

EXPOSURE DRAFT

ED 02/13

(August 2013)

Proposed Auditing Standard ASA 610 (Revised)

Using the Work of Internal Auditors

Issued for Comment by the **Auditing and Assurance Standards Board**



Australian Government

Auditing and Assurance Standards Board

Commenting on this Exposure Draft

Comments on this Exposure Draft should be forwarded so as to arrive by no later than 30 September 2013. Comments should be addressed to:

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PREFACE

Reasons for Issuing ED 02/13

The Auditing and Assurance Standards Board (AUASB) is proposing to re-issue Auditing Standard ASA 610 (Revised) *Using the Work of Internal Auditors*, pursuant to the requirements of the legislative provisions and the Strategic Direction explained below.

The AUASB is an independent statutory committee of the Australian Government established under section 227A of the *Australian Securities and Investments Commission Act 2001* (as amended) (ASIC Act). Under section 336 of the *Corporations Act 2001*, the AUASB may make Auditing Standards for the purposes of the corporations legislation. These Auditing Standards are legislative instruments under the *Legislative Instruments Act 2003*.

Under the Strategic Direction given to the AUASB by the Financial Reporting Council (FRC), the AUASB is required, inter alia, to develop auditing standards that have a clear public interest focus and are of the highest quality.

Other Relevant Exposure Drafts

ED 02/13 is to be read in conjunction with ED 03/13 Proposed Auditing Standard ASA 2013-2 *Amendments to Australian Auditing Standards*.

Main Proposals

This proposed Auditing Standard is a comprehensive revision of existing standard ASA 610 *Using the Work of Internal Auditors* (issued October 2009) that:

1. Reflects recent developments in the internal auditing environment;
2. Provides a more robust framework for the evaluation and, where appropriate, use of the work of the internal audit function; and
3. Prohibits the use of internal auditors to provide direct assistance in an independent audit or review conducted in accordance with the Australian Auditing Standards. For a group audit, this prohibition extends to the use of internal auditors to provide direct assistance in an audit or review of a component, including an overseas component, conducted in accordance with the Australian Auditing Standards.

The revised Auditing Standard, therefore, does not include the paragraphs relating to the use of internal auditors to provide direct assistance that are included in ISA 610 (Revised 2013) *Using the Work of Internal Auditors* and such paragraphs have been replaced with the words “[Deleted by the AUASB. Refer Aus 1.2]”.

This prohibition does not represent a divergence from ISA 610 (Revised 2013), as the IAASB makes it clear that its requirements and guidance in this area will not be applicable in jurisdictions where the use of internal auditors to provide direct assistance is prohibited.

This Auditing Standard contains both new and revised requirements. The revised requirements clarify existing requirements and make explicit matters that are implicit in existing ASA 610. The new requirements, in most instances, articulate what would ordinarily be expected to occur in current practice.

The main proposals in this Auditing Standard are:

- (a) Revised requirements relating to the external auditor:

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- (i) Determining whether, in which areas, and to what extent, the work of the internal audit function can be used; and
 - (ii) Determining the adequacy of the work of the internal audit function for the purposes of the audit.
- (b) New requirements for the external auditor, if planning to use the work of the internal audit function, to:
- (i) Evaluate whether using the work of the internal audit function would still result in the external auditor being sufficiently involved in the audit;
 - (ii) Communicate with those charged with governance the planned use of the work of the internal audit function;
 - (iii) Communicate with the internal audit function, to co-ordinate the relevant activities of the internal and external auditors; and
 - (iv) Re-perform some of the work of the internal audit function that is planned to be used.
- (c) A clear link between ASA 610 (Revised) and ASA 315 *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment* (as amended), which contains a new requirement for the auditor's risk assessment procedures to include enquiries of appropriate individuals within the internal audit function (if the function exists), whether or not the auditor expects to use the work of that function.

Proposed Operative Date

It is intended that this proposed Auditing Standard will be operative for financial reporting periods commencing on or after 1 January 2014.

Main changes from existing ASA 610 *Using the Work of Internal Auditors* (issued October 2009)

The main differences between this proposed Auditing Standard and the Auditing Standard that it supersedes, ASA 610 *Using the Work of Internal Auditors* (issued October 2009), are included in the Tables of Differences provided as an attachment to this Exposure Draft.

Request for Comments

Comments are invited on this Exposure Draft of the proposed re-issuance of ASA 610 (Revised) *Using the Work of Internal Auditors* by no later than 30 September 2013. The AUASB is seeking comments from respondents on the following questions:

1. Have applicable laws and regulations been appropriately addressed in the proposed standard?
2. Are there any references to relevant laws or regulations that have been omitted?
3. Are there any laws or regulations that may, or do, prevent or impede the application of the proposed standard, or may conflict with the proposed standard?
4. What, if any, are the additional significant costs to/benefits for auditors and the business community arising from compliance with the main changes to the requirements of this proposed Auditing Standard? If there are significant costs, do these outweigh the benefits to the users of audit services?

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5. Are there any other significant public interest matters that constituents wish to raise?

The AUASB prefers that respondents express a clear opinion on whether the proposed Auditing Standard, as a whole, is supported and that this opinion be supplemented by detailed comments, whether supportive or critical, on the above matters. The AUASB regards both supportive and critical comments as essential to a balanced review of the Auditing Standard.

AUTHORITY STATEMENT

The Auditing and Assurance Standards Board (AUASB) makes this Auditing Standard ASA 610 (Revised) *Using the Work of Internal Auditors*, pursuant to section 227B of the *Australian Securities and Investments Commission Act 2001* and section 336 of the *Corporations Act 2001*.

This Auditing Standard is to be read in conjunction with ASA 101 *Preamble to Australian Auditing Standards*, which sets out the intentions of the AUASB on how the Australian Auditing Standards, operative for financial reporting periods commencing on or after 1 January 2010, are to be understood, interpreted and applied. This Auditing Standard is to be read also in conjunction with ASA 200 *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with Australian Auditing Standards*.

Conformity with International Standards on Auditing

This Auditing Standard issued by the AUASB conforms with International Standard on Auditing ISA 610 (Revised 2013) *Using the Work of Internal Auditors*, issued by the International Auditing and Assurance Standards Board (IAASB), an independent standard-setting board of the International Federation of Accountants (IFAC).

This Auditing Standard prohibits the use of internal auditors to provide direct assistance in an audit or review conducted in accordance with the Australian Auditing Standards. This prohibition on direct assistance does not represent a divergence from ISA 610 (Revised 2013), as the IAASB makes it clear that its requirements and guidance in this area will not be applicable in jurisdictions where the use of internal auditors to provide direct assistance is prohibited.

Where paragraphs in ISA 610 (Revised 2013) relating to the use of internal auditors to provide direct assistance have not been included in this Auditing Standard, the words “[Deleted by the AUASB. Refer Aus 1.2]” have been inserted in their place.

Paragraphs that have been added to this Auditing Standard (and do not appear in the text of the equivalent ISA) are identified with the prefix “Aus”.

Compliance with this Auditing Standard enables compliance with ISA 610 (Revised 2013).

AUDITING STANDARD ASA 610 (REVISED)

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Application

- Aus 0.1 This Auditing Standard applies to:
- (a) an audit of a financial report for a financial year, or an audit or a review of a financial report for a half-year, in accordance with the *Corporations Act 2001*; and
 - (b) an audit of a financial report, or a complete set of financial statements, for any other purpose.
- Aus 0.2 This Auditing Standard also applies, as appropriate, to an audit of other historical financial information.

Operative Date

- Aus 0.3 This Auditing Standard is operative for financial reporting periods commencing on or after 1 January 2014. Early adoption is permitted.

Introduction

Scope of this Auditing Standard

1. [Deleted by the AUASB. Refer Aus 1.1 and Aus 1.2]
- Aus 1.1 This Auditing Standard deals with the external auditor's responsibilities if using the work of internal auditors. This includes using the work of the internal audit function in obtaining audit evidence.
- Aus 1.2 The use of internal auditors to provide direct assistance is prohibited in an audit or review conducted in accordance with the Australian Auditing Standards.* For a group audit, this prohibition extends to the use of internal auditors to provide direct assistance in an audit or review of a component, including an overseas component, conducted in accordance with the Australian Auditing Standards.#
2. This Auditing Standard does not apply if the entity does not have an internal audit function. (Ref: Para. A2)
3. If the entity has an internal audit function, the requirements in this Auditing Standard relating to using the work of that function do not apply if:
 - (a) The responsibilities and activities of the function are not relevant to the audit; or

* International Standard on Auditing ISA 610 (Revised 2013) *Using the Work of Internal Auditors*, paragraph 5 makes it clear that the requirements and application and other explanatory material in that standard relating to direct assistance do not apply in jurisdictions where direct assistance is prohibited, or restricted to some extent, by law or regulation. Accordingly, ASA 610 does not include requirements and application and other explanatory material on direct assistance and replaces them with the words "[Deleted by the AUASB. Refer Aus 1.2]".

See ASA 600 *Special Considerations—Audits of a Group Financial Report (Including the Work of Component Auditors)* (as amended).

- (b) Based on the auditor's preliminary understanding of the function obtained as a result of procedures performed under ASA 315,¹ the external auditor does not expect to use the work of the function in obtaining audit evidence.

Nothing in this Auditing Standard requires the external auditor to use the work of the internal audit function to modify the nature or timing, or reduce the extent, of audit procedures to be performed directly by the external auditor; it remains a decision of the external auditor in establishing the overall audit strategy.

4. [Deleted by the AUASB. Refer Aus 1.2]

5. [Deleted by the AUASB. Refer Aus 1.2]²

Relationship between ASA 315 and ASA 610

6. Many entities establish internal audit functions as part of their internal control and governance structures. The objectives and scope of an internal audit function, the nature of its responsibilities and its organisational status, including the function's authority and accountability, vary widely and depend on the size and structure of the entity and the requirements of management and, where applicable, those charged with governance.
7. ASA 315 addresses how the knowledge and experience of the internal audit function can inform the external auditor's understanding of the entity and its environment and identification and assessment of risks of material misstatement. ASA 315³ also explains how effective communication between the internal and external auditors also creates an environment in which the external auditor can be informed of significant matters that may affect the external auditor's work.
8. Depending on whether the internal audit function's organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors, the level of competency of the internal audit function, and whether the function applies a systematic and disciplined approach, the external auditor may also be able to use the work of the internal audit function in a constructive and complementary manner. This Auditing Standard addresses the external auditor's responsibilities when, based on the external auditor's preliminary understanding of the internal audit function obtained as a result of procedures performed under ASA 315, the external auditor expects to use the work of the internal audit function as part of the audit evidence obtained.⁴ Such use of that work modifies the nature or timing, or reduces the extent, of audit procedures to be performed directly by the external auditor.
9. [Deleted by the AUASB. Refer Aus 1.2]
10. There may be individuals in an entity that perform procedures similar to those performed by an internal audit function. However, unless performed by an objective and competent function that applies a systematic and disciplined approach, including quality control, such procedures would be considered internal controls and obtaining evidence regarding the effectiveness of such controls would be part of the auditor's responses to assessed risks in accordance with ASA 330.⁵

The External Auditor's Responsibility for the Audit

11. [Deleted by the AUASB. Refer Aus 1.2]

¹ ASA 315 *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment* (as amended).

² [Footnote deleted by the AUASB. Refer Aus 1.2]

³ See ASA 315 (as amended), paragraph A116.

⁴ See paragraphs 15–25 of this Auditing Standard.

⁵ ASA 330 *The Auditor's Responses to Assessed Risks*.

Aus 11.1 The external auditor has sole responsibility for the audit opinion expressed, and that responsibility is not reduced by the external auditor's use of the work of the internal audit function on the engagement. Although they may perform audit procedures similar to those performed by the external auditor, neither the internal audit function nor the internal auditors are independent of the entity as is required of the external auditor in an audit of a financial report in accordance with ASA 200.⁶ This Auditing Standard, therefore, defines the conditions that are necessary for the external auditor to be able to use the work of internal auditors. It also defines the necessary work effort to obtain sufficient appropriate evidence that the work of the internal audit function is adequate for the purposes of the audit. The requirements are designed to provide a framework for the external auditor's judgements regarding the use of the work of internal auditors to prevent over or undue use of such work.

Effective Date

12. [Deleted by the AUASB. Refer Aus 0.3]

Objectives

13. [Deleted by the AUASB. Refer Aus 1.2]

Aus 13.1 The objectives of the external auditor, where the entity has an internal audit function and the external auditor expects to use the work of the function to modify the nature or timing, or reduce the extent, of audit procedures to be performed directly by the external auditor are:

- (a) To determine whether the work of the internal audit function can be used, and if so, in which areas and to what extent;

and having made that determination:

- (b) If using the work of the internal audit function, to determine whether that work is adequate for purposes of the audit.

Definitions

14. For the purposes of this Auditing Standard, the following terms have the meanings attributed below:

- (a) Internal audit function means a function of an entity that performs assurance and consulting activities designed to evaluate and improve the effectiveness of the entity's governance, risk management and internal control processes. (Ref: Para. A1–A4)
- (b) Direct assistance means the use of internal auditors to perform audit procedures under the direction, supervision and review of the external auditor. (Ref: Para. Aus 1.2)

Requirements

Determining Whether, in Which Areas, and to What Extent the Work of the Internal Audit Function Can Be Used

Evaluating the Internal Audit Function

15. The external auditor shall determine whether the work of the internal audit function can be used for purposes of the audit by evaluating the following:

⁶ See ASA 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with Australian Auditing Standards* (as amended), paragraph 14.

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- (a) The extent to which the internal audit function's organisational status and relevant policies and procedures support the objectivity of the internal auditors; (Ref: Para. A5-A9)
- (b) The level of competence of the internal audit function; and (Ref: Para. A5-A9)
- (c) Whether the internal audit function applies a systematic and disciplined approach, including quality control. (Ref: Para. A10-A11)

Aus 15.1 An illustrative example questionnaire is provided as a supplement to this Auditing Standard to assist the external auditor in evaluating the internal audit function.

16. The external auditor shall not use the work of the internal audit function if the external auditor determines that:
- (a) The function's organisational status and relevant policies and procedures do not adequately support the objectivity of internal auditors;
 - (b) The function lacks sufficient competence; or
 - (c) The function does not apply a systematic and disciplined approach, including quality control. (Ref: Para. A12-A14)

Determining the Nature and Extent of Work of the Internal Audit Function that Can Be Used

17. As a basis for determining the areas and the extent to which the work of the internal audit function can be used, the external auditor shall consider the nature and scope of the work that has been performed, or is planned to be performed, by the internal audit function and its relevance to the external auditor's overall audit strategy and audit plan. (Ref: Para. A15-A17)
18. The external auditor shall make all significant judgements in the audit engagement and, to prevent undue use of the work of the internal audit function, shall plan to use less of the work of the function and perform more of the work directly: (Ref: Para. A15-A17)
- (a) The more judgement is involved in:
 - (i) Planning and performing relevant audit procedures; and
 - (ii) Evaluating the audit evidence gathered; (Ref: Para. A18-A19)
 - (b) The higher the assessed risk of material misstatement at the assertion level, with special consideration given to risks identified as significant; (Ref: Para. A20-A22)
 - (c) The less the internal audit function's organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors; and
 - (d) The lower the level of competence of the internal audit function.
19. The external auditor shall also evaluate whether, in aggregate, using the work of the internal audit function to the extent planned would still result in the external auditor being sufficiently involved in the audit, given the external auditor's sole responsibility for the audit opinion expressed. (Ref: Para. A15-A22)
20. The external auditor shall, in communicating with those charged with governance an overview of the planned scope and timing of the audit in accordance with ASA 260,⁷ communicate how the external auditor has planned to use the work of the internal audit function. (Ref: Para. A23)

⁷ See ASA 260 *Communication with Those Charged with Governance* (as amended), paragraph 15.

Using the Work of the Internal Audit Function

21. If the external auditor plans to use the work of the internal audit function, the external auditor shall discuss the planned use of its work with the function as a basis for co-ordinating their respective activities. (Ref: Para. A24–A26)
22. The external auditor shall read the reports of the internal audit function relating to the work of the function that the external auditor plans to use to obtain an understanding of the nature and extent of audit procedures it performed and the related findings.
23. The external auditor shall perform sufficient audit procedures on the body of work of the internal audit function as a whole that the external auditor plans to use to determine its adequacy for purposes of the audit, including evaluating whether:
- (a) The work of the function had been properly planned, performed, supervised, reviewed and documented;
 - (b) Sufficient appropriate evidence had been obtained to enable the function to draw reasonable conclusions; and
 - (c) Conclusions reached are appropriate in the circumstances and the reports prepared by the function are consistent with the results of the work performed. (Ref: Para. A27–A30)
24. The nature and extent of the external auditor’s audit procedures shall be responsive to the external auditor’s evaluation of:
- (a) The amount of judgement involved;
 - (b) The assessed risk of material misstatement;
 - (c) The extent to which the internal audit function’s organisational status and relevant policies and procedures support the objectivity of the internal auditors; and
 - (d) The level of competence of the function;⁸ (Ref: Para. A27–A29)
- and shall include re-performance of some of the work. (Ref: Para. A30)
25. The external auditor shall also evaluate whether the external auditor’s conclusions regarding the internal audit function in paragraph 15 of this Auditing Standard and the determination of the nature and extent of use of the work of the function for purposes of the audit in paragraphs 18–19 of this Auditing Standard remain appropriate.

26.-35. [Deleted by the AUASB. Refer Aus 1.2]^{9,10}

Documentation

36. If the external auditor uses the work of the internal audit function, the external auditor shall include in the audit documentation:
- (a) The evaluation of:
 - (i) Whether the function’s organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors;
 - (ii) The level of competence of the function; and

⁸ See paragraph 18 of this Auditing Standard.

⁹ [Footnote deleted by the AUASB. Refer Aus 1.2]

¹⁰ [Footnote deleted by the AUASB. Refer Aus 1.2]

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- (iii) Whether the function applies a systematic and disciplined approach, including quality control;
 - (b) The nature and extent of the work used and the basis for that decision; and
 - (c) The audit procedures performed by the external auditor to evaluate the adequacy of the work used.
37. [Deleted by the AUASB. Refer Aus 1.2]¹¹

* * *

¹¹ [Footnote deleted by the AUASB. Refer Aus 1.2]

Application and Other Explanatory Material

Definition of Internal Audit Function (Ref: Para. 2, 14(a))

- A1. The objectives and scope of internal audit functions typically include assurance and consulting activities designed to evaluate and improve the effectiveness of the entity's governance processes, risk management and internal control such as the following:

Activities Relating to Governance

- The internal audit function may assess the governance process in its accomplishment of objectives on ethics and values, performance management and accountability, communicating risk and control information to appropriate areas of the organisation and effectiveness of communication among those charged with governance, external and internal auditors, and management.

Activities Relating to Risk Management

- The internal audit function may assist the entity by identifying and evaluating significant exposures to risk and contributing to the improvement of risk management and internal control (including effectiveness of the financial reporting process).
- The internal audit function may perform procedures to assist the entity in the detection of fraud.

Activities Relating to Internal Control

- Evaluation of internal control. The internal audit function may be assigned specific responsibility for reviewing controls, evaluating their operation and recommending improvements thereto. In doing so, the internal audit function provides assurance on the control. For example, the internal audit function might plan and perform tests or other procedures to provide assurance to management and those charged with governance regarding the design, implementation and operating effectiveness of internal control, including those controls that are relevant to the audit.
 - Examination of financial and operating information. The internal audit function may be assigned to review the means used to identify, recognise, measure, classify and report financial and operating information, and to make specific enquiry into individual items, including detailed testing of transactions, balances and procedures.
 - Review of operating activities. The internal audit function may be assigned to review the economy, efficiency and effectiveness of operating activities, including non-financial activities of an entity.
 - Review of compliance with laws and regulations. The internal audit function may be assigned to review compliance with laws, regulations and other external requirements, and with management policies and directives and other internal requirements.
- A2. Activities similar to those performed by an internal audit function may be conducted by functions with other titles within an entity. Some or all of the activities of an internal audit function may also be outsourced to a third-party service provider. Neither the title of the function, nor whether it is performed by the entity or a third-party service provider, are sole determinants of whether or not the external auditor can use the work of the function. Rather, it is the nature of the activities; the extent to which the internal audit function's organisational status and relevant policies and procedures support the objectivity of the internal auditors; competence; and systematic and disciplined approach of the function that are relevant. References in this Auditing Standard to the work of the internal audit function include relevant activities of other functions or third-party providers that have these characteristics.

- A3. In addition, those in the entity with operational and managerial duties and responsibilities outside of the internal audit function would ordinarily face threats to their objectivity that would preclude them from being treated as part of an internal audit function for the purpose of this Auditing Standard, although they may perform control activities that can be tested in accordance with ASA 330.¹² For this reason, monitoring controls performed by an owner-manager would not be considered equivalent to an internal audit function.
- A4. While the objectives of an entity's internal audit function and the external auditor differ, the function may perform audit procedures similar to those performed by the external auditor in an audit of a financial report. If so, the external auditor may make use of the function for purposes of the audit in one or more of the following ways:
- To obtain information that is relevant to the external auditor's assessments of the risks of material misstatement due to error or fraud. In this regard, ASA 315¹³ requires the external auditor to obtain an understanding of the nature of the internal audit function's responsibilities, its status within the organisation, and the activities performed, or to be performed, and make enquiries of appropriate individuals within the internal audit function (if the entity has such a function); or
 - Unless prohibited, or restricted to some extent, by law or regulation, the external auditor, after appropriate evaluation, may decide to use work that has been performed by the internal audit function during the period in partial substitution for audit evidence to be obtained directly by the external auditor.¹⁴

[Deleted by the AUASB. Refer Aus 1.2]¹⁵

Determining Whether, in Which Areas, and to What Extent the Work of the Internal Audit Function Can Be Used

Evaluating the Internal Audit Function

Objectivity and Competence (Ref: Para. 15(a)–(b))

- A5. The external auditor exercises professional judgement in determining whether the work of the internal audit function can be used for purposes of the audit, and the nature and extent to which the work of the internal audit function can be used in the circumstances.
- A6. The extent to which the internal audit function's organisational status and relevant policies and procedures support the objectivity of the internal auditors and the level of competence of the function are particularly important in determining whether to use and, if so, the nature and extent of the use of the work of the function that is appropriate in the circumstances.
- A7. Objectivity refers to the ability to perform those tasks without allowing bias, conflict of interest or undue influence of others to override professional judgements. Factors that may affect the external auditor's evaluation include the following:
- Whether the organisational status of the internal audit function, including the function's authority and accountability, supports the ability of the function to be free from bias, conflict of interest or undue influence of others to override professional judgements. For example, whether the internal audit function reports to those charged with governance or an officer with appropriate authority, or if the function reports to management, whether it has direct access to those charged with governance.

¹² See paragraph 10 of this Auditing Standard.

¹³ See ASA 315 (as amended), paragraph 6(a).

¹⁴ See paragraphs 15–25 of this Auditing Standard.

¹⁵ [Footnote deleted by the AUASB. Refer Aus 1.2]

- Whether the internal audit function is free of any conflicting responsibilities, for example, having managerial or operational duties or responsibilities that are outside of the internal audit function.
 - Whether those charged with governance oversee employment decisions related to the internal audit function, for example, determining the appropriate remuneration policy.
 - Whether there are any constraints or restrictions placed on the internal audit function by management or those charged with governance for example, in communicating the internal audit function's findings to the external auditor.
 - Whether the internal auditors are members of relevant professional bodies and their memberships obligate their compliance with relevant professional standards relating to objectivity, or whether their internal policies achieve the same objectives.
- A8. Competence of the internal audit function refers to the attainment and maintenance of knowledge and skills of the function as a whole at the level required to enable assigned tasks to be performed diligently and in accordance with applicable professional standards. Factors that may affect the external auditor's determination include the following:
- Whether the internal audit function is adequately and appropriately resourced relative to the size of the entity and the nature of its operations.
 - Whether there are established policies for hiring, training and assigning internal auditors to internal audit engagements.
 - Whether the internal auditors have adequate technical training and proficiency in auditing. Relevant criteria that may be considered by the external auditor in making the assessment may include, for example, the internal auditors' possession of a relevant professional designation and experience.
 - Whether the internal auditors possess the required knowledge relating to the entity's financial reporting and the applicable financial reporting framework and whether the internal audit function possesses the necessary skills (for example, industry-specific knowledge) to perform work related to the entity's financial report.
 - Whether the internal auditors are members of relevant professional bodies that oblige them to comply with the relevant professional standards including continuing professional development requirements.
- A9. Objectivity and competence may be viewed as a continuum. The more the internal audit function's organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors and the higher the level of competence of the function, the more likely the external auditor may make use of the work of the function and in more areas. However, an organisational status and relevant policies and procedures that provide strong support for the objectivity of the internal auditors cannot compensate for the lack of sufficient competence of the internal audit function. Equally, a high level of competence of the internal audit function cannot compensate for an organisational status and policies and procedures that do not adequately support the objectivity of the internal auditors.

Application of a Systematic and Disciplined Approach (Ref: Para. 15(c))

- A10. The application of a systematic and disciplined approach to planning, performing, supervising, reviewing and documenting its activities distinguishes the activities of the internal audit function from other monitoring control activities that may be performed within the entity.
- A11. Factors that may affect the external auditor's determination of whether the internal audit function applies a systematic and disciplined approach include the following:

- The existence, adequacy and use of documented internal audit procedures or guidance covering such areas as risk assessments, work programs, documentation and reporting, the nature and extent of which is commensurate with the size and circumstances of an entity.
- Whether the internal audit function has appropriate quality control policies and procedures, for example, such as those policies and procedures in ASQC 1¹⁶ that would be applicable to an internal audit function (such as those relating to leadership, human resources and engagement performance) or quality control requirements in standards set by the relevant professional bodies for internal auditors. Such bodies may also establish other appropriate requirements such as conducting periodic external quality assessments.

Circumstances When Work of the Internal Audit Function Cannot Be Used (Ref: Para. 16)

- A12. The external auditor's evaluation of whether the internal audit function's organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors, the level of competence of the internal audit function, and whether it applies a systematic and disciplined approach may indicate that the risks to the quality of the work of the function are too significant and therefore it is not appropriate to use any of the work of the function as audit evidence.
- A13. Consideration of the factors in paragraphs A7, A8 and A11 of this Auditing Standard individually and in aggregate is important because an individual factor is often not sufficient to conclude that the work of the internal audit function cannot be used for purposes of the audit. For example, the internal audit function's organisational status is particularly important in evaluating threats to the objectivity of the internal auditors. If the internal audit function reports to management, this would be considered a significant threat to the function's objectivity unless other factors such as those described in paragraph A7 of this Auditing Standard collectively provide sufficient safeguards to reduce the threat to an acceptable level.
- A14. In addition, the relevant ethical requirements¹⁷ state that a self-review threat is created when the external auditor accepts an engagement to provide internal audit services to an audit client, and the results of those services will be used in conducting the audit. This is because of the possibility that the engagement team will use the results of the internal audit service without properly evaluating those results or without exercising the same level of professional scepticism as would be exercised when the internal audit work is performed by individuals who are not members of the firm. The relevant ethical requirements¹⁸ discuss the prohibitions that apply in certain circumstances and the threats and the safeguards that can be applied to reduce the threats to an acceptable level in other circumstances.

Determining the Nature and Extent of Work of the Internal Audit Function that Can Be Used

Factors Affecting the Determination of the Nature and Extent of the Work of the Internal Audit Function that Can Be Used (Ref: Para. 17–19)

- A15. Once the external auditor has determined that the work of the internal audit function can be used for purposes of the audit, a first consideration is whether the planned nature and scope of the work of the internal audit function that has been performed, or is planned to be performed, is relevant to the overall audit strategy and audit plan that the external auditor has established in accordance with ASA 300.¹⁹

¹⁶ Auditing Standard ASQC 1 *Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements* (as amended).

¹⁷ See ASA 102 *Compliance with Ethical Requirements when Performing Audits, Reviews and Other Assurance Engagements* (as amended).

¹⁸ See ASA 102 (as amended).

¹⁹ ASA 300 *Planning an Audit of a Financial Report* (as amended).

A16. Examples of work of the internal audit function that can be used by the external auditor include the following:

- Testing of the operating effectiveness of controls.
- Substantive procedures involving limited judgement.
- Observations of inventory counts.
- Tracing transactions through the information system relevant to financial reporting.
- Testing of compliance with regulatory requirements.
- In some circumstances, audits or reviews of the financial information of subsidiaries that are not significant components to the group (where this does not conflict with the requirements of ASA 600).²⁰

A17. The external auditor's determination of the planned nature and extent of use of the work of the internal audit function will be influenced by the external auditor's evaluation of the extent to which the internal audit function's organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors and the level of competence of the internal audit function in paragraph 18 of this Auditing Standard. In addition, the amount of judgement needed in planning, performing and evaluating such work and the assessed risk of material misstatement at the assertion level are inputs to the external auditor's determination. Further, there are circumstances in which the external auditor cannot use the work of the internal audit function for purpose of the audit as described in paragraph 16 of this Auditing Standard.

Judgements in planning and performing audit procedures and evaluating results (Ref: Para. 18(a))

A18. The greater the judgement needed to be exercised in planning and performing the audit procedures and evaluating the audit evidence, the external auditor will need to perform more procedures directly in accordance with paragraph 18 of this Auditing Standard, because using the work of the internal audit function *alone* will not provide the external auditor with sufficient appropriate audit evidence.

A19. Since the external auditor has sole responsibility for the audit opinion expressed, the external auditor needs to make the significant judgements in the audit engagement in accordance with paragraph 18. Significant judgements include the following:

- Assessing the risks of material misstatement;
- Evaluating the sufficiency of tests performed;
- Evaluating the appropriateness of management's use of the going concern assumption;
- Evaluating significant accounting estimates; and
- Evaluating the adequacy of disclosures in the financial report, and other matters affecting the auditor's report.

Assessed risk of material misstatement (Ref: Para. 18(b))

A20. For a particular account balance, class of transaction or disclosure, the higher an assessed risk of material misstatement at the assertion level, the more judgement is often involved in planning and performing the audit procedures and evaluating the results thereof. In such circumstances, the external auditor will need to perform more procedures directly in

²⁰ See ASA 600 (as amended).

accordance with paragraph 18 of this Auditing Standard, and accordingly, make less use of the work of the internal audit function in obtaining sufficient appropriate audit evidence. Furthermore, as explained in ASA 200,²¹ the higher the assessed risks of material misstatement, the more persuasive the audit evidence required by the external auditor will need to be, and, therefore, the external auditor will need to perform more of the work directly.

- A21. As explained in ASA 315,²² significant risks require special audit consideration and therefore the external auditor's ability to use the work of the internal audit function in relation to significant risks will be restricted to procedures that involve limited judgement. In addition, where the risks of material misstatement is other than low, the use of the work of the internal audit function alone is unlikely to reduce audit risk to an acceptably low level and eliminate the need for the external auditor to perform some tests directly.
- A22. Carrying out procedures in accordance with this Auditing Standard may cause the external auditor to re-evaluate the external auditor's assessment of the risks of material misstatement. Consequently, this may affect the external auditor's determination of whether to use the work of the internal audit function and whether further application of this Auditing Standard is necessary.

Communication with Those Charged with Governance (Ref: Para. 20)

- A23. In accordance with ASA 260,²³ the external auditor is required to communicate with those charged with governance an overview of the planned scope and timing of the audit. The planned use of the work of the internal audit function is an integral part of the external auditor's overall audit strategy and is therefore relevant to those charged with governance for their understanding of the proposed audit approach.

Using the Work of the Internal Audit Function

Discussion and Co-ordination with the Internal Audit Function (Ref: Para. 21)

- A24. In discussing the planned use of their work with the internal audit function as a basis for co-ordinating the respective activities, it may be useful to address the following:
- The timing of such work.
 - The nature of the work performed.
 - The extent of audit coverage.
 - Materiality for the financial report as a whole (and, if applicable, materiality level or levels for particular classes of transactions, account balances or disclosures), and performance materiality.
 - Proposed methods of item selection and sample sizes.
 - Documentation of the work performed.
 - Review and reporting procedures.
- A25. Co-ordination between the external auditor and the internal audit function is effective when, for example:
- Discussions take place at appropriate intervals throughout the period.

²¹ See ASA 200 (as amended), paragraph A29.

²² See ASA 315 (as amended), paragraph 4(e).

²³ See ASA 260 (as amended), paragraph 15.

- The external auditor informs the internal audit function of significant matters that may affect the function.
 - The external auditor is advised of and has access to relevant reports of the internal audit function and is informed of any significant matters that come to the attention of the function when such matters may affect the work of the external auditor so that the external auditor is able to consider the implications of such matters for the audit engagement.
- A26. ASA 200²⁴ discusses the importance of the auditor planning and performing the audit with professional scepticism, including being alert to information that brings into question the reliability of documents and responses to enquiries to be used as audit evidence. Accordingly, communication with the internal audit function throughout the engagement may provide opportunities for internal auditors to bring matters that may affect the work of the external auditor to the external auditor's attention.²⁵ The external auditor is then able to take such information into account in the external auditor's identification and assessment of risks of material misstatement. In addition, if such information may be indicative of a heightened risk of a material misstatement of the financial report or may be regarding any actual, suspected or alleged fraud, the external auditor can take this into account in the external auditor's identification of risk of material misstatement due to fraud in accordance with ASA 240.²⁶

Procedures to Determine the Adequacy of Work of the Internal Audit Function (Ref: Para. 23–24)

- A27. The external auditor's audit procedures on the body of work of the internal audit function as a whole that the external auditor plans to use provide a basis for evaluating the overall quality of the function's work and the objectivity with which it has been performed.
- A28. The procedures the external auditor may perform to evaluate the quality of the work performed and the conclusions reached by the internal audit function, in addition to re-performance in accordance with paragraph 24, include the following:
- Making enquiries of appropriate individuals within the internal audit function.
 - Observing procedures performed by the internal audit function.
 - Reviewing the internal audit function's work program and working papers.
- A29. The more judgement involved, the higher the assessed risk of material misstatement, the less the internal audit function's organisational status and relevant policies and procedures adequately support the objectivity of the internal auditors, or the lower the level of competence of the internal audit function, the more audit procedures are needed to be performed by the external auditor on the overall body of work of the function to support the decision to use the work of the function in obtaining sufficient appropriate audit evidence on which to base the audit opinion.

Re-performance (Ref: Para. 24)

- A30. For purposes of this Auditing Standard, re-performance involves the external auditor's independent execution of procedures to validate the conclusions reached by the internal audit function. This objective may be accomplished by examining items already examined by the internal audit function, or where it is not possible to do so, the same objective may also be accomplished by examining sufficient other similar items not actually examined by the internal audit function. Re-performance provides more persuasive evidence regarding the adequacy of the work of the internal audit function compared to other procedures the external

²⁴ See ASA 200 (as amended), paragraphs 15 and A18.

²⁵ See ASA 315 (as amended), paragraph A116.

²⁶ See ASA 315 (as amended), paragraph A11 in relation to ASA 240 *The Auditor's Responsibilities Relating to Fraud in an Audit of a Financial Report*.

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auditor may perform in paragraph A28. While it is not necessary for the external auditor to do re-performance in each area of work of the internal audit function that is being used, some re-performance is required on the body of work of the internal audit function as a whole that the external auditor plans to use in accordance with paragraph 24. The external auditor is more likely to focus re-performance in those areas where more judgement was exercised by the internal audit function in planning, performing and evaluating the results of the audit procedures and in areas of higher risk of material misstatement.

A31.-A41. [Deleted by the AUASB. Refer Aus 1.2]²⁷⁻³⁰

²⁷⁻³⁰[Footnotes deleted by the AUASB. Refer Aus 1.2]

Illustrative Example Questionnaire – Evaluating the Internal Audit Function

The following illustrative questionnaire provides a broad range of questions that may assist the external auditor in evaluating the internal audit function and determining the nature and extent of the work of the internal audit function that can be used in obtaining audit evidence. Not all questions are necessarily relevant to every audit or review engagement, and the questionnaire is not intended to be exhaustive.

Evaluating the Internal Audit Function

Organisational Status

1. To whom does the head of internal audit report, and is this appropriate?
2. Do those charged with governance and/or management's view of the internal audit function appear to not limit the function?
3. Is the head of internal audit free from:
 - (a) The influences of operational management which would impact on the head of internal audit's objectivity?
 - (b) Any operating responsibility?
4. Does the head of internal audit have:
 - (a) Direct access (as required) to:
 - (i) The governing body?
 - (ii) The chairman of the governing body?
 - (iii) The chief executive?
 - (iv) The audit committee (if applicable)?
 - (b) Freedom/flexibility from direct instruction from those charged with governance as to the scope and direction of audit activity?
 - (c) Freedom to communicate with the external auditor on relevant matters on a regular basis?
5. Do those charged with governance oversee employment decisions related to the internal audit function, for example, determining the appropriate remuneration policy?

Level of Competence

6. Is the head of internal audit a professionally trained auditor? (If not, describe qualifications by training and by experience for the position held).
7. Do the entity's hiring and/or internal promotion/transfer policies for internal audit staff require:
 - (a) Tertiary qualifications?
 - (b) Formal professional qualifications?
 - (c) Previous internal audit experience?

8. Does the entity provide internal audit staff with the opportunity to maintain professional competence, for example by encouraging:
 - (a) Internal staff training?
 - (b) Attendance at external training and professional courses?
9. If the entity has a large internal audit function, does it contain an adequate number of professionally trained/experienced internal auditors?
10. Are internal audit staff members of relevant professional bodies, where membership obligates them to comply with relevant professional standards relating to competence, objectivity and continuing professional development?
11. Is the internal audit function adequately and appropriately resourced relative to the size of the entity and the nature of its operations?
12. Do assignments undertaken reflect that those charged with governance have confidence in the internal audit function, and provide experience in audit related work?
13. Do the reports prepared by the internal audit function reflect a clear understanding of the audit task undertaken and the expression of valid conclusions?

Systematic and Disciplined Approach

14. Does internal audit function have documented internal audit procedures or guidance covering areas such as risk assessments, work programs, documentation and reporting, which is commensurate with the size and circumstances of the entity? Is there evidence that the internal audit procedures or guidance are used by the internal audit function in performing its activities?
15. Does the internal audit function have appropriate quality control policies and procedures, for example, relating to leadership, human resources and engagement performance?
16. Is the work of the internal audit function controlled and supervised through managers or supervisors responsible to the head of the function, each of whom supervises the work of allocated staff?
17. Does the internal audit function use written work programs prepared in conformity with appropriate professional standards and practice?
18. Are comprehensive work programs prepared for all internal audit engagements?
19. Does the internal audit function prepare work papers to record work done and conclusions drawn?
20. Are the work papers reviewed by appropriate internal audit staff?
21. Do internal work papers and audit reports indicate that the internal audit function applies a systematic and disciplined approach to internal audit engagements?
22. Where the internal audit activity is co-sourced or fully outsourced, is the relationship between the entity and the third party provider appropriate and well managed?

Determining the Nature and Extent of Work of the Internal Audit Function that Can be Used

23. Is the planned nature and scope of the work of the internal audit function that has been performed, or is planned to be performed, relevant to the external auditor's overall audit strategy and audit plan?
24. Does internal audit regularly examine the controls over all significant accounting operations which affect the financial report? (If not, what areas not covered by internal audit?)

25. How do the following factors influence the nature and extent of the use of the work of the internal audit function:
- (a) The level of judgement exercised by the internal audit function in planning and performing relevant audit procedures, and in evaluating the audit evidence gathered?;
 - (b) The risk of material misstatement at the assertion level, particularly for risks identified as significant?;
 - (c) The organisational status and relevant policies and procedures of the internal audit function (that is, do they adequately support the objectivity of internal auditors)?; and
 - (d) The level of competence of the internal audit function?
26. Does the head of internal audit have flexibility to act using discretion on suggestions made by the external auditor as to areas to be included in the internal audit program?
27. Has past experience shown that internal audit has been able to complete previous internal audit programs?
28. In relation reporting by the internal audit function:
- (a) Do internal audit reports identify weaknesses or problems, and contain recommendations for improvements?
 - (b) Are such reports addressed to the appropriate level of those charged with governance who are capable and able to achieve satisfactory audit results?
 - (c) Are copies of all internal audit reports forwarded to:
 - (i) the chairman of the governing body or chief executive? and/or
 - (ii) the audit committee (if applicable)?
 - (d) Are copies of all internal audit reports relating to accounting and associated records available to the external auditor?
 - (e) Is there evidence, for example in the minutes of governing body and/or audit committee meetings, that internal audit reports have been considered?
29. Is there evidence that a person of senior authority, for example the chief executive, has taken action to see that internal audit recommendations are properly considered?

Tables of Differences — ASA 610 (Revised) and Existing ASA 610

Underlying Standard

ISA 610 (Revised 2013) *Using the Work of Internal Auditors* is used as the underlying Auditing Standard for the purpose of re-drafting this proposed Auditing Standard. The underlying Auditing Standard will be amended for the following matters:

- Australian Laws and Regulations (including the *Corporations Act 2001*);
- Changes considered necessary because this Auditing Standard is a legislative instrument; and
- Changes considered necessary in the public interest.

Summary of Main Differences — ASA 610 (Revised) and Existing ASA 610

The table below details the main differences (excluding editorial amendments) between this proposed Auditing Standard and existing ASA 610.

Item #	New Standard Para. No.	Requirements/Significant Guidance Extract	Commentary
<p>Overall comments: Proposed standard ASA 610 (Revised) provides a more robust framework for the evaluation and use of the work of the internal audit function in obtaining audit evidence. The standard introduces some new requirements for external auditors, however, the new requirements, in most instances, express more clearly what was already in existing ASA 610 or make explicit matters that were implicit in existing ASA 610. The effect of the proposed changes is to clarify the requirements where an entity has an internal audit function and the external auditor expects to use the work of that function for the purposes of the audit.</p> <p>This proposed standard also prohibits the use of internal auditors to provide direct assistance in an audit or review conducted in accordance with the Australian Auditing Standards.</p>			
1	14(b)	Direct assistance means the use of internal auditors to perform audit procedures under the direction, supervision and review of the external auditor. (Ref: Para. Aus 1.2)	This definition of direct assistance is included to clarify the meaning of the term used in paragraph Aus 1.2.
2	19	The external auditor shall also evaluate whether, in aggregate, using the work of the internal audit function to the extent planned would still result in	New requirement making explicit obligations that are contained in the introductory material in the existing ASA 610.

Item #	New Standard Para. No.	Requirements/Significant Guidance Extract	Commentary
		the external auditor being sufficiently involved in the audit, given the external auditor’s sole responsibility for the audit opinion expressed. (Ref: Para. A15-A22)	
3	20	The external auditor shall, in communicating with those charged with governance an overview of the planned scope and timing of the audit in accordance with ASA 260, communicate how the external auditor has planned to use the work of the internal audit function. (Ref: Para. A23)	New explicit requirement. This requirement articulates what would ordinarily be expected to occur in current practice when complying with ASA 260.
4	21	If the external auditor plans to use the work of the internal audit function, the external auditor shall discuss the planned use of its work with the function as a basis for co-ordinating their respective activities. (Ref: Para. A24-A26)	New explicit requirement. This requirement articulates what would ordinarily be expected to occur in current practice.
5	22	The external auditor shall read the reports of the internal audit function relating to the work of the function that the external auditor plans to use to obtain an understanding of the nature and extent of audit procedures it performed and the related findings.	New explicit requirement. This requirement articulates what would ordinarily be expected to occur in current practice when complying with existing ASA 610.
6	23	The external auditor shall perform sufficient audit procedures on the body of work of the internal audit function as a whole that the external auditor plans to use to determine its adequacy for purposes of the audit, including evaluating whether: (a) The work of the function had been properly planned, performed, supervised, reviewed and documented;	New explicit requirement. This requirement articulates what would ordinarily be expected to occur in current practice when complying with existing ASA 610.

Item #	New Standard Para. No.	Requirements/Significant Guidance Extract	Commentary
		(b) Sufficient appropriate evidence had been obtained to enable the function to draw reasonable conclusions; and (c) Conclusions reached are appropriate in the circumstances and the reports prepared by the function are consistent with the results of the work performed. (Ref: Para. A27-A30)	
7	25	The external auditor shall also evaluate whether the external auditor’s conclusions regarding the internal audit function in paragraph 15 of this Auditing Standard and the determination of the nature and extent of use of the work of the function for purposes of the audit in paragraphs 18-19 of this Auditing Standard remain appropriate.	New explicit requirement. This requirement articulates what would ordinarily be expected to occur in current practice when complying with existing ASA 610.