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Ken Siong  
IESBA TECHNICAL DIRECTOR

Dear Sir/Madam

**ICAZ SUBMISSION ON PROFESSIONAL SKEPTICISM-MEETING PUBLIC EXPECTATIONS**

In response to your request for comments on **Professional Skepticism- Meeting Public Expectations** attached is the comment letter prepared by the Institute of Chartered Accountants of Zimbabwe. The comment letter is a result of deliberations of the Auditing and Professional Standards Committee (APSC), which comprises members from reporting organisations, regulators, auditors, IFRS specialists, and academics.

We are grateful for the opportunity to provide our comments on this project.

Please do not hesitate to contact us should you wish to discuss any of our comments.

Yours faithfully,

Mike De beer (KPMG)  
Chairperson of the APSC

Cleopatra Woneyika  
Technical Director

Cc: Matthews Kunaka (ICAZ C.E.O)

### Question 1

- Agreed.

Considering the complexity and diversity of the Accountancy Profession and accountants being gatekeepers for the legitimate financial system.

The public may not trust information associated with professional accountants due to corporate scandals that often arise. However professional accountants are at the forefront when it comes to ethics since they have a long history of following and applying the code of ethics.

### Question 2

- Agree

The behaviour must be transparent and trustworthy since they have a key role to play as noted in Question 1 above as well as encouraging and influencing ethical behaviour and decision making within their organizations.

Aspects that can be included in the summary is a guidance on professional scepticism as per points in paragraph 7.

### Question 3

- Agree

The mindset and behaviour should be expected of all professional accountants as the public does not separate those in business and those in practice hence uniform behaviour is needed and to maintain a good reputation and earn public trust.

### Question 4

- These are not sufficient

Due to expectation gaps there is need to train professional accountants on the principles of the existing Code and fill in the expectation gaps in the Code as well.

### Question 5

- This is not appropriate

The definition in ISAs is related to the behaviour of an auditor in gathering audit evidence, in an audit and assurance context hence is it not all inclusive of all professional accountants i.e. include those in business and scalability as well.

### Question 6

- a) YES. A different definition would be appropriate for all types of professional activity and professional accountants.
- b) Agree  
There may be need to consider maintaining the existing definition as per ISAs relating to assurance engagements due to its effectiveness but only add for non-assurance engagements.
- c) N/A

#### **Question 7**

- a) No  
Professional scepticism may be used and further defined making use of critical thinking, critical analysis and diligent mindset.
- b) N/A

#### **Question 8**

- YES

Additional material in the Code will highlight the importance of exercising the behaviour and relevant professional skills for all professional accountants. ISA 240 may remain as is, applicable to assurance engagements. This material may include hypothetical corporate scandal examples and situations.

#### **Question 9**

The options would favour IAASB if the best option is selected since the profession's reputation will be upheld.

#### **Question 10**

The Code should include application material to increase awareness of biases, pressure and other impediments to approaching professional activities with an impartial and diligent mindset and exercising appropriate professional scepticism. This can be done using examples (short case studies) and explanatory material.