

**PROPOSED REVISED INTERNATIONAL STANDARD ON AUDITING 220**  
**QUALITY CONTROL FOR AUDITS OF HISTORICAL FINANCIAL INFORMATION**

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International Standards on Auditing (ISAs) are to be applied, as appropriate, in the audit or review of historical financial information.

ISAs contain basic principles and essential procedures (identified in bold lettering) together with related guidance in the form of explanatory and other material, including appendices. The basic principles and essential procedures are to be understood and applied in the context of the explanatory and other material that provide guidance for their application. It is therefore necessary to consider the whole text of an ISA to understand and apply the basic principles and essential procedures.

The nature of ISAs requires auditors to exercise professional judgment in applying them. In exceptional circumstances, an auditor may judge it necessary to depart from a basic principle or essential procedure of an ISA to achieve more effectively the objective of the audit. When such a situation arises, the auditor should be prepared to justify the departure.

Any limitation of the applicability of a specific ISA is made clear in the ISA.

In circumstances where specific basic principles, essential procedures or guidance contained in an ISA are not applicable in a public sector environment, or when additional guidance is appropriate in such an environment, the Public Sector Committee of the International Federation of Accountants so states in a Public Sector Perspective (PSP) at the end of the ISA. When no PSP is added, the ISA is to be applied as written to engagements in the public sector.

## Introduction

1. The purpose of this International Standard on Auditing (ISA) is to establish standards and provide guidance on specific responsibilities of firm personnel regarding quality control procedures for audit engagements. This ISA is to be read in conjunction with Parts A and B of the IFAC *Code of Ethics for Professional Accountants* (the IFAC Code).
2. **The engagement team should implement quality control procedures that are applicable to the individual audit engagement.**
3. Under International Standard on Quality Control (ISQC) 1, “Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements,” a firm ~~of professional accountants~~ has an obligation to establish a system of quality control designed to provide it with reasonable assurance that the firm and its personnel comply with professional standards and ~~applicable~~ regulatory and legal requirements, and that the auditors’ reports issued by the firm or engagement partners are appropriate in the circumstances.
4. Engagement teams:
  - (a) Comply with quality control procedures that are applicable to the audit engagement;
  - (b) Provide the firm with relevant information to enable the functioning of that part of the firm’s system of quality control relating to independence; and
  - (c) Are entitled to rely on the firm’s systems; (for example in relation to capabilities and competence of personnel through their recruitment and formal training of human resources; and independence through the accumulation and communication of relevant independence information in order for the firm and its personnel to determine whether relevant independence requirements are satisfied; maintenance of client relationships through acceptance and continuance systems; and adherence to regulatory and legal requirements through the monitoring process), unless ~~there is reason to believe otherwise through~~ information provided by the firm or other parties suggests otherwise.

## Definitions

5. —In this ISA, the following terms have the meanings attributed below:
  - (a) “Engagement partner” – the partner or other person in the firm who ~~has is~~ responsible ~~ibility~~ for the audit engagement and its performance, and for issuing the auditor’s report on behalf of the firm, and who has the appropriate authority from a professional, legal or regulatory body;
  - (b) “Engagement quality control review” —~~in connection with an audit engagement~~, a process designed to provide an objective evaluation, before the auditor’s report is issued, of the significant judgments ~~made by~~ the engagement

- team made and the conclusions they reached in formulating the auditor's report;
- (c) "Engagement quality control reviewer" – a partner, other person in the firm, ~~or~~ suitably qualified external ~~consultant~~person, or a team made up of such individuals, ~~who has with~~ sufficient and appropriate experience and authority to ~~provide an~~ objectively evaluatetion, before the auditor's report is issued, ~~of~~ the significant judgments ~~made by~~ the engagement team made and the conclusions they reached in formulating the auditor's report;
  - (d) "Engagement team" – all professionals ~~participating in performing~~ an audit engagement, including any experts employed or ~~engaged~~contracted by the firm in connection with that audit engagement;
  - (e) "Firm" – a sole practitioner, partnership, corporation or other ~~legal~~ entity of professional accountants;
  - (f) "Inspection" – in relation to completed audit engagements, ~~those~~ monitoring procedures designed to provide evidence ~~about whether of compliance by~~ engagement teams ~~have complied~~ with the firm's quality control policies and procedures;
  - (g) "Listed entity" – an entity whose shares, stock or debt are quoted or listed on a recognized stock exchange, or are marketed under the regulations of a recognized stock exchange or other equivalent body;
  - (h) "Monitoring" – a process ~~that~~ comprisinges both an ongoing consideration and evaluation of the firm's system of quality control, and a periodic inspection of a selection of completed engagements, designed to enable the firm to obtain reasonable assurance that its system of quality control is operating effectively;
  - (i) "Network firm" – an entity under common control, ownership or management with the firm or any entity that a reasonable and informed third party having knowledge of all relevant information would reasonably conclude as being ~~under common control, ownership or management with the firm~~ part of the firm nationally or internationally;
  - (j) "Partner" – any individual with authority to bind the firm with respect to the performance of ~~audits of historical financial information~~ a professional services engagement;
  - (k) "Personnel" – partners and staff;
  - (l) "Professional standards" – IAASB engagement standards, as defined in the IAASB's "Preface to the International Standards on Quality Control, Auditing, Assurance and Related Services," and relevant ethical requirements, which ordinarily comprise Parts A and B of the IFAC Code ~~of Ethics for Professional Accountants~~ and relevant national ethical requirements;
  - ~~(m) "Reasonable assurance" – a high, but not absolute, level of assurance;~~

- (~~ma~~) “Staff” – professionals, other than partners, including any experts ~~employed by~~ the firm ~~employs in connection with an audit engagement~~;
- (~~no~~) “Suitably qualified external ~~consultant person~~” – an individual ~~outside the firm who possesses with~~ the capabilities and competence to act as an engagement partner, for example a partner of another firm, or an employee (with appropriate experience) of either a professional accountancy body whose members may perform audits of historical financial information or of an organization that provides quality control services.

### Leadership Responsibilities for Quality on Audits

6. The engagement partner should ~~be~~ take responsibility for the overall ~~achievement of quality on each audit engagement to which that engagement partner is assigned.~~
7. The engagement partner sets an example regarding audit quality to the other members of the engagement team through ~~out~~ all stages of the audit engagement. Ordinarily, this example is provided through the actions of the engagement partner and through appropriate messages to the engagement team. Such actions and messages emphasize:
  - (a) The importance of:
    - (i) Performing work that complies with professional standards and ~~applicable~~ regulatory and legal requirements;
    - (ii) Comply~~ing~~ance with the firm’s quality control policies and procedures as applicable; and
    - (iii) Issuing auditors’ reports that are appropriate in the circumstances; and
  - (b) The fact that quality is essential in performing audit engagements.

### Ethical Requirements

8. The engagement partner should consider whether members of the engagement team have complied with ~~relevant~~ ethical requirements.
9. ~~Relevant e~~ Ethical requirements relating to audit engagements ordinarily comprise Parts A and B of the IFAC Code together with ~~applicable~~ national requirements ~~where these that~~ are more restrictive. The IFAC Code establishes the fundamental principles of professional ethics which are:
  - (a) Integrity;
  - (b) Objectivity;
  - (c) Professional competence and due care;
  - (d) Confidentiality;
  - (e) Professional behavior; and
  - (f) Technical standards.

10. ~~Consideration of compliance with ethical requirements occurs first during client or engagement acceptance procedures.~~ Inquiry and discussion-observation regarding ethical matters ~~between-amongst~~ the engagement partner and other members of the engagement team, ~~and where considered necessary, ethics specialists within or outside the firm,~~ occur as necessary throughout the audit engagement ~~as appropriate~~. If matters come to the engagement partner's attention through the firm's systems or otherwise that indicate that members of the engagement team have not complied with ethical requirements, the partner, in consultation with others in the firm, determines the appropriate action.
11. The engagement partner and, where appropriate, together with other members of the engagement team ~~as appropriate~~, document issues identified and how they were resolved ~~the extent of inquiries and discussions that have taken place, including:~~
- ~~The manner in which any issues arising have been resolved; and~~
  - ~~A conclusion on compliance with ethical requirements with respect to such issues.~~

#### *Independence*

12. The engagement partner should form a conclusion ~~on~~ compliance with independence requirements that apply ~~ieable~~ to the audit engagement. In forming the conclusion ~~doing so~~, the engagement partner should:
- (a) Obtain relevant information from the firm and, where applicable, network firms, to ~~enable the engagement partner to~~ identify and evaluate circumstances and relationships that create threats to independence ~~for the audit engagement~~;
  - (b) Evaluate information on regarding identified breaches, if any, of the firm's independence policies and procedures to determine whether they create a threat to independence for the audit engagement;
  - (c) Take appropriate action to eliminate such threats or reduce them to an acceptable level by ~~the applying~~ ieation of safeguards. The engagement partner should promptly report to the firm any failure to resolve or, if the matter is not resolved, communicate this promptly to the firm so that for appropriate action ~~can be taken~~; and
  - (d) Document conclusions on regarding independence and any relevant discussions with the firm that support these conclusions.
13. ~~Where, in the judgment of t~~The engagement partner may identify, ~~there is~~ a threat to independence regarding the audit engagement ~~for which it might not be possible to adopt safeguards that safeguards may not be able to eliminate the threat or reduce it to an acceptable level.~~ In that case, the engagement partner consults within the firm to determine ~~the appropriate action to be taken~~, which may include eliminating the activity or interest that gives rise to creates the threat, or withdrawing from the audit engagement. Such discussion and conclusions are documented.

#### **Acceptance and Continuance of Client Relationships and Specific Audit Engagements**

14. The engagement partner should be satisfied that appropriate procedures regarding the acceptance and continuance of client relationships and specific audit engagements have been followed, and that conclusions reached in this regard have been documented.
15. The engagement partner may or may not initiate the decision-making process for acceptance or continuance ~~decision-making process~~ regarding the audit engagement. Regardless of whether the engagement partner initiated that process, the engagement partner reviews the procedures performed for ~~determines whether~~ the most recent decision ~~and concludes as to whether the decision~~ remains appropriate.
16. ~~The engagement team follows the firm's procedures for a~~ acceptance and continuance of client relationships and specific audit engagements ~~which~~ include considering:
- The integrity of the principal owners, key management and those charged with governance of the entity;
  - Whether the engagement team is competent to undertake-perform the audit engagement and has the necessary time and resources ~~to do so~~; and
  - Whether the firm and the engagement team can comply with ethical requirements.
- Where issues arise out of any of these considerations ~~have been identified~~, the engagement team conducts the ~~takes place as~~ set out in paragraphs ~~301~~ to ~~334~~, and documents how ~~the manner in which the~~ issues ~~have been~~ were resolved ~~is documented~~.
- ~~17. The satisfactory completion of acceptance and continuance procedures does not eliminate the need for the engagement partner to maintain appropriate professional skepticism with regard to the client's integrity throughout the engagement partner's relationship with that client.~~
- ~~187. The decision on~~ Deciding whether to continue a client relationship includes consideration of significant matters that have arisen during the current or previous audit engagement, and their implications for ~~the continu~~ingance ~~of the~~ eat relationship. For example, a client may have started to expand its business operations into an area where the firm does not possess the necessary knowledge or expertise.
- ~~189. Where the engagement partner has obtained~~ information that would have caused the firm to decline ~~the appointment to~~ the audit engagement if had that information had been ~~obtained available~~ earlier, the engagement partner should communicate that information promptly to the firm, so that ~~to enable~~ the firm and the engagement partner can ~~to~~ take the necessary action ~~in conjunction with the engagement partner.~~

#### Assignment of Engagement Teams

- ~~1920.~~ The engagement partner should be satisfied that the engagement team collectively has the appropriate capabilities, competence and time to perform

the audit engagement in accordance with professional standards and **applicable** regulatory and legal requirements, and to enable an auditor's report that is appropriate in the circumstances to be issued.

201. The appropriate capabilities and competence expected of the engagement team as a whole include the following:

- ~~An U~~nderstanding and practical experience of audit engagements of a similar nature and complexity through appropriate training and participation.
- ~~An u~~nderstanding of professional standards and ~~applicable~~ regulatory and legal requirements.
- Appropriate technical knowledge, including knowledge of relevant information technology ~~knowledge~~.
- Knowledge of relevant industries in which the client operates.
- Ability to apply professional judgment.
- ~~An u~~nderstanding of the firm's quality control policies and procedures.

#### Engagement Performance

212. The engagement partner should ~~take be~~ responsibility for the direction, supervision and performance of the audit engagement in compliance with professional standards and ~~applicable~~ regulatory and legal requirements, and for the auditor's report that is issued to be appropriate in the circumstances.

223. The engagement partner directs the audit engagement by informing the members of the engagement team of:

- ~~(a) t~~ Their responsibilities;
- ~~(b) t~~ The nature of the entity's business;
- ~~(c) , r~~ Risk-related issues;
- ~~(d) , p~~ Problems that may arise; and
- ~~(e) t~~ The detailed approach to the performance of the engagement.

— The engagement team's responsibilities include ~~the maintenance of~~ maintaining an objective state of mind and an appropriate level of professional skepticism, and ~~the performing~~ of the work delegated to them in accordance with the ethical principle of due care. Members of the engagement team are encouraged to raise questions ~~they may have~~ with more experienced team members. Appropriate communication occurs within the engagement team.

234. It is important that all members of the engagement team understand the objectives of the work they are to perform. Appropriate team-working and training are necessary to assist less experienced members of the engagement team to ~~in~~ clearly understanding the objectives of the assigned work ~~they are assigned~~.

245. Supervision includes the following:



- Tracking the progress of the audit engagement.
- Considering the capabilities and competence of individual members of the engagement team, whether they have sufficient time to carry out their work, whether they understand their instructions, and whether the work is being carried out in accordance with the planned approach to the audit engagement.
- Addressing significant issues arising during the audit engagement, considering their significance and modifying the planned approach ~~as~~ appropriately.
- Identifying matters for consultation or consideration by more experienced engagement team members during the audit engagement.

256. ~~Review responsibilities are determined on the basis that more experienced team members, including the engagement partner, review w~~Work performed by ~~less experienced team members of the engagement team is reviewed by more experienced engagement team members, including the engagement partner.~~  
Reviewers consider whether:

- (a) The work has been performed in accordance with professional standards and ~~applicable~~ regulatory and legal requirements;
- (b) Significant matters have been raised for further consideration;
- (c) Appropriate consultations have taken place and the resulting conclusions have been documented and implemented;
- (d) There ~~are indications that suggest~~is a need to revise the nature, timing and extent of work performed;
- (e) The work performed supports the conclusions reached and is appropriately documented;
- (f) ~~The E~~evidence obtained is sufficient and appropriate to support the auditor's report; and
- (g) The objectives of the engagement procedures have been achieved.

267. ~~Before the auditor's report is issued, the engagement partner, through review of the working papers audit documentation and discussion with the engagement team, should be satisfied that sufficient appropriate audit evidence has been obtained to support the conclusions reached and for the auditor's report to be issued.~~

278. The engagement partner's ~~conducts timely reviews is conducted in a timely manner~~ at appropriate stages during the engagement. ~~This to allow~~s ~~for~~ significant matters ~~identified~~ to be resolved on a timely basis to the engagement partner's satisfaction before the auditor's report is issued. ~~The engagement partner's review need not cover all working papers. The reviews~~ However, it covers critical areas of judgment, especially those relating to difficult or contentious matters identified during the course of the engagement, significant risks, and other areas ~~which~~ the engagement partner considers important. ~~The engagement partner need not review all audit documentation. However, t~~The engagement partner documents the extent and timing

of the reviews. ~~Matters–Issues~~ arising from the reviews are resolved to the satisfaction of the engagement partner.

~~289. Where there is a change of engagement partner during the course of the current audit engagement, the~~ A new engagement partner ~~taking over an audit during the engagement undertakes a~~ reviews of the work performed to the date of the change. The review procedures are sufficient to satisfy the new engagement partner that the work performed to the date of the review has been planned and performed in accordance with professional standards and ~~applicable~~ regulatory and legal requirements.

~~2930.~~ Where more than one partner is involved in the conduct of an audit engagement, it is important that the responsibilities of the respective partners are clearly defined and understood by the engagement team.

#### *Consultation*

~~304.~~ **The engagement partner should:**

- (a) **Be responsible for the engagement team undertaking appropriate consultation on difficult or contentious matters;**
- (b) **Be satisfied that members of the engagement team have undertaken appropriate consultation during the course of the engagement, both within the engagement team and between the engagement team and others at the appropriate level within or outside the firm;**
- (c) **Be satisfied that the nature and scope of, and conclusions resulting from, such consultations are documented and agreed with the party consulted; and**
- (d) **Determine that conclusions resulting from consultations have been implemented.**

~~312.~~ Effective consultation with other professionals requires that those consulted be given all the relevant facts that will enable them to provide informed advice, ~~whether~~ on technical, ethical or other matters. Where appropriate, the engagement team consults individuals with appropriate knowledge, seniority and experience within the firm or, where applicable, outside the firm. Conclusions resulting from consultations are appropriately documented and implemented.

~~323. In certain circumstances, i~~It may be appropriate for the engagement team to consult outside the firm, for example, where the firm lacks appropriate internal resources. ~~In such circumstances, t~~They may take advantage of advisory services provided by other firms, professional and regulatory bodies, or commercial organizations that provide relevant quality control services.

~~334.~~ The documentation of consultations with other professionals that involve difficult or contentious matters is agreed by both the individual seeking consultation and the individual consulted. The documentation, ~~and~~ is sufficiently complete and detailed to enable an understanding of:

- (a) The issue on which consultation was sought; and
- (b) The results of the consultation, including any decisions taken, the basis for those decisions and ~~the manner in which~~ how they were implemented.

**345. Where differences of opinion arise within the engagement team, with those consulted and, where applicable, between the engagement partner and the engagement quality control reviewer, the engagement team should follow the firm's policies and procedures for dealing with and resolving differences of opinion.**

*Engagement Quality Control Review*

**356. For audits of listed entities, the engagement partner should:**

- (a) Determine that an engagement quality control reviewer has been appointed;
- (b) Discuss significant matters arising during the audit engagement, including those identified during the engagement quality control review, with the engagement quality control reviewer; and
- (c) Not issue the auditor's report until the completion of the engagement quality control review, including resolution to the satisfaction of the engagement quality control reviewer of issues raised.

For other audit engagements where an engagement quality control review is performed, the engagement partner follows the requirements set out in subparagraphs (a) to (c) ~~above~~.

**367. ~~For an audit engagement w~~Where, at the start of the engagement, ~~the firm's criteria do not require the performance of~~ an engagement quality control review is not considered necessary, the engagement partner is alert for changes in circumstances ~~during the engagement~~ that would require such a ~~the performance of an engagement quality control~~ review.**

**378. An engagement quality control review should include an objective evaluation of:**

- (a) The significant judgments made by the engagement team; and
- (b) The conclusions reached in formulating the auditor's report.

**389. An engagement quality control review ordinarily involves discussion with the engagement partner, a review of the financial statements and the auditor's report, and, in particular, consideration of whether the auditor's report is appropriate. It also involves a review of selected ~~working papers~~ audit documentation relating to the significant judgments the engagement team made and the conclusions they reached. The extent of the ~~engagement quality control~~ review depends on the complexity of the audit engagement and the risk that- the auditor's report might not be appropriate**

in the circumstances. ~~It~~ The review does not reduce the responsibilities of the engagement partner.

~~3940.~~ ~~The scope of a~~ An engagement quality control review includes consideration of the following:

- The engagement team's evaluation of the firm's independence in relation to the specific audit engagement.
- ~~The s~~Significant risks identified during the engagement (in accordance with ISA 315, "Understanding the Entity and its Environment and Assessing the Risks of Material Misstatement,") and the responses to those risks (in accordance with ISA 325, "Auditor's Procedures in Response to Assessed Risks,") including the engagement team's assessment of, and response to, the risk of fraud.
- ~~The j~~Judgments made, particularly relating with respect to materiality and to significant risks.
- Whether appropriate consultation has taken place on difficult or contentious matters and the conclusions arising from those consultations.
- The significance and disposition of corrected and uncorrected misstatements identified during the audit.
- ~~Whether appropriate~~ The matters to be communicated have been considered for reporting to management and those charged with governance and, where applicable, other parties such as regulatory bodies.
- Whether ~~selected audit~~ documentation selected for review ~~ed~~ reflects the work performed in relation to the significant judgments and supports the conclusions reached ~~drawn as a result of that work.~~
- ~~Whether the~~ The appropriateness of the auditor's report to be issued is ~~appropriate in the circumstances.~~

## Monitoring

~~401.~~ ~~In accordance with~~ ISQC 1, requires the firm's system of quality control to includes monitoring of quality control policies and procedures. The engagement partner considers the results of the monitoring process as evidenced in the latest information circulated by the firm and, if applicable, other network firms. The engagement partner and considers:

- (a) Whether deficiencies noted in that information may affect ~~have an impact on~~ the audit engagement ~~in question~~; and
- (b) Whether the measures ~~taken by~~ the firm took to rectify the situation are sufficient in the context of that audit.

~~412.~~ A deficiency in the firm's system of quality control does not, ~~in and of itself,~~ indicate that a particular audit engagement was not performed in accordance with professional standards and ~~applicable~~ regulatory and legal requirements, or that the auditor's report was not appropriate ~~in the circumstances.~~

~~43. The engagement partner or engagement team should communicate with the responsible parties within the firm regarding any complaints or allegations (not including those that are clearly frivolous) about whether the work performed fails to comply with professional standards and applicable regulatory and legal requirements.~~

#### Effective Date

~~424.~~ This ISA is effective for audits of financial statements for periods commencing on or after ~~January 1, 2005~~December 15, 2004.

#### Public Sector Perspective

1. *This ISA is applicable in all material respects to the public sector.*
2. *Some of the terms used in this ISA, such as “engagement partner” and “firm,” should be read as referring to their public sector equivalents. Audits of significant public sector entities should be subject to the same standards as audits of listed entities. The significance of a public sector entity may be assessed by reference to a number of factors including business risk, public interest, political and/or public significance and the number and range of affected stakeholders.*
3. *In the public sector, auditors may be appointed in accordance with statutory procedures. Accordingly, certain of the considerations regarding the acceptance and continuance of client relationships and specific engagements, as set out in paragraphs 16 ~~and~~ 178 of this ISA, may not be relevant.*
4. *Similarly, the independence of public sector auditors may be protected by statutory measures. However, public sector auditors or audit firms carrying out public sector audits on behalf of the statutory auditor may, depending on the terms of the mandate in a particular jurisdiction, need to adapt their approach in order to ensure compliance with the spirit of paragraphs 12 and 13. This may include, where the public sector auditor’s mandate does not permit withdrawal from the engagement, disclosure of circumstances that have arisen that would, if they were in the private sector, lead the auditor to withdraw.*
5. *Paragraph ~~201~~ sets out capabilities and competence expected of the engagement team. Additional capabilities may be required in public sector audits, dependent upon the terms of the mandate in a particular jurisdiction. Such additional capabilities may include an understanding of the applicable reporting arrangements, including reporting to parliament or in the public interest. The wider scope of a public sector audit may require the financial statements audit to include, for example, some aspects of performance auditing and a comprehensive assessment of the arrangements for ensuring legality and preventing and detecting fraud and corruption.*