

QAS Committee (the Committee) meeting

29 September 2022, 10.00-13:00 Quarterly meeting

| Attending: | Alison Carr (actuary), Alison Carr (lay), Helen Brown, Scott Cameron, Sophie Dignan, Victor Olowe (Chair) |
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| Executive Staff: | Cargill Sanderson, Katie Wood |
| Apologies: | Tze Leong Chan |
| Dial in details: | [REDACTED] |

| Item | Title | Action |
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| 1. | Welcome, apologies and conflicts | |
| | The Committee discussed the potential benefits of meeting in person. It was noted that most members of the Committee had not met any of the other members in person. It was agreed that it would be helpful to have a steer from the Regulatory Board (RB) on whether it would be acceptable to meet in person once a year. The Committee expressed a preference for meeting in person, at least once. A Committee member volunteered to email Neil Buckley, the RB Chair, for a steer on this matter. | Committee |
| | 1.1 To declare any conflicts of interest No conflicts of interest were noted with the exception [REDACTED] | |
| | 1.2 Review of previous minutes (16 June 2022 and 21 July 2022) Committee members will email the Executive if they notice any typos, and it was agreed that discussion in the meeting would be limited to either what should or should not be redacted or questions of the material accuracy of the minutes as a representation of the relevant discussion. | Committee |
| | The minutes of the meeting on 16 June 2022 The following changes were requested, which will be made by the Executive following the meeting: | Executive |
| | 3.1, last paragraph: to be rephrased for clarity [REDACTED] 4.6 noted an action that does not appear in the action list – action list to be updated 4.8, redaction needs to be updated to ensure the approval is included in what can be viewed publicly. It should also be indicated, in the non-redated version, that [REDACTED] 7.1, final paragraph, [REDACTED] 8.1, second paragraph, [REDACTED]. | |



| Item | Title | Action |
|------|--|-----------|
| | 9, first paragraph, [REDACTED][REDACTED] | |
| | The minutes of the meeting on 21 July 2022 The following changes were requested, which will be made by the Executive following the meeting: | |
| | 2.1, last sentence, [REDACTED] 2.5, organisation name should be redacted 4.1 (DEI Reports), [REDACTED] | Executive |
| | The minutes of 16 June 2022 and of 21 July 2022 were approved, pending the above-mentioned changes, which will be made by the Executive, and pending any additional comments on typos provided to the Executive by the Committee. | |
| 2. | Standing items | |
| | 2.1 To review the live action list Committee Business actions 380 and 381 (regarding whether or not at least one SQAR needs to be an IFoA member) require input from the Regulatory Board (RB). It was noted that the matters may not be sufficient to merit a RB agenda item, but that RB needs to be consulted in some way The Committee asked for the Executive to advise on the best approach. The advice was that this matter falls within the scope of wider IFoA governance considerations on regulatory matters. The Executive took an action to follow up on this point with the Head of Regulatory Policy to establish when it might be considered by RB. | |
| | 2.2 To discuss the use of the strategic plan going forward This topic was introduced with background on how and why this document was initially created. In discussion it was agreed that this document had served its useful purpose, but that it was necessary to maintain a strategic document of some kind. Emphasis was placed on both the need to: put an appropriate strategic document in place to track progress; and, agree on what the Committee's new strategic priorities should be. | |
| | With respect to putting in place a document, the Executive took an action to bring together a draft Work Programme document, which will be used by the Committee on an annual cycle (to fit with the Committee's reporting cycle to RB, running from June to May). The Work Programme document will include the Committee's strategic priorities (for the 12 or 24 month period ahead), as well as items such as the Committee's annual Self-assessment, its annual report to the RB, and its regular review of its | Executive |



| Item | | Title | Action |
|------|---------------------------|---|-----------|
| | i | Terms of Reference (ToR). It was also suggested that it would be useful to include a one-line summary, and to make sure that closed issues are archived to ensure the document is kept to a manageable and user friendly length. | |
| | t 2 k 1 | With respect to agreeing strategic priorities, the group agreed that this would be best done at an in-person meeting subject to obtaining a steer as referred to earlier in the meeting in Section 1 above. The agreed aim was to have everything in place for the start of the next reporting year (ie June 2023). The Committee noted that any meeting to agree priorities would be best to take place once feedback has been received from SQARs on the recent changes to the Scheme, and once the next Committee Self-assessment exercise has taken place. The Executive will investigate options for an in-person meeting for the Committee. | Executive |
| | t 0 2 | During the discussion it was noted that the RB, at their Strategy Day on 27 September, had considered its future subcommittee structure and that the Chair had been consulted prior to the consideration by the RB It was noted that the Committee was considered an essential part of that structure on an on-going basis. Whilst not of material importance to the RB discussion of 27 September, an out-of-date version of the Committee's ToR had been provided with the RB papers. The Executive took an action to ensure that the correct version was highlighted to relevant Executive colleagues. | Executive |
| | l \ | The significance of how the QAS has incorporated Diversity, Equity and Inclusion (DEI) was also highlighted. Not only does the inclusion of DEI add value for accredited organisations, but it makes the QAS something of a flagbearer in the context of the wider IFoA priorities concerning DEI. | |
| 3. | Updat | te from the IFoA Executive | |
| | | To discuss the Executive update | |
| | - ((| KPIs linked to the Handbook There was challenge of the suggested timelines in the suggested KPIs. Following a response to, and discussion of, those challenges the Committee agreed with the suggested KPIs. The Committee agreed that the Executive may need to escalate certain cases by email (such as Change of Lead SQAR applications, or Annual Returns) if waiting for their next meeting may cause am unreasonable or problematic delay. Such escalations would include cases where an organisation would be left without a SQAR for a significant period without the escalation. | |
| | | It was agreed that the Committee should see a report on KPIs once a year, for noting, as part of the new Work Programme (see 2.2, above). | |



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| | QAS Application form This discussion was triggered following an application in which the | Executive |
| | applicant had referred to many of its own existing internal documents as part of their application, instead of providing information in their application form. The overall volume of the documentation on which the application relied was larger than could reasonably be considered by the Committee. For this reason, the Committee had found that they were almost completely dependent on the work of the ICAEW in their assessment of the applicant. | |
| | In that context, the Committee considered two matters. First, whether to update the minutes from the meeting at which this application was discussed in order that its decision in relation to the form could be more clearly recorded. Second, whether there should be an adaptation in the application form or application process to anticipate and mitigate against similar applications in the future. | |
| | The Committee agreed that the minutes of the original meeting should remain unchanged. | |
| | Additional guidance, perhaps including a request to summarise additional documentation was briefly considered. However, it was felt that this may act as a disincentive for applicants to provide additional documentation. The Committee agreed that the Executive should be given discretion to seek further information in cases where applicants provide a response such as the one discussed. | |
| | Strategic actions It was agreed that this had been covered under 2., above. | |
| | Re-accreditation form It was agreed to accept the recommendation to update the form to include a section in which applicants are asked to reflect on progress over the period of accreditation, and provide a brief, general summary of its improvements over that time, as they relate to the QAS outcomes. | Executive |
| 4. | Re-accreditation Reports | |
| | 4.1 First review of [REDACTED] Re-accreditation Report | |
| | It was noted that the organisation's re-accreditation form had been reviewed at a previous meeting, and the Executive provided a summary of that discussion as a reminder. | |



| Item | | Title | Action |
|------|-----|---|-----------|
| | | The organisation's re-accreditation was approved. [REDACTED]. All Best Practice Findings (BPFs) remain open and the organisation should provide an update in its next Annual Return. | Executive |
| | 4.2 | First review of [REDACTED] Re-accreditation Report It was noted that the organisation's re-accreditation form had been reviewed at a previous meeting, and the Executive provided a brief summary of that discussion as a reminder. | |
| | | The Executive provided an update on the response from the organisation to a request for further information following review of their re-accreditation form. The organisation noted that a resource strain had meant that Cold File Reviews (CFRs) had not been a priority. In addition, [REDACTED], and while awaiting the introduction of a new TAS 100 from the FRC, the organisation had decided to hold over further CFRs until next year. | |
| | | The organisation's re-accreditation was approved. [REDACTED]. All BPFs remain open. | Executive |
| | | A more general question about CFRs was raised, noting the frequency with which they have been cited in re-accreditation reports as an area for improvement. It was considered that there was no technical regulatory reason for this, and it was agreed that the Executive would ask the ICAEW about the rationale for this focus in their reports. | |
| | 4.3 | First review of [REDACTED] Re-accreditation Report It was noted that the organisation's re-accreditation form had been reviewed at a previous meeting, and the Executive provided a summary of that discussion as a reminder. | |
| | | The organisations re-accreditation was approved. [REDACTED]. All BPFs remain open and the organisation should provide an update in its next Annual Return. | Executive |
| | 4.4 | First review of [REDACTED] Re-accreditation Report It was noted that the organisation's re-accreditation form had been reviewed at a previous meeting, and the Executive provided a summary of that discussion as a reminder. | |
| | | The organisation's re-accreditation was approved. [REDACTED]. All BPFs remain open and the organisation should provide an update in its next Annual Return. | Executive |
| | | In the discussion it was suggested that "near misses" may be a useful discussion topic for SQAR Forum, whilst acknowledging that there would | Executive |



| Item | | Title | Action |
|------|------|---|--------|
| | | have to be sensitive planning if organisations are to be happy to share experiences in that setting. | |
| | 4.5 | First review of [REDACTED] Re-accreditation Report It was noted that the organisation's re-accreditation form had been reviewed at a previous meeting, and the Executive provided a summary of that discussion as a reminder. | |
| | | The Matter Requiring Action (MRA) identified by ICAEW was now considered closed given that the matter had been dealt with and the firm had been very open with both ICAEW and the IFoA about how the matter arose. The organisation's re-accreditation was approved. [REDACTED]. All BPFs remain open and the organisation should provide an update in its next Annual Return | |
| 5. | Re-a | accreditation Forms | |
| | 5.1 | First Review of [REDACTED] Re-accreditation Form | |
| | | At 11:44 there was a break, during which time it was agreed everyone would read the re-accreditation report for this item, (which had been included as a last-minute item in the papers having been received in good time to have been included). It was agreed the meeting would restart at 12:00. | |
| | | The organisation's re- accreditation was approved following discussion on the lack of detail on Conflicts of Interest and Speaking Up in the form. [REDACTED]. All BPFs remain open and the organisation should provide an update in its next Annual Return. | |
| 6. | App | lications for re-accreditation | |
| | 6.1 | First review of [REDACTED] Re-accreditation Report and Form | |
| | | It was noted that two additional SQARs had now been appointed, following an application processed by the Executive. | |
| | | There was general agreement that the standard of the information provided by the organisation was of a high standard, with strong examples in relation to best practice in both Quality Assurance and DEI provided However, the organisation had submitted its material late and had not used the standard form provided. The Committee discussed those two points at length. | |
| | | The Committee agreed that the organisation, despite not using the standard form, had not prevented them from demonstrating that the QAS outcomes were being achieved. However, they also noted that it meant | |



| Item | | Title | Action |
|------|--------|--|-----------|
| | | they had not provided certain information, which all other organisations had been required to provide in particular relating to the two columns in section 5 of the form. Given that the organisation has not used the standard forms previously, the Committee gave consideration to how best to proceed in the future. First, however, they satisfied themselves that all reasonable accommodations had been made both by the Committee and the Executive. They agreed to continue to request information in the standard form, to continue to offer additional support to help the organisation with future returns, and to manage any exceptions on a case-by-case basis. | |
| | i | With respect to timeliness, it was noted that the organisation had been late in providing not only this application for re-accreditation, but also its previous annual returns. It was noted that the organisation had indicated that because of their internal processes, it is not appropriate for them to provide information until after August, each year. The Committee agreed that the organisation should be offered the option of moving their accreditation date, by paying an additional <i>pro rata</i> fee to extend the accreditation from their current accreditation date, to sometime after August. Should the organisation either decline this offer, or continue to provide late submissions despite changing accreditation date, the Committee agreed that a more firm approach may have to be considered. | |
| | i (| The re-accreditation was approved. When writing to the organisation, the Executive will propose a change of accreditation date, in the way described. [REDACTED]. All BPFs remain open and the organisation should provide an update in its next Annual Return | |
| | | First review of [REDACTED] Re-accreditation Report and review of updated re-accreditation form. | |
| | i | It was noted that the organisation's re-accreditation form had been reviewed at a previous meeting, and the Executive provided a summary of that discussion as a reminder. | |
| | (| It was noted that the form had required significantly more information than originally provided, which had now been included after follow-up by the Executive. It was commented that the additional information provided remained brief, although not so brief as to prevent re-accreditation. | |
| | 5 | When discussing the ICAEW report it was noted that there was a significant discrepancy between the organisation's relatively generous assessment of its approach to DEI and the ICAEW assessment. | Executive |



| Item | | Title | Action |
|------|-------|---|-----------|
| | | The organisation was re-accredited. [REDACTED]. All BPFs remain open and the organisation should provide an update in its next Annual Return | |
| 7. | Ann | ual Returns | |
| | 7.1 | First review of [REDACTED] Annual Return | |
| | | The Committee was reviewing this return following a request for information by the Executive prior to bringing it to the Committee. The Executive were commended on the way in which they drafted the request for information to the organisation. | |
| | | Whilst there was agreement that the return had met the minimum standard required, there remained concern that there was insufficient focus on continuous improvement with respect to the QAS Outcomes. It was agreed that in the response to the organisation the Executive would encourage the organisation to consider incorporating best practices highlighted in the annual report to SQARs and to take advantage of SQAR Forums and the QAS Handbook as sources of further inspiration for improvements. An emphasis should be placed on the need to demonstrate that changes have had an impact. | Executive |
| | | The return was noted without a request for further information. [REDACTED]. | |
| 8. | Inter | rim Visit Reports | |
| | 8.1 | First review of [REDACTED] Interim Visit Report | |
| | | It was noted that the organisation had indicated that it would not be adopting a BPF which had the recommendation to introduce CFRs. Whilst not a problem in itself, there was concern that the organisation had not provided a rationale for this decision, either in terms of indicating what mitigating review activities it already conducts or indicating what alternative it intends to pursue. The Committee asked the Executive to clarify this matter with the organisation. | |
| | | The Executive will request further information from the organisation. The Committee gave the Executive discretion to decide whether the organisation's response is sufficient for the accreditation to continue without further review by the Committee. Based on that contingency, continuation of the accreditation was approved. If the Executive deems it necessary, the Committee will review the organisation's response at its next meeting. [REDACTED]. BPFs 1, 2 and 4 remain open, the organisation should provide an update in its next Annual Return unless the Executive is minded to refer the response to the request for more information about CFRs to the Committee. BPF 3 is now closed. | |



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| 9. | Qual | ity check of Executive Annual Return analysis | |
| | 9.1 | QA Check of [REDACTED] Annual Return | |
| | | The Executive took an action to check if this return should have been considered by the Committee, and whether the organisation had already been contacted following assessment of the return. It was agreed that the return would be discussed today in either case. | |
| | | The annual return was noted without any specific feedback for the organisation. [REDACTED]. All BPFs were closed. | Executive |
| 10. | АОВ | | |
| | 10.1 | Additional Items | |
| | | It was agreed that the next scheduled call could be cancelled if the Executive judged the response from [REDACTED] to be sufficient. The Executive will inform the Committee as to whether the meeting will take place. | Executive |
| | | It was noted that the initial tranche of 20 re-accreditations had now been successfully completed. | |