



Forensic Accounting: Time for a Unified Global Approach

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Abstract

Forensic accountants need to respond to the ever-growing global threat of financial crime and the continuing need for expertise within the area of financial dispute work. The global development of forensic accounting as a discipline has been ad hoc, and this paper will focus on the two most developed nations regarding the expansion of forensic accounting i.e., the USA and the UK. From this study two major themes have emerged: that of the status of the regulation and education of forensic accountants within the USA and the UK and we ultimately call for radical reform in both areas. Currently there is no recognised regulatory body which encompasses all aspects of a forensic accountant's role, thus there is no standard code of ethics which practicing forensic accountants are obliged to follow. In addition, the absence of a recognised educational route to becoming a forensic accountant has resulted in a lack of awareness of the role as a potential career path and makes succession planning within forensic accounting firms problematic.

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1. Introduction

Forensic accounting is a multi-faceted, developing discipline. Although its roots sit firmly within the arena of fraud examination and investigation, the work of the forensic accountant within the area of financial dispute resolution is of equal importance.

Globally, financial crime continues to have a significant impact. The Association of Certified Fraud Examiners (ACFE) in their most recent Report to the Nations (ACFE, 2022) estimate that the average US company loses approximately 5 percent of its revenues to fraud each year and that global occupational fraud, across 133 countries, has reached \$3.6bn, spanning 2,110 cases. Corruption was identified as the most common occupational fraud scheme in all eight global regions recognised, with 50 percent of all reported cases involving corruption in some form. The US Department of Justice reported that 342 individuals were convicted in cases brought by the Fraud Section in 2022, 107 of which relate to the Market Integrity and Major Frauds (MIMF) Unit (United States Department of Justice, 2022).

Forensic accounting practitioners have evolved as different forms of financial crime and dispute work have also evolved. Regulators and organisations have also emerged within the space; ACFE forming within the United States in 1988 with other international examples such as the Government Counter Fraud Profession (GCFP) forming in the UK in 2018. Alongside this, educators have developed degree programmes and training materials to support the continuing growth and demand for appropriately trained forensic accountants.

Within the UK, the KPMG Fraud Barometer 2021 valued fraud losses in that calendar year at £445 million and stated that the number of fraud cases in UK courts equalled 298 (KPMG, 2022). The scale of the problem within the UK is further substantiated by Cifas, an organisation which identifies itself as the UK's leading fraud prevention service. Cifas reported that over 360,000 cases of fraudulent conduct were recorded by them, close to pre-pandemic levels (Cifas, 2022). Action Fraud, the UK's national reporting centre for fraud and cybercrime state that 875,622 cases of fraud were reported in 2020-21 with a total loss of £2.35bn, an increase of £0.05bn from 2019-20 (Action Fraud, 2022).

The significant international money laundering issue is, by its very nature, almost impossible to quantify, though the United Nations have estimated that globally costs sit between \$800 billion and \$2 trillion (United Nations, 2022).

The Covid-19 pandemic has had a significant impact on fraudulent behaviours. In the period 1 January 2020 to 13 February 2023 the Federal Trade Commission (FTC) reported that fraud cases in the US which specifically mentioning Covid-19 have a total loss of \$1.01billion (Federal Trade Commission, 2023). This behaviour is further evidenced within the UK; the UK

Parliament Public Accountants Committee report *Covid-19 Cost-Tracker*, states that UK government losses due to the pandemic, as a direct result of fraud and error sit within the range of £12.4bn to £20.1bn (House of Commons, 2022).

As the world faces the risk of another global economic recession (World Bank, 2023), fraud is likely to increase with respect to an upsurge in *claim culture*, a phenomenon experienced during the economic recession of 2008 (Pallot, 2009). At that time, individuals and organisations were initiating disputes to obtain compensation, thus increasing their income during a time of financial uncertainty.

Fraud detection is only one element of the forensic accountant's role, however this continuing upsurge in fraud cases is an indication of the continuing growth in workload for the forensic accountant in all aspects. With financial crime recognised as the key funding source for all forms of serious organised crime and with key drivers such as the impact of the current economic position alongside the fallout from the Covid-19 pandemic, it is imperative that both current and future forensic accountants are appropriately skilled and are ready to act proactively if there is ever to be a reduction in the substantial statistics quoted above. The demand for forensic accountants globally is certainly on the increase with "*fraud....a major international problem*" (Prabowo, 2013, p. 353).

A significant number of established forensic accountants have become experts within their field by building experience and gaining knowledge as and when differing case types have presented themselves in what was at the time, a new area of investigative accounting. As the demand for forensic accountants continues to grow, it is essential that the discipline establishes a more formal, recognised route. Potential forensic accountants should obtain a recognised relevant qualification and achieve membership of a regulated professional body prior to being able to practice. This approach would offer a clear career path to graduates who may not otherwise fully understand the role. In addition, it would give the users of forensic accountants the assurances they should expect regarding the credibility of the discipline overall.

The structure of this paper addresses the themes raised within section one. Section two examines forensic accounting and its global development with section three moving on to consider the skillset of the forensic accountant. Section four and five explore forensic accounting within the United States of America and the United Kingdom respectively, with a comparative critique at section six. An overall conclusion is offered at section seven with final recommendation presented at section eight.

2. Forensic Accounting and its Global Development

There are several definitions which attempt to describe what forensic accounting is and the skillset required to be successful in the role. Surprisingly, the United States dictionary, Meriam-Webster, does not offer a definition for the phrase, whereas in the UK, the online Oxford English Dictionary's definition encompasses the role in the simplest terms: *"...a branch of accounting which analyses financial information to be used as evidence in legal proceedings and the investigation of crime, esp. fraud.."* (Oxford Dictionaries, 2022). Academics have also attempted to define exactly what forensic accounting is. *"Forensic accounting includes the use of accounting, auditing and investigative skills to assist in legal matters"* (Houck, et al., 2006, p. 68). *"...the relation and application of financial facts to legal problems"* (Singleton & Singleton, 2010, p. 12). As Frank Piantidosi, states, the then chairman and chief executive of Deloitte Financial Advisory Services *"it really is much more than dealing with numbers"* and that the field is *"complex and demands specialist knowledge"* (Accounting Today, 2006, p. 32). It has been said that the role encompasses a variety of fields of expertise including accounting, business, law and IT (Van Akkeren, Buckby, & MacKenzie, 2013). Digabriele suggests that forensic accountants are hired to apply their *"unique expertise to an array of diverse assignments"* (Digabriele, 2010, p. 331). The fact that so many different studies are offering their own interpretation of exactly what forensic accounting is, all comprising of a variety of differing elements, highlights that the discipline is indeed still developing and emphasises a need for a definitive definition of exactly what the discipline entails. We must know what it is we are regulating before we can regulate it.

Forensic accounting is developing at a differing pace throughout the world. The term *forensic accounting* is said to have first been used in the United States in 1953 (Smith, 2015) and yet in other nations the discipline is still viewed as a relatively new practice. If forensic accounting is to emerge as a world-wide international profession, it is imperative that a global approach is taken regarding its development. International inconsistencies could discourage capable, newly qualified accountants from considering the role as a career option. They may view the discipline with caution, not willing to enter this relatively unknown, unregulated area of accountancy.

Within the UK, whilst the discipline is more established than in most other countries, there is still a lack of a clear educational route or of any compulsory regulation of practitioners. Forensic accountants can achieve recognition of status, with organisations such as the Network of Network of Independent Forensic Accountants (NIFA) who offer membership to forensic

accountants, but this is voluntary and generally only relevant to relatively smaller accountancy firms who offer forensic services.

Within Australia, although the practice is a recognised profession, *"little is known about... Australian forensic accounting services"* (Van Akkeren, Buckby, & MacKenzie, 2013, p. 189). Akyel suggests that within Turkey, forensic accounting is still a new phenomenon referring to forensic accounting as a *"new area of expertise"* (Akyel, 2012, p. 77). Currently, a project in Bosnia and Herzegovina, funded by the US Embassy, is developing forensic accounting education programs, the purpose of which is to address the *"lack of trained forensic accountants"* which *"hampers government and private sector efforts to detect and combat fraud"* (University of Sarajevo - School of Economics and Business, 2023). The discipline is clearly emerging at a differing pace throughout the world which is certain to present difficulties over time. The role and the responsibilities of a forensic accountant will be defined by the differing practices, educational models and regulatory requirements within each country rather than by a unified global approach to its development.

3. The Skillset of a Forensic Accountant

The key skills of a forensic accountant have been identified in various studies and have included skills such as communication, critical thinking, interpersonal skills, technical accounting skills and attention to detail (Van Akkeren, Buckby, & MacKenzie, 2013). Further skills such as having a strong accounting background, a thorough knowledge of auditing procedures and an understanding of risk assessment (Akyel, 2012) have also been acknowledged. Within the American publication *Accountancy Today* core skills were listed as communication, simplifying information and critical/strategic thinking (Carlino, 2010). In addition, Digabriele identified skills such as deductive analysis, critical thinking and specific legal knowledge (Digabriele, 2010). By way of comparison, the top three skills identified as needed by present day auditors were professional integrity, assessing audit evidence and having a questioning mind (Siriwardane, Kin Hoi Hu, & Yew, 2014). These skills do not appear to be significantly different from the skills identified as needed by a forensic accountant. As such all the skills identified thus far could be said to be generic skills applicable to all types of accountants. It is however the psychology of the forensic accountant which makes them stand out from the crowd and become a *financial detective* (Cornett, 2015). A forensic accountant needs to be *"curious, tough and creative"* (Bozkurt, 2000 as cited by Akyel, 2012 p. 80) and *"have the ability to differentiate the right from the wrong, courage to stand up for what is*

right...and a puzzle solving mind-set" (Prabowo, 2013, p. 361). Carly Chynoweth a forensic accountant with EY in Jersey described herself as *inherently nosy* (Chynoweth, 2010). The intuition of a forensic accountant has also been considered with most respondents to a study undertaken in 2009 stating that a forensic accountant's intuition can only be gained from experience (Davis, Farrell, & Ogilby, 2009). Further traits of *persistence* and *inquisitiveness* have also been identified (McIntosh, 2015). It would appear that it is the character of the forensic accountant that differentiates them from the more general accountant.

4. Forensic Accounting within the United States of America

The US is evidently several years ahead in terms of the development of forensic accounting as a discipline, not just in respect of the UK but also the rest of the world. Within the US, the prospective forensic accountant has a specific career path to take. They would need an appropriate degree, to qualify as an accountant and ideally obtain a professionally certified forensic accounting qualification. The problem arises when considering which professional certification to choose. The rate of growth of the profession has led to several certification corporations being formed with differing membership standards and codes of ethics.

4.1.Education of Forensic Accountants within the USA

The principally recognised professional accounting body with the US is AICPA (American Institute of Certified Public Accountants). Accountants who qualify with AICPA gain the designatory letters CPA i.e., Certified Public Accountant. To become a CPA, an individual must satisfy AICPA's 3 E's - Education, Exam and Experience (AICPA, 2022). Education requirements are set by the specific state in which the CPA wishes to be registered. By way of an example a Californian student must have undertaken 150 semester units with a proportion being in accountancy subjects prior to being eligible to sit the AICPA exam (State of California, 2022). The applicant then goes on to take the AICPA exam which consists of four sections:

- Auditing and Attestation
- Business Environment and Concepts
- Financial Accounting and Reporting
- Regulation

From a review of the syllabuses, the American forensic accountant receives very little forensic training as part of their professional chartered accountant qualification.

In 2010 AICPA sponsored a research paper to consider the characteristics and skills of forensic accountants (Davis, Farrell, & Ogilby, 2009). Over 750 responses were received from US lawyers, CPA's and accounting academics. One of the outcomes of the survey was that on average all respondent groups *strongly agreed* that there was a need for a forensic accountant to have a relevant credential. Participants were also asked to consider the characteristics and skills of forensic accountants. Looking specifically at the lawyers' responses (the only category relating to the users of forensic accounting services) they identified *analytical* as the number one essential trait, *communication* as the number one core skill and *analyse and interpret financial statements* as the number one enhanced skill. Realistically, these skills can be taught via a standard professional accountancy educational route although other skills such as *testifying* and potentially *critical thinker*, which were ranked less highly by the participants, would need to be taught via either specific academic study or a specialised professional certification.

A further area the study considered was whether the intuition of a forensic accountant can be taught or must be gained from experience. On a scale of 1 to 5, with 1 being strongly agree and 5 being strongly disagree, the lawyers gave an average score of 2.97 in relation to whether intuition can be taught and 1.93 in relation to it being learned from experience. Therefore, the majority agreeing that intuition is gained from experience.

ACFE give their interpretation of the educational requirements of a forensic accountant as: (ACFE, 2022):

- A bachelor's degree in forensic accounting, accounting, finance, or a related field
- Education in criminal justice or law enforcement
- Certified Public Accountant (CPA) or Chartered Accountant (CA)
- Certified Fraud Examiner (CFE) *encouraged*

Although this list may be somewhat skewed in favour of ACFE's own qualification, it does highlight that there is a desire (albeit not compulsory) for the forensic accountant to have certification over and above that of a qualified accountant. The FBI state that to work for them as a forensic accountant the applicant should hold a relevant bachelor's degree, and ideally be a qualified accountant and hold other relevant qualifications which include CFF, CFE and CIA (Certified Internal Auditor) (FBI, 2022). For highly regarded professionals and organisations to be promoting these qualifications on their websites highlights the importance that the discipline within the US places upon them.

It is not possible to obtain a definitive list of the number of universities within the US which offer either a bachelor's or a master's degree in forensic accounting, however basic internet research suggests that there are numerous campus and online options for American students to undertake this line of study.

4.2.Regulation of Forensic Accountants within the USA

US Stakeholders within the forensic accounting arena do have a desire for a recognised certifying organisation with Huber suggesting that this should be regulated by the government (Huber, Should the Forensic accounting profession be regulated?, 2013). Huber's overriding concern within his paper is the lack of regulation of the current certifying corporations.

A further Huber study (Huber, A Comparison of Forensic Accounting Corporations in the United States, 2011) looked at the different corporations offering accreditation within the US. The study was particularly interested in the governance and ethics of these organisations with an aim of identifying whether the forensic accountants who were accredited by these corporations were fully ofay with the qualifications of the officers and directors of their chosen corporation, whether they were aware of the code of ethics in place and whether they had an overall awareness of the corporate history.

The corporations identified as offering certification within the US were:

- Forensic CPA Society Inc. (FCPAS)
- Association of Certified Fraud Specialists (ACFS)
- Association of Certified Fraud Examiners (ACFE)
- American College of Forensic Examiners International (ACFEI)
- National Association of Certified Valuation Analysts (NACVA)

Huber found that all except one of the corporations (ACFS) to be profit making. ACFS as the most recently formed corporation identified by the paper, was also the only corporation to tick all of Huber's other criteria in a positive light, potentially sensing the need for change with regard to regulation and wanting to be at the forefront when and if this occurs. The study also found that most members of these organisations *believed* that the officers and directors held appropriate qualification and certification i.e., in the main members do not rigorously review the issuers of their certification prior to registering and paying their fees.

In addition to the certifying corporations identified by Huber, Smith identified several other institutions within his article published in the CPA Journal, March 2015 (Smith, 2015):

- America Board of Forensic Accounting
- Institute of Certified Forensic Accountants

- The Association of Chartered Certified Forensic Accountants
- Forensic CPA Society

Huber suggests that the forensic accounting profession in the US could be under threat and that government regulation is required (Huber, 2013). He highlights the disciplines significant role in the judicial process and the difficulties faced when attempting to comply with the gatekeeping approach to expert testimony introduced in Daubert (Daubert v Merrell Dow Pharmaceuticals Inc, 1993). Without government recognised standards, courts will find it difficult to establish whether a forensic accountant is suitably experienced. The Daubert guidelines and its criteria-based approach is used within the US to determine whether expert evidence is admissible. Federal Rule 702 (US Government, 2014) is concerned with the qualifications of the expert. During the period 2000 - 2021 there were 3,342 Daubert challenges to financial experts, 181 of those were in some way related to qualification (PWC, 2022).

There is little doubt that an American forensic accountant is recognised as an expert and as a professional within their field. However, the rapid growth of the discipline has led to the formation of several unregulated, profit-making institutions offering certification to forensic accounting professionals. With no form of regulation and in some instances no code of ethics, this will undermine the profession as ultimately it will be the user of forensic accounting services who has to decipher which of the corporations are the most relevant and most scrupulous. As Huber says this could put the profession in jeopardy (Huber, 2011).

5. Forensic Accounting within the United Kingdom

The UK forensic accounting discipline, whilst clearly performing, still lacks structure and form. The lack of a recognised career path for future forensic accountant is of concern. Current forensic accountants are marketing their services based on experience rather than any additional qualification or certification, an aspiring forensic accountant is going to find it difficult to compete with this. Current forensic accountants may well be succession planning and training the next generation, but such an ad hoc methodology will not create uniformity and thus the users of the forensic accounting service will not have a benchmark to enable them to hold forensic accountants to account.

5.1. Education of Forensic Accountants within the UK

A brief review of the current syllabuses of the main UK professional accounting bodies (ICAEW, ACCA and CIMA) found that forensic accounting receives limited coverage, this could deter capable, qualified accountants from considering forensic accounting as a career

option. If accountants are not hearing the term *forensic accounting* within their professional study, it will follow that they will not feel confident to take on the role. It may well be that most of the required skills are taught via the standard professional body syllabuses but is not being packaged as being *specifically* relevant to a role in forensic accounting. A simple re-branding of the syllabuses may be all that is required to give qualified accountants the confidence to become forensic accountants. All of the accounting professional bodies also offer ad hoc forensic accounting related conferences, training and online courses.

Currently, within the UK there is no dedicated professional forensic accounting qualification. This is generally replicated throughout the world with only the US offering a professional qualification via ACFE. The limitations of the ACFE qualification from a UK perspective is that all prospective CFE's study the same US based syllabus, i.e., they develop an understanding of US laws and regulations and as such, achieving accreditation does not guarantee that the UK CFE has an adequate understanding of UK legal processes. An article published within a UK newspaper *The Independent* stated that to become a forensic accountant you needed "...an accountancy qualification and the right mind-set" (Cafferty, 2006). Interestingly, this article was written by an individual who held the ACFE qualification and yet he did not discuss it as either a requirement or even as being beneficial to the would-be UK forensic accountant.

It is possible to obtain an academic qualification in forensic accounting within the UK with two universities offering an undergraduate programme (UCAS, 2022) and four universities offering a postgraduate programme (UCAS, 2022). However, based on 343 providers of undergraduate courses within the UK (UCAS, 2022), it is clear that academic options are limited. A study undertaken looking at the desire to add forensic accounting skills to university studies detected very little aspiration for curricular change (Gierlasinski, Carnes, & Fuhrman, 1998). The most frequent response was that there was not enough room on the curriculum to add further content. A 1994 study (Siegel & S, 1994) concluded that entry-level accountants were under prepared in many areas including managerial accounting and in their understanding of real-world problems. Perhaps explaining why forensics is not yet an option for universities as they are still working on getting the basics right for the more traditional accountant. These two papers (Gierlasinski, Carnes, & Fuhrman, 1998) and (Siegel & S, 1994) are however relatively old, it would be interesting to see the results if these two studies were undertaken again. Universities are beginning to offer forensic accounting as a module on their more general accountancy courses, for example, Nottingham Trent University offer *Forensic*

Accounting and Assurance during the second year of their Accounting and Finance BA (Hons) course (Nottingham Trent University, 2022).

Reviewing the UK corporate forensic websites of the Big 4 accountancy firms and specifically looking at the information pertaining to the head of the service, none of the four individuals state that they have any specific forensic accounting qualifications (Deloitte, 2022; EY, 2022; PWC, 2022; KPMG, 2022). They do however emphasise the forensic experience that they have over and above any accounting qualifications they hold.

To have to look overseas, i.e., to ACFE for a qualification is not ideal. The users of UK forensic accountants need to be confident that the certification is relevant and that the professionals they appoint have the necessary skills for their own UK case.

5.2.Regulation of Forensic Accountants within the UK

Within the UK, accreditation, or any form of regulation of forensic accountants is limited. The Institute of Chartered Accountants in England and Wales (ICAEW) did offer accreditation, but this was withdrawn in 2016, instead now offering membership of a *community* which is open to anyone for a fee or free to ICAEW members. Independent forensic accountants can apply for membership with the Network of Independent Forensic Accountants (NIFA) (NIFA, 2022). However, this is only available to experienced forensic accountants, not to new or relatively inexperienced forensic accountants. Interestingly NIFA state on their website that all of their members are “*qualified Accountants as well as members of either the Academy of Experts or the Expert Witness Institute*” (NIFA, 2022) perhaps recognising the need to add something extra if they are to compete for work against the larger accountancy firms. The Academy of Experts (Academy of Experts, 2022) and the Expert Witness institute (Expert Witness Institute, 2022) offer differing levels of membership but this is with regard to being an expert witness in general, covering a number of professions, it is not specific to forensic accounting.

In 2018 the UK Government made a huge leap forward by launching *The Government Counter Fraud Profession* (GCFP) which now has over 7,100 members across a range of government departments (UK Government, 2023). The aim of this new profession is to have a common structure for developing fraud capability across government and claims to be the first profession globally with common professional standards and competencies for those working in fraud roles (UK Government, 2023). The publication of their 2023-25 strategy document details objectives such as developing CPD including leadership skills, alongside this they foresee an increase membership of over 40 percent by 2025. (UK Government, 2023).

Within the UK, forensic accounting is a growing and respected discipline, and yet other than GCFP there is no regulator nor is there any clear desire to establish one. In order to offer the required assurances to the users of forensic accountants, some form of regulation should be considered, potentially via the future development of GCFP into the private sector.

6. An Overall Comparison of Forensic Accounting within the US to the UK

The development of forensic accounting within the US is particularly interesting when compared to the position within the UK. The UK is a number of years behind the US in relation to regulation and education but it is likely that if the supply of suitably qualified and experienced forensic accountants can keep up with the demand for their services (Carnes & Gierlasinski, 2001) then the UK will soon face the same issues that the US is currently challenged with. The lack of formalised education or regulation within the UK could be a block with regard to the number of potential forensic accountants entering the field, staying within a more established areas of accountancy may be seen as the safest and less risky option.

The development of the discipline within the US should be reflected upon both within the UK and the rest of the world; consideration needs to be given to developing a more effective approach to education and regulation than has been the case thus far. Within the US, an entire industry has been borne offering accreditation to forensic accountants, with most corporations entering the market as profit making entities. If there is a global aspiration to advance forensic accounting regulation and education, it would not be wise for other nations to simply follow the lead of the United States; progress needs to be approached cautiously, ensuring that all relevant stakeholders are involved from the beginning. The launch of the GCFP within the UK is an enormous step forward in this regard but as it only encompasses fraud roles and individuals working within UK government, there is still ample scope to develop similar schemes to cover the full forensic accounting role and for a crossover into the private sector.

No global research away from the US (Huber, Should the Forensic accounting profession be regulated?, 2013), has been identified regarding the regulation of the forensic accounting discipline suggesting that as yet, there has been no evidence of a significant push for this from either practitioners or the users of forensic accountants themselves.

7. Conclusion

There is frequent reference to forensic accounting being a new area of accountancy and yet it has been in existence as a practice since the South Sea Bubble of 1720 and recognised as

a term since 1953 (Smith, 2015). The demand for forensic accountants, particularly within the US has led to the discipline developing haphazardly with no real regard for how forensic accountants should be educated or indeed regulated. To protect the discipline going forward it has been said that it needs to be regulated (Huber, 2013). Additionally, further regard in relation to a recognised educational route needs to be considered to ensure that a constant supply of forensic accountants is available to meet the growing demand.

The formation of any regulated organisation should consider the short comings of the current education route and offer additional courses and examinations in areas not already covered by the traditional professional accountancy exams. Intuition should also be considered, if this is to be gained by experience (Davis, Farrell, & Ogilby, 2009) then a period of relevant experience should have to be undertaken, similarly to the practice taken by the professional accounting bodies, before final certification or full membership is granted.

The global financial crime problem, alongside a continuously growing litigation culture, will ensure that forensic accountants will continue to be a necessity. It is imperative that *one global approach* is taken in relation to the future evolvement of the discipline to ensure that the more random nature of its development to date is taken under control, ideally via a globally recognised educational route alongside robust regulation.

8. Recommendations

Although recognised as a term for over 70 years, (Smith, 2015), forensic accounting is still a generally under-researched topic, still regarded as a new and niche area of accounting. This is precisely the right time to undertake research to support the continuing formation of the discipline going forward. As identified throughout this article, the discipline is developing haphazardly around the world with the US enduring the consequences of being the trailblazer. More focussed, global research involving all stakeholders i.e., practitioners, educators, government bodies and potential regulators would identify the response the US should now adopt to rectify some of the difficulties the forensic accounting profession is encountering within that country. Alongside this, the outcome of further research would also help other countries to avoid the same pitfalls as the discipline continues to develop globally.

Globally, there are examples of the continuing development of the discipline. The research taking place within Sarajevo, sponsored by the US Embassy is a prime example of the need for worldwide collaboration (University of Sarajevo - School of Economics and Business, 2023).

A great deal of work has been done by the UK Government in relation to the formation of the GCFP, as a profession, it has now been active for over 5 years. The publication of their strategy document to 2025 (UK Government, 2023) creates an excellent opportunity for researchers to reflect on its success and to capture the lessons learned since its creation. In addition, research projects could consider the potential to develop a similar profession that is all encompassing i.e., to include the private sector and also to include areas of forensic accounting other than fraud. Although this is currently a UK initiative, there is no reason why this could not be considered from a global perspective.

Establishing the opinions of practicing forensic accountants would be a further area of potential research. Determining whether practitioners have identified a need for more formal regulation and gaining an understanding of their opinions regarding the current forensic accounting educational process. This new knowledge would help to inform potential future changes to professional syllabus and, academic courses. Considering the succession plans that practitioners have in place would also be a useful study, gauging whether plans are adequate when considered alongside the future demand of forensic accountants.

Additional research could also consider the career path of the forensic accountant, initially to establish whether newly qualified accountants and graduates are aware, not only of the role of a forensic accountant but also the steps they would need to take to become one. This research would identify the current awareness of the discipline and whether more work is needed to make the role more attractive, thus ensuring the future supply of appropriately qualified and experienced forensic accountants to meet growing demand.

Researchers could work with educators, both from academia and the accounting professional bodies. This work would establish the educators view in relation to the future requirements of forensic accounting education and the demand they currently have from potential students for courses. The educator's perspective could also be established in relation to whether there is space within their current syllabus to incorporate additional content or indeed to measure their appetite to amend certain terminology within their materials to make them more *forensic friendly*. The previous studies of (Gierlasinski, Carnes, & Fuhrman, 1998) and (Siegel & S, 1994) could be revisited to establish whether there is now more of an appetite to add forensic accounting skills to the university syllabus than was found to be the case at the end of the last century. Involving practitioners with this project would also ensure that they can feed into any identified required changes to syllabuses and delivery.

Each of these areas of further research could be standalone projects although preferably a larger research project could encompass all aspects to fully involve all stakeholders in the

future growth and success of the forensic accounting discipline. Global research is imperative if we are to overcome the current situation of ad hoc development of the discipline around the world. As yet, there is a small but growing body of standalone research papers considering the development within individual countries. International research collaborations would help to blend this global knowledge as forensic accounting as a field continues to mature.

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Sažetak

Forenzične računovođe moraju odgovoriti na sve veću globalnu prijetnju finansijskog kriminala i stalnu potrebu za ekspertizom u oblasti rada na finansijskim sporovima. Globalni razvoj forenzičnog računovodstva kao discipline bio je ad hoc, a ovaj rad će se fokusirati na dvije najrazvijenije zemlje u pogledu ekspanzije forenzičnog računovodstva, a to su SAD i UK. Iz ove studije proizašle su dvije glavne teme: status regulacije i obrazovanja forenzičnih računovođa u SAD-u i Velikoj Britaniji i na kraju pozivamo na radikalnu reformu u obje oblasti. Trenutno ne postoji priznato regulatorno tijelo koje obuhvata sve aspekte uloge forenzičnog računovođe, tako da ne postoji standardni etički kodeks kojeg su forenzične računovođe dužne slijediti. Osim toga, nepostojanje priznatog obrazovnog puta da se postane forenzični računovođa rezultiralo je nedostatkom svijesti o ulozi kao i potencijalnom putu karijere forenzičnog računovođe, što čini problematičnim planiranje u forenzičnim računovodstvenim kompanijama.

Ključne riječi: *forenzično računovodstvo; regulacija; akreditacija; obrazovanje.*