

ANNUAL CONFIRMATION OF INDEPENDENCE – GUIDANCE ON FORM D

1. Annual confirmations are required of all Partners, Professional Staff and others employed by the Member Firm (DPM Section 1420 para. 9.44). The term “Professional Staff” is defined in DPM 1420 as “Employees of Member Firms who participate in providing Professional Services to Member Firm Clients.”
2. The nature of the work of certain employees who are regularly involved, directly or indirectly, in the provision of professional services to clients or who work professionally with client service teams by providing them with e.g. technical information, support, or advice, could threaten our independence. As a consequence, such employees should provide an annual confirmation of their independence. However, the requirement on “others employed by the Member Firm” to provide annual confirmations of independence is unnecessarily broad and onerous.
3. Annual confirmations are not required from employees whose responsibilities and tasks are unlikely to create a threat to independence. This includes such groups as:
 - Drivers
 - Facility security staff
 - Janitorial staff
 - Catering staff
 - Mailroom staff
 - Delivery service staff
 - Others in similar positions