



Guidance for
regulatory orders

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SECTION 1: INTRODUCTION

- 1.1 This section of the Guidance for Regulatory Orders (“Guidance”) concerns applications from members for UK or Irish responsible individual status or an audit qualification valid in the Channel Islands and/or Isle of Man where ACCA staff have concerns about granting the application administratively based on the information provided by the member about their recent audit experience and audit-related CPD. It also concerns similar applications from non-ACCA members who wish to be responsible for audit work in firms holding audit registration from ACCA in the UK or Ireland.
- 1.2 The Guidance has been developed by ACCA’s Regulatory Board, which oversees the regulatory and disciplinary committees and reports to ACCA’s Council on the fairness and impartiality of the arrangements in place. The purpose of the Guidance is to assist the Admissions and Licensing and Appeal Committees (“the Committee”) in the exercise of their powers. It is designed to manage regulatory risk, provide transparency of policies and procedures and ensure consistency of approach.
- 1.3 The Guidance is for use by:
- ACCA staff when they are considering the appropriate action to take, for example based on the information provided in the application form
 - the Committee when they are considering what order or decision to make
 - ACCA certificate or licence holders and non-ACCA members seeking to be responsible individuals in ACCA audit registered firms so that they are aware, prior to any decision being made, of what the Committee’s range of options are and which matters the Committee members may take into account when coming to a decision.
- 1.4 The Guidance is a ‘living document’ which will be updated and revised when the need arises.

SECTION 2: THE ROLE AND REGULATORY POWERS OF THE COMMITTEE

2.1 Introduction

2.1.1 The Committee is totally independent of ACCA and is free to exercise its own judgement in making decisions:

- according to the established facts and supporting evidence provided
- with regard at all times to the regulatory framework set out in ACCA's Rulebook, policy statements issued by the Regulatory Board and any other relevant guidance
- taking account of the regulatory risk posed by the applicant's history
- in accordance with the standard of proof, which on ACCA regulatory matters is on the balance of probabilities
- balancing the need to maintain public confidence in the profession with appropriate proportionality.

2.2 The role of the Committee

2.2.1 The Admissions and Licensing Committee is responsible for considering applications for a certificate or licences issued by ACCA and applications from non-ACCA members to be responsible individuals in ACCA audit registered firms in the UK and Ireland. Provided an application meets the criteria specified from time to time by the Committee, the power to grant the application is usually delegated to ACCA staff.

2.3 Purpose of an order

2.3.1 It is a settled principle of law that the purpose of orders issued by a professional regulatory body is to:

- protect the public
- maintain public confidence in the profession
- maintain proper standards of conduct.

2.3.2 It is vitally important that the holder of a certificate or licence or other authorisation issued by ACCA meets the high standards expected by the public. The function of the Committee is to take appropriate action to ensure that the holder is competent to undertake the work and will maintain proper standards of conduct in future, thereby maintaining public confidence in the profession. Their function is not to discipline the firm or individual for any past wrongdoing of which they may be culpable.

2.3.3 It was noted in *Bolton v The Law Society* [1994] 2 ALL ER 486 that the reputation of a profession as a whole is more important than the fortunes of an individual member of that profession.

2.4 Regulatory powers

- 2.4.1 All applications for certificates, licences and other authorisations, including applications for renewals, are subject to approval by the Admissions and Licensing Committee, although the routine scrutiny of application forms is delegated to ACCA staff. Applications that do not meet the eligibility criteria and problematic applications are referred to the Committee for consideration. In accordance with Authorisation Regulation 3(10) the Committee may grant or refuse the application, and where it grants the application may impose any conditions it believes appropriate. The Committee may also accept undertakings from any person as a condition of issuing a certificate, licence or other authorisation.
- 2.4.2 The Committee may impose whatever conditions it believes are appropriate on a member's practising certificate and/or any other certificate or licence or authorisation issued to a member or firm which authorises them to undertake a regulated activity and/or to a non-ACCA member applying to be a responsible individual in a firm registered with ACCA for audit purposes in the UK and/or Ireland. Any conditions must be:
- enforceable;
 - addressed to the certificate holder and not third parties (including ACCA);
 - relevant, in that they address a specific circumstance or risk factor;
 - necessary (see proportionality below);
 - workable, in that they are capable of practical application by the applicant and are consistent with other elements of the decision; and
 - written in such a way that compliance can be easily verified.

2.5 Proportionality

- 2.5.1 In deciding on the appropriate order and conditions to impose, the Committee must weigh the need to fulfil the purpose of a regulatory order set out in paragraph 2.3.1 (ie to safeguard the public interest) against the interests of the applicant.
- 2.5.2 Any order and/or conditions imposed should, taking into account all the circumstances of the case, be proportionate to the future licensing risk of the firm or individual failing to:
- carry out work in accordance with the applicable requirements
 - meet the eligibility requirements for a certificate, licence or other authorisation
- 2.5.3 In order to ensure that the order (including any conditions imposed) is the minimum necessary to achieve the purpose, the Committee will need to consider:
- the individual's and firm's evidence in support of the application having regard to the fact that it is for the applicant to convince the Committee
 - the possible risks to the public of granting the application and the conditions which the Committee could put in place for the future to reduce these risks.

2.6 Publicity

- 2.6.1 Publicity of the decision is not currently required and it is not usually the practice for such applications, whether or not they are granted.

SECTION 3: THE BASIC APPROACH FOR CONSIDERING APPLICATIONS AND GUIDANCE FOR THE COMMITTEE

3.1 Introduction

3.1.1 In all cases, it is for the applicant to satisfy the Committee that they are eligible for a certificate/licence/authorisation. For most types of applications the applicant must demonstrate that exceptional circumstances exist and these will be particular to each application. It is not appropriate to provide a list of exceptional circumstances and the Committee always considers each case on its own merits. However, set out below are the broad principles and relevant factors that the Committee considers in making its decisions on applications.

3.2 Adequate competence in audit work demonstrated through recent audit experience and audit-related CPD – UK

3.2.1 Members and non-members applying for responsible individual (RI) status in a firm holding, or applying for, a UK firm's auditing certificate from ACCA are required to demonstrate adequate competence in audit work by providing details of their recent audit experience and recent audit-related CPD before the application can be granted. This applies to first-time RI applications and applications from individuals who have been RIs in the past and is common to all the Recognised Supervisory Bodies in the UK. Applicants are required to provide this information on the Audit Experience Form (AEF) within the UK RI application form.

3.2.2 Applicants are required to provide a combination of recent practical audit work experience and audit-related CPD achieved in the two years immediately preceding their RI application. More weight is given to the recent audit experience than the recent audit-related CPD when applications are assessed. Therefore, ACCA would not award RI status to an applicant who has achieved inadequate audit experience in the last two years even if they have achieved an adequate (or substantial) amount of audit-related CPD in those years. The experience must also be signed off by a statutory auditor.

3.2.3 If the applicant does not meet the threshold of adequate competence in audit work they are given guidance about the steps they need to take in order to meet the threshold. The reasons for not meeting the threshold may relate to the number of audits that the applicant has worked on in the last two years, the size of the clients, the types of audits (eg lack of Companies Acts audits), the judgement exercised by the applicant during the audits and their supervisory responsibilities. Section 1 of the UK AEF indicates that applicants should aim to provide details of at least 10 audit engagements carried out during the last 24 months. If they have gained very little audit experience in that period they can provide additional information in section 2 of the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work and to explain why they have given less than 10 examples in section 1 of the form.

3.2.4 However, ACCA may refer applications to the Committee for consideration that are borderline as they do not quite meet ACCA's threshold of adequate competence in audit work but the applicants may have exceptional circumstances and the Committee may wish to grant them subject to conditions. ACCA may refer the following types of applications to the Committee for consideration. In all cases the applicant must have achieved at least some recent audit experience.

(i) Recent audit experience is deemed inadequate

3.2.5 In these cases ACCA has concerns about the adequacy of the applicant's recent audit experience but recognises that the applicant may have exceptional circumstances. The Committee first needs to be satisfied that an exceptional circumstance exists. It is not appropriate to provide a list of exceptional circumstances and the Committee always considers each case on its own merits but an example might be an unexpected event has occurred which was outside of the applicant's control which prevented the applicant from completing the experience requirement, as they originally planned. The unexpected offer of a partnership/directorship which will be lost if not accepted immediately may also be regarded as an exceptional circumstance.

3.2.6 The Committee needs to consider ACCA's reasons for not granting the application administratively and ACCA's view of the adequacy of the applicant's recent audit experience. The Committee also needs to consider what other steps the applicant has taken to remain competent in audit work during the period, such as whether an extended programme of recent audit-related CPD has been undertaken.

3.2.7 If the Committee is satisfied that the applicant has demonstrated exceptional circumstances for not having achieved adequate relevant audit experience in the last two years it may be minded to grant the application subject to conditions (see below).

(ii) Recent audit experience is not corroborated

3.2.8 Sometimes applicants are unable to get some or all of their recent audit experience signed off by a suitably qualified person. For example, the experience may have been signed off by someone who is not a statutory auditor or the applicant is a sole practitioner (eg re-applying for RI status after a gap). In other cases applicants are unable to get some or all of their experience signed off at all, meaning that it is uncorroborated. In these cases the Committee needs to consider the reasons why the experience has not been appropriately signed off by a suitably qualified principal and whether the applicant has used their best endeavours to get it signed off. The Committee also needs to consider whether the applicant's experience can be accepted in view of the fact that it has not been corroborated, taking into account ACCA's view of the adequacy of the experience (notwithstanding that it has not been corroborated) and any other forms of corroboration provided by the applicant.

Conditions

3.2.9 If the Committee is minded to grant an application it then needs to consider what conditions, if any, should be placed on the grant of the application in order to safeguard the public (see paragraph 4.3.6). The Committee should also note that if the applicant intends to practise in a new firm holding UK audit registration from ACCA it will automatically receive a monitoring visit from ACCA within 12 months, provided some audit work has been undertaken.

3.2.10 The fact that an applicant does not want to wait until they have achieved adequate recent audit experience and audit-related CPD in order to be responsible for undertaking audit work immediately is not in itself an exceptional circumstance.

3.3 Adequate competence in audit work demonstrated through recent audit experience and audit-related CPD – Ireland

3.3.1 Members and non-members applying for responsible individual (RI) status in a firm holding, or applying for, an Irish firm's auditing certificate from ACCA are required to demonstrate adequate competence in audit work by providing details of their recent audit experience and recent audit-related CPD before the application can be granted. This applies to first-time RI applications and applications from individuals who have been RIs in the past and is common to all the Recognised Accountancy Bodies in Ireland. Applicants are required to provide this information on the Audit Experience Form (AEF) within the Irish RI application form.

3.3.2 Applicants are required to provide a combination of recent practical audit work experience and audit-related CPD achieved in the two years immediately preceding their application. More weight is given to the recent audit experience than the recent audit-related CPD when applications are assessed. Therefore, ACCA would not award responsible individual status to an applicant who has achieved inadequate audit experience in the last two years even if they have achieved an adequate (or substantial) amount of audit-related CPD in those years. The experience must also be signed off by a statutory auditor.

3.3.3 If the applicant does not meet the threshold of adequate competence in audit work they are given guidance about the steps they need to take in order to meet the threshold. The reasons for not meeting the threshold may relate to the number of audits that the applicant has worked on in the last two years, the size of the clients, the types of audits (eg lack of Companies Acts audits), the judgement exercised by the applicant during the audits and their supervisory responsibilities. Section 1 of the Irish AEF indicates that applicants should aim to provide details of at least 10 audit engagements carried out during the last 24 months. If they have gained very little audit experience in that period they can provide additional information in section 2 of the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work and to explain why they have given less than 10 examples in section 1 of the form.

3.3.4 However, ACCA may refer applications to the Committee for consideration that are borderline as they do not quite meet ACCA's threshold of adequate competence in audit work but the applicants may have exceptional circumstances and the Committee may wish to grant them subject to conditions. ACCA may refer the following types of applications to the Committee for consideration. In all cases the applicant must have achieved at least some recent audit experience.

(i) Recent audit experience is deemed inadequate

- 3.3.5 In these cases ACCA has concerns about the adequacy of the applicant's recent audit experience but recognises that the applicant may have exceptional circumstances. The Committee first needs to be satisfied that an exceptional circumstance exists. It is not appropriate to provide a list of exceptional circumstances and the Committee always considers each case on its own merits but an example might be an unexpected event has occurred which was outside of the applicant's control which prevented the applicant from completing the experience requirement, as they originally planned. The unexpected offer of a partnership/directorship which will be lost if not accepted immediately may also be regarded as an exceptional circumstance.
- 3.3.6 The Committee needs to consider ACCA's reasons for not granting the application administratively and ACCA's view of the adequacy of the applicant's recent audit experience. The Committee also needs to consider what other steps the applicant has taken to remain competent in audit work during the period, such as whether an extended programme of recent audit-related CPD has been undertaken.
- 3.3.7 If the Committee is satisfied that the applicant has demonstrated exceptional circumstances for not having achieved adequate relevant audit experience in the last two years it may be minded to grant the application subject to conditions (see below).

(ii) Recent audit experience is not corroborated

- 3.3.8 Sometimes applicants are unable to get some or all of their recent audit experience signed off by a suitably qualified person. For example, the experience may have been signed off by someone who is not a statutory auditor or the applicant is a sole practitioner (eg re-applying for RI status after a gap). In other cases applicants are unable to get some or all of their experience signed off at all, meaning that it is uncorroborated. In these cases the Committee needs to consider the reasons why the experience has not been appropriately signed off by a suitably qualified principal and whether the applicant has used their best endeavours to get it signed off. The Committee also needs to consider whether the applicant's experience can be accepted in view of the fact that it has not been corroborated, taking into account ACCA's view of the adequacy of the experience (notwithstanding that it has not been corroborated) and any other forms of corroboration provided by the applicant.

Conditions

- 3.3.9 If the Committee is minded to grant an application it then needs to consider what conditions, if any, should be placed on the grant of the application in order to safeguard the public (see paragraph 4.3.6). The Committee should also note that if the applicant intends to practise in a new firm holding Irish audit registration from ACCA it will automatically receive a monitoring visit from ACCA within 12 months, provided some audit work has been undertaken.
- 3.3.10 The fact that an applicant does not want to wait until they have achieved adequate recent audit experience and audit-related CPD in order to be responsible for undertaking audit work immediately is not in itself an exceptional circumstance.

3.4 Adequate competence in audit work demonstrated through recent audit experience and audit-related CPD – Channel Islands and Isle of Man

- 3.4.1 Members applying for a Channel Islands and/or Isle of Man audit qualification are required to demonstrate adequate competence in audit work by providing details of their recent audit experience and recent audit-related CPD before the application can be granted. This applies to new applications and re-applications. Applicants are required to provide this information on the Audit Experience Form (AEF).
- 3.4.2 Applicants are required to provide a combination of recent practical audit work experience and audit-related CPD achieved in the two years immediately preceding their application. More weight is given to the recent audit experience than the recent audit-related CPD when applications are assessed. Therefore, ACCA would not award an audit qualification to an applicant who has achieved inadequate audit experience in the last two years even if they have achieved an adequate (or substantial) amount of audit-related CPD in those years. The experience must also be signed off by a statutory auditor.

3.4.3 If the applicant does not meet the threshold of adequate competence in audit work they are given guidance about the steps they need to take in order to meet the threshold. The reasons for not meeting the threshold may relate to the number of audits that the applicant has worked on in the last two years, the size of the clients, the types of audits (eg lack of Companies Acts audits), the judgement exercised by the applicant during the audits and their supervisory responsibilities. Section 1 of the AEF indicates that applicants should aim to provide details of at least 10 audit engagements carried out during the last 24 months. If they have gained very little audit experience in that period they can provide additional information in section 2 of the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work and to explain why they have given less than 10 examples in section 1 of the form.

3.4.4 However, ACCA may refer applications to the Committee for consideration that are borderline as they do not quite meet ACCA's threshold of adequate competence in audit work but the applicants may have exceptional circumstances and the Committee may wish to grant them subject to conditions. ACCA may refer the following types of applications to the Committee for consideration. In all cases the applicant must have achieved at least some recent audit experience.

(i) Recent audit experience is deemed inadequate

3.4.5 In these cases ACCA has concerns about the adequacy of the applicant's recent audit experience but recognises that the applicant may have exceptional circumstances. The Committee first needs to be satisfied that an exceptional circumstance exists. It is not appropriate to provide a list of exceptional circumstances and the Committee always considers each case on its own merits but an example might be an unexpected event has occurred which was outside of the applicant's control which prevented the applicant from completing the experience requirement, as they originally planned. The unexpected offer of a partnership/directorship which will be lost if not accepted immediately may also be regarded as an exceptional circumstance.

3.4.6 The Committee needs to consider ACCA's reasons for not granting the application administratively and ACCA's view of the adequacy of the applicant's recent audit experience. The Committee also needs to consider what other steps the applicant has taken to remain competent in audit work during the period, such as whether an extended programme of recent audit-related CPD has been undertaken.

3.4.7 If the Committee is satisfied that the applicant has demonstrated exceptional circumstances for not having achieved adequate relevant audit experience in the last two years it may be minded to grant the application subject to conditions (see below).

(ii) Recent audit experience is not corroborated

3.4.8 Sometimes applicants are unable to get some or all of their recent audit experience signed off by a suitably qualified person. For example, the experience may have been signed off by someone who is not a statutory auditor or the applicant is a sole practitioner (eg re-applying for a practising certificate after having it withdrawn). In other cases applicants are unable to get some or all of their experience signed off at all, meaning that it is uncorroborated. In these cases the Committee needs to consider the reasons why the experience has not been appropriately signed off by a suitably qualified principal and whether the applicant has used their best endeavours to get it signed off. The Committee also needs to consider whether the applicant's experience can be accepted in view of the fact that it has not been corroborated, taking into account ACCA's view of the adequacy of the experience (notwithstanding that it has not been corroborated) and any other forms of corroboration provided by the applicant.

Conditions

3.4.9 If the Committee is minded to grant an application it then needs to consider what conditions, if any, should be placed on the grant of the application in order to safeguard the public (see paragraph 4.3.6).

3.4.10 The fact that an applicant does not want to wait until they have achieved adequate recent audit experience and audit-related CPD in order to be responsible for undertaking audit work immediately is not in itself an exceptional circumstance.

SECTION 4: DESCRIPTION OF THE AVAILABLE ORDERS AND APPLICATION GUIDELINES

4.1 Introduction

- 4.1.1 The orders available to the Committee for applications for certificates/licences/authorisation may differ, but the principles behind the process are the same. The onus is always on the applicant to convince the Committee of the entitlement to a certificate/licence/authorisation.
- 4.1.2 Before reaching a decision, the Committee will consider whether the order it has arrived at is appropriate to achieve the purpose of balancing the interests of the applicant and the public, in accordance with the principle of proportionality outlined in Section 2.5 of this publication.
- 4.1.3 The Committee may depart from ACCA's recommendation and the guideline orders and conditions; however, the Committee should have regard to the guidance in this document and ensure that the written reasons for decision clearly explain the exceptional circumstances which resulted in any such departure.

4.2 Available orders

- 4.2.1 The Committee may make any one or more of the following orders:

Order to adjourn consideration of the application

- 4.2.2 It would be appropriate for the Committee to adjourn consideration of the application if questions arise on the day which it would have been difficult for the applicant to have anticipated and the answers to which are vital for the Committee to decide the case. For example, the Committee may have questions which the applicant can answer only by reference to documents which they do not have and will have to obtain. In addition, it may be appropriate for the Committee to consider adjourning a case, although the applicant by their own choice is not present, if the Committee believes that it may be able to grant the application if it has the opportunity of putting certain questions to the applicant to satisfy itself on certain matters.

Order to grant the application subject to a condition(s)

- 4.2.3 It would be appropriate for the Committee to grant an application subject to conditions if the Committee is satisfied that there are exceptional circumstances and that not to grant the application would cause undue hardship to the member or firm. However, the Committee may wish to put safeguards in place to protect the public.
- 4.2.4 For example, an application for an audit qualification may be granted in exceptional circumstances subject to the applicant providing evidence of future CPD completed.

Refuse the application

- 4.2.5 It would be appropriate for the Committee to refuse an application if the Committee is not satisfied that there are exceptional circumstances and that refusing the application would not cause the applicant or firm any undue hardship.
- 4.2.6 For example, an applicant for UK and/or Irish RI status who has not demonstrated adequate competence in audit work by way of recent audit experience may have:
- chosen to work for a firm that is unable to provide the necessary audit experience towards obtaining an audit qualification, and/or
 - obtained inadequate experience of statutory audits in the preceding two years, and/or
 - achieved inadequate audit-related CPD in the preceding two years
- 4.2.7 In the above examples the applicants have put themselves in the position of not remaining competent to undertake audit work by not ensuring that their audit knowledge and audit experience is up to date. In such circumstances it will be more difficult for applicants to show that there are exceptional circumstances.

Grant the application

- 4.2.8 It would be appropriate for the Committee to grant an application and not impose any conditions if the Committee is satisfied that there are exceptional circumstances and that not to grant the application would cause undue hardship to the applicant or firm.
- 4.2.9 For example, an application for UK and/or Irish RI status from an individual who is just short of meeting the threshold of adequate recent audit experience and audit-related CPD in the previous two years may be granted in exceptional circumstances if the applicant was gaining the necessary experience and an unexpected or unforeseen event occurred which prevented them doing so.

4.3 Application guidelines

- 4.3.1 The guidelines set out on the pages to follow relate to the most common types of applications that are made to the Committee. The guidelines are not intended to be treated as appropriate for all cases. Each case will be judged on its own facts. Separate guidelines are provided for UK, Ireland and Channel Islands/Isle of Man.
- 4.3.2 In deciding the appropriate order, the Committee must consider all factors relevant to the application. The Committee is free to attach such weight as it thinks fit in its absolute discretion to any factor. The list of factors is not exhaustive.
- 4.3.3 Adequate competence in audit work demonstrated through recent audit experience and audit-related CPD – UK applications

Recent audit experience is deemed inadequate

Guideline: refuse the application

- The applicant has not demonstrated that any exceptional circumstances exist
- The applicant has provided details of less than 10 audit engagements carried out during the last 24 months and has not explained why and has not provided sufficient additional information on the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work
- The applicant chose to work in a firm that is unable to provide the necessary statutory audit experience towards the award of RI status
- The applicant has been given guidance by ACCA about the steps they need to take to meet the threshold of adequate competence in audit work but has chosen not to do so
- The applicant has achieved no UK statutory audit experience in the last two years
- The applicant has achieved no UK statutory audit-related CPD in the last two years
- The applicant has obtained some non-statutory audit experience in the last two years but no experience of statutory audits
- The applicant has not provided a good, recent reference in support of their application from another UK statutory auditor
- The applicant's recent audit experience and audit-related CPD has not been signed off by another UK statutory auditor
- The applicant's recent audit experience and audit-related CPD has been self-certified as the experience was not supervised
- The applicant intends to practise in a firm where they will be the only audit-qualified principal
- The applicant has not provided written confirmation that they will have access to technical and ethical support from another firm of UK statutory auditors
- The recent audit experience achieved by the applicant was not achieved on UK registered companies or equivalent.

Guideline: grant the application

- A recent unforeseen or unexpected event has occurred which is outside of the applicant's control (for example, the applicant has been made redundant or their employer has died, retired or become incapacitated)
- The applicant has provided details of less than 10 audit engagements carried out during the last 24 months but has explained why and has provided additional information on the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work
- Although the applicant has not achieved adequate audit-related CPD in the last two years they have achieved an adequate amount of relevant UK statutory audit experience in the last two years
- Although the applicant has achieved inadequate experience of UK statutory audits in the last two years they have obtained adequate experience in other types of audits in the last two years (eg non-statutory audits, charities audits)
- Although the applicant has achieved no, or inadequate, CPD relating to UK statutory (ie Companies Act) audits in the last two years they have obtained substantial CPD relating to other types of audits in the last two years (eg non-statutory audits, charities audits)
- The applicant's audit experience and audit-related CPD in the last two years has been signed off by another UK statutory auditor
- The applicant has provided a good, recent reference in support of their application from another UK statutory auditor
- The applicant intends to practise in a firm where there will be other audit-qualified principals to provide support
- The applicant has provided confirmation that they will have technical and ethical support from another firm of UK statutory auditors.

Recent audit experience is not corroborated

Guideline: refuse the application

- The applicant has not demonstrated that any exceptional circumstances exist
- The applicant has made no attempt to get their recent audit experience signed off by their employer and/or has refused to allow ACCA to contact their employer to obtain corroboration
- The applicant has not contacted the firm's continuity nominee to obtain sign off and/or has refused to allow ACCA to contact the nominee to obtain corroboration
- The applicant has not provided (or provided inadequate) other forms of corroborative evidence for the recent audit experience they have achieved
- The applicant has not provided a good, recent reference in support of their application from another UK statutory auditor
- The applicant's recent audit experience and audit-related CPD has not been signed off by another UK statutory auditor
- The applicant's recent audit experience and audit-related CPD has been self-certified as the experience was not supervised
- The applicant intends to practise in a firm where they will be the only audit-qualified principal
- The applicant has not provided written confirmation that they will have access to technical and ethical support from another firm of UK statutory auditors

Guideline: grant the application

- The applicant has provided written evidence that they tried to get their recent audit experience signed off by the firm's continuity nominee

- The applicant has demonstrated exceptional circumstances such as a recent unforeseen or unexpected event outside of their control that prevented them from getting their recent audit experience signed off
- The applicant is the only auditor in the firm and there was no other UK qualified auditor in the firm to sign off their recent audit experience
- Although the applicant's recent audit experience and audit-related CPD has not been signed off, the experience outlined is appropriate and ACCA would have granted the application administratively if it had been signed off
- The applicant has provided other forms of corroborative evidence for the recent audit experience they have achieved (eg from the continuity of practice nominee)
- Although not in the same firm, the applicant's recent audit experience and audit-related CPD has been signed off by another UK statutory auditor
- The applicant has provided a good, recent reference in support of their application from another UK statutory auditor
- The applicant intends to practise in a firm where there will be other audit-qualified principals to provide support
- The applicant has provided confirmation that they will have technical and ethical support from another firm of UK statutory auditors.

4.3.4 Adequate competence in audit work demonstrated through recent audit experience and audit-related CPD – Irish applications

Recent audit experience is deemed inadequate

Guideline: refuse the application

- The applicant has not demonstrated that any exceptional circumstances exist
- The applicant has provided details of less than 10 audit engagements carried out during the last 24 months and has not explained why and has not provided sufficient additional information on the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work
- The applicant chose to work in a firm that is unable to provide the necessary audit experience towards the award of Irish RI status
- The applicant has been given guidance by ACCA about the steps they need to take to meet the threshold of adequate competence in audit work but has chosen not to do so
- The applicant has achieved no Irish statutory audit experience in the last two years
- The applicant has achieved no Irish statutory audit-related CPD in the last two years
- The applicant has obtained some non-statutory audit experience in the last two years but no, or inadequate, experience of statutory audits
- The applicant has not provided a good, recent reference in support of their application from another Irish statutory auditor
- The applicant's recent audit experience and audit-related CPD has not been signed off by another Irish statutory auditor
- The applicant's recent audit experience and audit-related CPD has been self-certified as the experience was not supervised
- The applicant intends to practise in a firm where they will be the only audit-qualified principal
- The applicant has not provided written confirmation that they will have access to technical and ethical support from another firm of Irish statutory auditors
- The recent audit experience achieved by the applicant was not achieved on Irish registered companies or equivalent.

Guideline: grant the application

- A recent unforeseen or unexpected event has occurred which is outside of the applicant's control (for example, the applicant has been made redundant or their employer has died, retired or become incapacitated)
- The applicant has provided details of less than 10 audit engagements carried out during the last 24 months but has explained why and has provided additional information on the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work
- Although the applicant has not achieved adequate audit-related CPD in the last two years they have achieved an adequate amount of relevant audit experience in the last two years
- Although the applicant has achieved no, or inadequate, experience of statutory audits in the last two years they have obtained adequate experience in other types of audits in the last two years (eg non-statutory audits, charities audits)
- Although the applicant has achieved no, or inadequate, CPD relating to statutory audits in the last two years they have obtained substantial CPD relating to other types of audits in the last two years (eg non-statutory audits, charities audits)
- The applicant's audit experience and audit-related CPD in the last two years has been signed off by another Irish statutory auditor
- The applicant has provided a good, recent reference in support of their application from another Irish statutory auditor
- The applicant intends to practise in a firm where there will be other audit-qualified principals to provide support
- The applicant has provided confirmation that they will have technical and ethical support from another firm of Irish statutory auditors.

Recent audit experience is not corroborated

Guideline: refuse the application

- The applicant has made no attempt to get their recent audit experience signed off by their employer and/or has refused to allow ACCA to contact their employer to obtain corroboration
- The applicant has not contacted the firm's continuity nominee to obtain sign off and/or has refused to allow ACCA to contact the nominee to obtain corroboration
- The applicant has not provided (or provided inadequate) other forms of corroborative evidence for the recent audit experience they have achieved
- The applicant has not demonstrated that any exceptional circumstances exist
- The applicant has not provided a good, recent reference in support of their application from another Irish statutory auditor
- The applicant's recent audit experience and audit-related CPD has not been signed off by another Irish statutory auditor
- The applicant's recent audit experience and audit-related CPD has been self-certified as the experience was not supervised
- The applicant intends to practise in a firm where they will be the only audit-qualified principal
- The applicant has not provided written confirmation that they will have access to technical and ethical support from another firm of Irish statutory auditors

Guideline: grant the application

- The applicant has provided written evidence that they tried to get their recent audit experience signed off by the firm's continuity nominee
- The applicant has demonstrated exceptional circumstances such as a recent unforeseen or unexpected event outside of their control that prevented them from getting their recent audit experience signed off

- The applicant is a sole practitioner and there was no other UK qualified auditor in the firm to sign off their recent audit experience
- Although the applicant's recent audit experience and audit-related CPD has not been signed off, the experience outlined is appropriate and ACCA would have granted the application administratively if it had been signed off
- The applicant has provided other forms of corroborative evidence for the recent audit experience they have achieved (eg from the continuity of practice nominee)
- Although not in the same firm, the applicant's recent audit experience and audit-related CPD has been signed off by another Irish statutory auditor
- The applicant has provided a good, recent reference in support of their application from another Irish statutory auditor
- The applicant intends to practise in a firm where there will be other audit-qualified principals to provide support
- The applicant has provided confirmation that they will have technical and ethical support from another firm of Irish statutory auditors.

4.3.5 Adequate competence in audit work demonstrated through recent audit experience and audit-related CPD – Channel Islands and Isle of Man applications

Recent audit experience is deemed inadequate

Guideline: refuse the application

- The applicant has not demonstrated that any exceptional circumstances exist
- The applicant has provided details of less than 10 audit engagements carried out during the last 24 months and has not explained why and has not provided sufficient additional information on the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work
- The applicant chose to work in a firm that is unable to provide the necessary audit experience towards the award of an audit qualification
- The applicant has been given guidance by ACCA about the steps they need to take to meet the threshold of adequate competence in audit work but has chosen not to do so
- The applicant has achieved no, or inadequate, audit experience in the last two years
- The applicant has achieved no, or inadequate, audit-related CPD in the last two years
- The applicant has obtained some non-statutory audit experience in the last two years but no, or inadequate, experience of statutory (ie Companies Act) audits
- The applicant has not provided a good, recent reference in support of their application from another UK/ Channel Islands/Isle of Man statutory auditor
- The applicant's recent audit experience and audit-related CPD has not been signed off by another UK/ Channel Islands/Isle of Man statutory auditor
- The applicant's recent audit experience and audit-related CPD has been self-certified as the experience was not supervised
- The applicant intends to practise in a firm where they will be the only audit-qualified principal
- The applicant has not provided written confirmation that they will have access to technical and ethical support from another firm of UK/Channel Islands/Isle of Man statutory auditors
- The recent audit experience achieved by the applicant was not achieved on UK/Channel Islands/Isle of Man registered companies or equivalent.

Guideline: grant the application

- A recent unforeseen or unexpected event has occurred which is outside of the applicant's control (for example, the applicant has been made redundant or their employer has died, retired or become incapacitated)
- The applicant has provided details of less than 10 audit engagements carried out during the last 24 months but has explained why and has provided additional information on the AEF to demonstrate that they have recent, relevant and sufficient audit experience to be competent to conduct audit work
- Although the applicant has not achieved adequate audit-related CPD in the last two years they have achieved an adequate amount of relevant audit experience in the last two years
- Although the applicant has achieved no, or inadequate, experience of statutory (ie Companies Act) audits in the last two years they have obtained adequate experience in other types of audits in the last two years (eg non-statutory audits, charities audits)
- Although the applicant has achieved no, or inadequate, CPD relating to statutory (ie Companies Act) audits in the last two years they have obtained substantial CPD relating to other types of audits in the last two years (eg non-statutory audits, charities audits)
- The applicant's audit experience and audit-related CPD in the last two years has been signed off by another UK/Channel Islands/Isle of Man statutory auditor
- The applicant has provided a good, recent reference in support of their application from another UK/Channel Islands/Isle of Man statutory auditor
- The applicant intends to practise in a firm where there will be other audit-qualified principals to provide support
- The applicant has provided confirmation that they will have technical and ethical support from another firm of UK/Channel Islands/Isle of Man statutory auditors.

Recent audit experience is not corroborated

Guideline: refuse the application

- The applicant has made no attempt to get their recent audit experience signed off by their employer and/or has refused to allow ACCA to contact their employer to obtain corroboration
- The applicant has not contacted the firm's continuity nominee to obtain sign off and/or has refused to allow ACCA to contact the nominee to obtain corroboration
- The applicant has not provided (or provided inadequate) other forms of corroborative evidence for the recent audit experience they have achieved
- The applicant has not demonstrated that any exceptional circumstances exist
- The applicant has not provided a good, recent reference in support of their application from another UK/Channel Islands/Isle of Man statutory auditor
- The applicant's recent audit experience and audit-related CPD has not been signed off by another UK/Channel Islands/Isle of Man statutory auditor
- The applicant's recent audit experience and audit-related CPD has been self-certified as the experience was not supervised
- The applicant intends to practise in a firm where they will be the only audit-qualified principal
- The applicant has not provided written confirmation that they will have access to technical and ethical support from another firm of UK/Channel Islands/Isle of Man statutory auditors

Guideline: grant the application

- The applicant has provided written evidence that they tried to get their recent audit experience signed off by the firm's continuity nominee
- The applicant has demonstrated exceptional circumstances such as a recent unforeseen or unexpected event outside of their control that prevented them from getting their recent audit experience signed off
- The applicant is the only auditor in the firm and there was no other UK/Channel Islands/Isle of Man qualified auditor in the firm to sign off their recent audit experience
- Although the applicant's recent audit experience and audit-related CPD has not been signed off, the experience outlined is appropriate and ACCA would have granted the application administratively if it had been signed off
- The applicant has provided other forms of corroborative evidence for the recent audit experience they have achieved (eg from the continuity of practice nominee)
- Although not in the same firm, the applicant's recent audit experience and audit-related CPD has been signed off by another UK/Channel Islands/Isle of Man statutory auditor
- The applicant has provided a good, recent reference in support of their application from another UK/Channel Islands/Isle of Man statutory auditor
- The applicant intends to practise in a firm where there will be other audit-qualified principals to provide support
- The applicant has provided confirmation that they will have technical and ethical support from another firm of UK/Channel Islands/Isle of Man statutory auditors.

4.3.6 Conditions

If the Committee is minded to grant the application it may wish to impose conditions in order to safeguard the public. The Committee may wish to order the applicant to:

UK applications:

- Have their audit work hot reviewed by a training company or another registered auditor before any audit reports are signed off.
- Notify ACCA immediately if they take on any statutory audit clients or other clients which require a report to a regulator.
- Notify ACCA immediately when an audit report or report to a regulator is signed.
- Submit a CPD plan to ACCA by X date that addresses their audit-related CPD for X years.
- Receive a CPD evidence review from ACCA of their CPD records for X years to ensure compliance with the CPD regulations.

The Committee may also wish to order that should the applicant fail to comply with any of the conditions:

- the application is refused, or
- the application be referred back to the Committee.

Irish applications:

- Have their audit work hot reviewed by a training company or another registered auditor before any audit reports are signed off.
- Notify ACCA immediately if they take on any statutory audit clients or other clients which require a report to a regulator.
- Notify ACCA immediately when an audit report or report to a regulator is signed.
- Submit a CPD plan to ACCA by X date that addresses their audit-related CPD for X years.
- Receive a CPD evidence review from ACCA of their CPD records for X years to ensure compliance with the CPD regulations.

The Committee may also wish to order that should the applicant fail to comply with any of the conditions:

- the application is refused, or
- the application be referred back to the Committee.

Channel Island and Isle of Man applications:

- Submit a CPD plan to ACCA by X date that addresses their audit-related CPD for X years.
- Receive a CPD evidence review from ACCA of their CPD records for X years to ensure compliance with the CPD regulations.

Note: ACCA does not carry out audit monitoring in the Channel Islands and Isle of Man. Therefore, some of the conditions listed above for UK and Irish applications are not applicable to Channel Islands and Isle of Man applications. ACCA members who are responsible for audits of market traded companies in the Channel Islands and Isle of Man are monitored by ICAEW.



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Think Ahead