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# INTERNATIONAL STANDARD ON AUDITING (UK) 220 (REVISED NOVEMBER 2019)

## Quality Control for an Audit of Financial Statements

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**INTERNATIONAL STANDARD ON AUDITING (UK) 220**  
**(REVISED NOVEMBER 2019)**

**QUALITY CONTROL FOR AN AUDIT OF FINANCIAL STATEMENTS**

(Effective for audits of financial statements for periods commencing on or after 15 December 2019)

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International Standard on Auditing (UK) (ISA (UK)) 220 (Revised November 2019), *Quality Control for an Audit of Financial Statements*, should be read in conjunction with ISA (UK) 200 (Revised June 2016), *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing (UK)*.

## Introduction

### Scope of this ISA (UK)

1. This International Standard on Auditing (UK) (ISA (UK)) deals with the specific responsibilities of the auditor regarding quality control procedures for an audit of financial statements. It also addresses, where applicable, the responsibilities of the engagement quality control reviewer. This ISA (UK) is to be read in conjunction with relevant ethical requirements.

### System of Quality Control and Role of Engagement Teams

2. Quality control systems, policies and procedures are the responsibility of the audit firm. Under ISQC (UK) 1 (Revised November 2019), the firm has an obligation to establish and maintain a system of quality control to provide it with reasonable assurance that:
  - (a) The firm and its personnel comply with professional standards and applicable legal and regulatory requirements; and
  - (b) The reports issued by the firm or engagement partners are appropriate in the circumstances.<sup>1</sup>

This ISA (UK) is premised on the basis that the firm is subject to ISQC (UK) 1 (Revised November 2019) or to national requirements that are at least as demanding. (Ref: Para. A1)

3. Within the context of the firm's system of quality control, engagement teams have a responsibility to implement quality control procedures that are applicable to the audit engagement and provide the firm with relevant information to enable the functioning of that part of the firm's system of quality control relating to independence.
4. Engagement teams are entitled to rely on the firm's system of quality control, unless information provided by the firm or other parties suggests otherwise. (Ref: Para. A2)

### Effective Date

5. This ISA (UK) is effective for audits of financial statements for periods commencing on or after 15 December 2019.

## Objective

6. The objective of the auditor is to implement quality control procedures at the engagement level that provide the auditor with reasonable assurance that:
  - (a) The audit complies with professional standards and applicable legal and regulatory requirements; and
  - (b) The auditor's report issued is appropriate in the circumstances.

## Definitions

7. For purposes of the ISAs (UK), the following terms have the meanings attributed below:

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<sup>1</sup> ISQC (UK) 1 (Revised November 2019), *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements*, paragraph 11.

- (a) Engagement partner<sup>2</sup> – The partner or other person in the firm who is responsible for the audit engagement and its performance, and for the auditor's report that is issued on behalf of the firm, and who, where required, has the appropriate authority from a professional, legal or regulatory body. **The engagement partner is a Key Audit Partner.**
  - (b) Engagement quality control review – A process designed to provide an objective evaluation, on or before the date of the auditor's report, of the significant judgments the engagement team made and the conclusions it reached in formulating the auditor's report. The engagement quality control review process is only for audits of financial statements of listed entities and those other audit engagements, if any, for which the firm has determined an engagement quality control review is required.
  - (c) Engagement quality control reviewer – A partner, other person in the firm, suitably qualified external person, or a team made up of such individuals, none of whom is part of the engagement team, with sufficient and appropriate experience and authority to objectively evaluate the significant judgments the engagement team made and the conclusions it reached in formulating the auditor's report.
  - (d) Engagement team – All partners and staff performing the engagement, and any individuals engaged by the firm or a network firm who perform audit procedures on the engagement. This excludes an auditor's external expert engaged by the firm or by a network firm.<sup>3</sup> The term "engagement team" also excludes individuals within the client's internal audit function who provide direct assistance on an audit engagement when the external auditor complies with the requirements of ISA (UK) 610 (Revised June 2013).<sup>4</sup>
  - (e) Firm – A sole practitioner, partnership or corporation or other entity of professional accountants.
  - (f) Inspection – In relation to completed audit engagements, procedures designed to provide evidence of compliance by engagement teams with the firm's quality control policies and procedures.
- (f)-1 Key audit partner – Is defined in UK legislation<sup>4a</sup> as:
- (i) The statutory auditor designated by an audit firm for a particular audit engagement as being primarily responsible for carrying out the statutory audit on behalf of the audit firm; or

<sup>2</sup> "Engagement partner," "partner," and "firm" should be read as referring to their public sector equivalents where relevant.

<sup>3</sup> ISA (UK) 620 (Revised November 2019), *Using the Work of an Auditor's Expert*, paragraph 6(a), defines the term "auditor's expert."

<sup>4</sup> ISA 610 (Revised 2013), *Using the Work of Internal Auditors*, establishes limits on the use of direct assistance. It also acknowledges that the external auditor may be prohibited by law or regulation from obtaining direct assistance from internal auditors. Therefore, the use of direct assistance is restricted to situations where it is permitted.

The use of internal auditors to provide direct assistance is prohibited in an audit conducted in accordance with ISAs (UK) – see ISA (UK) 610 (Revised June 2013), paragraph 5-1.

<sup>4a</sup> In the UK, Schedule 10 to the Companies Act 2006.

- (ii) In the case of a group audit, the statutory auditor designated by an audit firm as being primarily responsible for carrying out the statutory audit at the level of the group and the statutory auditor designated at the level of material subsidiaries; or (Ref: Para. A3-1)
  - (iii) The statutory auditor who signs the audit report.
- (g) Listed entity – An entity whose shares, stock or debt are quoted or listed on a recognized stock exchange, or are marketed under the regulations of a recognized stock exchange or other equivalent body.
- In the UK, this includes any company in which the public can trade shares, stock or debt on the open market, such as those listed on the London Stock Exchange (including those admitted to trading on the Alternative Investments Market) and ISDX Markets. It does not include entities whose quoted or listed shares, stock or debt are in substance not freely transferable or cannot be traded freely by the public or the entity.
- (h) Monitoring – A process comprising an ongoing consideration and evaluation of the firm's system of quality control, including a periodic inspection of a selection of completed engagements, designed to provide the firm with reasonable assurance that its system of quality control is operating effectively.
- (i) Network firm – A firm or entity that belongs to a network.
- (j) Network – A larger structure:
- (i) That is aimed at cooperation, and
  - (ii) That is clearly aimed at profit or cost-sharing or shares common ownership, control or management, common quality control policies and procedures, common business strategy, the use of a common brand name, or a significant part of professional resources.
- (k) Partner – Any individual with authority to bind the firm with respect to the performance of a professional services engagement.
- (l) Personnel – Partners and staff.
- (m) Professional standards – International Standards on Auditing (UK) (ISAs (UK)) and relevant ethical requirements.

- (m)-1 Public interest entity – Is defined in UK legislation<sup>4b</sup> as:
- (i) An issuer whose transferable securities are admitted to trading on a UK regulated market;<sup>4c</sup>
  - (ii) A credit institution within the meaning given by Article 4(1)(1) of Regulation (EU) No. 575/2013 of the European Parliament and of the Council, which is a CRR firm within the meaning of Article 4(1)(2A) of that Regulation;
  - (iii) A person who would be an insurance undertaking as defined in Article 2(1) of Council Directive 91/674/EEC of 19 December 1991 of the European

<sup>4b</sup> In the UK, Section 494A of the Companies Act 2006.

<sup>4c</sup> In the UK, "issuer" and "regulated market" have the same meaning as in Part 6 of the Financial Services and Markets Act 2000.

Parliament and of the Council on the annual accounts and consolidated accounts of insurance undertakings as that Article had effect immediately before exit day, were the United Kingdom a Member State.

- (n) Relevant ethical requirements – Ethical requirements to which the engagement team and engagement quality control reviewer are subject, which ordinarily comprise Parts A and B of the International Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants* (IESBA Code) related to an audit of financial statements together with national requirements that are more restrictive.

Auditors in the UK are subject to ethical requirements from two sources: the FRC's Ethical Standard concerning the integrity, objectivity and independence of the auditor, and the ethical pronouncements established by the auditor's relevant professional body.

- (o) Staff – Professionals, other than partners, including any experts the firm employs.
- (p) Suitably qualified external person – An individual outside the firm with the competence and capabilities to act as an engagement partner, for example a partner of another firm, or an employee (with appropriate experience) of either a professional accountancy body whose members may perform audits of historical financial information or of an organization that provides relevant quality control services.

## Requirements

### Leadership Responsibilities for Quality on Audits

8. The engagement partner shall take responsibility for the overall quality on each audit engagement to which that partner is assigned. (Ref: Para. A3)

### Relevant Ethical Requirements

9. Throughout the audit engagement, the engagement partner shall remain alert, through observation and making inquiries as necessary, for evidence of non-compliance with relevant ethical requirements by members of the engagement team. (Ref: Para. A4–A5)
10. If matters come to the engagement partner's attention through the firm's system of quality control or otherwise that indicate that members of the engagement team have not complied with relevant ethical requirements, the engagement partner, in consultation with others in the firm, shall determine the appropriate action. (Ref: Para. A5)

### *Independence*

11. The engagement partner shall form a conclusion on compliance with independence requirements that apply to the audit engagement. In doing so, the engagement partner shall: (Ref: Para. A5)
- (a) Obtain relevant information from the firm and, where applicable, network firms, to identify and evaluate circumstances and relationships that create threats to independence;

- (b) Evaluate information on identified breaches, if any, of the firm's independence policies and procedures to determine whether they create a threat to independence for the audit engagement; and
- (c) Take appropriate action to eliminate such threats or reduce them to an acceptable level by applying safeguards, or, if considered appropriate, to withdraw from the audit engagement, where withdrawal is possible under applicable law or regulation. The engagement partner shall promptly report to the firm any inability to resolve the matter for appropriate action. (Ref: Para. A6–A7)

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

- 12. The engagement partner shall be satisfied that appropriate procedures regarding the acceptance and continuance of client relationships and audit engagements have been followed, and shall determine that conclusions reached in this regard are appropriate. (Ref: Para. A8–A10)
- 13. If the engagement partner obtains information that would have caused the firm to decline the audit engagement had that information been available earlier, the engagement partner shall communicate that information promptly to the firm, so that the firm and the engagement partner can take the necessary action. (Ref: Para. A10)

### **Assignment of Engagement Teams**

- 14. The engagement partner shall be satisfied that the engagement team, and any auditor's experts who are not part of the engagement team, collectively have the appropriate competence and capabilities to:
  - (a) Perform the audit engagement in accordance with professional standards and applicable legal and regulatory requirements; and
  - (b) Enable an auditor's report that is appropriate in the circumstances to be issued. (Ref: Para. A11–A13)

### **Engagement Performance**

#### *Direction, Supervision and Performance*

- 15. The engagement partner shall take responsibility for:
  - (a) The direction, supervision and performance of the audit engagement in compliance with professional standards and applicable legal and regulatory requirements; and (Ref: Para. A14–A16, A21)
  - (b) The auditor's report being appropriate in the circumstances.

#### *Reviews*

- 16. The engagement partner shall take responsibility for reviews being performed in accordance with the firm's review policies and procedures. (Ref: Para. A17–A18, A21)
- 17. On or before the date of the auditor's report, the engagement partner shall, through a review of the audit documentation and discussion with the engagement team, be satisfied that sufficient appropriate audit evidence has been obtained to support the conclusions reached and for the auditor's report to be issued. (Ref: Para. A19–A21)

*Consultation*

18. The engagement partner shall:
- (a) Take responsibility for the engagement team undertaking appropriate consultation on difficult or contentious matters;
  - (b) Be satisfied that members of the engagement team have undertaken appropriate consultation during the course of the engagement, both within the engagement team and between the engagement team and others at the appropriate level within or outside the firm;
  - (c) Be satisfied that the nature and scope of, and conclusions resulting from, such consultations are agreed with the party consulted; and
  - (d) Determine that conclusions resulting from such consultations have been implemented. (Ref: Para. A22–A23)

*Engagement Quality Control Review*

19. For audits of financial statements of listed entities, and those other audit engagements, if any, for which the firm has determined that an engagement quality control review is required, the engagement partner shall:
- (a) Determine that an engagement quality control reviewer has been appointed;
  - (b) Discuss significant matters arising during the audit engagement, including those identified during the engagement quality control review, with the engagement quality control reviewer; and
  - (c) Not date the auditor's report until the completion of the engagement quality control review. (Ref: Para. A24–A26)
20. The engagement quality control reviewer shall perform an objective evaluation of the significant judgments made by the engagement team, and the conclusions reached in formulating the auditor's report. This evaluation shall involve:
- (a) Discussion of significant matters with the engagement partner;
  - (b) Review of the financial statements and the proposed auditor's report;
  - (c) Review of selected audit documentation relating to the significant judgments the engagement team made and the conclusions it reached; and
  - (d) Evaluation of the conclusions reached in formulating the auditor's report and consideration of whether the proposed auditor's report is appropriate. (Ref: Para. A27–A29, A31–A33)
21. For audits of financial statements of listed entities, the engagement quality control reviewer, on performing an engagement quality control review, shall also consider the following:
- (a) The engagement team's evaluation of the firm's independence in relation to the audit engagement;
  - (b) Whether appropriate consultation has taken place on matters involving differences of opinion or other difficult or contentious matters, and the conclusions arising from those consultations; and

- (c) Whether audit documentation selected for review reflects the work performed in relation to the significant judgments and supports the conclusions reached. (Ref: Para. A29–A32)

21-1. For audits of financial statements of public interest entities, the engagement quality control reviewer, on performing an engagement quality control review,<sup>4d</sup> shall also consider the following matters: (Ref: Para. A33-1–A33-4)

- (a) The independence of the firm from the entity;
- (b) The significant risks which are relevant to the audit and which the key audit partner(s) has identified during the performance of the audit and the measures that the key audit partner(s) has taken to adequately manage those risks;
- (c) The reasoning of the key audit partner(s), in particular with regard to the level of materiality and the significant risks referred to in paragraph 21-1(b);
- (d) Any request for advice to external experts and the implementation of such advice;
- (e) The nature and scope of the corrected and uncorrected misstatements in the financial statements that were identified during the carrying out of the audit;
- (f) The subjects discussed with the audit committee and management and/or supervisory bodies of the entity;
- (g) The subjects discussed with competent authorities<sup>4e</sup> and, where applicable, with other third parties; and
- (h) Whether the documents and information selected from the file by the engagement quality control reviewer support the opinion of the key audit partner(s) as expressed in the draft of the auditor's report and the additional report to the audit committee.<sup>4f</sup>

21-2. The engagement quality control reviewer shall discuss the results of the review, including the matters considered in paragraph 21-1, with the key audit partner(s).

21-3. For audits of group financial statements of public interest entities, the engagement quality control reviewer also considers the matters required by paragraphs 21-1(a)–21-1(h) for components and discusses the results of the review with each of the relevant key audit partners. (Ref: Para. A33-2)

### *Differences of Opinion*

22. If differences of opinion arise within the engagement team, with those consulted or, where applicable, between the engagement partner and the engagement quality control reviewer, the engagement team shall follow the firm's policies and procedures for dealing with and resolving differences of opinion.

<sup>4d</sup> The requirement for an engagement quality control review is established in ISQC (UK) 1 (Revised November 2019), paragraph 36-1.

<sup>4e</sup> In the UK, the competent authority designated by law is the Financial Reporting Council.

<sup>4f</sup> The requirements for these reports are set out respectively in ISA (UK) 700 (Revised November 2019), *Forming an Opinion and Reporting on Financial Statements* and ISA (UK) 260 (Revised November 2019), *Communication with Those Charged with Governance*.

## Monitoring

23. An effective system of quality control includes a monitoring process designed to provide the firm with reasonable assurance that its policies and procedures relating to the system of quality control are relevant, adequate, and operating effectively. The engagement partner shall consider the results of the firm's monitoring process as evidenced in the latest information circulated by the firm and, if applicable, other network firms and whether deficiencies noted in that information may affect the audit engagement. (Ref: Para A34–A36)

## Documentation

24. The auditor shall include in the audit documentation:<sup>5</sup>
- (a) Issues identified with respect to compliance with relevant ethical requirements and how they were resolved.
  - (b) Conclusions on compliance with independence requirements that apply to the audit engagement, and any relevant discussions with the firm that support these conclusions.
  - (c) Conclusions reached regarding the acceptance and continuance of client relationships and audit engagements.
  - (d) The nature and scope of, and conclusions resulting from, consultations undertaken during the course of the audit engagement. (Ref: Para. A36)

- 24-1. The auditor shall include in the audit documentation:

- (a) All significant threats to the firm's independence as well as the safeguards applied to mitigate those threats; and
- (b) Those matters it is required to assess before accepting or continuing a statutory audit engagement in accordance with ISQC (UK) 1 (Revised November 2019).

25. The engagement quality control reviewer shall document, for the audit engagement reviewed, that:

- (a) The procedures required by the firm's policies on engagement quality control review have been performed;
- (b) The engagement quality control review has been completed on or before the date of the auditor's report; and
- (c) The reviewer is not aware of any unresolved matters that would cause the reviewer to believe that the significant judgments the engagement team made and the conclusions it reached were not appropriate.

- 25-1. For audits of financial statements of public interest entities, the engagement quality control reviewer shall also record:

- (a) The oral and written information provided by the key audit partner(s) to support the significant judgments as well as the main findings of the audit procedures carried out and the conclusions drawn from those findings, whether or not at the request of the engagement quality control reviewer; and

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<sup>5</sup> ISA (UK) 230 (Revised June 2016), *Audit Documentation*, paragraphs 8–11, and A6.

- (b) The opinions of the key audit partner(s), as expressed in the draft of the reports required by ISA (UK) 260 (Revised November 2019) and ISA (UK) 700 (Revised November 2019).

25-2. For audits of financial statements of public interest entities:

- (a) The auditor and the engagement quality control reviewer shall keep a record of the results of the engagement quality control review, together with the considerations underlying those results, in the audit documentation; and
- (b) The engagement quality control reviewer documents their consideration of each of the matters in paragraphs 21-1(a)–21-1(h), as appropriate, and their conclusion thereon.

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## Application and Other Explanatory Material

### System of Quality Control and Role of Engagement Teams (Ref: Para. 2)

A1. ISQC (UK) 1 (Revised November 2019), or national requirements that are at least as demanding, deals with the firm's responsibilities to establish and maintain its system of quality control for audit engagements. The system of quality control includes policies and procedures that address each of the following elements:

- Leadership responsibilities for quality within the firm;
- Relevant ethical requirements;
- Acceptance and continuance of client relationships and specific engagements;
- Human resources;
- Engagement performance; and
- Monitoring.

National requirements that deal with the firm's responsibilities to establish and maintain a system of quality control are at least as demanding as ISQC (UK) 1 (Revised November 2019) when they address all the elements referred to in this paragraph and impose obligations on the firm that achieve the aims of the requirements set out in ISQC (UK) 1 (Revised November 2019).

### *Reliance on the Firm's System of Quality Control* (Ref: Para. 4)

A2. Unless information provided by the firm or other parties suggest otherwise, the engagement team may rely on the firm's system of quality control in relation to, for example:

- Competence of personnel through their recruitment and formal training.
- Independence through the accumulation and communication of relevant independence information.
- Maintenance of client relationships through acceptance and continuance systems.
- Adherence to applicable legal and regulatory requirements through the monitoring process.

**Leadership Responsibilities for Quality on Audits** (Ref: Para. 8)

- A3. The actions of the engagement partner and appropriate messages to the other members of the engagement team, in taking responsibility for the overall quality on each audit engagement, emphasize:
- (a) The importance to audit quality of:
    - (i) Performing work that complies with professional standards and applicable legal and regulatory requirements;
    - (ii) Complying with the firm's quality control policies and procedures as applicable;
    - (iii) Issuing auditor's reports that are appropriate in the circumstances; and
    - (iv) The engagement team's ability to raise concerns without fear of reprisals; and
  - (b) The fact that quality is essential in performing audit engagements.

A3-1. ISQC (UK) 1 (Revised November 2019)<sup>5a</sup> sets out requirements to ensure that securing audit quality, independence and competence are the main criteria used by the firm to select the engagement partner or key audit partner(s).

**Relevant Ethical Requirements**

*Compliance with Relevant Ethical Requirements* (Ref: Para. 9)

- A4. The IESBA Code<sup>5b</sup> establishes the fundamental principles of professional ethics, which include:
- (a) Integrity;
  - (b) Objectivity;
  - (c) Professional competence and due care;
  - (d) Confidentiality; and
  - (e) Professional behavior.

Definition of "Firm," "Network" and "Network Firm" (Ref: Para. 9–11)

- A5. The definitions of "firm," "network" or "network firm" in relevant ethical requirements may differ from those set out in this ISA (UK). For example, the IESBA Code<sup>5b</sup> defines the "firm" as:
- (a) A sole practitioner, partnership or corporation of professional accountants;
  - (b) An entity that controls such parties through ownership, management or other means; and
  - (c) An entity controlled by such parties through ownership, management or other means.

<sup>5a</sup> ISQC (UK) 1 (Revised November 2019), paragraph 30-1.

<sup>5b</sup> In the UK, auditors are subject to ethical requirements from two sources: the FRC's Ethical Standard concerning the integrity, objectivity and independence of the auditor, and the ethical pronouncements established by the auditor's relevant professional body.

The IESBA Code also provides guidance in relation to the terms "network" and "network firm."

In complying with the requirements in paragraphs 9–11, the definitions used in the relevant ethical requirements apply in so far as is necessary to interpret those ethical requirements.

*Threats to Independence* (Ref: Para. 11(c))

- A6. The engagement partner may identify a threat to independence regarding the audit engagement that safeguards may not be able to eliminate or reduce to an acceptable level. In that case, as required by paragraph 11(c), the engagement partner reports to the relevant person(s) within the firm to determine appropriate action, which may include eliminating the activity or interest that creates the threat, or withdrawing from the audit engagement, where withdrawal is possible under applicable law or regulation.

*Considerations Specific to Public Sector Entities*

- A7. Statutory measures may provide safeguards for the independence of public sector auditors. However, public sector auditors or audit firms carrying out public sector audits on behalf of the statutory auditor may, depending on the terms of the mandate in a particular jurisdiction, need to adapt their approach in order to promote compliance with the spirit of paragraph 11. This may include, where the public sector auditor's mandate does not permit withdrawal from the engagement, disclosure through a public report, of circumstances that have arisen that would, if they were in the private sector, lead the auditor to withdraw.

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

(Ref: Para. 12)

- A8. ISQC (UK) 1 (Revised November 2019) requires the firm to obtain information considered necessary in the circumstances before accepting an engagement with a new client, when deciding whether to continue an existing engagement, and when considering acceptance of a new engagement with an existing client.<sup>6</sup> Information such as the following assists the engagement partner in determining whether the conclusions reached regarding the acceptance and continuance of client relationships and audit engagements are appropriate:

- The integrity of the principal owners, key management and those charged with governance of the entity;
- Whether the engagement team is competent to perform the audit engagement and has the necessary capabilities, including time and resources;
- Whether the firm and the engagement team can comply with relevant ethical requirements; and
- Significant matters that have arisen during the current or previous audit engagement, and their implications for continuing the relationship.

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<sup>6</sup> ISQC (UK) 1 (Revised November 2019), paragraph 27(a).

- A9. Law, regulation, or relevant ethical requirements<sup>7</sup> may require the auditor to request, prior to accepting the engagement, the predecessor auditor to provide known information regarding any facts or circumstances that, in the predecessor auditor's judgment, the auditor needs to be aware of before deciding whether to accept the engagement. In some circumstances, the predecessor auditor may be required, on request by the proposed successor auditor, to provide information regarding identified or suspected non-compliance with laws and regulations to the proposed successor auditor.<sup>7a</sup> For example, where the predecessor auditor has withdrawn from the engagement as a result of identified or suspected non-compliance with laws and regulations, the IESBA Code requires that the predecessor auditor, on request by a proposed successor auditor, provides all such facts and other information concerning such non-compliance that, in the predecessor auditor's opinion, the proposed successor auditor needs to be aware of before deciding whether to accept the audit appointment.<sup>8</sup>

*Considerations Specific to Public Sector Entities* (Ref: Para. 12–13)

- A10. In the public sector, auditors may be appointed in accordance with statutory procedures. Accordingly, certain of the requirements and considerations regarding the acceptance and continuance of client relationships and audit engagements as set out in paragraphs 12, 13 and A8 may not be relevant. Nonetheless, information gathered as a result of the process described may be valuable to public sector auditors in performing risk assessments and in carrying out reporting responsibilities.

**Assignment of Engagement Teams** (Ref: Para. 14)

- A11. An engagement team includes a person using expertise in a specialized area of accounting or auditing, whether engaged or employed by the firm, if any, who performs audit procedures on the engagement. However, a person with such expertise is not a member of the engagement team if that person's involvement with the engagement is only consultation. Consultations are addressed in paragraph 18, and paragraph A22-A23.
- A12. When considering the appropriate competence and capabilities expected of the engagement team as a whole, the engagement partner may take into consideration such matters as the team's:
- Understanding of, and practical experience with, audit engagements of a similar nature and complexity through appropriate training and participation.

<sup>7</sup> See, for example, paragraph R320.8 of the IESBA Code.

In the UK, the relevant guidance on proposed communications with a predecessor auditor is provided by the pronouncements relating to the work of auditors issued by the auditor's relevant professional body.

<sup>7a</sup> In the UK, the predecessor auditor is required to provide the successor statutory auditor with access to all relevant information concerning the entity, including information concerning the most recent audit. This would include non-compliance with laws and regulations. See ISQC (UK) 1 (Revised November 2019), *Quality Control for Firms that Perform Audits and Reviews of Financial Statements*, and other Assurance and Related Services Engagements, paragraph 28-1.

<sup>8</sup> See, for example, paragraphs R360.22 and R360.23 of the IESBA Code.

In the UK, the auditor has regard to any specific requirements of the auditor's relevant professional body.

- Understanding of professional standards and applicable legal and regulatory requirements.
- Technical expertise, including expertise with relevant information technology and specialized areas of accounting or auditing.
- Knowledge of relevant industries in which the client operates.
- Ability to apply professional judgment.
- Understanding of the firm's quality control policies and procedures.

#### *Considerations Specific to Public Sector Entities*

A13. In the public sector, additional appropriate competence may include skills that are necessary to discharge the terms of the audit mandate in a particular jurisdiction. Such competence may include an understanding of the applicable reporting arrangements, including reporting to the legislature or other governing body or in the public interest. The wider scope of a public sector audit may include, for example, some aspects of performance auditing or a comprehensive assessment of compliance with law, regulation or other authority and preventing and detecting fraud and corruption.

#### **Engagement Performance**

##### *Direction, Supervision and Performance* (Ref: Para. 15(a))

A14. Direction of the engagement team involves informing the members of the engagement team of matters such as:

- Their responsibilities, including the need to comply with relevant ethical requirements, and to plan and perform an audit with professional skepticism as required by ISA (UK) 200 (Revised June 2016).<sup>9</sup>
- Responsibilities of respective partners where more than one partner is involved in the conduct of an audit engagement.
- The objectives of the work to be performed.
- The nature of the entity's business.
- Risk-related issues.
- Problems that may arise.
- The detailed approach to the performance of the engagement.

Discussion among members of the engagement team allows less experienced team members to raise questions with more experienced team members so that appropriate communication can occur within the engagement team.

A15. Appropriate teamwork and training assist less experienced members of the engagement team to clearly understand the objectives of the assigned work.

A16. Supervision includes matters such as:

- Tracking the progress of the audit engagement.

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<sup>9</sup> ISA (UK) 200 (Revised June 2016), *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing (UK)*, paragraph 15.

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

### *Reviews*

#### Review Responsibilities (Ref: Para. 16)

A17. Under ISQC (UK) 1 (Revised November 2019), the firm's review responsibility policies and procedures are determined on the basis that work of less experienced team members is reviewed by more experienced team members.<sup>10</sup>

A18. A review consists of consideration whether, for example:

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

#### The Engagement Partner's Review of Work Performed (Ref: Para. 17)

A19. Timely reviews of the following by the engagement partner at appropriate stages during the engagement allow significant matters to be resolved on a timely basis to the engagement partner's satisfaction on or before the date of the auditor's report:

- Critical areas of judgment, especially those relating to difficult or contentious matters identified during the course of the engagement;
- Significant risks; and
- Other areas the engagement partner considers important.

The engagement partner need not review all audit documentation, but may do so. However, as required by ISA (UK) 230 (Revised June 2016), the partner documents the extent and timing of the reviews.<sup>11</sup>

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<sup>10</sup> ISQC (UK) 1 (Revised November 2019), paragraph 33.

<sup>11</sup> ISA (UK) 230 (Revised June 2016), paragraph 9(c).

A20. An engagement partner taking over an audit during the engagement may apply the review procedures as described in paragraph A19 to review the work performed to the date of a change in order to assume the responsibilities of an engagement partner.

*Considerations Relevant Where a Member of the Engagement Team with Expertise in a Specialized Area of Accounting or Auditing Is Used* (Ref: Para. 15–17)

A21. Where a member of the engagement team with expertise in a specialized area of accounting or auditing is used, direction, supervision and review of that engagement team member's work may include matters such as:

- Agreeing with that member the nature, scope and objectives of that member's work; and the respective roles of, and the nature, timing and extent of communication between that member and other members of the engagement team.
- Evaluating the adequacy of that member's work including the relevance and reasonableness of that member's findings or conclusions and their consistency with other audit evidence.

*Consultation* (Ref: Para. 18)

A22. Effective consultation on significant technical, ethical, and other matters within the firm or, where applicable, outside the firm can be achieved when those consulted:

- Are given all the relevant facts that will enable them to provide informed advice; and
- Have appropriate knowledge, seniority and experience.

A23. It may be appropriate for the engagement team to consult outside the firm, for example, where the firm lacks appropriate internal resources. They may take advantage of advisory services provided by other firms, professional and regulatory bodies, or commercial organizations that provide relevant quality control services.

*Engagement Quality Control Review*

Completion of the Engagement Quality Control Review before Dating of the Auditor's Report (Ref: Para. 19(c))

A24. ISA (UK) 700 (Revised November 2019) requires the auditor's report to be dated no earlier than the date on which the auditor has obtained sufficient appropriate evidence on which to base the auditor's opinion on the financial statements.<sup>12</sup> In cases of an audit of financial statements of listed entities or when an engagement meets the criteria for an engagement quality control review, such a review assists the auditor in determining whether sufficient appropriate evidence has been obtained.

A25. Conducting the engagement quality control review in a timely manner at appropriate stages during the engagement allows significant matters to be promptly resolved to the engagement quality control reviewer's satisfaction on or before the date of the auditor's report.

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<sup>12</sup> ISA (UK) 700 (Revised November 2019), *Forming an Opinion and Reporting on Financial Statements*, paragraphs 49–49-2.

A26. Completion of the engagement quality control review means the completion by the engagement quality control reviewer of the requirements in paragraphs 20–21, and where applicable, compliance with paragraph 22. Documentation of the engagement quality control review may be completed after the date of the auditor's report as part of the assembly of the final audit file. ISA (UK) 230 (Revised June 2016) establishes requirements and provides guidance in this regard.<sup>13</sup>

Nature, Extent and Timing of Engagement Quality Control Review (Ref: Para. 20)

A27. Remaining alert for changes in circumstances allows the engagement partner to identify situations in which an engagement quality control review is necessary, even though at the start of the engagement, such a review was not required.

A28. The extent of the engagement quality control review may depend, among other things, on the complexity of the audit engagement, whether the entity is a listed entity, and the risk that the auditor's report might not be appropriate in the circumstances. The performance of an engagement quality control review does not reduce the responsibilities of the engagement partner for the audit engagement and its performance.

A29. When ISA (UK) 701 (Revised November 2019)<sup>14</sup> applies, the conclusions reached by the engagement team in formulating the auditor's report include determining:

- The key audit matters to be included in the auditor's report;
- The key audit matters that will not be communicated in the auditor's report in accordance with paragraph 14 of ISA (UK) 701 (Revised November 2019), if any; and
- If applicable, depending on the facts and circumstances of the entity and the audit, that there are no key audit matters to communicate in the auditor's report.

In addition, the review of the proposed auditor's report in accordance with paragraph 20(b) includes consideration of the proposed wording to be included in the Key Audit Matters section.

Engagement Quality Control Review of Listed Entities (Ref: Para. 21)

A30. Other matters relevant to evaluating the significant judgments made by the engagement team that may be considered in an engagement quality control review of a listed entity include:

- Significant risks identified during the engagement in accordance with ISA (UK) 315 (Revised July 2020),<sup>15</sup> and the responses to those risks in accordance with ISA (UK) 330 (Revised July 2017),<sup>16</sup> including the engagement team's assessment of, and response to, the risk of fraud in accordance with ISA (UK) 240 (Revised May 2021).<sup>17</sup>

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<sup>13</sup> ISA (UK) 230 (Revised June 2016), paragraphs 14–16.

<sup>14</sup> ISA (UK) 701 (Revised November 2019), *Communicating Key Audit Matters in the Auditor's Report*.

<sup>15</sup> ISA (UK) 315 (Revised July 2020), *Identifying and Assessing the Risks of Material Misstatement*.

<sup>16</sup> ISA (UK) 330 (Revised July 2017), *The Auditor's Responses to Assessed Risks*.

<sup>17</sup> ISA (UK) 240 (Revised May 2021), *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*.

- Judgments made, particularly with respect to materiality and significant risks.
- The significance and disposition of corrected and uncorrected misstatements identified during the audit.
- The matters to be communicated to management and those charged with governance and, where applicable, other parties such as regulatory bodies.

These other matters, depending on the circumstances, may also be applicable for engagement quality control reviews for audits of financial statements of other entities.

#### Considerations Specific to Smaller Entities (Ref: Para. 20–21)

A31. In addition to the audits of financial statements of listed entities, an engagement quality control review is required for audit engagements that meet the criteria established by the firm that subjects engagements to an engagement quality control review. In some cases, none of the firm's audit engagements may meet the criteria that would subject them to such a review.

#### Considerations Specific to Public Sector Entities (Ref: Para. 20–21)

A32. In the public sector, a statutorily appointed auditor (for example, an Auditor General, or other suitably qualified person appointed on behalf of the Auditor General), may act in a role equivalent to that of engagement partner with overall responsibility for public sector audits. In such circumstances, where applicable, the selection of the engagement quality control reviewer includes consideration of the need for independence from the audited entity and the ability of the engagement quality control reviewer to provide an objective evaluation.

A33. Listed entities as referred to in paragraphs 21 and A30 are not common in the public sector. However, there may be other public sector entities that are significant due to size, complexity or public interest aspects, and which consequently have a wide range of stakeholders. Examples include state owned corporations and public utilities. Ongoing transformations within the public sector may also give rise to new types of significant entities. There are no fixed objective criteria on which the determination of significance is based. Nonetheless, public sector auditors evaluate which entities may be of sufficient significance to warrant performance of an engagement quality control review.

#### Public Interest Entities (Ref: Para. 21-1–21-3)

A33-1. In rare circumstances, there may be no matters to discuss with key audit partners, and the engagement quality control reviewer may conclude that a discussion with the key audit partners is therefore unnecessary, having documented the rationale for this decision.

A33-2. Documentation may take many different forms. For example, it may include a file note of the discussion between the engagement quality control reviewer and the key audit partner(s) as necessary, where the results of the review are discussed, covering at least the elements required by paragraphs 21-1(a)–21-1(h), and including any agreed actions arising from that discussion.

A33-3. It is important that the documentation demonstrates a robust appraisal of the quality of the work performed and the conclusions reached by the engagement team. A simple sign off or completion of a checklist is unlikely to demonstrate a robust appraisal.

A33-4. When assessing the appropriateness of the engagement team's judgements and conclusions, the engagement quality control reviewer may consider alternative outcomes. In such circumstances, the engagement quality control reviewer may find it beneficial to document such an assessment as a way to demonstrate they have performed a robust appraisal of the work performed and the conclusions reached.

**Monitoring** (Ref: Para. 23)

- A34. ISQC (UK) 1 (Revised November 2019) requires the firm to establish a monitoring process designed to provide it with reasonable assurance that the policies and procedures relating to the system of quality control are relevant, adequate and operating effectively.<sup>18</sup>
- A35. In considering deficiencies that may affect the audit engagement, the engagement partner may have regard to measures the firm took to rectify the situation that the engagement partner considers are sufficient in the context of that audit.
- A36. A deficiency in the firm's system of quality control does not necessarily indicate that a particular audit engagement was not performed in accordance with professional standards and applicable legal and regulatory requirements, or that the auditor's report was not appropriate.

**Documentation**

*Documentation of Consultations* (Ref: Para. 24(d))

- A37. Documentation of consultations with other professionals that involve difficult or contentious matters that is sufficiently complete and detailed contributes to an understanding of:
- The issue on which consultation was sought; and
  - The results of the consultation, including any decisions taken, the basis for those decisions and how they were implemented.

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<sup>18</sup> ISQC (UK) 1 (Revised November 2019), paragraph 48.



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