

Association of Accounting Technician's response to the IESBA Exposure Draft on Proposed Revisions to the Code Pertaining to the Offering and Accepting of Inducements Revision

The Association of Accounting Technicians (AAT) is pleased to have the opportunity to respond to the IESBA Exposure Draft on Proposed Revisions to the Code Pertaining to the Offering and Accepting of Inducements, published in September 2017.

AAT is submitting this response on behalf of our membership and for the wider public benefit.

AAT has focussed on the operational elements of the proposals and has provided opinion on the practicalities in implementing the measures outlined. Furthermore, the comments reflect the potential impact that the proposed changes would have on SMEs and micro-entities, many of which employ AAT members or would be represented by our licensed accountants.

The following paragraphs outline AAT's response to the questions posed in the consultation paper.

Question 1: Do respondents support the proposals in Section 250? In particular, do respondents support the proposed new guidance to determine whether there is an intent to improperly influence behaviour, and how it is articulated in the proposals?

AAT supports the proposals and supports the clarifications in relation to inducements not necessarily requiring an improper intent, but also the detailed guidance on where such an intent may be identified.

Question 2: Do respondents agree that the proposed provisions relating to inducements for PAPPs should be aligned with the enhanced provisions for PAIBs in proposed section 250? If so, do respondents agree that the proposals in Section 340 achieve this objective?

AAT supports the enhanced provisions and the general principle of alignment wherever possible within the Code.

Question 3: Do respondents support the restructuring changes and proposed confirming amendments in proposed Sections 420 and 906?

AAT supports the restructuring and conforming amendments in light of the changes.

Question 4: Do respondents believe the IESBA should consider a project in the future to achieve further alignment of Sections 402 and 906 with proposed Section 340? If so, please explain why.

AAT agrees that maximum alignment, regardless of the type of professional being focussed upon, is beneficial. However, without greater detail on what is currently considered 'non-aligned' it would be difficult to support a new project.

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 over 4,250 licensed accountants who provide accountancy and taxation services to individuals, not-for-profit organisations and the full range of business types.

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:

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