavior as a critical, consistent foundation for businesses, firms and other organizations, particularly when developing and using technology.
2. Complexity of the Professional Environment	<ul style="list-style-type: none"> Consider revising the Code to more effectively deal with the threats created by the complexity of the professional environment in which professional accountants perform their professional activities.
3. Suitability of the Fundamental Principles for the Digital Age	<ul style="list-style-type: none"> Consider expanding the Code to expressly state the professional accountant's responsibility to be transparent, and provide factors to be considered in determining the extent of transparency that may be appropriate (e.g., in an audit, the type and timing of audit procedures, and in business, proprietary commercial information).
4. Suitability of the Fundamental Principles for the Digital Age	<ul style="list-style-type: none"> To the extent that it is not already covered in the revisions arising from the Role and Mindset project, consider addressing the concept of accountability in the Code in a more explicit manner by: <ul style="list-style-type: none"> – Including new application material to prompt the professional accountant willingness to accept responsibility, especially – Highlighting the professional accountant's responsibility in light of the increasing use of external experts and intelligent agents. – Including explicit references to technology as appropriate in the requirements and application material relating to relying on the work of others when preparing and presenting information (i.e., Section 220).
5. Suitability of the Fundamental Principles for the Digital Age	<ul style="list-style-type: none"> Consider revisions to modernize the provisions relating to confidentiality (i.e., Subsection 114) in light of the increased availability and use of personal and other sensitive data. Emphasize the need to actively protect information. Provide guidance to assist professional accountants give appropriate consideration to privacy-related matters.
6. Enabling Competencies and Skills	<ul style="list-style-type: none"> To the extent that it is not already covered in the revisions arising from the Role and Mindset project, consider adding new application material to highlight the importance of professional or "soft" skills and provide examples of the emergent technical skills needed by professional accountants in the digital age.
7. Auditor Independence	<p>To the extent that it is not already covered in the revised NAS provisions:</p> <ul style="list-style-type: none"> Consider whether the provisions relating to Business Relationships (i.e., Section 520) should include a cross-reference to Revised Section 600 to prompt firms to apply the NAS provisions in identifying, evaluating and addressing threats to independence created by: <ul style="list-style-type: none"> – The sale or licensing of technology applications to audit clients; and – The use of an audit client's technology tool in the delivery of NAS to another client. Consider further technology-related refinements to the revised NAS provisions (i.e., Revised Section 600), in particular subsection 606 (Information Technology Systems Services). In relation to the concept of an "office," consider whether the Code (e.g., Section 510) should be revised to better capture the threats to independence that might be created by the use of modern communication technologies. Such technologies potentially challenge the notion of an engagement partner's physical office location being a determining factor in whether that engagement partner or the audit engagement can be unduly influenced by another partner in that same office.