



Thursday, 2 March 2023

Mr Channa Wijesinghe  
Chief Executive Officer  
Accounting Professional and Ethical Standards Board (APESB)  
Level 11  
99 William Street  
Melbourne VIC 3000  
Via email: [sub@apesb.org.au](mailto:sub@apesb.org.au)  
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Dear Channa

### Proposed Standard: APES 215 Forensic Accounting Services

Chartered Accountants Australia and New Zealand (“**CA ANZ**”) appreciates the opportunity to provide comment on the proposals to revise APES 215 *Forensic Accounting Services* (“**APES 215**”).

#### Request for Specific comments

- *The use of Artificial Intelligence (AI) or digital technology in Forensic Accounting Services*  
CA ANZ has no comment.
- *Aspects of APES 215 that may require revision or development to address the use of AI or digital technology.*

The recent proposed technology-related revisions to the Code of Ethics for Professional Accountants (“**the Code**”) considers the effects of AI and digital technologies on all services provided by professional accountants. It may be beneficial if APES 215 refers users to these provisions in the Code once they become operative.

#### General Comments

For the purposes of clarity, it would be beneficial if proposed amended paragraph 3.14 was drafted to reflect what is contained in the definitions for ‘Reports’. Members have expressed concern that this paragraph creates, or could create, an expectation with clients that any report prepared by an experienced forensic accountant is an Expert Witness Service. As the term ‘report’ is commonly used by accountants, it being a defined term may be overlooked.

Amended paragraph 7.1 indicates that a forensic accounting service may be included as an assurance or related service. Given the implications in terms of complying with the quality management standards, more guidance or examples are needed on when a forensic accounting service may be considered an assurance or related service.

It may also be useful for the definitions to include what constitutes expert evidence.

The **Appendix** provides more information about CA ANZ. Should you have any questions about the matters raised in this submission or wish to discuss them further, please contact Josephine Haste CA, [josephine.haste@charteredaccountantsanz.com](mailto:josephine.haste@charteredaccountantsanz.com).

Sincerely,

**Vanessa Chapman**

Group Executive - General Counsel and Corporate Assurance

## Appendix

### About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents 131,673 financial professionals, supporting them to make a difference to the businesses, organisations and communities in which they work and live. Chartered Accountants are known as Difference Makers. The depth and breadth of their expertise helps them to see the big picture and chart the best course of action.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with mentored practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate boldly in the public good. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations.

We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 15 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.

We employ more than 500 talented people across Australia, New Zealand, Singapore, Malaysia, Hong Kong and the United Kingdom.