

CIPFA response to IAESB consultation on the IES 3 Exposure Draft

Introduction

The Chartered Institute of Public Finance and Accountancy (CIPFA) welcomes the issue of the Exposure Draft of International Education Standard 3, Initial Professional Development – Professional Skills (Revised).

Requests for specific comments

Question	Comment
Question 1 – Do you support the definition of professional skills?	<p>The term 'professional skills' could legitimately include the technical skills to perform the work of that profession, but the definition here excludes technical accounting skills, and may therefore be potentially misleading.</p> <p>The distinction between technical competence and professional competence is not particularly clear or helpful. The definitions in the glossary are very similar, so it is not clear why there is a need to distinguish between the two terms.</p>
Question 2: Do you support the removal of General Education from this IES?	Yes. Care needs to be taken to ensure that the content of this IES is consistent with IES 1 <i>Entry requirements for professional accounting education</i> .
Question 3: Is the objective to be achieved by an IFAC member body appropriate?	Yes.
Question 4: Do you agree with the adoption of a learning outcomes approach?	Yes.
Question 5: Table A provides learning outcomes for various competence areas of professional skills – are there any additional learning outcomes that you would expect from an aspiring professional accountant?	<p>Other possible areas are:</p> <ul style="list-style-type: none"> • The ability to distinguish between what is important and what is not, and to prioritise action accordingly. • The ability to exercise professional judgement. • The ability to learn and adapt to circumstances.
Question 6: For Table A, are there any learning outcomes that you do not think are appropriate?	No, but there are several that are only assessable via workplace activities and this perhaps needs to be noted in the IES. These include (c) (iv) negotiating skills, (d) (i) undertaking work assignments, (d) (ii)

	<p>reviewing work against organisational standards, and (d) (vi) apply technology to work tasks. It may be helpful to amend the wording of these so that member bodies that rely more on examinations rather than workplace assessments can relate these learning outcomes to their assessments (eg in case studies, simulations). There may also be a need to reference the development of these skills through practical experience requirements as outlined in IES 5.</p> <p>It is questionable whether (c) (iv) negotiation skills and (c) (v) consultative skills are assessable within an accountancy education programme.</p>
Question 7: Are the minimum levels of proficiency appropriate for each professional skills competence area?	Yes
Question 8: Overall, are the requirements clear and appropriate? If not, what changes would you like to see?	Yes, but note comments above.
Question 9: Do you anticipate any impact of implications for your organisation, or organisations with which you are familiar, in implementing the new requirements?	The CIPFA Professional Qualification contains various requirements that match the skills outlined in this IES, particularly in the higher level examinations and in the requirements specified in the institute's practical experience portfolio (which has recently been revised to meet the requirements of IES 5 ED Revised). Aspects such as negotiating skills and consultative skills are very difficult to build into assessments, and we may need to revisit how these are covered in our syllabuses and assessments if the current IES 2 ED is taken forward as it stands.
Question 10: Are there any additional explanatory paragraphs needed to better explain the requirements?	Some further explanation of how these skills are to be covered through general education, the accountancy education programme (including assessment), and the practical experience requirements, etc would be helpful.
Question 11: Have the criteria identified by the IAESB for determining whether a requirement should be specified been applied appropriately and consistently such that the resulting requirements promote consistency in implementation by member bodies?	Yes
Question 12: Are there any terms which require further clarification? If so, please explain the nature of the deficiencies.	See comments to Question 1 above