Post Implementation Review of APES 320 and APES 325

Review of Submissions - Specific Comments
Post Implementation Review of APES 320 and APES 325

Note: General comments from Professional Accounting Bodies relating to Post Implementation Review (PIR) of APES 320 and APES 325 are addressed in separate tables/documents. This table excludes minor editorial changes.

Item No.	Paragraph No. in Standard	Respondent	Respondents' Comments	Proposed Action
1.	APES 320 – Para. 3.18	CPAA	Members operating as sole-practitioners still need to document policies and procedures and document this in action. Section 3.18 acknowledges that documentation requirements should be proportionate, in both form and substance, to the size and nature of a firm's practice. However, the standard would benefit from explicitly stating that sole practitioners are also required to appropriately document their policies and procedures. There are of course many good reasons for this, not least of all in the circumstance of a quality review, a dispute with a client and for succession planning purposes. The definition for "firm" includes sole practitioners, but a specific callout may solve this perception gap by removing any ambiguity as to this requirement for sole practitioners.	No
2.	APES 320 – Para. 4.30 Para. 4.31	CPAA	Given the exponential growth in AI being used by practitioners to date and in ways we still haven't foreseen, the near future may mean we see more firms with just one staff member doing work similar to multi-staff firms. We recommend that the PIR consider AI's specific impact on the Quality Control Management including interaction between sections 4.30 - 4.31 'Technology Resources' with the technology sections in Part 3 of APES 110.	Yes
3.	APES 320 – Para. 4.59 to 4.64	CPAA	Any revision of APES 320 should include greater consideration of data security in light of AI use, in particular section 4.59 - 4.64.	Yes

RESPONDENTS

1	CPAA	CPA Australia