

Name	of Muhammad Umar
Respondent:	
Organisation:	Mo Chartered Accountants (Zimbabwe)
Responsibility:	Partner
Jurisdiction:	Zimbabwe
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Glossary

1. Do respondents support the proposals set out in the glossary concerning the proposed new and revised definitions? See Section III.

In addition to the definition under 32, we propose to include “professional competence”. Competence ought to be included since it relates to the actual conducting of the work and the elements of knowledge and skill are merely precursors and necessities to this critical element. This may latently be and form part of the knowledge, skills and experience but these 3 do not speak to one being competent. This has to be matter of judgement.

We agree to the removal of experience and classify it as a complementary requirement. This should restrict the profession from adopting its own definitions in future rather than being guided by dictionary, literal definitions. Definitions should be be-spoke to the professions unique challenges.

The separate definition of internal experts and external experts is crucial. A great number of audit firms have experts in house who match the skills, experience and knowledge of external experts. Internal experts should be subject to all the quality and independence requirements as ordinary employees are. External experts need to be scrutinised more closely since in many cases they have a relationship with the firm which to an independent party may be deemed to be too close or one that may impair independence. For the protection of the public interest, in the interest of the profession and to maintain inimitable standards of professional conduct and integrity we propose that all experts be subject to independence and quality requirements.

Evaluation of CCO for all Professional Services and Activities

2. Do respondents support the approach regarding evaluating an external expert's competence, capabilities and objectivity? Are there other considerations that should be incorporated in the evaluation of CCO specific to PAIBs, PAPPs and SAPs? See Section V.

We concur that evaluation of CCO should be performed prior to commencement. If, after acceptance matters come to light that cast doubt on the previous confirmation, then to the greatest extent possible the matters have to investigated and probed and may result in the previous assertions regarding COO to be nullified. Irregularities, misconduct or

contradictory matters may arise with the work of the expert and judgment has to be bought to bear on the impact such matters will have and the appropriate course of remedial action.

3. Do respondents agree that if an external expert is not competent, capable or objective, the Code should prohibit the PA or SAP from using their work? See paragraphs 67 to 74.

Yes we agree.

Evaluation of CCO for Audit or Other Assurance Engagements

4. In the context of an audit or other assurance (including sustainability assurance) engagement, do respondents agree that the additional provisions relating to evaluating an external expert's objectivity introduce an appropriate level of rigor to address the heightened public interest expectations concerning external experts? If not, what other considerations would help to address the heightened public interest expectations? See Section (V)(A).

Integrity of the expert is barely, if at all given adequate prominence and with greater emphasis on audit and assurance. This must be equally considered with objectivity and professional competence. Otherwise matters discussed in 77-86 are proportionate, fair, justified and operable.

Potential Threats Arising from Using the Work of an External Expert

5. Do respondents support the provisions that guide PAs or SAPs in applying the conceptual framework when using the work of an external expert? Are there other considerations that should be included? See Section (VI)(A).

This evaluation should be on-going and not merely pre-commencement, similar to independence requirements which require on to be independent throughout.

6. Other comments

Developing and developed countries should be permitted to discuss their unique challenges regarding implementation but we believe that generally application should not pose any peculiar challenges, yet we stand to be corrected on such and our assessment is by no means final and conclusive.

Translations may be permitted to suits the respective environments. The benchmarks should always be these standards as a minimum/benchmark/threshold requirement to ensure uniformity of application and adoption to enable comparability and equal application of the requirements.