

EXPOSURE DRAFT

ED 08/08
(September 2008)

Proposed Auditing Standard
ASA 230
Audit Documentation
(Revised and Redrafted)
(Re-issuance of ASA 230)

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

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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 15 October 2008. Comments should be addressed to:

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A copy of all non-confidential submissions will be placed on public record on the AUASB website: www.auasb.gov.au.

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PREFACE

Reasons for Issuing ED 08/08

The Auditing and Assurance Standards Board (AUASB) is proposing to re-issue Auditing Standard ASA 230 *Audit Documentation (Revised and Redrafted)* pursuant to the requirements of the legislative provisions and the Strategic Direction explained below.

The AUASB is an independent statutory board of the Australian Government established under section 227A of the *Australian Securities and Investments Commission Act 2001* (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*.

The International Auditing and Assurance Standards Board (IAASB) has undertaken a programme to redraft, in clarity format, the entire suite of International Standards on Auditing (ISAs). In some cases, and in accordance with normal practice, the ISAs have been revised in addition to being redrafted. The redrafted ISAs are effective for audits of financial statements for periods beginning on or after 15th December 2009.

Under the Strategic Direction given to the AUASB by the Financial Reporting Council (FRC), the AUASB is required to have regard to any programme initiated by the IAASB for the revision and enhancement of the ISAs and to make appropriate consequential amendments to the Australian Auditing Standards. Accordingly, the AUASB has decided to revise and redraft the Australian Auditing Standards (ASAs) using the equivalent redrafted ISAs.

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Main Proposals

This proposed Auditing Standard establishes mandatory Requirements and provides Application and Other Explanatory Material regarding the auditor's responsibility to prepare audit documentation for an audit of a financial report.

Proposed Operative Date

It is intended that this proposed Auditing Standard will be operative for financial reporting periods commencing on or after 1 January 2010.

Main changes from existing ASA 230 *Audit Documentation (April 2006)*

The main differences between this proposed Auditing Standard and the Standard that it supersedes, *ASA 230 Audit Documentation (April 2006)*, 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 Auditing Standard ASA 230 *Audit Documentation* by no later than 15 October 2008. The AUASB is seeking comments on the main changes from the existing ASA 230. In addition, respondents are asked to consider and respond to 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 which 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 main changes to the Requirements of this proposed Auditing Standard are 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.

Draft

Proposed Auditing Standard ASA 230
Audit Documentation (Revised and Redrafted) (Re-issuance of ASA 230)

AUTHORITY STATEMENT

The Auditing and Assurance Standards Board (AUASB) makes this Auditing Standard ASA 230 *Audit Documentation (Revised and Redrafted)* 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 100 *Preamble to AUASB Standards (Revised)*, which sets out the intentions of the AUASB on how the Australian Auditing Standards are to be understood, interpreted and applied.

AUDITING STANDARD ASA 230

Audit Documentation (Revised and Redrafted)

Application

- Aus 0.1 This Auditing Standard applies to:
- (a) an audit of a financial report for a financial year, or an audit of a financial report for a half-year, in accordance with Part 2M.3 of the *Corporations Act 2001*; and
 - (b) an audit of a financial report 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 2010.

Introduction

Scope of this ASA

1. This Auditing Standard deals with the auditor's responsibility to prepare audit documentation for an audit of a financial report. Appendix 1 lists other Auditing Standards that contain specific documentation requirements and guidance. The specific documentation requirements of other Auditing Standards do not limit the application of this Auditing Standard. Laws or regulations may establish additional documentation requirements.

Nature and Purposes of Audit Documentation

2. Audit documentation that meets the requirements of this Auditing Standard and the specific documentation requirements of other relevant Auditing Standards provides:
 - (a) Evidence of the auditor's basis for a conclusion about the achievement of the overall objective of the auditor; and

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- (b) Evidence that the audit was planned and performed in accordance with Australian Auditing Standards and applicable legal and regulatory requirements.
3. Audit documentation serves a number of additional purposes, including the following:
- Assisting the engagement team to plan and perform the audit.
 - Assisting members of the engagement team responsible for supervision to direct and supervise the audit work, and to discharge their review responsibilities in accordance with ASA 220 (Revised and Redrafted).¹
 - Enabling the engagement team to be accountable for its work.
 - Retaining a record of matters of continuing significance to future audits.
 - Enabling the conduct of quality control reviews and inspections in accordance with APES 320.²
 - Enabling the conduct of external inspections in accordance with applicable legal, regulatory or other requirements.

Effective Date

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

Objective

5. The objective of the auditor is to prepare documentation that provides:
- (a) A sufficient and appropriate record of the basis for the auditor's report; and

¹ ASA 220 (Revised and Redrafted), *Quality Control for an Audit of a Financial Report*, paragraphs [14-17].

² APES 320 *Quality Control for Firms*, issued by the Accounting Professional and Ethical Standards Board from time to time.

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- (b) Evidence that the audit was planned and performed in accordance with Australian Auditing Standards and applicable legal and regulatory requirements.

Definitions

- 6. For purposes of the Australian Auditing Standards, the following terms have the meanings attributed below:
 - (a) Audit documentation – The record of audit procedures performed, relevant audit evidence obtained, and conclusions the auditor reached (terms such as “working papers” or “workpapers” are also sometimes used).
 - (b) Audit file – One or more folders or other storage media, in physical or electronic form, containing the records that comprise the audit documentation for a specific engagement.
 - (c) Experienced auditor – An individual (whether internal or external to the firm) who has practical audit experience, and a reasonable understanding of:
 - (i) audit processes;
 - (ii) Auditing Standards and applicable legal and regulatory requirements;
 - (iii) the business environment in which the entity operates; and
 - (iv) auditing and financial reporting issues relevant to the entity’s industry.

Requirements

Timely Preparation of Audit Documentation

- 7. The auditor shall prepare audit documentation on a timely basis.
(Ref: Para. A1)

Documentation of the Audit Procedures Performed and Audit Evidence Obtained

Form, Content and Extent of Audit Documentation

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8. The auditor shall prepare audit documentation that is sufficient to enable an experienced auditor, having no previous connection with the audit, to understand: (Ref: Para. A2-A5, A16-A17)
- (a) the nature, timing, and extent of the audit procedures performed to comply with the Australian Auditing Standards and applicable legal and regulatory requirements; (Ref: Para. A6-A7)
 - (b) the results of the audit procedures performed, and the audit evidence obtained; and
 - (c) significant matters arising during the audit, the conclusions reached thereon, and significant professional judgments made in reaching those conclusions. (Ref: Para. A8-A11)
9. In documenting the nature, timing and extent of audit procedures performed, the auditor shall record:
- (a) the identifying characteristics of the specific items or matters tested; (Ref: Para. A12)
 - (b) who performed the audit work and the date such work was completed; and
 - (c) who reviewed the audit work performed and the date and extent of such review. (Ref: Para. A13)
10. The auditor shall document discussions of significant matters with management, those charged with governance, and others, including the nature of the significant matters discussed and when and with whom the discussions took place. (Ref: Para. A14)
11. If the auditor identified information that is inconsistent with the auditor's final conclusion regarding a significant matter, the auditor shall document how the auditor addressed the inconsistency. (Ref: Para. A15)
12. [Deleted by the AUASB. Refer Aus 12.1]

Documentation of Inability to Comply with Mandatory Requirements

- Aus 12.1 Where, in rare and exceptional circumstances, factors outside the auditor's control prevent the auditor from complying with an essential procedure contained within a

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relevant mandatory requirement, the auditor shall document:

- (a) the circumstances surrounding the inability to comply;
- (b) the reasons for the inability to comply; and
- (c) justification of how alternative audit procedures achieve the objectives of the mandatory requirement. (Ref: Para. A18-A19)

Matters Arising after the Date of the Auditor's Report

13. If, in exceptional circumstances, the auditor performs new or additional audit procedures or draws new conclusions after the date of the auditor's report, the auditor shall document: (Ref: Para. A20)
- (a) The circumstances encountered;
 - (b) The new or additional audit procedures performed, audit evidence obtained, and conclusions reached, and their effect on the auditor's report; and
 - (c) When and by whom the resulting changes to audit documentation were made and reviewed.

Assembly of the Final Audit File

14. The auditor shall assemble the audit documentation in an audit file and complete the administrative process of assembling the final audit file on a timely basis after the date of the auditor's report. (Ref: Para. A21-A22)
15. After the assembly of the final audit file has been completed, the auditor shall not delete or discard audit documentation of any nature before the end of its retention period. (Ref: Para. A23 and Aus A23.1)
16. In circumstances other than those envisaged in paragraph 13 where the auditor finds it necessary to modify existing audit documentation or add new audit documentation after the assembly of the final audit file has been completed, the auditor shall, regardless of the nature of the modifications or additions, document: (Ref: Para. A24)
- (a) The specific reasons for making them; and

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- (b) When and by whom they were made and reviewed.

Confidentiality, safe custody, integrity, accessibility and retrievability of the audit documentation

Aus 16.1 The auditor shall adopt appropriate procedures for maintaining the confidentiality, safe custody, integrity, accessibility and retrievability of the audit documentation.
(Ref: Para. Aus A24.1)

Draft

Application and Other Explanatory Material

Timely Preparation of Audit Documentation (Ref: Para. 7)

- A1. Preparing sufficient and appropriate audit documentation on a timely basis helps to enhance the quality of the audit and facilitates the effective review and evaluation of the audit evidence obtained and conclusions reached before the auditor's report is finalised. Documentation prepared after the audit work has been performed is likely to be less accurate than documentation prepared at the time such work is performed.

Documentation of the Audit Procedures Performed and Audit Evidence Obtained

Form, Content and Extent of Audit Documentation (Ref: Para. 8)

- A2. The form, content and extent of audit documentation depend on factors such as:
- The size and complexity of the entity.
 - The nature of the audit procedures to be performed.
 - The identified risks of material misstatement.
 - The significance of the audit evidence obtained.
 - The nature and extent of exceptions identified.
 - The need to document a conclusion or the basis for a conclusion not readily determinable from the documentation of the work performed or audit evidence obtained.
 - The audit methodology and tools used.
- A3. Audit documentation may be recorded on paper or on electronic or other media. Examples of audit documentation include:
- Audit programs.
 - Analyses.
 - Issues memoranda.

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- Summaries of significant matters.
- Letters of confirmation and representation.
- Checklists.
- Correspondence (including e-mail) concerning significant matters.

The auditor may include abstracts or copies of the entity's records (for example, significant and specific contracts and agreements) as part of audit documentation. Audit documentation, however, is not a substitute for the entity's accounting records.

- A4. The auditor need not include in audit documentation superseded drafts of working papers and financial reports, notes that reflect incomplete or preliminary thinking, previous copies of documents corrected for typographical or other errors, and duplicates of documents.
- A5. Oral explanations by the auditor, on their own, do not represent adequate support for the work the auditor performed or conclusions the auditor reached, but may be used to explain or clarify information contained in the audit documentation.

Documentation of Compliance with Auditing Standards (Ref: Para. 8(a))

- A6. In principle, compliance with the requirements of this Auditing Standard will result in the audit documentation being sufficient and appropriate in the circumstances. Other Auditing Standards contain specific documentation requirements that are intended to clarify the application of this Auditing Standard in the particular circumstances of those other Auditing Standards. The specific documentation requirements of other Auditing Standards do not limit the application of this Auditing Standard. Furthermore, the absence of a documentation requirement in any particular Auditing Standard is not intended to suggest that there is no documentation that will be prepared as a result of complying with that Auditing Standard.
- A7. Audit documentation provides evidence that the audit complies with the Auditing Standards. However, it is neither necessary nor practicable for the auditor to document every matter considered, or professional judgment made, in an audit. Further, it is unnecessary for the auditor to document separately (as in a checklist, for example) compliance with matters for which compliance is

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demonstrated by documents included within the audit file. For example:

- The existence of an adequately documented audit plan demonstrates that the auditor has planned the audit.
- The existence of a signed engagement letter in the audit file demonstrates that the auditor has agreed the terms of the audit engagement with management or, where appropriate, those charged with governance.
- An auditor's report containing an appropriately qualified opinion demonstrates that the auditor has complied with the requirement to express a qualified opinion under the circumstances specified in the Auditing Standards.
- In relation to requirements that apply generally throughout the audit, there may be a number of ways in which compliance with them may be demonstrated within the audit file:
 - ◆ For example, there may be no single way in which the auditor's professional scepticism is documented. But the audit documentation may nevertheless provide evidence of the auditor's exercise of professional scepticism in accordance with the Auditing Standards. Such evidence may include specific procedures performed to corroborate management's responses to the auditor's inquiries.
 - ◆ Similarly, that the engagement partner has taken responsibility for the direction, supervision and performance of the audit in compliance with the Auditing Standards may be evidenced in a number of ways within the audit documentation. This may include documentation of the engagement partner's timely involvement in aspects of the audit, such as participation in the team discussions required by ASA 315 (Revised and Redrafted).³

Documentation of Significant Matters and Related Significant Professional Judgments (Ref: Para. 8(c))

³ ASA 315 (Revised and Redrafted), "Identifying and Assessing the Risks of Material Misstatement Through Understanding the Entity and Its Environment," paragraph 10.

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- A8. Judging the significance of a matter requires an objective analysis of the facts and circumstances. Examples of significant matters include:
- Matters that give rise to significant risks (as defined in ASA 315 (Revised and Redrafted).⁴
 - Results of audit procedures indicating (a) that the financial report could be materially misstated, or (b) a need to revise the auditor's previous assessment of the risks of material misstatement and the auditor's responses to those risks.
 - Circumstances that cause the auditor significant difficulty in applying necessary audit procedures.
 - Findings that could result in a modification to the audit opinion or the inclusion of an Emphasis of Matter paragraph in the auditor's report.
- A9. An important factor in determining the form, content and extent of audit documentation of significant matters is the extent of professional judgment exercised in performing the work and evaluating the results. Documentation of the professional judgments made, where significant, serves to explain the auditor's conclusions and to reinforce the quality of the judgment. Such matters are of particular interest to those responsible for reviewing audit documentation, including those carrying out subsequent audits when reviewing matters of continuing significance (for example, when performing a retrospective review of accounting estimates).
- A10. Some examples of circumstances in which, in accordance with paragraph 8, it is appropriate to prepare audit documentation relating to the use of professional judgment include, where the matters and judgments are significant:
- The rationale for the auditor's conclusion when a requirement provides that the auditor 'shall consider' certain information or factors, and that consideration is significant in the context of the particular engagement.
 - The basis for the auditor's conclusion on the reasonableness of areas of subjective judgments (for example, the reasonableness of significant accounting estimates).

⁴ ASA 315 (Revised and Redrafted), paragraph 4(e).

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- The basis for the auditor's conclusions about the authenticity of a document when further investigation (such as making appropriate use of an expert or of confirmation procedures) is undertaken in response to conditions identified during the audit that caused the auditor to believe that the document may not be authentic.

A11. The auditor may consider it helpful to prepare and retain as part of the audit documentation a summary (sometimes known as a completion memorandum) that describes the significant matters identified during the audit and how they were addressed, or that includes cross-references to other relevant supporting audit documentation that provides such information. Such a summary may facilitate effective and efficient reviews and inspections of the audit documentation, particularly for large and complex audits. Further, the preparation of such a summary may assist the auditor's consideration of the significant matters. It may also help the auditor to consider whether, in light of the audit procedures performed and conclusions reached, there is any individual relevant Auditing Standard objective that the auditor has not met or is unable to meet that would prevent the auditor from achieving the auditor's overall objective.

Identification of Specific Items or Matters Tested, and of the Preparer and Reviewer (Ref: Para. 9)

A12. Recording the identifying characteristics serves a number of purposes. For example, it enables the engagement team to be accountable for its work and facilitates the investigation of exceptions or inconsistencies. Identifying characteristics will vary with the nature of the audit procedure and the item or matter tested. For example:

- For a detailed test of entity-generated purchase orders, the auditor may identify the documents selected for testing by their dates and unique purchase order numbers.
- For a procedure requiring selection or review of all items over a specific amount from a given population, the auditor may record the scope of the procedure and identify the population (for example, all journal entries over a specified amount from the journal register).
- For a procedure requiring systematic sampling from a population of documents, the auditor may identify the documents selected by recording their source, the starting

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point and the sampling interval (for example, a systematic sample of shipping reports selected from the shipping log for the period from April 1 to September 30, starting with report number 12345 and selecting every 125th report).

- For a procedure requiring inquiries of specific entity personnel, the auditor may record the dates of the inquiries and the names and job designations of the entity personnel.
- For an observation procedure, the auditor may record the process or matter being observed, the relevant individuals, their respective responsibilities, and where and when the observation was carried out.

A13. ASA 220 (Revised and Redrafted) requires the auditor to review the audit work performed through review of the audit documentation.⁵ The requirement to document who reviewed the audit work performed does not imply a need for each specific working paper to include evidence of review. The requirement, however, means documenting what audit work was reviewed, who reviewed such work, and when it was reviewed.

Documentation of Discussions of Significant Matters with Management, Those Charged with Governance, and Others (Ref: Para. 10)

A14. The documentation is not limited to records prepared by the auditor but may include other appropriate records such as minutes of meetings prepared by the entity's personnel and agreed by the auditor. Others with whom the auditor may discuss significant matters may include other personnel within the entity, and external parties, such as persons providing professional advice to the entity.

Documentation of How Inconsistencies have been Addressed (Ref: Para. 11)

A15. The requirement to document how the auditor addressed inconsistencies in information does not imply that the auditor needs to retain documentation that is incorrect or superseded.

Considerations Specific to Smaller Entities (Ref: Para. 8)

A16. The audit documentation for the audit of a smaller entity is generally less extensive than that for the audit of a larger entity. Further, in the case of an audit where the engagement partner performs all the audit work, the documentation will not include matters that might have to

⁵ ASA 220 (Revised and Redrafted), paragraph [16]. ASA 220 (Revised and Redrafted), paragraph [A12], describes the nature of a review.

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be documented solely to inform or instruct members of an engagement team, or to provide evidence of review by other members of the team (for example, there will be no matters to document relating to team discussions or supervision). Nevertheless, the engagement partner complies with the overriding requirement in paragraph 8 to prepare audit documentation that can be understood by an experienced auditor, as the audit documentation may be subject to review by external parties for regulatory or other purposes.

- A17. When preparing audit documentation, the auditor of a smaller entity may also find it helpful and efficient to record various aspects of the audit together in a single document, with cross-references to supporting working papers as appropriate. Examples of matters that may be documented together in the audit of a smaller entity include the understanding of the entity and its internal control, the overall audit strategy and audit plan, materiality, assessed risks, significant matters noted during the audit, and conclusions reached.

Documentation of Inability to Comply with Relevant Mandatory Requirements (Ref: Para. 12)

- A18. The objectives and requirements in Auditing Standards are designed to support the achievement of the overall objective of the auditor.⁶ Accordingly, other than in exceptional circumstances, the Auditing Standards call for compliance with each requirement that is relevant in the circumstances of the audit.

Aus A18.1 ASA 200 contains a mandatory requirement regarding the situation, where, in rare and exceptional circumstances, factors outside the auditor's control prevent the auditor from complying with an essential procedure contained within a relevant mandatory requirement.

- A19. The documentation requirement applies only to requirements that are relevant in the circumstances. A requirement is not relevant⁷ only in the cases where:

- (a) The Auditing Standard is not relevant (for example, in a continuing engagement, nothing in ASA 510 (Revised and Redrafted)⁸ is relevant); or

⁶ ASA 200 (Revised and Redrafted), "Overall Objective of the Independent Auditor, and the Conduct of an Audit in Accordance with International Standards on Auditing," paragraphs [23-24].

⁷ ASA 200 (Revised and Redrafted), paragraph [27].

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- (b) The circumstances envisioned do not apply because the requirement is conditional and the condition does not exist (for example, the requirement to modify the auditor's opinion where there is an inability to obtain sufficient appropriate audit evidence, and there is no such inability).

Matters Arising after the Date of the Auditor's Report (Ref: Para. 13)

- A20. Examples of exceptional circumstances include facts which become known to the auditor after the date of the auditor's report but which existed at that date and which, if known at that date, might have caused the financial report to be amended or the auditor to modify the opinion in the auditor's report.⁹ The resulting changes to the audit documentation are reviewed in accordance with the review responsibilities set out in ASA 220 (Revised and Redrafted),¹⁰ with the engagement partner taking final responsibility for the changes.

Assembly of the Final Audit File (Ref: Para. 14-16)

- A21. APES 320 requires firms to establish policies and procedures for the timely completion of the assembly of audit files.¹¹ An appropriate time limit within which to complete the assembly of the final audit file is ordinarily not more than 60 days after the date of the auditor's report.¹²
- A22. The completion of the assembly of the final audit file after the date of the auditor's report is an administrative process that does not involve the performance of new audit procedures or the drawing of new conclusions. Changes may, however, be made to the audit documentation during the final assembly process if they are administrative in nature. Examples of such changes include:
- Deleting or discarding superseded documentation.
 - Sorting, collating and cross-referencing working papers.
 - Signing off on completion checklists relating to the file assembly process.

⁸ ASA 510 (Revised and Redrafted), "Initial Audit Engagements—Opening Balances."

⁹ ASA 560 (Revised and Redrafted), "Subsequent Events," paragraph 13.

¹⁰ ASA 220 (Revised and Redrafted), paragraph [15].

¹¹ APES 320, paragraph [73a].

¹² APES 320, paragraph [73b].

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- Documenting audit evidence that the auditor has obtained, discussed and agreed with the relevant members of the engagement team before the date of the auditor's report.

A23. APES 320 requires firms to establish policies and procedures for the retention of engagement documentation.¹³ The retention period for audit engagements ordinarily is no shorter than seven years from the date of the auditor's report, or, if later, the date of the group auditor's report.¹⁴

Aus A23.1 Under section 307B of the Corporations Act 2001, the auditor or member of an audit firm is required to retain all audit working papers prepared by or for, or considered or used by, the auditor in accordance with the requirements of the Auditing Standards until:

- (a) the end of seven years after the date of the audit report prepared in relation to the audit or review to which the audit working papers relate; or
- (b) an earlier date determined by ASIC* for the audit working papers.

A24. An example of a circumstance in which the auditor may find it necessary to modify existing audit documentation or add new audit documentation after file assembly has been completed is the need to clarify existing audit documentation arising from comments received during monitoring inspections performed by internal or external parties.

Confidentiality, safe custody, integrity, accessibility and retrievability of the audit documentation (Ref: Para. Aus 16.1)

Aus A24.1 Under APES 320, firms are required to establish policies and procedures to maintain the confidentiality, safe custody, integrity, accessibility and retrievability of audit documentation.[#]

¹³ APES 320, paragraph [73i].

¹⁴ APES 320, paragraph [73j].

* Australian Securities and Investments Commission.

APES 320 paragraph [73d].

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Conformity with International Standards on Auditing

Except as noted below, this Auditing Standard conforms with International Standard on Auditing ISA 230, issued by the International Auditing and Assurance Standards Board (IAASB), as an independent standard-setting body within the International Federation of Accountants (IFAC).

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

The main differences between this Auditing Standard and ISA 230 are:

- This Auditing Standard includes the following Requirements that are not included as Requirements in ISA 230:
 - This Auditing Standard makes reference to APES 320, issued by the Accounting Professional and Ethical Standards Board (paragraphs 3, A21, A23 and Aus 24.1). ISA 230 refers to the International Standard on Quality Control (ISQC) 1, issued by the IAASB.
 - This Auditing Standard includes a requirement that where, in rare and exceptional circumstances, the auditor is unable to comply with an essential procedure contained within a relevant requirement, the auditor shall document certain matters (paragraph Aus 12.1). In ISA 230, the auditor is required to document certain matters where the auditor has judged it necessary to depart from a relevant requirement in an ISA.
 - This Auditing Standard requires the Auditor to adopt appropriate procedures for maintaining the confidentiality, safe custody, integrity, accessibility and retrievability of the audit documentation (paragraph Aus 16.1). ISA 230 does not contain any requirement for the auditor to maintain the confidentiality, safe custody, integrity, accessibility and retrievability of the audit documentation.

Compliance with this Auditing Standard enables compliance with ISA 230.

Appendix 1

(Ref: Para. 1)

Specific Audit Documentation Requirements in Other Auditing Standards

This appendix identifies paragraphs in other Auditing Standards as at December 31, 2007 that contain specific documentation requirements. The list is not a substitute for considering the requirements and related application and other explanatory material in Auditing Standards.

- ASA 210 (Revised and Redrafted), “Agreeing the Terms of Audit Engagements” – paragraphs [9-11]
- ASA 220 (Revised and Redrafted), “Quality Control for an Audit of a Financial Report” – paragraphs [26-27]
- ASA 240 (Revised and Redrafted), “The Auditor’s Responsibilities Relating to Fraud in an Audit of a Financial Report” – paragraphs 44-47
- ASA 250 (Revised and Redrafted), “The Auditor’s Responsibilities Relating to Laws and Regulations in an Audit of a Financial Report” – paragraph [28]
- ASA 260 (Revised and Redrafted), “Communication with Those Charged with Governance” – paragraph 19
- ASA 300 (Revised and Redrafted), “Planning an Audit of a Financial Report” – paragraph 11
- ASA 315 (Revised and Redrafted), “Identifying and Assessing the Risks of Material Misstatement Through Understanding the Entity and Its Environment” – paragraph 33
- ASA 320 (Revised and Redrafted), “Materiality in Planning and Performing an Audit” – paragraph [14]
- ASA 330 (Revised and Redrafted), “The Auditor’s Responses to Assessed Risks” – paragraphs 29-31
- ASA 450 (Revised and Redrafted), “Evaluation of Misstatements Identified During the Audit” – paragraph [20]

Proposed Auditing Standard ASA 230
Audit Documentation (Revised and Redrafted) (Re-issuance of ASA 230)

- ASA 540 (Revised and Redrafted), “Auditing Accounting Estimates, Including Fair Value Accounting Estimates, and Related Disclosures” – paragraph 23
- ASA 550 (Revised and Redrafted), “Related Parties” – paragraph [29]
- ASA 600 (Revised and Redrafted), “Special Considerations—Audits of Group Financial Reports (Including the Work of Component Auditors)” – paragraph 50

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Tables of Differences — ASA 230 (Revised and Redrafted) and Extant ASA 230

Base Standard

ISA 230 *Audit Documentation* (Redrafted) is used as the base Auditing Standard for the purpose of re-drafting this proposed ASA. The base Auditing Standard will be amended to account for the following matters:

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

Summary of Main Differences — ASA 230 and Extant ASA 230

The table below details the main differences (excluding editorial amendments) between the proposed standard and extant ASA 230.

ASA 230 (Revised and Redrafted) Requirements not in Extant ASA

Item #	ASA (Revised & Redrafted) Para. #	ASA (Revised & Redrafted) Requirements	Commentary
Objectives			
1	5	The objective of the auditor is to prepare documentation that provides: <ul style="list-style-type: none"> (a) A sufficient and appropriate record of the basis for the auditor's report; and (b) Evidence that the audit was planned and performed in accordance with ISAs and applicable legal and regulatory requirements. 	New Objectives. (Extant ASA 230 para 5—equivalent Requirement)

Definitions			
2	6	<p>For purposes of the ISAs, the following terms have the meanings attributed below:</p> <p>(a) Audit documentation – The record of audit procedures performed, relevant audit evidence obtained, and conclusions the auditor reached (terms such as “working papers” or “workpapers” are also sometimes used).</p> <p>(b) Audit file – One or more folders or other storage media, in physical or electronic form, containing the records that comprise the audit documentation for a specific engagement.</p> <p>(c) Experienced auditor – An individual (whether internal or external to the firm) who has practical audit experience, and a reasonable understanding of:</p> <ul style="list-style-type: none"> (i) Audit processes; (ii) ISAs and applicable legal and regulatory requirements; (iii) The business environment in which the entity operates; and (iv) Auditing and financial reporting issues relevant to the entity’s industry. 	<p>New Definitions.</p> <p>Shaded text shows new (ISA) definition of ‘audit file’ and increased description of extant definition of ‘experienced auditor’.</p> <p>[Extant ASA 230 para 8—equivalent definitions for ISA 230 para 6(a) and (c)]</p>
Documentation of the Audit Procedures Performed and Audit Evidence Obtained			
<i>Form, Content and Extent of Audit Documentation</i>			
3	8(c)	<p>The auditor shall prepare audit documentation that is sufficient to enable an experienced auditor, having no previous connection with the audit, to understand: (Ref: Para. A2-A5, A16-A17)</p> <p>(a) The nature, timing, and extent of the audit procedures performed to comply with the ISAs and applicable legal and regulatory requirements; (Ref: Para. A6-A7)</p> <p>(b) The results of the audit procedures performed, and the audit evidence obtained; and</p> <p>(c) Significant matters arising during the audit, the conclusions reached thereon, and significant professional judgments made in</p>	<p>Shaded text is an elevation of extant ASA Explanatory Guidance (Extant ASA 230 para 12, 3rd bullet point—equivalent Explanatory Guidance).</p> <p>Unshaded text is equivalent in meaning to the extant ASA Requirement (para 11).</p> <p>Related application material has been developed (refer ISA 230 (Redrafted) paras A9 and A10) that describes why this</p>

		reaching those conclusions. (Ref: Para. A8-A11)	documentation is important, and the circumstances in which it would be appropriate to prepare audit documentation relating to the use of professional judgement, where the matters and judgements are significant.
4	10	The auditor shall document discussions of significant matters with management, those charged with governance, and others, including the nature of the significant matters discussed and when and with whom the discussions took place. (Ref: Para. A14)	<p>Clarification of existing Requirement.</p> <p>Shaded text is an elevation of application material.</p> <p>(Extant ASA 230 para 19—equivalent explanatory Guidance; anchored to requirement in para 18)</p> <p>Note only:</p> <p>Extant ASA equivalent wording:</p> <p>“The auditor shall document discussions of significant matters with those charged with governance, management and others <u>on a timely basis.</u>”</p> <p>(Extant ASA 230 para 18)</p> <p>Underlined text has been deleted. Covered by requirement in para 7 of the ISA.</p>
Assembly of the Final Audit File			
5	14	The auditor shall assemble the audit documentation in an audit file and complete the administrative process of assembling the final audit file on a timely basis after the date of the auditor’s report. (Ref: Para. A21-A22)	<p>Shaded text is an elevation of application material.</p> <p>(Extant ASA 230 para 9 (last sentence)—equivalent explanatory guidance)</p> <p>Unshaded text is equivalent in meaning to the extant ASA Requirement (para 28).</p> <p>ISA 230 (Redrafted) includes a clear requirement for audit documentation to be maintained in an audit file – previously implied.</p>

Extant ASA Requirements not in ISA 230 (Redrafted)

Item #	Extant ASA Para. #	Extant ASA 230 Requirements	Commentary
Not retained in ASA 230 (Revised and Redrafted)			
Assembly of the Final Audit File			
1	34	When the auditor finds it necessary to modify existing audit documentation or add new audit documentation after the assembly of the final audit file has been completed, the auditor shall, regardless of the nature of the modifications or additions, document: <ul style="list-style-type: none"> (a) when and by whom they were made, and (where applicable) reviewed; (b) the specific reasons for making them; and (c) their effect, if any, on the auditor’s conclusions. 	<p>Shaded text: Qualifying words “where applicable” deleted from requirement as changes to audit documentation should always be reviewed.</p> <p>Shaded text: Deletion of the requirement for the auditor to document the effect, if any, on the auditor’s conclusions is because such changes are made <i>prior</i> to the auditor assessing all conclusions as a basis for forming the opinion. Changes <i>after</i> the date of the auditor’s report are dealt with in para 13 (extant ASA para 35)</p>
Retained in ASA [Revised & Redrafted]			
Form, Content and Extent of Audit documentation			
<i>Documentation of Inability to Comply with Mandatory Requirements</i>			
2	23	Where, in rare and exceptional circumstances, factors outside the auditor’s control prevent the auditor from complying with an essential procedure contained within a relevant mandatory requirement, the auditor shall document: <ul style="list-style-type: none"> (a) the circumstances surrounding the inability to comply; (b) the reasons for the inability to comply; and (c) justification of how alternative audit procedures achieve the objectives of the mandatory requirement. 	<p>Maintain existing ASA policy.</p> <p>Shaded text identifies the differences with ISA equivalent wording, namely:</p> <p>“If, in exceptional circumstances, the auditor judges it necessary to depart from a relevant requirement in an ISA, the auditor shall document how the alternative audit procedures performed achieve the aim of that</p>

Item #	Extant ASA Para. #	Extant ASA 230 Requirements	Commentary
			requirement, and the reasons for the departure. (Ref: ISA 230 para. A18-A19)” [Ref: ISA 230 (Redrafted) para 12]
Confidentiality, Safe Custody, Integrity, Accessibility and Retrievability of Audit Documentation			
3	37	The auditor shall adopt appropriate procedures for maintaining the confidentiality, safe custody, integrity, accessibility and retrievability of the audit documentation.	This extant requirement is included as a requirement in ISQC 1 “Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements” (Redrafted). [Ref: ISQC 1 (Redrafted) para 57] APES 320 “Quality Control for firms”, issued by the Accounting Professional and Ethical Standards Board, contains an identical requirement. [Ref: APES 320 para 73d]. However, as APES 320 is not part of the Australian Auditing Standards, extant requirement retained.

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Item #	ASA (Revised & Redrafted) Para. #	Guidance	Commentary
		<ul style="list-style-type: none"> • In relation to requirements that apply generally throughout the audit, there may be a number of ways in which compliance with them may be demonstrated within the audit file: <ul style="list-style-type: none"> ○ For example, there may be no single way in which the auditor’s professional scepticism is documented. But the audit documentation may nevertheless provide evidence of the auditor’s exercise of professional scepticism in accordance with the ISAs. Such evidence may include specific procedures performed to corroborate management’s responses to the auditor’s inquiries. ○ Similarly, that the engagement partner has taken responsibility for the direction, supervision and performance of the audit in compliance with the ISAs may be evidenced in a number of ways within the audit documentation. This may include documentation of the engagement partner’s timely involvement in aspects of the audit, such as participation in the team discussions required by ISA 315 (Redrafted) 	
2	A16	<p>The audit documentation for the audit of a smaller entity is generally less extensive than that for the audit of a larger entity. Further, in the case of an audit where the engagement partner performs all the audit work, the documentation will not include matters that might have to be documented solely to inform or instruct members of an engagement team, or to provide evidence of review by other members of the team (for example, there will be no matters to document relating to team discussions or supervision). Nevertheless, the engagement partner complies with the overriding requirement in paragraph 8 to prepare audit documentation that can be understood by an experienced auditor, as the audit documentation may be subject to review by external parties for regulatory or other purposes.</p> <p>When preparing audit documentation, the auditor of a smaller entity may also find it helpful and efficient to record various aspects of the audit together in a single document, with cross-references to supporting working papers as appropriate. Examples of matters that may be documented together</p>	New application material regarding smaller entities.

Item #	ASA (Revised & Redrafted) Para. #	Guidance	Commentary
	A17	in the audit of a smaller entity include the understanding of the entity and its internal control, the overall audit strategy and audit plan, materiality, assessed risks, significant matters noted during the audit, and conclusions reached.	

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