Naming and branding: accountants and accountancy bodies in the British Empire and Commonwealth, 1853-2003

Robert H. Parker
University of Exeter

Abstract

The number of professional accountancy bodies and accountants within the countries of the British Empire and Commonwealth has greatly expanded within the last 150 years. Each body has had to choose a name for itself. This paper attempts to explain these names and the designations of the members. The names and designations are argued to be exclusionary and inclusionary devices that in many cases have been appropriated from other countries, notably the UK and the US. Certain designations, notably "chartered accountant" and "CPA", have evolved as brand names. It is argued that access to and use of these brands has spread not with colonisation but with the decolonisation of, first, the settler colonies and then the non-settler colonies. The paper discusses the choice between "chartered" and "CPA" and why neither has become the brand of international accountancy firms operating within a global economy.

Keywords: *names, designations, brands, professional accountancy bodies, closure, British Empire and Commonwealth.*

Acknowledgements: Earlier versions of this paper were presented at staff seminars at the University of Adelaide, Deakin University, Griffith University, the University of New South Wales and the University of the Sunshine Coast in 2003, and at the Accounting, Business & Financial History conference, Cardiff Business School, September 2004. I am grateful for comments received from participants in those seminars and also from Garry Carnegie, Robert Luther, Christopher Nobes, Christopher Poullaos, Alan Richardson, Brian West, Stephen Zeff and two anonymous referees.

Address for correspondence:
Robert H. Parker
School of Business and Economics
University of Exeter
Streatham Court
Exeter EX4 4PU
UK
Telephone: +44 01392 264526
Facsimile: +44 01392 263210
Email: R.H.Parker@exeter.ac.uk

Introduction

Of the 155 professional accountancy bodies in 113 countries which in 2003 were members of the International Federation of Accountants (IFAC), 61 (39 per cent) were located in 41 countries (36 per cent) that were members of the British Empire as it existed in the mid twentieth century. These remarkable statistics suggest that the growth of the accountancy profession worldwide cannot be understood without an imperial dimension. The first authors to recognise this were Johnson and Caygill (1971) in a paper written whilst decolonisation was still proceeding. More recently a number of researchers have addressed this topic, for example, Parker (1989), Carnegie and Parker (1999), Annisette (1999, 2000) and Chua and Poullaos (2000). The main aim of the present paper is to explain the names chosen by accountancy bodies (including the designations by which their members have come to be known and distinguished from members of other bodies) formed within the British Empire and Commonwealth during the last 150 years. At its greatest extent the Empire covered more than one quarter of the land and peoples of the globe. The length of the time span and the considerable number of countries covered have meant that much reliance has perforce been placed on printed sources. It is hoped that the paper will act as an incentive to researchers to examine available archival sources in the countries concerned.

The paper begins with a discussion of the theory and practice of finding suitable names, designations and designatory initials for accountancy bodies and accountants. This is followed by an examination of the importance of the context of decolonisation. The paper then explains how accountancy bodies in, first, Scotland, then England and Wales, Ireland, and the settler colonies, and, finally, the non-settler colonies, have been established, adopted names and designations, and taken measures to protect their names. The paper concludes with a discussion of the role of brand names for accountants within a global economy.

Within an ever-changing Empire and Commonwealth, accountancy bodies have been given names since 1853. No attempt is made in this paper to refer to all the multitudinous bodies that have been created. Indeed, given the tendency to proliferation of such bodies, it is doubtful if a definitive and complete list could ever be established. Many bodies have published official histories and in recent years there have been many excellent papers and books on the development of the accountancy profession but most give little or no space to the selection of names or the factors influencing them.

Naming an accountancy body: theory and practice

Naming a professional accountancy body and choosing a designation for its members is not a trivial matter. Names are not neutral. "What's in a name? That which we call a rose by any other name would smell as sweet". So said Juliet to

Romeo but they could not escape the tragic consequences of bearing the names of Capulet and Montague. The Capulets and Montagues at least agreed upon the name of the city they both lived in. But there are those who cannot so agree (for example, the inhabitants of, in alphabetical order, Derry or Londonderry) and who often find themselves on the opposite sides of barricades or at least of political and religious divides. During the First World War the British royal family felt obliged to change its name from the Germanic Saxe-Coburg-Gotha to the reassuringly British sounding Windsor (Rose, 1983, p.174). On the other hand, many multinationals (including international accounting firms) in recent decades have sought, and paid consultants vast sums for, brand names which are supposed to have a global rather than a national ring (Murphy, 1987, chapters 10 and 15).

Names and brands as exclusionary and inclusionary devices

Names and designations thus have many functions. Within the context of professionalism and the marketing of professional services, they can be thought of as exclusionary and inclusionary devices, designed to help a professional body control, de jure or de facto, the market for the services offered by its members and who is admitted to membership.

Control of the market and control of membership are not independent of each other but their relative importance may vary over time. The terms exclusionary and inclusionary are taken from neo-Weberian writers on the sociology of the professions (who do not, however, discuss naming strategies), and in particular from Witz (1992), who writes on patriarchy and the professions using an analytical framework based on Weber's (1968, pp.43-6, 341-8) concept of "closure". Her approach is broadly consistent with that of Parkin (1979, chapters 4-6) and Murphy (1984). Macdonald (1995) discusses exclusionary and inclusionary strategies in the context of accountancy. The terminology is extended in the present paper to distinguish between strong, weak and narrow exclusionary names.

Exclusionary names and designations are those that indicate the occupation and, sometimes, the territory over which an occupational body is claiming jurisdiction. The Society of Accountants in Edinburgh (SAE) (1853) and the Institute of Accountants and Actuaries in Glasgow (IAAG) (1854) are the earliest examples of such names in the British accountancy context. The names of the SAE and the IAAG are categorised in this paper as *weak exclusionary* because they do not address what Macdonald and Ritzer (1988, pp.257-8) call the "dilemma of exclusiveness versus market control":

> In order to control the market, the occupational body must include anyone with a reasonable claim to expertise, but such inclusion brings in marginal practitioners, who lower the standing of higher status members.

How can a professional body resolve this dilemma? There are two possible strategies in terms of nomenclature, one based primarily on status, the other more narrowly on the specific professional task. The first strategy is to retain the width of the occupation but to claim special merit or status for one's own sub-group of practitioners and thus develop a *strong exclusionary* designation, although sometimes retaining, at least for a time, a weak exclusionary name. In 1855 and 1856 the members of the SAE and the IAAG formally resolved to call themselves "chartered accountants" and use the initials "CA". This was a masterstroke of strong exclusionary naming and branding, given that the word "chartered" was not in the titles of the bodies and it was the bodies not their members that had received charters. The SAE and the IAAG combined the already prestigious term "chartered" with the less prestigious term "accountant" to produce a designation of great potential, if not yet actual, value. The designation was not chosen at random. As Millerson (1964, pp.90-1) points out:

> In medieval England, a charter signified royal approval by awarding some monopoly power, then it became a more accessible form of incorporation, granting a legal monopoly for business or control; finally in modern times the Charter has assumed a new dignity, by affording a different level of incorporation … . Consequently a Charter has developed as an inter-association status symbol, a distinguishing mark, acknowledging supremacy in a particular field and the ability to provide a sound public service.

No body of accountants within the Empire and Commonwealth has ever received both royal approval and monopoly power but nevertheless "chartered" has proved to be a powerful brand.

No other profession in the 1850s had members who referred to themselves as "chartered", even though there already existed professional bodies in England and Wales of physicians, surgeons, civil engineers, solicitors, architects and veterinary surgeons that had been incorporated by royal charter, as was normal before the company legislation of 1844 onwards.

The second possible exclusionary naming strategy for an accountancy body is to define the central core of the occupation (Bucher & Strauss, 1961) much more narrowly. This produces an exclusionary name and/or designation which lays claim to jurisdiction over a specific accounting task rather than claiming a special status. It is categorised in this paper as a *narrow exclusionary* name or designation. This strategy was first successfully adopted in the UK by the Corporate Treasurers' and Accountants' Institute (1885). A difficulty with this strategy is that what is regarded as the central core may be difficult to define and may of course change over time and lead to clashes of jurisdiction.

Strong exclusionary names and designations, whether based on status or task, have the potential to be developed as brands. A brand is a name that distinguishes a service or the provider of that service from competing services or providers. A successful brand name for an accountant or an accountancy body should provide the services offered with an identity; differentiate those services from those of other providers; segment the market; and remove uncertainty in the mind of the client (Kapferer, 1992). It may also represent a piece of legal property (Murphy, 1987, p.86). Where a de jure monopoly is unobtainable from the state, a brand name may be a means of obtaining and sustaining a de facto monopoly. Many clients do not have the skills to evaluate the quality of accounting services and they perforce rely upon the name of the professional body, the name of the professional firm and the designation of the professional person.

New names, however well chosen, take time to become brands and old-established professionals may prefer to continue using existing names. Richard Brown, the secretary of the Edinburgh Society, writing in celebration of fifty years of chartered accountancy in Scotland, observed that (Brown, 1905, p.212):

> It naturally took some little time before the new name became familiar to the public or even in the mouths of the members themselves, but ere long it acquired a definite signification throughout Scotland ... .

James Martin of the Corporation of Accountants (see below) put it rather differently, commenting that chartered accountants put the initials CA "upon their intimations of births, their marriages and deaths, nay, even on their tombstones" (Martin, 1897, pp.33-4).

A professional body which emphasises the role of its name as a brand is concerned more to exclude non-members from the market than to control the composition of its membership. Explicit recognition that the name of an accountancy body, and more particularly the designation of its members, can be regarded as a brand and discussed in the language of marketing became more common in the 1990s with the overt recognition of the commercialisiation of accountancy. In the UK, research conducted by the ICAEW showed little or no public awareness of the differentiation of accounting qualifications. That body therefore advertised "chartered accountant" as the "premium brand" (Parritt, 1995). In New Zealand the consulting firm Wheeler Campbell advised the New Zealand Society of Accountants in 1993 that "brand reputation is the primary component of the Chartered Accountant product" (quoted inVelayutham & Perera, 1996, p.452). The Institute of Chartered Accountants in Australia adopted a new CA logo in 1994 in order "to promote the training, skills and expertise behind the [CA] designation and emphasise the differences between a Chartered Accountant and other accountancy practitioners" (Mace, 1994, p.15).

A successful exclusionary name, designation or a set of initials may be challenged by *inclusionary* names. These are names that deliberately challenge existing names, not in order to include everybody but to include those making the challenge. Challengers may attempt to usurp the success of a *strong* exclusionary name or designation by appropriating status-claiming initials. For example, it may be argued that "CA" could stand not just for "chartered accountant" but also for "Corporation of Accountants", "certified accountant" or even "Canadian accountant". A *weak* exclusionary name may be attacked by renaming the territory. Thus the Scottish Institute of Accountants (SIA) (1880) took advantage of the territorial limitation in the names of the then three Scottish chartered bodies by claiming that it covered the whole of Scotland, not just the cities of Edinburgh, Glasgow and Aberdeen.

A name and particularly a designation may be established which does not simply challenge a more exclusive name or designation but also in its turn seeks to exclude other aspiring professionals. Designations such as "incorporated accountant" and "certified accountant" can be categorised as *dual exclusionary/inclusionary* in that they signal both an attempt to usurp a strong exclusionary name and an attempt to exclude other challengers.

Paradoxically, if a challenge eventually succeeds the members join the established body and the dual exclusionary/inclusionary name and designation are abandoned. As we shall see, after 72 years (1885-1957) incorporated accountants gave up their designation in order to become chartered accountants. Until this happens the challenger is likely to continue to pursue a dual closure strategy, striving for inclusion upwards but also for exclusion downwards.

To sum up the argument so far, one can distinguish the following categories of names and designations:

Weak exclusionary
Strong exclusionary
Narrow exclusionary
Inclusionary
Dual exclusionary/inclusionary

Appropriation of names and barriers to choice

Names and designations can be appropriated. *Appropriated* names are names, usually, but not necessarily, strong exclusionary, adopted in countries other than those in which they originated. The earliest example is the Institute of Chartered Accountants in England and Wales (ICAEW) (1880) which appropriated the Scottish chartered designation for its members and improved upon the name for the body itself. Many appropriated names differ from the original only by changing the name of the territory. Some bodies deliberately define their territories very widely. The CA designation has been appropriated in many Commonwealth countries. In other Commonwealth countries the US name and designation "certified public accountant" and "CPA" (discussed further below) have also been appropriated. In the process the meanings of the names and designations in their original countries have often been ignored.

It has been implicitly assumed so far that accountancy bodies control their choice of name and that there are no barriers to appropriation. Chua and Poullaos (1998) point out, however, that professional accountancy bodies do not always have the power to pursue the strategies they would prefer but are constrained by state authorities and competing organisations. Within the British Empire and

Commonwealth, an important constraint was the degree of colonisation. As we shall see later, many bodies had to wait for decolonisation before they could appropriate the name of their choice. This is a major explanation of the dates of formation of such bodies. Within the UK there have been few constraints on naming by state authorities (it would have been difficult although not impossible, for example, to have adopted the name Royal Institute of Accountants) but, as we shall also see later, the courts have been used (sometimes successfully) by contending accountancy bodies to restrict choice of name and designation. Except for the Society of Accountants in Edinburgh in 1853-1854 the founders of all accountancy bodies have had to choose a name in the light of names already in use elsewhere.

All accountancy bodies have taken a serious interest in their own names and in the names of other bodies. Protection, enhancement and maintenance of a brand name was and remains an important (although not necessarily the most important) element in each body's strategy. The extent to which bodies have been successful in managing their brands has varied according to the particular economic, social and political circumstances in which they have found themselves.

Naming formulas

In practice name givers have made use of a limited number of words. The Scottish bodies formed in the 1850s pioneered the formula: "The X of accountants in Z", where X is a word such as "institute", "society" or "association", and Z refers to a city, province, state, colony or country. This is a weak exclusionary name. The formula was later appropriated and made stronger by the English to "The X of Y accountants in Z", where Y is a word such as "chartered".

Society, association and institute are all words derived from Latin roots. "Society" (from *societas*) was used as early as the sixteenth century to mean a group of persons united in fellowship (the Society of Apothecaries, 1617, for example). "Association" (medieval Latin *associatio*) also dates from the sixteenth century, with much the same meaning. "Institute" comes from *instituere*, to set up, to establish, and was first used to describe an organisation in the early nineteenth century (for example, the Institute of Actuaries, 1848). By the second half of the nineteenth century the three words were almost synonymous, but perhaps formed a continuum of formality with association indicating the least formal body and institute the most formal. In *HMS Pinafore* (first performed in 1878) Gilbert and Sullivan's Sir Joseph Porter is articled presumably to a member of the Law Society but nevertheless sits for "the pass examination at the Institute", so that a rhyme can be achieved with "bran new suit".

As the first body to be founded, the Society of Accountants in Edinburgh had a free choice of these words. It is tempting to suggest that as a small group who clearly considered themselves an elite, the word "Society" with its implications of a united fellowship may have been chosen as more appropriate than "Institute", especially as the body they most wished to emulate was probably the Society of Writers to the Signet, the leading body of solicitors in Edinburgh. Unfortunately, there is no evidence of this. The founders of the SAE originally set up what they termed an "Institute". Somehow this metamorphosed into a "Society" in the royal charter granted in 1854 (ICAS, 1954, chapter 2). Scotland's second body was the Institute of Accountants and Actuaries in Glasgow (IAAG), established in 1854 and granted a royal charter in 1855. The name of the IAAG was adopted after "considerable deliberation" according to the official history (ICAS, 1954, p.27) but its founders appear to have regarded "Society" and "Institute" as interchangeable terms. It is possible that the term "Institute" was chosen the better to distinguish the new body from its Edinburgh counterpart.

Choice between institute, society and association was, however, often constrained by the existence of a body with a prior claim to one of the words. Thus in the UK incorporated accountants formed a Society in 1885 because there was already an Institute (formed in 1880); and certified accountants formed an Association in 1904 because there was already both an Institute and a Society. "Incorporated accountant" and "certified accountant" established themselves as dual exclusionary/inclusionary designations. In Quebec the Association of Accountants in Montreal (formed in 1880) wanted to change its name to an Institute but for many years was unable to do so because a competing body had got there first. It became a Society instead in 1927, only later (1946) becoming an Institute.

The second part of the naming formula was "accountants". "Accountant" has always been an ill-defined term but the word had already established itself in Scotland by the 1850s (Murray, 1930). The Glasgow Institute added the word "actuaries" which at that date signified "any clerk or secretary to a company, particularly one 'skilled in calculations' such as the secretary of an insurance company or a friendly society" (Horne, 1947, p.51). The calculations were not necessarily highly mathematical or statistical. Kedslie (1990b) argues the greater importance of such appointments to the founders of the Glasgow Institute than those of the Edinburgh Society. She concludes that the choice of name arose from a strong involvement with insurance and an undoubted desire to signal to the local business community their intention to retain this considerable interest. Members of the SAE were active in the formation of the Faculty of Actuaries as a separate Edinburgh-based body in the 1850s (Walker, 1988, p.17) and thus probably saw no need for the term "actuaries" in their title.

The third part of the formula was the name of a territory. The earliest accountancy bodies were based in particular cities and the name of the city was often included in the name of the body. In Scotland this was so in Edinburgh (1854), Glasgow (1855) and Aberdeen (1867); in England in Liverpool (1870), London (1870), Manchester (1871) and Sheffield (1877); in Canada in Montreal

(1880); in Australia in Adelaide (1885) and Sydney (1894). The Scottish bodies retained their city-based titles until 1951, even though, for example, many members of the Glasgow Institute practised in Dundee. No one of them alone could extend its territorial designation to Scotland as a whole and the three bodies merged only slowly and unwillingly (Shackleton & Walker, 1998). The geographical limitation to Edinburgh was at first strictly observed in the SAE's admission policies (Kedslie, 1990a, p.220). During the first fifty years of the SAE's existence, however, the careers of members of the SAE were increasingly located in other parts of Scotland; in England, Wales and Ireland; and in North America (Walker, 1988, p.44). Some even ventured as far away as Australia (Carnegie *et al.*, 2000). The same was true of the Glasgow Institute and the Aberdeen Society. Nevertheless, the Scottish chartered bodies never adopted a policy of imperial expansion or intervention.

The Montreal and Adelaide bodies changed the territorial part of their names to Quebec (1927) and South Australia (1899) respectively much earlier. The names of states or provinces were included from the beginning in the names of bodies founded in, just to give a few late nineteenth century examples, Manitoba (1886), Victoria (1886), Queensland (1891), Natal (1895), Nova Scotia (1900) and Western Australia (1900). Irish (1888) and New Zealand (1898) bodies adopted the names of their countries. The first body with Australia in its name was the Australian Institute of Incorporated Accountants (1892) which was based not in a capital city but in the Western District of Victoria (Carnegie, 1993).

From an early date some UK bodies (for example, the Society of Accountants and Auditors, 1885) eschewed a territorial designation, thus implicitly claiming their territory to be the world, or at least that considerable part of it which constituted the British Empire.

Names sometimes leave things unsaid. Accountancy bodies have never chosen names which specify gender, race, religion or class, but until comparatively recently accountancy bodies within the British Empire recruited, for the most part, white, anglophone, middle-class protestants. In Ireland, for example, accountants were disproportionately protestant; in Quebec and South Africa they were disproportionately English-speaking; in all Commonwealth countries they were disproportionately male and white (Richardson, 1987, Kirkham & Loft, 1993; Annisette, 2003).

Naming in the context of decolonisation

When the first accountancy bodies were formed in Scotland in the 1850s, Scotland, England, Wales and Ireland were one United Kingdom ruled from London, although Scots law was distinct from English law. An initiative in one part of the kingdom influenced but did not necessarily determine developments in other parts. British settlers in Canada, Australia and New Zealand regarded themselves as overseas Britons and at the same time looked forward to increasing self-government (Cole, 1971). For them, decolonisation (although the term was not in general use before the end of the 1950s: McIntyre, 1998, p.7) was already under way. By the time new bodies were set up in the UK in the 1880s, the colonists already enjoyed a considerable amount of local autonomy. The Dominion of Canada was established in 1867; the Australian colonies federated into what they called a Commonwealth rather than a dominion from 1 January 1901; New Zealand became a dominion in 1907; and the Union of South Africa was created as a dominion in 1910. What exactly constituted dominion status was always slightly imprecise but the national, provincial and state governments in the dominions certainly had powers, even before federation, to enact legislation relating to locally established professional bodies, with implications for their membership and, more particularly, their jurisdiction. Newfoundland (which did not initially join the Canadian confederation) and Southern Rhodesia (which did not join the South African Union) also enjoyed considerable self-government. Throughout the non-settler Empire, however, imperial rule was much more London based and decolonisation did not begin until after the Second World War.

British settlement and conquest considerably influenced naming patterns of all kinds throughout the Empire. The language and names of the mother country or imperial power were sometimes imposed upon the colonies, sometimes appropriated by them. The International Geographical Congress held in Berlin in 1899 established the principle that priority was to be given to "native" names and that only where these could not be found should those given by European discoverers prevail (Inglis, 1975, p.3). However, the influence of British and Irish place names is amply demonstrated on maps of North America, Australasia and other areas of British settlement (Christopher, 1988, pp.230-4). For example, there is an Exeter not just in England but also in New Hampshire and many other states in the US; in Ontario in Canada; in New South Wales, South Australia and Tasmania in Australia; and no doubt elsewhere. English, Scottish and Irish names were also given to many places in the non-settler colonies. Some but not all of these have survived decolonisation. Southern and Northern Rhodesia have become Zimbabwe and Zambia but there is still an Exeter Road in Singapore. The names of accountancy bodies and the designations of accountants were also imposed and appropriated throughout the British Empire and the Commonwealth, with the difference, however, that UK bodies with brand names, and their members whether inside or outside the UK, were not keen to have those names appropriated by local bodies. The greater the extent of decolonisation, however, the less they were able to prevent this. One might expect also that in some ex-colonies names of British origin might be deliberately rejected.

Thus the formation and naming of accountancy bodies within the Empire could be affected in one or more of three ways. First of all, there were precedents that the importers of the concept of professional accountancy (Parker, 1989) and the appropriators of names and designations might wish to follow. This is well brought out by the statement by leading Australian accountant Thomas Brentnall that accountants in Melbourne in the 1880s (Brentnall, 1938, p.64):

> knew the position attained by the Institute of Chartered Accountants in England and Wales, which had been incorporated by Royal charter in 1880, by the Society of Accountants and Auditors in 1885, as well as the three Scottish Institutes, which had come into existence some years previously. With these examples before us, we had no difficulty in arriving at the conclusion that our object could best be attained by following in their footsteps.

In the settler colonies, at a time when Britain was both the largest trading partner and the principal source of inward investment, the acquisition of the chartered designation could be thought both to reassure British investors and to enhance the prospects of colonial accountants visiting Britain (Poullaos, 1994, pp.73-4, 206-9, 290). It should be noted, however, that British style accountancy bodies did not emerge in places like South America where British trade and investment was equally strong but where there were no British settlers and British imperial power was "informal" rather than "formal" (Parker, 1989).

Secondly, colonial bodies might be constrained in what they could do. Accountancy bodies in the imperial centre, and especially those based in London, had the opportunity to exercise influence on accounting developments throughout the Empire by submissions to the Colonial Office and the Privy Council. The leading UK journal, *The Accountant,* took a lively interest in accounting throughout the world and the names and designations of accountancy bodies, and was quick to defend the interests of British accountants, especially within the Empire (Carnegie & Parker, 1999). At the same time, *The Accountant* was widely read throughout the Empire and beyond, proclaiming itself as "The recognised weekly organ for chartered accountants and accountancy throughout the world". The strategies of the largest British bodies differed, however. The ICAEW favoured exclusiveness. It did not seek members outside the UK, but it used its influence with the Colonial Office to protect the chartered brand throughout the Empire (Chua & Poullaos, 2000), although that influence was relatively limited in the settler colonies which had became dominions. It was much stronger in the non-settler colonies, few of which developed formal accountancy bodies before independence (see Tables 1, 2 and 3 below) and where accounting work was dominated by expatriate members of UK bodies. By contrast, the Society of Incorporated Accountants (established in 1885) and the Association of Certified and Corporate Accountants (formed by merger in 1939: see below) did not limit membership to accountants trained in the UK. Before its integration into the Chartered Institutes in 1957 the SIA actively sought members in countries such as South Africa and Australia, being particularly successful in the former. After its failure in 1970 to achieve a similar integration, the ACCA took on the SIA's role as an exporter of qualifications but, as decolonisation progressed, to the non-settler British Commonwealth rather than to the old Dominions (Briston & Kedslie, 1997).

Thirdly, British influence on local accountants remained strong even after independence, except in those few colonies or trust territories where the transfer of power was other than by negotiation. A principal example of loss of British influence is Israel, whose territory forms part of the British mandate of Palestine established after the First World War.

In the sections which follow, the naming experiences of accountants throughout the Empire and Commonwealth are traced and analysed, with particular reference to the dominance of the CA brand and the rival CPA brand originating outside the Empire. Analysis of the Scottish experience is followed by sections on England and Wales, the settler colonies (including the "rebels") and the non-settler colonies.

"Chartered" accountants in Scotland: originating and protecting the brand

For 25 years there were "chartered accountants" only in Scotland (Stewart, 1977). They were always relatively few in number: still only 332 by 1885. How quickly did Scottish chartered accountants realise the importance of the CA brand? Richard Brown's view has already been quoted. According to Walker (1991, p.261) the term soon became popular, although more slowly in Edinburgh than in Glasgow. It was adopted by the Aberdeen Society from the date of incorporation in 1867. The designation was thus a brand name shared by three separate bodies which were not to merge until 1951 (although they collaborated in many ways before then: Shackleton, 1995).

The Scottish chartered bodies were aggressively opposed to any new body perceived to be encroaching on their brand. This was linked, however, with a territorial limit. Scottish chartered accountants did not object to English and Welsh accountants adopting the chartered label within England and Wales in 1880 but they did object to the recruitment to the new body of members resident in Scotland. They also successfully objected to draft legislation that would prevent their members practising as chartered accountants in England and Wales. In its turn, the ICAEW successfully objected to draft legislation that would prevent their members practising as chartered accountants in Scotland (Lee, 1997). Some of the Scottish members of the ICAEW were also members of the Scottish Institute of Accountants (SIA), established in Glasgow in 1880, and the first body in Scotland to challenge the elitism and de facto near monopoly of the chartered bodies (Kedslie, 1990a, chapter 8; Walker, 1991). "Scottish Institute of Accountants" was an inclusionary name carefully chosen to challenge the alleged geographical limitations of bodies based in and named after the cities of Edinburgh, Glasgow and Aberdeen. The founders of the SIA made much of the fact that they were a

Scotland-wide body. They made three unsuccessful petitions for a royal charter, all of them opposed by the three bodies already possessing a charter. The first petition (1884) proposed that SIA members be allowed to use the chartered designation; the second (1889-1890) that the SIA be allowed to use the name "The Incorporated Society of Accountants in Scotland"; the third (1895-1896) that the SIA be allowed to use the name "The Scottish Provincial Institute of Accountants" and the designation CPIA. In 1891 the SIA sought incorporation under the *Companies Act* 1867 as "The Incorporated Society of Accountants in Scotland". All these attempts were vigorously and successfully opposed by the three chartered bodies as implying representativeness of the whole profession in Scotland. Walker (1991) regards this as a defence of monopoly; a subtler description would be protection of a brand or a strong exclusionary name, since the chartered accountants could not prevent other accountants from offering the same services that they were offering.

The next body to challenge the chartered bodies was the Corporation of Accountants Ltd which was incorporated by James Martin and others under the *Companies Act* 1891 with an inclusionary name deliberately chosen to produce the initials CA. The articles of association contained a clause that members designate themselves "Corporate Accountant" or "any initial or abbreviation thereof". In 1892-1893 the chartered bodies were successful in the Court of Session in Edinburgh in preventing members of the Corporation from using the initials "CA". In 1900 Martin tried again when the Corporation passed a resolution to adopt "MCA" as the designation of members but they were unsuccessful when taken to court. Finally the Corporation adopted, without formal opposition from the chartered bodies, the dual exclusionary/inclusionary designation "FCRA" (Fellow of the Corporate Registered Accountants).

These episodes show how important exclusionary names and designations were considered to be by the Scottish chartered bodies defending their brand. What they possessed and were determined to hold on to was a de jure monopoly not of the performance of particular professional tasks but of the control of the names of bodies and members, such that other accountants without those names did not de facto get appointed to carry out those tasks. At the same time, it was a strength of the "chartered" designation that it did not signal a limit on what a member could do, as was the case with the narrow exclusionary names of the specialised bodies of municipal treasurers and accountants and of cost and works accountants (see below).

Whereas the Scottish chartered bodies were quick to defend their interests in Scotland, they made little or no attempt to influence accountancy names and designations outside Scotland and the UK. This was a matter that they left to the Institute of Chartered Accountants in England and Wales, which quickly became a larger and more powerful body and one which, moreover, was based in the imperial capital, London.

Anglicising the brand: chartered accountants in England and Wales

English chartered accountants followed the Scottish precedents but also established new ones. In particular, they included the word "chartered" in the name of their Institute and sought, with mixed success, to restrict its use throughout the British Empire. They did not seek, however, to export the English chartered qualification within the Empire. As we shall see later, non-chartered bodies based in England took advantage of this and began actively to export their qualifications at first imperially and later globally. Specialised bodies with narrow exclusionary names were also set up.

The earliest English accountancy bodies bore the weak exclusionary names of the Incorporated Society of Liverpool Accountants (1870), the Institute of Accountants in London (1870), the Manchester Institute of Accountants (1871), the Society of Accountants in England (1873), and the Sheffield Institute of Accountants (1877) (Walker, 2004a,b). All these English bodies followed the Scottish formula of using the words "Society" and "Institute" apparently indiscriminately and indicating a restricted geographical location, although, in an attempt to widen the geographical spread of its membership, the Institute of Accountants in London changed its name from 1873 to the Institute of Accountants (Walker, 2004b, p.44). Unlike Scotland, however, practising accountants in England and Wales were not concentrated in a few towns. Hence the need for the Society of Accountants in England. This was the largest Institute numerically but when the bodies were merged in 1880 it was the members of the former London Institute that dominated. It was not until 1896 that a president of the ICAEW was elected from the English provinces and not until 1927 that a president was elected from Wales. As in this paper, "English Institute" was and is often used as a synonym for what was and is strictly an "English and Welsh Institute".

The original intention was to incorporate the new body by Act of Parliament but when the opportunity arose the alternative of a royal charter was preferred. The name in the draft charter was "The Incorporated Institute of Accountants in England" and previously designations such as "official accountants", "professional accountants", "sworn accountants" and "incorporated accountants" had been suggested (Walker, 2004b, chapters 9 and 10), but in the final version of the charter the new body was given the strong exclusionary name of the Institute of Chartered Accountants in England and Wales (ICAEW). Unlike the Scottish chartered bodies, the ICAEW included the word "chartered" in its name, the first accountancy body to do so. The members were designated chartered accountants. The name of the accountancy body was thus the same as that of the designation or brand name of its members. Significantly, the new body was called an Institute of Chartered Accountants not a Chartered Institute of Accountants. English chartered accountants, unlike those in Scotland, were classified into fellows (FCAs) and associates (ACAs). Canadians and South Africans have followed the Scottish style; Australians and New Zealanders the English style. Unlike other bodies later to be incorporated by charter in England and Wales, the ICAEW included a territorial designation in its name. It is not clear why it became an Institute rather than a Society – perhaps because of the dominance of the London Institute. By contrast, members of the Institution of Surveyors were more reluctant to call themselves "chartered". The Institution, founded in 1868 and incorporated by royal charter in 1881, was not renamed the Chartered Surveyors' Institution until 1930. It became the Royal Institution of Chartered Surveyors in 1946 (Thompson, 1968, pp.173-8, 292, 333).

From the formation of the ICAEW there were many more English and Welsh chartered accountants than Scottish ones and in 2003 the ICAEW was still the largest institute of chartered accountants in the world. The adoption of the designation "chartered accountant" by the ICAEW ensured, to continue the quotation from Brown (1905) above, that "... it soon became a recognised term wherever the English language was spoken". This included not only the British Empire but also the United States.

Within the United States, British chartered accountants played an important role in the early history of the profession (Lee, 2002) but the chartered name and designation were never adopted by any US accountancy body. The designation that eventually prevailed was "certified public accountant" (CPA), a term first used in legislation in New York State in 1896 and which spread to all states. Both CA and CPA originated as designations signifying approval by state authorities: the British monarchy and US state legislatures, respectively. It was not until 1957, however, that the American Institute of Certified Public Accountants (AICPA) adopted its present name. It was originally formed in 1886 as the American Association of Public Accountants, modelled on the ICAEW, and with a name that emphasised the public practice of accountancy (Webster, 1954). Changing its name to the American Institute of Accountants (AIA) in 1917, it merged in 1936 with the American Society of Certified Public Accountants which had been established by breakaway members of the AIA in 1921. By about 1950 the American Institute had become the largest body of accountants in the world.

Royal charters for all UK accountants: challenging and diluting the brand

Bodies in England and Wales challenging the chartered accountants attempted, after some initial hesitation, to establish their own brands and designations. The most successful were the Society of Accountants and Auditors (SAA) (1885) whose members were designated "incorporated accountants", and the London Association of Accountants (LAA) (1904) whose members were designated "certified accountants". In both cases the name of the body was inclusionary but the designation was dual exclusionary/inclusionary. As we shall see below, it took some time for the bodies to change their names to include their members' designation. The SAA took over the Scottish Institute of Accountants in 1899 and the LAA the Glasgow-based Corporation of Accountants in 1939. The members of the SAA and the LAA eventually became "chartered" by different routes: the incorporated accountants were absorbed by the Chartered Institutes in 1957; the certified accountants became "chartered certified accountants" forty years later in 1997.

The SAA changed its name twice: to Society of Incorporated Accountants and Auditors in 1908 and to Society of Incorporated Accountants in 1954. Its original inclusionary name of Society of Accountants and Auditors probably reflected the need to distinguish it from the ICAEW ("Society" rather than "Institute" and both accountants and auditors). There is more certainty about the reasons for the changes in name. Following the Scottish example, the SAA had chosen a designation ("incorporated accountant") for its members that was not part of its name. When exclusive use of this designation was threatened by the LAA, the Society sued successfully and changed its name to include the designatory word (Garrett, 1961, pp.51-5), so that both name and designation were dual exclusionary/inclusionary, aspiring to parity with chartered accountants but not granting it to certified accountants. The change in 1954 was, according the Society's secretary, a move towards conciseness without loss of comprehensiveness (Garrett, 1961, p.2).

The negotiations for the absorption of the members of the Society into the chartered institutes in 1957 demonstrated what features of the brand the latter considered fundamental. Those members of the Society who had not been articled in a practising office and those who had qualified outside the British Isles were admitted to the Institutes not as "chartered accountants" but as "incorporated accountant members". However this discrimination was abandoned as from 1 January 1974, except for those who wished to practise in the UK.

The London Association of Accountants was incorporated under the Companies Acts in 1904. Its choice of name is not explained in the official history (ACCA, 1954) but it is highly likely that "Association" was chosen because "Institute" and "Society" were already spoken for. It was founded in London but membership was not confined to London-based accountants (p.8). Perhaps it was thought that provincial accountants would be attracted by the cachet of membership of a metropolitan association. The name was inclusionary and did not provide a designation. An attempt to use "Incorporated Accountant, Lon.Asson" led to the dispute with the SAA already mentioned. As a result, in 1907 the Council of the Association chose instead the dual exclusionary/inclusionary designation "certified accountant" (pp.8-9). However, the name of the LAA was not changed to London Association of Certified Accountants (LACA) until 1933 (p.47). The LACA merged with the Glasgow-based Corporation of Accountants in 1939. The merged body was given the name Association of Certified and Corporate Accountants (ACCA). The initials remained unchanged when the name was changed to Chartered Association of Certified Accountants in 1984 on the grant of a royal charter, suggesting that ACCA had come to be regarded as a brand. The abbreviation CACA was avoided. In 1995, against the opposition of the three UK and Irish chartered institutes, the Privy Council decided that any accountancy body that had a royal charter could be granted the right to use the term "chartered" as part of its members' designation (Matthews *et al.*, 1998, pp.68-9). So, from 1 January 1997 the initials ACCA were redefined as Association of Chartered Certified Accountants, members obtaining the right to call themselves "chartered certified accountants". In welcoming these changes, an editorial in the Association's official journal displayed the dual nature of the new designation, which would, in the journal's view, "provide the public with a ready means of distinguishing those accountants who are professionally qualified and properly regulated from those who are not" (*Certified Accountant*, January 1996, p.1). The Association failed to convince the Privy Council of the merits of designations such as "chartered public accountant" or "chartered professional accountant", which would have provided the initials CPA.

The predecessor bodies of today's ACCA include not only the LAA and the Corporation of Accountants but also the Institution of Certified Public Accountants (ICPA, formed in 1903) and the Central Association of Accountants (CAA). The founders of the CAA (incorporated in 1905) had fairly obviously chosen an inclusionary name that came close to appropriating the initials CA. When it was proposed that the designatory letters of members of the new body should be ACAC for associates and FCAA for fellows, they were taken to court by the ICAEW – unsuccessfully (Stacey, 1954, pp.77-8). The members of the Central Association were absorbed by the ICPA in 1932, which in its turn was absorbed by the ACCA in 1941. No attempt was made to preserve the CPA designation.

Two specialised bodies were formed with narrow exclusionary names: the Corporate Treasurers' and Accountants' Institute (CTAI) (1885) and the Institute of Cost and Works Accountants (ICWA) (1914). Both bodies changed their names more than once. The Corporate Treasurers' and Accountants' Institute was set up in 1885 (Poynton, 1960; Sowerby, 1985). The word "corporate" referred to municipal corporations, "treasurer" to the name attached to the job by most employers. The CTAI was incorporated as a company limited by guarantee in 1901 and renamed the Institute of Municipal Treasurers and Accountants (IMTA). The name originally intended was the Institute of Municipal and County Treasurers but "and County" was dropped on the opposition of some county treasurers. After a number of attempts a royal charter was granted to IMTA in 1959 without a change of name but with the designation for members of chartered municipal treasurer. After the failure of the integration proposals in 1970, a petition for a supplemental charter to change the name to the Chartered Institute of Public Finance and Accountancy (CIPFA) was presented in 1971 and approved in 1973. As a result of objections from the English and Irish Chartered Institutes, the designation was changed not to the preferred "chartered public finance accountant" but to the weaker "institute of public finance accountant" (IPFA). However, the chartered designation was achieved as a result of the Privy Council decision of 1995. The dual nature of this designation is clear from comment in the Institute's official journal. The Privy Council's decision, it was pointed out, created "a clear public distinction between qualified accountants and members of unrecognised bodies such as the institute of cost and executive accountants" and at the same time treated CIPFA, CIMA and the ACCA as the equals of the chartered accountants' institutes (Weekes, 1995, p.2).

The Institute of Cost and Works Accountants (ICWA) was formed in 1919 as the Institute of Cost Accountants, whose members were to be designated FCAs and ACAs. These were designatory initials appropriating those of the ICAEW and Loft (1988, p.194) believes that it is quite possible that the prime mover of the new body, W.E. Stacey, "deliberately chose a title for the new Institute which was aimed at confusing its members with chartered accountants". However, the addition of the word "Works" provided a narrow exclusionary name that accurately reflected the new body's rather down to earth engineering connections. By the 1960s in the UK the more glamorous term "management accountant" had been imported from the US. When integration with the chartered accountants failed in 1970, the ICWA applied for its own royal charter. This was granted in 1975 and in the same year the name was changed to the Institute of Cost and Management Accountants (ICMA). The charter did not grant a right to the designation chartered management accountant and when this was requested in 1983 it was refused (Banyard, 1985, pp.63-4). In 1987 the name was changed to the Chartered Institute of Management Accountants (CIMA), a strong but narrow exclusionary name. The Privy Council decision of 1995 allowed members to call themselves chartered management accountants from 1996 onwards (*Management Accounting*, January 1996, p.3).

In 2003 there were thus five major accountancy bodies in Great Britain, all of which had been granted royal charters. All attempts at merger had failed (Shackleton & Walker, 2001). The leaders of the ACCA, CIMA and CIPFA obviously believe that the benefits to their members of the grant of a royal charter and the right to use the designation "chartered" are worth striving for, although like all brands quantification of the benefits is very difficult. It is possible that the proliferation of charters has diluted the brand. As Gilbert and Sullivan pointed out in *The Gondoliers* (1889), "when everybody is somebodee, then no one's anybody". If all accountants are chartered accountants the term becomes generic and in the terminology of the present paper weak rather than strong exclusionary.

However, there is still a place for a number of accountancy bodies (for example, the Institute of Company Accountants) not specifically recognised by company legislation and without a charter.

Charters (royal and non-royal) for settlers: Canadians, Australians, and New Zealanders

The concept of a professional accountancy body was exported from the UK to the rest of the British Empire, but the formation of local bodies was for many years restricted to those (increasingly self-governing) colonies dominated by European settlers (Parker, 1989). The imperial power's precedents were followed: but always with a difference that should be explicable from the local economic, social and political context. This had its effect on naming patterns. The Canadian, Australian and New Zealand experiences were not only different from the UK but also from each other.

Canadian provincialism

The establishment and naming of accountancy bodies in Canada was influenced by Scottish and English precedents and complexities but also by the local political environment. In Canada "charters" could be granted not only not by the Crown but also by legislatures. In Quebec names were also influenced by French speakers.

The Canadian confederation was established in 1867 as the Dominion of Canada. The founding provinces were Ontario, Quebec, Nova Scotia and New Brunswick. As Canada expanded "from sea to sea", they were joined by Manitoba in 1870, British Columbia in 1871, and Saskatchewan and Alberta in 1905. In the maritime provinces Prince Edward Island joined in 1873 but Newfoundland deliberately stayed out of the confederation until 1949. The two most economically advanced provinces were Quebec and Ontario and they were the first parts of the British Empire outside the UK in which accountancy bodies were set up. As in the UK there was a multitude of competing bodies. Many of the names of the bodies and the designations of their members were appropriated from Britain and designed to be strong exclusionary. Eventually every province had a body whose name combined the phrase "chartered accountant" (although none of the bodies had been granted a royal charter) with the name of the province. A Canada wide body, the Dominion Association of Chartered Accountants (now the Canadian Institute of Chartered Accountants) also emerged (Richardson, 1993).

The first Institute of Chartered Accountants in the British Empire to have the word "chartered" in its name but not to have a *royal* charter was the Institute of Chartered Accountants of Ontario (ICAO). This followed the North American usage of referring to all acts of incorporation as charters. It also took advantage of the reputation of the chartered brand in the UK. The establishment of the ICAO was apparently hardly noticed by the ICAEW (Chua & Poullaos, 2002, p.429). The original name of ICAO was the Institute of Accountants and Adjusters of Canada. It then briefly operated under the name of Institute of Accountants of Ontario before with some difficulty obtaining a charter from the provincial government in 1883 (Creighton, 1984, chapter 1).

The ICAO has not changed its name since 1883. The body which started life in 1880 with the weak exclusionary name of the Association of Accountants in Montreal (AAM) changed its name no less than five times (Collard, 1980). In 1927 it adopted the less weak name of the Society of Chartered Accountants of Quebec (SCAQ), a change first mooted in 1910. According to Collard (1980), what was wanted was a change from Association to Institute to indicate a desire to be seen as a professional body rather than as a club, and a change from Montreal to Quebec to indicate that the organisation had become province-wide. In the event "Society" had to be adopted rather than "Institute" because another body in the province (the Institute of Accountants and Auditors of the Province of Quebec, IAAPQ) was already using that designation. Under the legislation closing the profession in Quebec in 1946 the SCAQ was able to change its name to the strong exclusionary name Institute of Chartered Accountants of Quebec (ICAQ), absorbing the members of the IAAPQ and other bodies. When the provincial government's Chartered Accountants Act came into force in 1974 the name in the English version was changed to the Order of Chartered Accountants of Quebec (OCAQ), Order being a translation of French *Ordre*. In 1978 as a result of the government's language policy the name became the French version only, *Ordre des comptables agréés du Québec*, although the English version is still in use unofficially. *Comptables agréés* (literally approved accountants) preserves the all-important initials CA in French. The expression *comptable agréé* is no longer used in France, where the term employed is *expert comptable.*

Accountancy bodies obtaining local legislation allowing the name Institute of Chartered Accountants and the chartered designation for members were established in other provinces and territories as follows:

Manitoba (1886)
Nova Scotia (1900)
British Columbia (1905)
Saskatchewan (1908)
Alberta (1910)
New Brunswick (1916)
Prince Edward Island (1921)
Newfoundland (1949)
Yukon (1976)

All the Institutes except that of the Yukon were formed after the attainment of provincial self-government but the lag varies from three years for Saskatchewan to 49 years for New Brunswick. In Manitoba the original name was Chartered

Accountants' Association but this was changed to Institute of Chartered Accountants in 1913 in order to bring uniformity of title among the provincial institutes.

In spite of opposition from the provincial bodies in Ontario, Manitoba and Nova Scotia, a Dominion Association of Chartered Accountants (DACA) was granted a federal charter in 1902. The original but unsuccessful application had been for an Institute of Chartered Accountants of Canada. In 1909 it was restructured as a federation of provincial Institutes (Creighton, 1984, chapter 4). The word "Dominion" in its name reflected its ambition to be a nationwide body, Canada having been since confederation in 1867 the Dominion of Canada. The name was changed in 1951 to the Canadian Institute of Chartered Accountants (CICA). By this date use of the word dominion was declining.

Whereas the accountants in the Canadian provinces were able to obtain local legislation to incorporate "institutes of chartered accountants", the accountants of Newfoundland, a self-governing but impecunious colony, were prevented from doing so in 1905 by the Colonial Office, at the request of the ICAEW, and the Institute of Accountants of Newfoundland was not able to adopt the strong exclusionary name of Institute of Chartered Accountants until Newfoundland joined the Canadian confederation in 1949 (Chua & Poullaos, 2002).

Many other accountancy bodies were set up in Canada, notably the Canadian Accountants' Association which was established with an inclusionary name in 1908 by industrial accountants. It received a federal charter in 1913 but, given that "CA" could be interpreted as "Canadian accountant" or "chartered accountant", opposition from chartered accountants led to a change to the dual exclusionary/inclusionary name General Accountants' Association to prevent use of initials similar to CA. Members were henceforth called "certified general accountants" (CGAs). In c.1988 the name was changed to Certified General Accountants' Association of Canada (CGA-Canada) (Stuart, 1988).

Australian Colonial Nationalism

Australian accountants set a precedent that was not followed elsewhere: the obtaining of a royal charter by an accountancy body not based in the UK. In the last two decades of the nineteenth century, accountants in Victoria successfully resisted an attempt by the UK based Society of Incorporated Accountants and Auditors to become the premier body in the colony (Edwards *et al.*, 1997) but Australian accountants imported the British tendency to regionalism and proliferation (Parker, 1989). At least one body was set up in each state (as the colonies became from 1 January 1901). Most of the earliest bodies chose weak exclusionary names that included their state or capital city of origin, but did not give their members a distinctive designation. Examples are: Adelaide Society of Accountants (1885); Incorporated Institute of Accountants, Victoria (IIAV) (1886); Queensland Institute of Accountants (1891); Sydney Institute of Public Accountants (SIPA) (1894);

Tasmanian Institute of Accountants (1897); Society of Accountants and Auditors of Victoria (1900); Institute of Accountants and Auditors of Western Australia (1900); South Australian Society of Accountants (1903); Institute of Incorporated Accountants of New South Wales (IIANSW) (1908). All of these are predecessor bodies of the Institute of Chartered Accountants in Australia (ICAA) or of CPA Australia, as also are bodies which had a claim in their names to be nationwide: Federal Institute of Accountants (1894); Corporation of Accountants of Australia (1899); Institute of Public Accountants of Australasia (1907); Australasian Corporation of Public Accountants (ACPA) (1908); Association of Accountants of Australia (1910). The non-capital city based Australian Institute of Incorporated Accountants (AIIA) (1892) did not become a predecessor body of the ICAA or of CPA Australia. Unlike in South Africa (see below) no local members of the UK based SIA took legal action to stop the appropriation of the designation "incorporated accountant" by the AIIA in Victoria or by the IIANSW in New South Wales.

The most important of these many bodies were the IIAV based in Melbourne (Victoria), and the SIPA and the ACPA based in Sydney (New South Wales). Melbourne and Sydney were then and remain the largest cities in Australia, although the relative size of their populations has changed over the years. The IIAV has changed its name many times. The first change in 1918 was to the Incorporated Institute of Accountants, Commonwealth of Australia, a belated recognition of the establishment of the federation of the Australian colonies into a "Commonwealth" from 1 January 1901. The name was shortened in 1921 to Commonwealth Institute of Accountants, into which was merged in the 1920s bodies based in the other mainland states. "Commonwealth" was the Australian equivalent of the Canadian use of the word "Dominion", but unlike the DACA the Commonwealth Institute failed to provide its members with the chartered or any other strong exclusionary designation. This was not for want of trying: the IIAV attempted but failed in the 1900s to obtain a royal charter (Chua & Poullaos, 1993). When the Commonwealth Institute merged with two other bodies in 1952 it changed its name to the Australian Society of Accountants (ASA), but still did not provide a designation for its members. In 1990, however, the name was changed to Australian Society of Certified Practising Accountants (ASCPA) and in 2000 to CPA Australia. The appropriation of the CPA brand was born of the realisation that "if it is not possible by law to stop unqualified people from calling themselves accountants, then an alternative solution is for qualified people to call themselves something else" (*Australian Accountant,* June 1990, p.18). As this quotation suggests, the new name and designation were dual exclusionary/inclusionary. Moreover, the change of name was not only an attempt to challenge the chartered brand but also a turning away from an imperial towards a Pacific Rim and more particularly a US view of the world. As discussed in a later section, almost all accountancy bodies within the

Pacific Rim designate their members CPAs rather than CAs. CPA Australia has pursued a vigorous policy of recruitment and the establishment of branches in the West Pacific Rim.

The ACPA's name before it was incorporated in 1908 was the weak exclusionary Institute of Public Accountants in Australasia. It would have preferred to remain an "Institute" but became a "Corporation" in order to avoid confusion with the recently formed Institute of Public Accountants of Australasia (Graham, 1978, p.5). The alternatives "Society" and "Association" were perhaps avoided because of the English bodies bearing those names. The expression "public accountants" followed the precedent of the Sydney Institute of Public Accountants and reflected the fact that in Australia, as in Britain, there were tensions between accountants in practice and those not in practice. The ACPA was founded by accountants who wanted a separate body for public accountants. The term "Australasian" rather than "Australian" was used to leave the door open for New Zealand accountants. The ACPA obtained a royal charter in 1928 and changed its name to the strong exclusionary Institute of Chartered Accountants in Australia, with members designated as chartered accountants. By this date it was clear that NZ accountants would not join. No attempts were made to follow the Canadian precedent of obtaining permission from the federal or a state government to use the term chartered, perhaps because, unlike in North America, acts of incorporation are not typically referred to in Australasia as "charters".

New Zealand

New Zealand was the last of the former settler colonies to have "chartered" accountants. The reasons for the delay appear to be the achievement of a legal monopoly at an early stage; the absence until recently of much in the way of overseas competition; and the unwillingness of the NZ government to support a charter which would confer advantages on only a section of the accountancy profession. The earliest bodies were called the Incorporated Institute of Accountants of New Zealand (1894) (a weak exclusionary name probably based on that of the IIAV in Melbourne) and the Accountants' and Auditors' Association (1898). These two bodies sponsored the formation by Act of Parliament in 1909 of the New Zealand Society of Accountants (NZSA). The Association was wound up in 1950; the Institute in 1972. New Zealand Society of Accountants was a weak exclusionary name but sufficient for a body which, alone in the settler colonies, was granted legal registration (Graham, 1960). Members in practice were designated "public accountants" and members not in practice "registered accountants". The *New Zealand Society of Accountants Act* 1958 placed restrictions on the use of the terms "accountant" and "auditor". In 1966 the designations were changed to "chartered accountants". In 1993 an amending Act opened up the terms "accountant" and "auditor" to any "suitably qualified" person, encouraging a move by the NZSA to a stronger exclusionary name.

The Wheeler Campbell report of 1993 commissioned by the NZSA recommended that the NZSA be divided into three colleges of "Certified Practising Accountants", "Associate Chartered Accountants" and "Accounting Technicians". The NZSA, although accepting most of the report, rejected the term "Certified Practising Accountants" in favour of "Chartered Accountants" (Velayutham & Perera, 1996, pp.453-4). In 1996 the NZSA obtained legislation to change its name to the Institute of Chartered Accountants of New Zealand.

Charters for republicans and rebels: Ireland, South Africa and Zimbabwe

Canada, Australia and New Zealand are still monarchies, but the durability of the chartered brand is such that it can survive in countries that become republics or even leave the Commonwealth altogether. When the Institute of Chartered Accountants in Ireland (ICAI) was incorporated by royal charter in 1888 following the naming precedent of the ICAEW, the whole of Ireland was part of the UK. An Irish Institute with a royal charter still made reasonable sense after partition in 1921: Northern Ireland remained part of the UK and the Irish Free State became a dominion. It was agreed informally that the presidency of the ICAI should alternate between northern and southern members (Robinson, 1983, p.114). In 1937, however, a president of the Irish Free State was elected and in 1949 the Republic of Ireland was created outwith the Commonwealth. However, the ICAI did not change its name. For the first time a body of chartered accountants was based (in part at least) in a republic which was not part of the British Empire or even a member of the Commonwealth. Nevertheless, the ICAI lobbied hard and successfully to ensure that it was recognised in UK legislation (for example, the Companies Acts) on the same terms as the ICAEW and the ICAS and it took part in the integration of the SIAA in 1957 (Robinson, 1983, chapters 17 and 18). The members of the ICAI in Northern Ireland have clearly never regarded themselves as rebels against the British Crown, but what of accountants in the south? Annisette and O'Regan (2002) show that not only in Belfast but also in Dublin the founders of the ICAI were predominantly protestant and unionist and that their successors have never pursued a separatist agenda. What is surprising is the apparent lack of any republican pressure on the ICAI to change its name.

The South African experience was different again (Noyce, 1954; van Rensburg, 1990). Numerous bodies were formed in the four colonies (later provinces). The most important, but by no means the only and not the earliest, to emerge in each province were the Transvaal Society of Accountants (1904), the Cape Society of Accountants and Auditors (1907) (originally the Society of Accountants in the Cape Colony), the Society of Accountants and Auditors in the Orange Free State (1908) (originally in the Orange River Colony) and the Natal Society of Accountants (1909). All of these bodies were established in the years between the end of the Boer War in 1902 and the formation of the Union of South

Africa in 1910. All were given weak exclusionary names reminiscent of that of the Society of Accountants and Auditors in the UK, of which many members of the South African societies were also members. A non-member of the UK Society who called himself an incorporated accountant was successfully restrained from so doing by legal action initiated by local members of the Society (Garrett, 1961, p.144).

In the 1920s the four Societies worked together to achieve legislation conferring upon their members as from 1928 the use of the strong exclusionary designation Chartered Accountant (South Africa). There was some opposition to "stealing someone else's title", but South African accountants were well aware of precedents elsewhere in the British Empire. Maldwyn Edmund (soon to become Registrar of the Transvaal Society) argued that "The Scots had it first then the English took it and were not accused of 'stealing' it nor were the Canadians when they adopted the title" (van Rensburg, 1990, p.36). Although referred to as the chartered societies, the four bodies retained their existing names until 1970, when each took the title Society of Chartered Accountants preceded by the name of the province. A Joint Council of the Societies of Chartered Accountants of South Africa was formed in 1945 and renamed the National Council of Chartered Accountants (South Africa) in 1966. It was dissolved in 1980 and replaced by the South African Institute of Chartered Accountants (SAICA). The SAICA was an "Institute" but the provincial bodies remained "Societies" until they were transformed into regional branches (neutrally named Central, Eastern, Northern and Southern) in the 1990s. These regions are not co-terminous with the old four provinces but chartered accountancy in South Africa continues to be administered from offices in Johannesburg, Cape Town, Durban and Bloemfontein.

As in the other former settler colonies, the CA profession in South Africa was for long "the domain of the English-speaking white male". The first white woman to qualify with the Transavaal Society did so in 1918; the first black man to qualify did so in 1977 (van Rensburg, 1990, pp.97, 23, 99). As in Quebec the names of accountancy bodies in South Africa have needed translation. For example, chartered accountant is *Geoktrooierde Rekenmeester* in Afrikaans, an expression not used in the Netherlands.

The white settlers of what was to become in 1923 the self-governing colony of Southern Rhodesia voted not to join the South African Union, but they maintained close commercial and professional links with it. In 1928 they quickly followed the South African precedent by establishing an Institute of Chartered Accountants of Southern Rhodesia. This survived the unilateral declaration of independence (UDI) in 1965 to become the Institute of Chartered Accountants of Zimbabwe on the establishment of majority rule in 1980.

South Africa's long sojourn (1961-1994) as a republic outside the Commonwealth had no effect on the chartered designation in that country. In the year that South Africa became a republic there were already four other republics within Commonwealth or former Commonwealth countries, all of them with an Institute of Chartered Accountants: Ireland, India, Sri Lanka and Pakistan. The first of these had already left the Commonwealth and Pakistan was a non-member from 1972 to 1989. During the decades to follow many more ex-colonies chose to become republics, but did not leave the Commonwealth (see Tables 1, 2 and 3). Indeed, the former mainly French and wholly Portuguese territories of Cameroon and Mozambique joined the Commonwealth in the 1990s (McIntyre, 1998, p.122).

Charters in the non-settler Commonwealth

Unlike the settler colonies, accountancy in the non-settler colonies was for long dominated by expatriates, most of whom were members of UK based bodies. Few locals could afford to go to the UK to qualify as chartered accountants and most of the firms to which they would have had to be articled were not very welcoming to non-white applicants from the colonies. A search of lists of members and examination results suggests that the first Indian to qualify as an English chartered accountant was Ardeshir Edulji Cama in 1908 but that he did so under the name of Arthur Charles Rice, establishing the firm A.C. Rice & Co. in Bombay. From 1914 onwards he, but not his firm, appears in the ICAEW List of Members under his Indian name. He was born in 1879 (Kapadia, 1973, p.429) and died in 1948 or 1949. The first Nigerian to qualify as a member of the ICAEW was Akintola Williams ("A. Williams" in the examination results) in 1950. The first Trinidadians to obtain chartered accountancy qualifications in the UK were Peter Joseph Martinez and David Law. Martinez originally qualified as a member of the SIA in 1954, becoming a chartered accountant on integration in 1958. Law qualified as a member of the Irish Institute in 1956. Both were from that very small percentage of the Trinidadian population that was of European descent (Annisette, 1999).

In 1947 India and Pakistan were the first non-settler colonies to gain independence within the British Commonwealth. They became republics in 1950 and 1956 respectively but recognised the British monarch as head of the Commonwealth. During the colonial period several expatriate firms of UK chartered accountants established a strong audit presence. Few Indians were members of the UK bodies but, after the setting up of a Register of Accountants in 1930, many local practitioners became known as "registered accountants". In 1938 there were in pre-partition India 66 chartered accountants, 99 incorporated accountants and 429 accountants with Indian qualifications. Fifty per cent of audit work was in the hands of six expatriate firms (Kapadia, 1973, pp.110, 109). "Chartered accountant" was a strong exclusionary name that many Indian accountants believed that they, like accountants in the white dominions, should be entitled to appropriate. According to Kapadia, author of the official history of the Institute of Chartered Accountants of India (ICAI), which devotes a whole chapter to the subject "What is in a Name?", it was a "coveted designation" acquired after an "historic struggle". An attempt to obtain it in 1936 by means of an amendment to the *Indian Companies Act* failed. During the debate many speakers recognised the strength of the designation within India. M.A. Jinnah, for example, the future first prime minister of Pakistan, referred to the "glamour" that attached to chartered accountants, such that some companies might foolishly appoint a chartered accountant in preference to a far more competent registered accountant (Kapadia, 1973, pp.170, 211). The ICAI was established by national legislation in 1949, two years after the attainment of independence.

The Indian precedent was followed rather slowly in South Asia. Registered accountants in pre-partition India were overwhelmingly non-Muslim (Kapadia, 1973, p.110; Ansari & Aziz, 1981, p.244) and it was not until 1961 that an Institute of Chartered Accountants in Pakistan was established. Sri Lanka (formerly Ceylon) gained independence in 1948 and the Institute of Chartered Accountants of Sri Lanka was established in 1959.

Decolonisation accelerated in the 1960s and 1970s. Effectively denied access to the chartered qualification, many local accountants qualified as certified accountants through the overseas examinations of the ACCA. The typical first step as independence approached was the voluntary formation of an "Association" of expatriates (most of whom were chartered accountants, including former members of the Society) and locals (most of whom were certified accountants). The next step was to try to obtain state approval for the foundation of an "Institute". The histories of most of these bodies have still to be written but events in two very different countries, Nigeria, and Trinidad and Tobago, have been well researched. Brief histories of the Bahamas and Guyana bodies are available on websites.

Nigeria (Wallace, 1992; Uche, 2002) was the most populous non-settler colony outside the Indian sub-continent but at independence in 1960 had only 41 qualified accountants (that is, Nigerian nationals who were members of UK bodies). This was a larger number than any other non-settler African colony. In the year of independence certified accountants in Nigeria, both local and expatriate, were recognised by the ACCA as a local branch. In the same year the Association of Accountants of Nigeria (AAN) was registered as a company limited by guarantee, with a membership comprising resident members, both local and expatriate, of UK bodies, and an ambition to form an elite body of "chartered accountants" based on the model of the ICAEW. The weak exclusionary name of the body reflected the fact that it was a coming together of already established accountants without – as yet – a locally accepted brand name. Not all locally resident chartered accountants (local and expatriate) joined the new Association, believing that it would dilute the chartered brand and that the AAN was dominated by certified accountants. Some of these sought to incorporate an Institute of Chartered Accountants (Nigeria), with membership limited to Nigerian nationals who were members of the ICAEW, but this was successfully opposed by both the AAN and the ICAEW (the latter on the grounds that it was nationally and racially exclusive). The AAN's superior political clout resulted in 1965 in the establishment by legislation of the Institute of Chartered Accountants of Nigeria (ICAN) with a monopoly of audit, membership of which eventually became mandatory for any person wishing to practise as a chartered accountant in Nigeria. The exclusiveness of ICAN has been challenged by the Association of National Accountants of Nigeria (ANAN), comprised mainly of members of the Association of International Accountants, a body based in the UK but not recognised under the *UK Companies Act.*

The development of the accountancy profession in Trinidad and Tobago, a much smaller country than Nigeria, has been researched in depth by Annisette (1999, 2000). The first professional accountancy body in Trinidad and Tobago was established in 1964, two years after independence in 1962. It was unincorporated and unimaginatively but informatively named the Trinidad and Tobago Association of Chartered Accountants and Certified Accountants, its members comprising (mainly expatriate) members of the UK chartered institutes and (mainly indigenous) members of the ACCA. In 1970 the Institute of Chartered Accountants in Trinidad and Tobago (ICATT) was incorporated by Act of Parliament. The ICATT was promoted by the state and its founding members as a means by which indigenous accountants could, inter alia, lessen their dependence on the ACCA for education and training. The plans in the 1960s for the ACCA, the ICWA and the IMTA to be integrated into the UK and Irish Institutes would have removed the opportunities post-integration for accountants overseas to become members. In the event integration failed (Shackleton & Walker, 2001). As a result the ACCA has continued to provide examination facilities for accountants in Trinidad and Tobago, internationalisation triumphing over indigenisation. If integration had succeeded, there would have been no more "certified accountants" in Trinidad and Tobago. Instead, as in many other Commonwealth countries, in today's Trinidad and Tobago "the term Chartered Accountant has come to signify an ACCA-qualified accountant … in the public's eye to be a chartered account is to be a certified accountant … the distinction between 'chartered' and 'certified' is largely irrelevant" (Annisette, 1999, pp.123, 127). Thus in many of the smaller Commonwealth countries the brand names "chartered" and "certified" are now joined in a relationship which has arisen as a combination of the results of the strategies of UK bodies, the colonial experience and the internationalisation of accounting.

Nigeria and Trinidad and Tobago are examples of a process that took place throughout the Commonwealth. By 2003 there was an Institute of Chartered Accountants in no less than 19 Commonwealth countries outside the UK and Ireland. They are listed in chronological order of formation in Table 1. More than half of them have memberships of less than 1,000. Some of them are what Annisette (2003, p.659) calls "status bodies", that is, bodies which rather than conduct their own examinations accept for membership graduates or members of overseas bodies. Small memberships are the result of the combination of small populations and relatively underdeveloped economies. The British government failed in its attempt to set up before independence federations that would have resulted in larger political entities. Thus, for example, there is no Institute of Chartered Accountants in the West Indies but instead separate Institutes of Chartered Accountants in the Bahamas, Barbados, Guyana, Jamaica and Trinidad and Tobago, all with memberships of less than 1,000.

The table suggests that there is a strong link between date of the appropriation of the designation "chartered accountant" and dates of self-government and independence, but there are lags and local peculiarities. The provincial chartered bodies of Canada are not listed separately in the table; the date given (1883) is that of the earliest charter; CICA was formed as late as 1902 because of the prior establishment of provincial Institutes in Quebec and Ontario. The Australian date (1928) is even later because of the desire of their public accountants to obtain a *royal* charter. The NZ date (1966) is later still for reasons already discussed. Dates for former non-settler colonies are all post-Second World War. The apparently early Zimbabwe date (1928) is explained by the country's period as a settler-dominated self-governing colony from 1923 onwards.

Table 1: Commonwealth countries other than the UK and Ireland in which there was a chartered accountant body in 2003

Canada (1883) [1867]	New Zealand (1966) [1907]
Australia (1928) [1901]	*Trinidad & Tobago (1970) [1962]
South Africa (1928) [1910]	*Bahamas (1971) [1973]
Zimbabwe (1928) [1923, 1965, 1980]	*Bangladesh (1973) [1971]
India (1949) [1947]	*Barbados (1974) [1966]
Sri Lanka (1959) [1948]	*Guyana (1974) [1966]
Pakistan (1961) [1947]	*Cameroon (1985) [1961]
*Ghana (1963) [1957]	*Sierra Leone (1988) [1961]
*Jamaica (1965) [1962]	*Namibia (1990) [1990]
Nigeria (1965) [1960]	

N.B. The Canadian provincial Institutes of Chartered Accountants are not listed in this Table. Dates of dominion status/independence in square brackets. Date in round brackets is that of first assumption of chartered name.

* membership less than 1,000

The CPA challenge

According to IFAC, there were almost 2.4 million members of accountancy bodies in 2003. Although accountants with membership of a "chartered" body (a wider brand than "chartered accountant" *tout court*) are pre-eminent within the Commonwealth, globally they are exceeded in numbers by "certified public accountants". The largest accountancy body in the world by far is the American Institute of Certified Public Accountants and the second largest is the Chinese Institute of Certified Public Accountants (Nobes & Parker, 2004, chapter 1). The chartered brand has not established itself outside the bounds of the former British Empire, although there are bodies in Albania and Poland with "chartered accountants" as part of the English versions of their names.

In 2003 there were eleven bodies of CPAs (listed in chronological order of formation in Table 2) within the former Empire (twelve as from 2004 – see below). Two of them (Ireland and Australia) are in countries that also have institutes of chartered accountants. Both the Institute of Certified Public Accountants in Ireland (established in 1943) and CPA Australia use the CPA designation to challenge the dominance of the chartered brand in their countries. Both stress in their publicity material the worldwide recognition of the CPA designation and both have been clearly influenced by the US precedent. As already noted, CPA was chosen in 1990 by the then Australian Society of Accountants to denote certified *practising* accountants. Since 2000 it officially means just CPA, without any spelling out. All attempts to merge with the Institute of Chartered Accountants in Australia have failed.

For Canadian chartered accountants the challenge of the prestige of the American CPA designation was much closer to home. It may appear surprising that no Canadian body of CPAs is listed in Table 2. A competitor of the Institute of Chartered Accountants of Ontario did in fact gain the right to use the designation in 1936, but the CPAs Association of Ontario was merged with ICAO in 1962 "in part due to pressure from American CPA firms, who were affiliated with CA firms in Canada, to remove the confusion experienced by their clients who used CPAs in the United States but not in Canada. The CAs maintain the rights to the CPA designation to ensure that it does not reappear in Canada" (Richardson, 1987, p.606).

American influence does not, however, fully explain why the CPA name rather than CA was chosen in the other countries in Table 2, even if US ideas on accounting education have been seen in some Commonwealth countries as superior to UK ideas, as argued by Wijewardina and Yapa (1998), contrasting Singapore and Sri Lanka. In the absence of firm evidence, two partial explanations are tentatively offered. The first is that the accountants with UK qualifications who typically founded these bodies comprised both certified and chartered accountants and chose CPA as a dual exclusionary/ inclusionary designation which included all those with an "imperial" qualification whilst excluding other accountants practising locally. This may explain the designations used in Kenya, Uganda and Tanzania. In Kenya there was tension between those who wished to adopt the chartered designation and "modernists" who successfully supported the CPA designation, not as anti-British but as a symbol of Africanisation (Sian, 2004). The Institute of Certified Public Accountants in Israel was established in 1931 in what was then the British mandated territory of Palestine by members of UK bodies. At the creation of Israel in 1948 it had 46 members (Ascheim & Fatal, 1991). The Malayan (later Malaysian) Association of Certified Public Accountants (MACPA) was formed in 1958, one year after independence, by twenty members of the British chartered, incorporated and certified bodies resident in Malaya. A separate body, the Singapore Society of Accountants (SSA), was established in Singapore in 1963 when Singapore became part of the Malaysian federation (it left two years later to become an independent republic). The SSA did not change its name to the Institute of Certified Public Accountants of Singapore until 1989. The second partial explanation (not applicable in East Africa) is that CPA is more consistent than CA with usage in neighbouring countries. The CPA designation adopted in Malaysia, Singapore and Brunei is consistent with the non-Commonwealth East Asian countries of China, Japan, Korea and the Philippines. The CPA designation in Cyprus is consistent with that of non-Commonwealth Middle Eastern countries of Greece, Jordan, Israel, Lebanon, Saudi Arabia and Turkey.

Table 2: Former British territories with a body of CPAs in 2003

Israel (1931) [1948]	Kenya (1978) [1963]
Ireland (1943) [1949]	*Brunei (1987) [1984]
*Jordan [1946]	Australia (1990) [1901]
Malaysia (1958) [1957]	Singapore (1989) [1963, 1965]
Cyprus (1961) [1960]	*Uganda [1962]
*Tanzania (1972) [1961]	

N.B. Date of first assumption of CPA name (not known for Jordan and Uganda) in round brackets; date of independence in square brackets. The Brunei Institute of Certified Public Accountants (Foo, 1993; Yapa, 1999) is not a member of IFAC.

* membership less than 1,000

For the sake of completeness, Table 3 lists in alphabetical order the ten former British colonies (all now members of the Commonwealth except Bahrain, Hong Kong and the Sudan) that had an accountancy body which in 2003 was a member of IFAC but had neither "chartered accountants" nor "CPAs" in their names. All the bodies are small with the exception of the Hong Kong Society of Accountants (established 1973), which in September 2004 rebranded itself as the Hong Kong Society of Certified Public Accountants, consistent with other accountancy bodies in East Asia. There are some smaller Commonwealth countries (Antigua and Mauritius, for example) in which no local professional accountancy body has been established, although some have a branch of the ACCA.

Table 3: Former British territories with a non-chartered, non-CPA body in 2003

*Bahrain [1971]	*Malawi [1964]
*Botswana [1966]	*Malta [1964]
*Fiji [1970]	*Sudan [1956]
Hong Kong [1997]	*Swaziland [1968]
*Lesotho [1966]	*Zambia [1964]

N.B. Dates of independence in square brackets.

* membership less than 1,000

Branded accountants in a global economy

Most of the world's accountants are now branded. At the same time there are also, paradoxically, doubts about the brand strength of the designations "chartered accountant" and "CPA". The accountancy profession has become polarised (Hanlon, 1994, chapter 2). The advertisements and websites of national and local firms typically emphasise the chartered or the CPA brand. On the other hand, international firms have not only outgrown the national professions from which they have sprung, they have also come to regard themselves as suppliers of business services rather than just accounting and auditing services. In the global economy the brand names of these firms have become better known than the brand names of accountancy bodies. In their advertisements and on the home pages of their websites, international accounting firms typically do not refer to themselves as chartered accountants or CPAs. Neither brand is regarded as sufficiently global. Rather the brand name is that of the firm, although how shaky that can be was shown by the demise of Andersen.

The names and recent changes of name of the official journals of accountancy bodies demonstrate a tendency to get away from a perceived "beancounter" image of accountants and accountancy. In the UK, not one journal contains the word "chartered" in its name, although ICAS's journal changed its name from *The Accountant's Magazine* to *CA Magazine* (not to be confused with the Canadian *CAmagazine* – see below) in 1993. The move to a shorter snappier name, intended to be more appealing to advertisers, has been common. CIPFA has not only failed to add the word "chartered" to the title of its journal but has also dropped the word "accountancy", changing from *Public Finance and Accountancy* to *Public Finance* in October 1993 (that is, before members became chartered public finance accountants). The ACCA changed the title of its journal from 1998 from *Certified Accountant* not to *Chartered Certified Accountant* but to *Accounting and Business.*

In Canada, CICA's journal the *Canadian Chartered Accountant* first added a French version (*Comptable Agréé Canadien*) to its name and then changed to *CAmagazine* (all one word) from 1974. In Australia, names have been shortened and the word "accountant" deleted but brand names remain prominent. The *Australian Accountant* changed its name to *Australian CPA* as from its April 1998 issue, with the comment:

> The CPA "brand" is an extremely powerful marketing tool, and its application to the ASCPA journal makes good commercial sense.

However, in 2004 the journal changed its name to *In the Black.*

The ICAA has successively changed the title of its journal from *The Chartered Accountant in Australia* to *The Chartered Accountant* (1989 only), to *Charter* (1990-2001), to *CA Charter* (from 2002). The Institute's president explained the 1990 name change as follows (*Charter*, February, 1990, p.6):

> The new name retains the flavour of our prized designation "chartered", while signalling both to Institute members and the growing number of outside readers and advertisers that we are now a modern business magazine. Our new name is thus very much in keeping with the contemporary role of chartered accountants as top-level financial and management advisers to the business and general community.

In 2002 the name change was justified on the grounds that "members' top priority is to increase the value and recognition of the CA brand" (*CA Charter*, February 2002, p.8). In New Zealand the *Accountants' Journal* (established in 1922) became the *Chartered Accountants' Journal of New Zealand* as from the issue of May 1994.

Summary and conclusion

This paper has discussed the role of names and designations within the history of the accountancy profession and suggested their use as devices for helping accountancy bodies control both the composition of their membership and the market for their services. Every accountancy body has needed a name that reflected its strategy (exclusionary, inclusionary, double exclusionary/inclusionary) and "branded" its members. Brands have been protected by legislation, litigation and behind the scenes influence. The most successful brand name and designation within the British Empire and Commonwealth has been that of "chartered accountant" (CA), which originated in Scotland in the 1850s and has been appropriated in many other countries. After the Second World War it was challenged in some Commonwealth countries by the US derived name "certified public accountant" (CPA). The concept of professional accountancy bodies and the names and brands associated with those bodies spread to the colonies of the British Empire but local accountancy *bodies* were formed not during the period of colonisation but during the period of decolonisation. Decolonisation proceeded at a different pace for settler and non-settler colonies. Thus accountancy bodies were formed in the late nineteenth and early twentieth centuries in Canada, Australia, New Zealand and South Africa but after the Second World War in the non-settler Commonwealth.

The paper demonstrates how the term "chartered" has been gradually disassociated from its origins in the grant of a royal charter as a means of incorporation. In Scotland it was applied to the members of a body rather than the body itself; in England and Wales the brand was included for the first time in the name of the body; in Canada it was applied to a body incorporated by statute not by royal charter; in Ireland it was retained by accountants who lived in a republic. Newly independent members of the Commonwealth have accepted the term. Bodies in countries that have left the Commonwealth have retained the term. In the UK challengers to the chartered brand (incorporated accountants, certified accountants, specialised bodies) have themselves successfully sought to be "chartered", possibly diluting the brand. Worldwide, only "certified public accountants" (a term originating in the US in the 1890s) have achieved greater numbers. In the Middle East, South East Asia and East Africa some former British colonies have adopted the CPA designation. International accounting firms, however, have cultivated their own brand names and emphasised their role as business advisers rather than as accountants and auditors. This option is less appealing for national firms. The journals of accountancy bodies have tended to change their titles to de-emphasise accounting but to highlight the brand name.

As already noted, this paper is mainly based on secondary sources, not all of which are themselves based on a thorough search of archival resources. It is hoped that the arguments in the present paper will encourage research into the archives which will confirm, modify and extend the arguments put forward herein.

References

Annisette, M., (1999), "Importing Accounting: The Case of Trinidad and Tobago", *Accounting, Business & Financial History*, Vol.9, No.1, March, pp.103-33.

Annisette, M., (2000), "Imperialism and the Professions: The Education and Certification of Accountants in Trinidad and Tobago", *Accounting, Organizations and Society,* Vol.25, No.7, pp.631-59.

Annisette, M., (2003), "The Colour of Accountancy: Examining the Salience of Race in a Professionalisation Project", *Accounting, Organizations and Society*, Vol.28, No.7-8, pp.639-74.

Annisette, M. and O'Regan, P., (2002), "The Survival of an all Ireland Institution. The Case of the Institute of Chartered Accountants in Ireland", unpublished working paper.

Ansari, A.M. and Aziz, A., (1981), "Accounting Education in Pakistan", in Enthoven, A.J.H. (ed.), *Accounting Education in Economic Development Management*, Amsterdam: North Holland Publishing Company.

Ascheim, C. and Fatal, H., (1991), "The Institute of Certified Public Accountants in Israel", *ICPAI Yearbook*, pp.221-5.

Association of Certified and Corporate Accountants, (1954), *Fifty Years – The Story of the Association of Certified and Corporate Accountants 1904-1954*, London: ACCA.

Banyard, C.W., (1985), *The Institute of Cost and Management Accountants. A History,* London: Institute of Cost and Management Accountants.

Brentnall, T., (1938), *My Memories*, Melbourne: Robertson & Mullins.

Briston, R.J. and Kedslie, M.J.M., (1997), "The Internationalization of British Professional Accounting: The Role of Examination Exporting Bodies", *Accounting, Business & Financial History*, Vol.7, No.2, pp.175-94.

Brown, R. (ed.), (1905), *History of Accounting and Accountants*, Edinburgh: Jack.

Bucher, R. and Strauss, A., (1961), "Professions in Process", *American Journal of Sociology,* Vol.66, No.4, pp.325-34.

Carnegie, G.D., (1993), "The Australian Institute of Incorporated Accountants", *Accounting, Business & Financial History*, Vol.3, No.1, March, pp.61-80.

Carnegie, G.D. and Parker, R.H., (1999), "Accountants and Empire: The Case of Co-membership of Australian and British Accountancy Bodies, 1885-1914", *Accounting, Business & Financial History,* Vol.9, No.1, March, pp.77-102.

Carnegie, G.D., Parker, R.H. and Wigg, R., (2000), "The Life and Career of John Spence Ogilvy (1805-71), the First Chartered Accountant to Emigrate to Australia", *Accounting, Business & Financial History*, Vol.10, No.3, March, pp.371-83.

Christopher, A.J., (1988), *The British Empire at its Zenith*, London: Croom Helm.

Chua, W.F. and Poullaos, C., (1993), "Rethinking the Profession-State Dynamic: The Case of the Victorian Charter Attempt, 1885-1906", *Accounting, Organizations and Society,* Vol.18, No.7-8, pp.691-728.

Chua, W.F. and Poullaos, C., (1998), "The Dynamics of 'Closure' Amidst the Construction of Market, Profession, Empire, and Nationhood: A Historical Analysis of an Australian Accounting Association, 1886-1903", *Accounting, Organizations and Society*, Vol.23, No.2, pp.155-88.

Chua, W.F. and Poullaos. C., (2002), "The Empire Strikes Back? An Exploration of Centre-Periphery Interaction Between the ICAEW and Accounting Associations in the Self-Governing Colonies of Australia, Canada and South Africa, 1880-1907", *Accounting, Organizations and Society*, Vol.27, No.4/5, May-July, pp.409-45.

Cole, D., (1971), "The Problem of 'Nationalism' and 'Imperialism' in British Colonies", *Journal of British Studies,* Vol.10, No.2, May, pp.160-82.

Collard, E.A., (1980), *First in North America, One Hundred Years in the Life of the Ordre des Comptables Agréés du Québec,* Montreal: Ordre des Comptables Agréés du Québec.

Creighton, P., (1984), *A Sum of Yesterdays*, Toronto: Institute of Chartered Accountants of Ontario.

Foo, S.L., (1993), "The Auditing Profession in Brunei", *Research in Third World Accounting,* Vol.2, pp.303-11.

Garrett, A.A., (1961), *History of The Society of Incorporated Accountants 1885-1957*, printed at the University Press, Oxford.

Graham, A.W., (1960), *The First Fifty Years: 1909-1959,* Wellington: New Zealand Society of Accountants.

Graham, A.W., (1978), *Without Fear or Favour,* Sydney: Butterworths.

Hanlon, G., (1994), *The Commercialisation of Accountancy*, London: Macmillan.

Horne, H.O., (1947), *A History of Savings Banks*, London: Oxford University Press.

Inglis, K., (1975), "Papua New Guinea. Naming a Nation", *New Guinea*, January, pp.2-20.

Institute of Chartered Accountants of Scotland, (1954), *A History of the Chartered Accountants of Scotland*, Edinburgh: Institute of Chartered Accountants of Scotland.

International Federation of Accountants, (2003), *IFAC Membership Statistics,* www.ifac.org.

Johnson, T.J. and Caygill, M., (1971), "The Development of Accountancy Links in the Commonwealth", *Accounting and Business Research*, Vol.1, No.2, Spring, pp.155-73.

Kapadia, G.P., (1973), *History of the Accountancy Profession in India*, New Delhi: Institute of Chartered Accountants of India.

Kapferer, J.-N., (1992), *Strategic Brand Management,* London: Kogan Page.

Kedslie, M.J.M., (1990a), *Firm Foundations. The Development of Professional Accounting in Scotland 1850-1900,* Hull: Hull University Press.

Kedslie, M.J.M., (1990b), "Mutual Self Interest – A Unifying Force: The Dominance of Societal Closure Over Social Background in the Early Professional Accounting Bodies", *Accounting Historians Journal*, December, Vol.17, No.2, pp.1-19.

Kirkham, L.M. and Loft, A., (1993), "Gender and the Construction of the Professional Accountant", *Accounting, Organizations and Society*, Vol.18, No.6, pp.507-58.

Lee, T.A., (1997), "The Influence of the Individual in the Professionalisation of Accountancy: The Case of Richard Brown and the Society of Accountants in Edinburgh, 1892-6", in Cooke, T.E. and Nobes, C.W. (eds.), (1997), *The Development of Accounting in an International Context,* London: Routledge, pp.30-48.

Lee, T.A., (2002), "UK Immigrants and the Foundation of the US Public Accountancy Profession", *Accounting, Business & Financial History*, Vol.12, No.1, March, pp.73-94.

Loft, A., (1988), *Understanding Accounting in its Social and Historical Context. The Case of Cost Accounting in Britain 1914-1925*, New York: Garland Publishing.

Macdonald, K.M., (1995), *The Sociology of the Professions,* London: Sage Publications.

Macdonald, K. and Ritzer, G., (1988), "The Sociology of the Professions: Dead or Alive?", *Work and Occupations,* Vol.15, No.3, pp.251-72.

Mace, J., (1994), "Promotion by Design", *Charter*, Vol.65, No.8, September, pp.14-15.

McIntyre, W.D., (1998), *British Decolonization, 1946-1997*, London: Macmillan Press.

Martin, J., (1897), *The Sanctification of the Lie*, Glasgow: Carter and Pratt.

Matthews, D., Anderson, M. and Edwards, J.R., (1998), *The Priesthood of Industry,* London: Oxford University Press.

Millerson, G., (1964), *The Qualifying Associations,* London: Routledge & Kegan Paul.

Murphy, G.J., (1993), *A History of Canadian Accounting Thought and Practice*, New York: Garland Publishing.

Murphy, J.M., (1987), *Branding. A Key Marketing Tool*, London: Macmillan.

Murphy, R., (1984), "The Structure of Closure: A Critique and Development of the Theories of Weber, Collins and Parkin", *British Journal of Sociology*, Vol.35, No.4, pp.547-67.

Murray, D., (1930), *Chapters in the History of Bookkeeping Accountancy & Commercial Arithmetic,* Glasgow: Jackson, Wylie & Co.

Nobes, C. and Parker, R., (2004), *Comparative International Accounting*, London: Prentice Hall.

Noyce, G.E., (1954), "The History of the Profession in South Africa", *South African Accountant*, Vol.1, March, pp.3-12.

Parker, R.H., (1989), "Importing and Exporting Accounting: The British Experience", in Hopwood, A. (ed.), *International Pressures for Accounting Change*, (London: Prentice Hall) reprinted in Parker, R.H. and Yamey, B.S. (eds.), 1994, *Accounting History. Some British Contributions,* Oxford: Oxford University Press.

Parkin, F., (1979), *Marxism and Class Theory: A Bourgeois Critique*, London: Tavistock Publications.

Parritt, C., (1995), "Chartered: The Premium Brand", *Accountancy*, Vol.115, No.1219, March, p.137.

Poullaos, C., (1993), "Making Profession and State, 1907 to 1914: The ACPA's First Charter Attempt", *Abacus*, Vol.29, No.2, pp.196-229.

Poullaos, C., (1994), *Making the Australian Chartered Accountant*, New York: Garland Publishing.

Poynton, T.L., (1960), *The Institute of Municipal Treasurers and Accountants. A Short History 1885-1960*, London: IMTA.

Richardson, A.J., (1987), "Professionalization and Intra-Professional Competition in the Canadian Accounting Profession", *Work and Occupations*, November, Vol.14, No.4, pp.591-615, reprinted in Murphy, G.J. (eds.), (1993), pp.183-207.

Richardson, A.J., (1993), "An Interpretive Chronology of the Development of Accounting Associations in Canada: 1879-1979", in Murphy, G.J. (ed.), (1993), pp.551-627.

Robinson, H.W.A., (1983), *A History of Accountants in Ireland*, Dublin: Institute of Chartered Accountants in Ireland.

Rose, K., (1983), *King George V*, London: Weidenfeld and Nicolson.

Shackleton, K., (1995), "Scottish Chartered Accountants: Internal and External Political Relationships, 1853-1916", *Accounting Auditing & Accountability Journal*, Vol.8, No.2, pp.18-46.

Shackleton, K. and Walker. S.P., (1998), *Professional Reconstruction: the Co-ordination of the Accountancy Bodies 1930-1957*, Edinburgh: Institute of Chartered Accountants of Scotland.

Shackleton, K. and Walker, S.P., (2001), *A Future for the Accountancy Profession: The Quest for Closure and Integration 1957-1970*, Edinburgh: Institute of Chartered Accountants of Scotland.

Sian, S., (2004), "Inclusion, Exclusion and Control: The Case of the Kenyan Accounting Professionalisation Project", unpublished working paper.

Sowerby, T., (1985), *The History of the Chartered Institute of Public Finance and Accountancy 1885-1985,* London: Chartered Institute of Public Finance and Accountancy.

Stacey, N.A.H., (1954), *English Accountancy 1800-1954. A Study in Social and Economic History*, London: Gee and Company.

Stewart, J.C., (1977), *Pioneers of a Profession,* Edinburgh: Institute of Chartered Accountants of Scotland.

Stuart, R.C., (1988), *The First Seventy-Five Years. A History of the Certified General Accountants' Association of Canada*, Vancouver: CGA-Canada.

Thompson, F.M.L., (1968), *Chartered Surveyors. The Growth of a Profession*, London: Routledge & Kegan Paul.

Uche, C.U., (2002), "Professional Accounting Development in Nigeria: Threats from the Inside and Outside", *Accounting, Organizations and Society,* Vol.27, No.4/5, May/July, pp.471-96.

van Rensburg, M.J.J., (1990), *Presidents I Have Known. Some Aspects of the History of the Transvaal Society of Chartered Accountants,* Johannesburg: The Transvaal Society of Chartered Accountants.

Velayutham, S. and Perera, H., (1996), "Recent Developments in the Accounting Profession in New Zealand: A Case of Deprofessionalization?", *International Journal of Accounting*, Vol.31, No.4, pp.445-62.

Velayutham, S. and Rahman, A., (2000), "Towards Market Differentiation in the Accounting Profession: The Case of Australia and New Zealand", *Critical Perspectives on Accounting*, Vol.11, No.6, pp.691-711.

Walker, S.P., (1988), *The Society of Accountants in Edinburgh 1854-1914: A Study of Recruitment to a New Profession*, New York: Garland.

Walker, S.P., (1991), "The Defence of Professional Monopoly: Scottish Chartered Accountants and 'Satellites in the Accountancy Firmament' 1854-1914", *Accounting, Organizations and Society*, Vol.16, No.3, pp.257-83.

Walker, S.P., (2004a), "The Genesis of Professional Organisation in English Accountancy", *Accounting, Organizations and Society*, Vol.29, No.2, pp.127-56.

Walker, S.P., (2004b), *Towards the "Great Desideratum". The Unification of the Accountancy Bodies in England, 1870-1880,* Edinburgh: Institute of Chartered Accountants of Scotland.

Wallace, R.S.O., (1992), "Growing Pains of an Indigenous Accountancy Profession: The Nigerian Experience", *Accounting, Business & Financial History*, Vol.2, No.1, March, pp.25-53.

Weber, M., (1968), in Roth, G. and Wittich, C. (ed.), *Economy and Society,* New York: Bedminster Press.

Webster, N.E., (1954), *The American Association of Public Accountants. Its First Twenty Years 1886-1906*, New York: American Institute of Accountants.

Weekes, T., (1995), "Chartered Public Finance Accountants – It's Official!", *Public Finance*, 15 December, p.2.

Wijewardina, H. and Yapa, S., (1998), "Colonialism and Accounting Education in Developing Countries: The Experience of Singapore and Sri Lanka", *International Journal of Accounting*, Vol.33, No.2, pp.269-81.

Witz, A., (1992), *Professions and Patriarchy,* London: Routledge.

Yapa, P.W.S., (1999), "Professional Accounting Environment in Brunei Darussalam", *Accounting, Auditing & Accountability Journal*, Vol.12, No.3, pp.328-39.