



The Chairman

Auditing and Assurance Standards Board

By Email: edcomments@auasb.gov.au

3 October 2013

Dear Merran,

Macquarie University's Department of Accounting and Corporate Governance is pleased to provide the Auditing and Assurance Standards Board (AUASB) with its comments on:

- (a) ED 02/13 Proposed Auditing Standard ASA 610 (Revised) Using the Work of Internal Auditors which is based on the International Auditing and Assurance Standards Board's Auditing Standard ISA 610 of the same name, and
- (b) ED 03/13 Proposed Auditing Standard ASA 2013-2 Amendments to Australian Auditing Standards

Macquarie University's response reflects our position as a leading educator to the Australian and global community. This submission has benefited with input from discussions with key constituents, including those that attended various Roundtables hosted by the AUASB.

We do not support the proposals in the EDs that prohibit the use of internal auditors to provide direct assistance in an audit or review conducted in accordance with Australian Auditing Standards. We note that ISA 610 does not contain such a prohibition, and given the Government's policy of requiring compliance with International Standards, we see no compelling evidence that such a prohibition needs to be applied in Australia.

The IAASB as noted in ED 02/13 has left it to individual jurisdictions to determine whether direct assistance can be provided. We see this as an independence issue and best addressed in Australia by the Accounting Professional and Ethical Standards Board (APESB) having regard to its role in ensuring that its Standards reflect International Independence Standards.

If you require any further information or comment, please contact me.

Keith Reilly

Industry Fellow (International Governance & Reporting)

Department of Accounting and Corporate Governance - Macquarie University

keith.reilly@mq.edu.au