

PROPOSED INTERNATIONAL STANDARD ON QUALITY MANAGEMENT 1 (PREVIOUSLY INTERNATIONAL STANDARD ON QUALITY CONTROL 1) – QUALITY MANAGEMENT FOR FIRMS THAT PERFORM AUDITS OR REVIEWS OF FINANCIAL STATEMENTS, OR OTHER ASSURANCE OR RELATED SERVICES ENGAGEMENTS

(Effective as of December 15, 2022)

TRACK CHANGES FROM MARCH 2020 / JUNE 2020

Track changes in this document:

The track changes in this document are as follows:

- Items presented in June 2020, which are **highlighted in grey** in this document: The track changes are from June 2020 Agenda Item 5-A
- Items not presented in June 2020: The track changes are from March 2020 Agenda Item 4-A (Updated)

The paragraph numbers in this document have been renumbered since March 2020 / June 2020. Changes to the paragraph numbers and references to the paragraphs are not shown in track changes. However, Appendix 1 indicates the paragraph numbers in March 2020 / June 2020 and the new number that has been assigned in this document.

How to provide written comments

If providing written comments, Board members are asked to provide suggested wording in a comment box, rather than as changes to the text in the draft. If it is not possible to provide suggested wording in a comment box, please indicate in a comment box that there are suggested changes in the text. This will help Staff combine all comments from Board members in a more efficient manner.

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Proposed International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, should be read in conjunction with the *Preface to the International Quality Management, Auditing, Review, Other Assurance, and Related Services Pronouncements*.

Introduction	Application and Other Explanatory Material
<p>Scope of this ISQM</p>	<p>Scope of this ISQM (Ref: Para. 3–4)</p>
<p>1. This International Standard on Quality Management (ISQM) deals with a firm’s responsibilities to design, implement and operate a system of quality management for audits or reviews of financial statements, or other assurance or related services engagements.</p> <p><u>2. Engagement quality reviews form part of the firm’s system of quality management and:</u></p> <p><u>(a) This ISQM addresses the firm’s responsibility to establish policies or procedures for which engagements are required to be subject to engagement quality reviews.</u></p> <p><u>(b) ISQM 2¹ deals with the appointment and eligibility of the responsibility of the firm and engagement quality reviewers, and the performance and</u></p>	

¹ Proposed ISQM 2, *Engagement Quality Reviews*

<p>documentation of the relating to engagement quality reviews.</p> <p>This ISQM is to be read in conjunction with relevant ethical requirements.</p>	
<p>3. Other pronouncements of the International Auditing and Assurance Standards Board (IAASB):</p> <p>(a) Are premised on the basis that the firm is subject to the ISQMs or to national requirements that are at least as demanding;² and</p> <p>(b) Include requirements for engagement partners and engagement teamother personnel regarding quality management at the engagement level. For example, ISA 220 (Revised), for example, deals with the specific responsibilities of the auditor regarding quality management at the</p>	<p>A1. Other pronouncements of the IAASB, including ISRE 2400 (Revised)³ and ISAE 3000 (Revised),⁴ also establish requirements for the engagement partner for the management of quality at the engagement level.</p>

² See, for example, Proposed International Standard on Auditing (ISA) 220 (Revised), *Quality Management for an Audit of Financial Statement* (Revised), paragraph 3

³ International Standard on Review Engagements (ISRE) 2400 (Revised), *Engagements to Review Historical Financial Statements*

⁴ International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

<p>engagement level for an audit of financial statements and the related responsibilities of the engagement partner. (Ref: Para. A1)</p>	
<p>4. <u>This ISQM is to be read in conjunction with relevant ethical requirements.</u> Law, regulation or relevant ethical requirements may establish responsibilities for the firm’s management of quality beyond those described in this ISQM. (Ref: Para. A2)</p>	<p>A2. <i>[Moved from paragraph A2 (previously attached to paragraph 7 in June 2020 draft)]</i> The IESBA Code⁵ contains requirements and application material for professional accountants that enable professional accountants to meet their responsibility to act in the public interest. In the context of engagement performance as described in this ISQM, the consistent performance of quality engagements forms part of the professional accountant’s responsibility to act in the public interest.</p>
<p>5. This ISQM applies to all firms performing audits or reviews of financial statements, or other assurance or related services engagements (i.e., if the firm performs any of these engagements, this ISQM applies).</p>	
<p>The Firm’s System of Quality Management</p>	<p>The Firm’s System of Quality Management (Ref: Para. 6–9)</p>
<p>6. A system of quality management is continual, and iterative and is responsive to changes in the nature</p>	<p>A3. The firm may use different terminology or frameworks to describe the components of its system of quality management.</p>

⁵ The International Ethics Standards Board for Accountants’ *International Code of Ethics for Professional Accountants (including International Independence Standards)* (IESBA Code)

<p>and circumstances of the firm and its engagements. It also does not operate in a linear manner. However, for the purposes of this ISQM, a system of quality management addresses the following eight components: (Ref: Para. A3)</p> <ul style="list-style-type: none"> (a) The firm’s risk assessment process; (b) Governance and leadership; (c) Relevant ethical requirements; (d) Acceptance and continuance of client relationships and specific engagements; (e) Engagement performance; (f) Resources; (g) Information and communication; and (h) The monitoring and remediation process. 	
<p>7. [Moved to paragraph 15]</p>	<p>A2. [Moved to paragraph A2 (attached to paragraph 4)]</p> <p>A3. [Moved to paragraph A5]</p>
<p>7. This ISQM requires the firm to apply a risk-based approach in designing, implementing and</p>	<p>A4. Examples of the interconnected nature of the components include the following:</p>

<p>operating the components of the system of quality management in an interconnected and coordinated manner such that <u>the firm proactively manages</u> the quality of engagements <u>performed by the firm</u> is proactively managed by the firm. (Ref: Para. A4)</p>	<ul style="list-style-type: none"> • The firm’s risk assessment process sets out the process the firm is required to follow in implementing <u>at the</u> risk-based approach to quality management, and applies across the system of quality management. • The governance and leadership component provides the basis for the system of quality management and also creates <u>establishes</u> the environment <u>that supports</u> in which the other components of the system of quality management operate. • <u>The resources and</u> The information and communication and resources components enable the design, implementation and operation of the system of quality management. • The monitoring and remediation process is a process designed to monitor the entire system of quality management. The results of the monitoring and remediation process may provide information that is relevant to the firm’s risk assessment process. • There may be interrelationships of specific matters, for example, <u>certain</u> aspects of relevant ethical requirements may be <u>are</u> relevant when to accepting and continuing client relationships and specific engagements.
<p>8. The risk-based approach is embedded in the requirements of this ISQM through:</p> <p>(a) Establishing quality objectives. The quality objectives established by the firm consist of objectives in relation to the components of the system of quality management that are to be achieved by the firm. The firm is required to establish the quality objectives <u>specified</u> out by <u>in</u> this ISQM and any additional quality objectives</p>	

<p>beyond those specified by this ISQM that are considered necessary by the firm to achieve the objectives of the system of quality management.</p> <p>(b) Identifying and assessing risks to the achievement of the quality objectives (referred to in this standard as quality risks). The firm is required to identify and assess quality risks to provide a basis for the designing and implementing of responses.</p> <p>(c) Designing and implementing responses to address the assessed-quality risks. The nature, timing and extent of the firm's responses to address the assessed-quality risks are based on, and responsive to, the reasons for the assessments given to the quality risks.</p>	
<p>9. <u>The purpose of a system of quality management is to provide the firm with reasonable assurance that the objectives of the system of quality</u></p>	<p>A5. <i>[Moved from paragraph A3]</i> Reasonable assurance is obtained when the firm's-system of quality management reduces to an acceptably low level the risk that the objectives stated in paragraph 14(a) and (b) are not achieved. Reasonable assurance is not an absolute level of assurance, because there are inherent limitations of a system of quality management. Such limitations include</p>

<p><u>management, stated in paragraph 14(a) and (b), are achieved.</u> This ISQM requires that, at least annually, the individual(s) assigned ultimate responsibility and accountability for the system of quality management evaluates the system of quality management and <u>the firm</u> concludes whether the system of quality management provides the firm with reasonable assurance that the objectives of the system are being achieved. (Ref: Para. A5)</p>	<p>that human judgment in decision making can be faulty and that breakdowns in a firm's system of quality management may occur, for example, due to human error or behavior or failures in IT applications.</p>
<p><i>Scalability</i></p> <p>10. In applying a risk-based approach, the firm is required to take into account:</p> <ul style="list-style-type: none"> (a) The nature and circumstances of the firm; and (b) The nature and circumstances of the engagements performed by the firm. <p>Accordingly, the design of the firm's system of quality management, in particular the complexity and formality of the system, will vary. For example, a firm that performs</p>	

<p>different types of engagements for a wide variety of entities, including audits of financial statements of listed entities, will likely need to have a more complex and and more formalized system of quality management and supporting documentation, than a firm that performs only reviews of financial statements or compilation engagements.</p>	
<p>Use of the Terms “Personnel,” “Individuals,” and “Engagement Team” in this ISQM</p> <p>13B. In this ISQM, the following terms are used and applied as attributed below:</p> <ul style="list-style-type: none">• Personnel: Requirements of this ISQM that refer to personnel apply to partners and people employed by the firm, including people in a service delivery center of the firm.• Individuals: Requirements of this ISQM that refer to individuals apply to:<ul style="list-style-type: none">○ Personnel as described above; and	

<ul style="list-style-type: none"> ○ People used by the firm from a network, another network firm or a service provider to perform procedures on an engagement or activities within the system of quality management, including people in a service delivery center of a network or another network firm, component auditors and external experts. ● Engagement teams: Requirements of this ISQM that refer to engagement teams apply to all individuals included in the definition of engagement team, including component auditors. 	
<p><i>Networks and Service Providers</i></p> <p>11. This ISQM addresses the firm's responsibilities when the firm's system of quality management may include:</p> <p>(a) Belongs to a network , and the firm is required to comply with nNetwork requirements</p>	

or uses network services in ~~circumstances when the firm belongs to a network~~the system of quality management or in performing engagements; or

- (b) Uses R~~esources that are obtained~~ from a service provider in the system of quality management or in performing engagements ~~that are external to the firm or external to the network when the firm belongs to a network.~~

Even when the firm ~~Notwithstanding the firm's responsibility to comply~~ with network requirements, or ~~the use~~s of network services or resources from a service provider, the firm is~~remains~~ responsible for its system of quality management. ~~Accordingly, this ISQM addresses the firm's responsibility in circumstances when the system of quality management includes network requirements or network services or resources from a service provider.~~

Authority of this ISQM	Authority of this ISQM (Ref: Para. 12)
<p>12. This ISQM contains the objective of the firm in following this ISQM, and requirements designed to enable the firm to meet that stated objective. In addition, this ISQM# contains related guidance in the form of application and other explanatory material and introductory material that provides context relevant to a proper understanding of this ISQM, and definitions. (Ref: Para. A6–A9)</p>	<p>A6. The objective of this ISQM provides the context in which the requirements of this ISQM are set, establishes the desired outcome of this ISQM and is intended to assist the firm in understanding what needs to be accomplished and, where necessary, the appropriate means of doing so.</p> <p>A7. The requirements of this ISQM are expressed using “shall.”</p> <p>A8. Where necessary, the application and other explanatory material provides further explanation of the requirements and guidance for carrying them out. In particular, it may:</p> <ul style="list-style-type: none"> • Explain more precisely what a requirement means or is intended to cover; and • Include examples that illustrate how the requirements might be applied. <p>While such guidance does not in itself impose a requirement, it is relevant to the proper application of the requirements. The application and other explanatory material may also provide background information on matters addressed in this ISQM. Where appropriate, additional considerations specific to public sector audit organizations are included within the application and other explanatory material. These additional considerations assist in the application of the requirements in this ISQM. They do not, however, limit or reduce the responsibility of the firm to apply and comply with the requirements in this ISQM.</p> <p>A9. This ISQM includes, under the heading “Definitions,” a description of the meanings attributed to certain terms for purposes of this ISQM. These definitions are provided to assist in the consistent application and interpretation of this ISQM, and are not intended to override definitions that may be established for other purposes, whether in law, regulation or otherwise. The Glossary of Terms relating to International Standards issued by the IAASB in the <i>Handbook of International Quality Management, Auditing, Review, Other Assurance, and Related Services Pronouncements</i> published by IFAC includes the terms defined in this ISQM. The Glossary of Terms also includes descriptions of other terms found in the ISQMs to assist in common and consistent interpretation and translation.</p>

<p>Effective Date</p>	
<p>13. Systems of quality management in compliance with this ISQM are required to be designed and implemented by <u>December 15, 2022TBD</u>, and the evaluation of the system of quality management required by paragraphs 53–54 of this ISQM is required to be performed within one year following <u>December 15, 2022TBD</u>.</p>	
<p>Objective</p>	
<p>14. The objective of the firm is to design, implement and operate a system of quality management for audits or reviews of financial statements, or other assurance or related services engagements performed by the firm, that provides the firm with reasonable assurance that:</p> <p>(a) The firm and its personnel fulfill their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance</p>	

<p>with such standards and requirements; and</p> <p>(b) Engagement reports issued by the firm or engagement partners are appropriate in the circumstances.</p> <p>15. <i>[Moved from paragraph 7]</i> The public interest is served by the consistent performance of quality engagements. The design, implementation and operation of the system of quality management supports—enables the consistent performance of quality engagements by providing the firm with reasonable assurance that the objectives of the system of quality management, stated in paragraph 18(a) and (b), are achieved. Quality engagements are achieved through planning and performing engagements and reporting on them in accordance with professional standards and applicable legal and regulatory requirements. Achieving the objectives of those standards and complying with the requirements of applicable law or regulation involves exercising professional judgment and, when applicable to</p>	
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<p>the type of engagement, exercising professional skepticism.</p>	
<p>Definitions</p>	<p>Definitions</p>
<p>16. For purposes of this ISQM, the following terms have the meanings attributed below:</p>	
<p>(a) Deficiency in the firm’s system of quality management (referred to as “deficiency” in this ISQM) – This exists when: (Ref: Para. A10, A159)</p> <p>(i) A quality objective required to achieve the objective of the system of quality management is not established;</p> <p>(ii) A quality risk, or combination of quality risks, is not identified or properly assessed; (Ref: Para. A11)</p> <p>(iii) A response, or combination of responses, does not reduce to an acceptably low level the likelihood of a related quality risk</p>	<p><i>Deficiencies</i> (Ref: Para. 16(a))</p> <p>A10. The firm identifies deficiencies through evaluating findings. A deficiency may arise from a finding, or a combination of findings.</p> <p>A11. When a deficiency is identified as a result of a quality risk, or combination of quality risks, not being identified or properly assessed, the response(s) to address such quality risk(s) may be likely to also be absent, or not appropriately designed or implemented.</p> <p>A12. In the context of this ISQM, the other aspects of the system of quality management consist of the requirements in this ISQM addressing:</p> <ul style="list-style-type: none"> • Assigning responsibilities (paragraphs 20–22); • The firm’s risk assessment process; • The monitoring and remediation process; and • The evaluation of the system of quality management. <div style="border: 1px solid black; padding: 5px;"> <p><i>Examples of deficiencies related to other aspects of the firm’s system of quality management</i></p> <ul style="list-style-type: none"> • The firm’s risk assessment process fails to identify information that indicates changes in the nature and circumstances of the firm and its engagements and the need to establish additional quality objectives need to be established, or <u>modify the</u> quality risks or responses modified. • The firm’s monitoring and remediation process is not designed or implemented in a manner that: </div>

<p>occurring because the response(s) is not properly designed, implemented or operating effectively; <u>or</u>-</p> <p>(iv) An other aspect of the system of quality management is absent, or not properly designed, implemented or operating effectively, such that a requirement of this ISQM has not been addressed. (Ref: Para. A12)</p>	<ul style="list-style-type: none"> ○ Provides relevant, reliable and timely information about the design, implementation and operation of the system of quality management. ○ Enables the firm to take appropriate actions to respond to identified deficiencies such that deficiencies are remediated on a timely basis. ● The individual(s) assigned ultimate responsibility and accountability for the system of quality management does not undertake the annual evaluation of the system of quality management.
<p>(b) Engagement documentation – The record of work performed, results obtained, and conclusions the practitioner reached (terms such as “working papers” or “work papers” are sometimes used).</p>	
<p>(c) Engagement partner⁶ – The partner or other individual,</p>	

⁶ “Engagement partner” and “partner” should be read as referring to their public sector equivalents where relevant.

<p>appointed by the firm, who is responsible for the engagement and its performance, and for the report that is issued on behalf of the firm, and who, where required, has the appropriate authority from a professional, legal or regulatory body.</p>	
<p>(d) Engagement quality review – An objective evaluation of the significant judgments made by the engagement team and the conclusions reached thereon, performed by the engagement quality reviewer and completed on or before the date of the engagement report.</p>	
<p>(e) Engagement quality reviewer – A partner, other individual in the firm, or an external individual, appointed by the firm to perform the engagement quality review.</p>	
<p>(f) Engagement team – All partners and staff performing the engagement, and any</p>	<p><u>A13. Proposed ISA 220 (Revised)⁸ provides guidance in applying the definition of engagement team in the context of an audit of financial statements.</u></p>

⁸ [Proposed ISA 220 \(Revised\), paragraphs A15–A21](#)

<p>other individuals who perform procedures on the engagement, excluding an external expert engaged by the firm or a network firm⁷ and internal auditors who provide direct assistance on an engagement. (Ref: Para. A13)</p>	
<p>(g) External inspections – Inspections or investigations undertaken by an external oversight authority, related to the firm’s system of quality management or engagements performed by the firm. (Ref: Para. A14)</p>	<p><i>External Inspections</i> (Ref: Para. 16(g))</p> <p>A14. In some circumstances, an external oversight authority may undertake other types of reviews inspections, for example, thematic reviews that focus on, for a selection of firms, particular aspects of audit engagements or firm-wide practices.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>Example of another type of review undertaken by an external oversight authority</i></p> <p>Thematic reviews of specific areas of focus that cross multiple audit firms, which are focused on matters that contribute to the improvement of engagement quality.</p> </div>
<p>(h) Findings (in relation to a system of quality management) – Information about the design, implementation and operation of the system of quality management that has been accumulated from the performance of monitoring activities, external inspections and other</p>	<p><i>Findings</i> (Ref: Para. 16(h))</p> <p>A15. As part of accumulating findings, information accumulated from the performance of monitoring activities, external inspections and other relevant sources, the firm may identify/reveal other observations about the firm’s system of quality management, such as positive outcomes or opportunities for the firm to improve, or further enhance, the system of quality management. Paragraph A157 further explains how other observations may be used by the firm in the system of quality management.</p> <p>A16. Paragraph A148 provides examples of information from other relevant sources.</p>

⁷ ISA 620, *Using the Work of an Auditor’s Expert*, paragraph 6(a), defines the term “auditor’s expert.”

<p>relevant sources, which indicates that one or more deficiencies may exist. (Ref: Para. A15–A17)</p>	<p>A17. Monitoring activities include monitoring at the engagement level, such as inspection of engagements. Furthermore, external inspections and other relevant sources may include information that relates to specific engagements. As a result, information about the design, implementation and operation of the system of quality management includes engagement-level findings that may be indicative of findings in relation to the system of quality management.</p>
<p>(i) Firm – A sole practitioner, partnership or corporation or other entity of professional accountants, or public sector equivalent. (Ref: Para. A18)</p>	<p><i>Firm</i> (Ref: Para. 16(i)) A18. The definition of “firm” in relevant ethical requirements may differ from the definition set out in this ISQM.</p>
<p>(j) 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.</p>	
<p>(k) Network firm – A firm or entity that belongs to a network.</p>	
<p>(l) Network ⁹ – A larger structure: (Ref: Para. A19–A20) (i) That is aimed at cooperation, and</p>	<p><i>Network</i> (Ref: Para. 16(l), 48) A19. Networks and the firms within the network may be structured in a variety of ways. <u>In the context of a firm’s system of quality management:</u>In some instances,</p>

⁹ —As defined in the IESBA Code

<p>(ii) That is clearly aimed at profit or cost-sharing or shares common ownership, control or management, common quality management policies or procedures, common business strategy, the use of a common brand name, or a significant part of professional resources.</p>	<ul style="list-style-type: none"> • <u>The network may establish requirements for the firm related to its system of quality management, or provide services that are used by the firm in its system of quality management or in performing engagements;</u> • <u>Other firms within the network-firms</u> may provide services (e.g., resources) that are used by the firm in its system of quality management <u>or in performing engagements; or-</u> • There may also be circumstances when the network includes oOther structures or organizations <u>within the network may</u>that establish requirements for the firm related to its system of quality management, or provides services. <p>For the purposes of this ISQM, networks and the other firms within the network are external to the firm andany network requirements or network services that are obtained from the network, <u>another firm within the network-firms</u> or another structure or organization in the network are considered “network requirements or network services.” Services used by the firm in the system of quality management that are obtained from outside of the network, network firms or another structure or organization in the network are considered services obtained from “service providers.”</p> <p>A20. The IESBA Code <u>defines and</u> provides guidance in relation to the terms “network” and “network firm.”</p>
<p>(m) Partner – Any individual with authority to bind the firm with respect to the performance of a professional services engagement.</p>	
<p><u>(n) Personnel – Partners and staff. (Ref: Para. A21–A22)</u></p>	<p><u>Personnel (Ref: Para. 16(n))</u></p> <p><u>A21. Personnel includes partners and staff in a service delivery center of the firm.</u></p> <p><u>A22. In addition to its personnel, the firm may use other individuals external to the firm in performing activities in the system of quality management or in performing engagements.</u></p>
<p>(o) Professional judgment – The application of relevant</p>	

<p>training, knowledge and experience, within the context of professional standards, in making informed decisions about the courses of action that are appropriate in the design, implementation and operation of the firm's system of quality management.</p>	
<p>(p) Professional standards – IAASB Engagement Standards, as defined in the IAASB's <i>Preface to the International Quality Management, Auditing, Review, Other Assurance and Related Services Pronouncements</i>, and relevant ethical requirements.</p>	
<p>(q) Quality objectives – The desired outcomes in relation to the components of the system of quality management to be achieved by the firm.</p>	

<p>(r) Quality risk – A risk that has a reasonable possibility of:</p> <p>(i) Occurring; and</p> <p>(ii) Individually, or in combination with other risks, adversely affecting the achievement of one or more quality objectives.</p>	<p>Quality Risk (Ref: Para. 19(g))</p> <p>A11C. The firm exercises professional judgment in determining the degree to which a risk, individually, or in combination with other risks, may adversely affect the achievement of a quality objective(s), and whether the risk is a quality risk. The degree may vary based on the conditions, events, circumstances, actions or inactions giving rise to the risk and how the risk affects the quality objective(s).</p>
<p>(s) Reasonable assurance – In the context of the ISQMs, a high, but not absolute, level of assurance.</p>	
<p>(t) Relevant ethical requirements – Principles of professional ethics and ethical requirements that are applicable to professional accountants when undertaking engagements that are audits or reviews of financial statements or other assurance or related services engagements. Relevant ethical requirements ordinarily comprise the provisions of the IESBA Code related to</p>	<p><i>Relevant Ethical Requirements</i> (Ref: Para. 16(t), 29)</p> <p>A23. The relevant ethical requirements that are applicable in the context of a system of quality management may vary, depending on the nature and circumstances of the firm and its engagements. The term “professional accountant” may be defined in relevant ethical requirements. For example, the IESBA Code defines the term “professional accountant” and further explains the scope of provisions in the IESBA Code that apply to individual professional accountants in public practice and their firms.</p> <p>A24. The IESBA Code addresses circumstances when law or regulation precludes the professional accountant from complying with certain parts of the IESBA Code. It further acknowledges that some jurisdictions might have provisions in law or regulation that differ from or go beyond those set out in the IESBA Code and that professional accountants in those jurisdictions need to be aware of those differences and comply with the more stringent provisions, unless prohibited by law or regulation.</p>

audits or reviews of financial statements, or other assurance or related services engagements, together with national requirements that are more restrictive. (Ref: Para. A23–A25, A62)

A25. Various provisions of the relevant ethical requirements may apply only to ~~individuals~~personnel in the context of performing engagements and not the firm itself. For example:

- Part 2 of the IESBA Code applies to individuals who are professional accountants in public practice when performing professional activities pursuant to their relationship with the firm, whether as a contractor, employee or owner, and may be relevant in the context of performing engagements.
- Certain requirements in Parts 3 and 4 of the IESBA Code address the individual professional accountant in public practice when performing professional activities for clients.

Compliance with such relevant ethical requirements by individuals may need to be addressed by the firm's system of quality management. ~~may need to address personnel's compliance with such relevant ethical requirements.~~

Examples of relevant ethical requirements that are applicable only to ~~individuals~~personnel and not the firm, and which relate to ~~the performing~~ance of engagements

~~Part 2 of the IESBA Code applies to individuals who are professional accountants in public practice when performing professional activities pursuant to their relationship with the firm, whether as a contractor, employee or owner.~~ Part 2 of the IESBA Code addresses: Pressure to breach the fundamental principles, and includes requirements that an individual shall not:

- Allow pressure from others to result in a breach of compliance with the fundamental principles; or
- Place pressure on others that the accountant knows, or has reason to believe, would result in the other individuals breaching the fundamental principles.

~~In the context of performing engagements, pressure to breach the fundamental principles~~For example, circumstances may arise when, in performing an engagement, an individual considers that the engagement partner or another senior member of the engagement team has ~~pressured~~de ~~them an engagement team member or the engagement quality reviewer~~ to breach the fundamental principles.

	<p>Preparation and presentation of information, and includes requirements for professional accountants when preparing and presenting information for clients or their firms and therefore applies to personnel performing a compilation engagement.</p>
<p>(u) Response (in relation to a system of quality management) – Policies or procedures designed and implemented by the firm to address one or more an assessed quality risk(s): (Ref: Para. A26–A28, A50)</p> <p>(i) Policies are statements of what should, or should not, be done to address an assessed quality risk(s). Such statements may be documented, explicitly stated in communications or implied through actions and decisions.</p> <p>(ii) Procedures are actions to implement policies.</p>	<p><i>Response</i> (Ref: Para. 16(u))</p> <p>A26. Policies are implemented through the actions of personnel and other individuals whose actions are subject to the policies <u>(including engagement teams)</u>, or through their restraint from taking actions that would conflict with the firm’s policies.</p> <p>A27. Procedures may be mandated, through formal documentation or other communications, or may result from behaviors that are not mandated but are rather conditioned by the firm’s culture. Procedures may be enforced through the actions permitted by IT applications, or other aspects of the firm’s IT environment.</p> <p><u>A28. If the firm uses individuals external to the firm in the system of quality management or in performing engagements, different policies or procedures may need to be designed by the firm to address the actions of the individuals.</u></p>
<p>(v) Service provider (in the context of this ISQM) – An individual or organization external to the firm, that <u>provides a resource that is</u></p>	

<p>engaged by the firm and used in the system of quality management or in, including in the performance of engagements. Service providers exclude the firm's networks, other firms within the network or other structures or organizations in the network. (Ref: Para. A105)</p>	
<p>(w) Staff – Professionals, other than partners, including any experts the firm employs.</p>	
<p>(x) System of quality management – A system designed, implemented and operated by a firm to provide the firm with reasonable assurance that:</p> <p>(i) The firm and its personnel fulfill their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance with</p>	

<p>such standards and requirements; and</p> <p>(ii) Engagement reports issued by the firm or engagement partners are appropriate in the circumstances.</p>	
<p>Requirements</p>	
<p>Applying, and Complying with, Relevant Requirements</p>	<p>Applying, and Complying with, Relevant Requirements (Ref: Para. 17)</p>
<p>20. [Moved to paragraph 18]</p>	
<p>17. The firm shall comply with each requirement of this ISQM unless the requirement is not relevant to the firm because of the nature and circumstances of the firm or its engagements. (Ref: Para. A29)</p>	<p>A29. <i>Examples of when a requirement of this ISQM may not be relevant to the firm</i></p> <ul style="list-style-type: none"> • The firm is a sole practitioner. For example, the requirements addressing the organizational structure and assigning roles, responsibilities and authority within the firm, direction, supervision and review and addressing differences of opinion may not be relevant. • The firm only performs engagements that are related services engagements. For example, if the firm is not required to maintain independence for the related services engagements, the requirement to obtain a documented confirmation of compliance with independence requirements from all personnel would not be relevant.
<p>18. [Moved from paragraph 20] The individual(s) assigned ultimate responsibility and accountability for the firm's system of quality management, and the individual(s) assigned operational responsibility</p>	

<p>for the firm's system of quality management shall have an understanding of this ISQM, including the application and other explanatory material, to understand the objective of this ISQM and to apply its requirements properly.</p>	
<p>System of Quality Management</p>	<p>System of Quality Management</p>
<p>19. The firm shall design, implement and operate a system of quality management. In doing so, the firm shall exercise professional judgment, taking into account the nature and circumstances of the firm and its engagements. The governance and leadership component of the system of quality management establishes the environment that supports the <u>design, implementation and operation of the system of quality management</u>, through the firm's culture, decision-making processes, actions, organizational structure and leadership. (Ref: Para. A30–A31)</p>	<p><i>Design, Implement and Operate a System of Quality Management</i> (Ref: Para. 19)</p> <p>A30. Quality management is not a separate function of the firm; it is the integration of a <u>quality culture that demonstrates a commitment to quality with and policies or procedures into the firm's strategy,</u> operational activities and <u>business</u> processes with the purpose of actively managing quality. As a result, designing the system of quality management and the firm's operational activities and <u>business</u> processes in an <u>integrated-unified</u> manner may promote a harmonious approach to managing the firm, and enhance the effectiveness of quality management.</p> <p>A22A. <i>[Moved to paragraph A33 in the March 2020 turnaround]</i></p> <p>A31. The quality of professional judgments exercised by the firm is likely to be enhanced when individuals making such judgments demonstrate an attitude that includes an inquiring mind, <u>which involves</u>including:</p> <ul style="list-style-type: none"> • <u>Considering the source, relevance and sufficiency of information obtained</u> Being open and alert for situations and information (or the lack thereof) regardingabout the system of quality management, including <u>information factors</u> related to the nature and circumstances of the firm and its engagements it performs; and • <u>Being open and alert to a need for further investigation or other action</u> Critically evaluating information obtained in formulating decisions about the system of quality management.

<p><i>Responsibilities</i></p> <p>20. The firm shall <u>assign</u>: (Ref: Para. A32–A35)</p> <p>(a) Assign <u>Ultimate</u> responsibility and accountability for the system of quality management to the firm’s chief executive officer or the firm’s managing partner (or equivalent) or, if appropriate, the firm’s managing board of partners (or equivalent); (Ref: Para. A24BA)</p> <p>(b) Assign <u>Operational</u> responsibility for <u>the system of quality management</u>;</p> <p>(c) <u>Operational responsibility for specific aspects of the system of quality management, including:</u></p> <p>(i) The system of quality management;</p> <p>(ii) Compliance with independence requirements; and (Ref: Para. A36)</p>	<p><i>Responsibilities</i> (Ref: Para. 20–21, 28(d))</p> <p>A32. The governance and leadership component includes a quality objective that the firm has an organizational structure and with appropriate assignment of roles, responsibilities and authority that <u>is appropriate to enable</u>supports the firm’s culture of quality and the design, implementation and operation of the firm’s system of quality management.</p> <p>A33. <u>Notwithstanding the assignment of responsibilities related to the system of quality management in accordance with paragraph 20, T</u>the firm remains ultimately is responsible for <u>the system of quality management and holding individuals</u> the individual(s) assigned ultimate responsibility and accountability for the system of quality management responsible and accountable for their <u>assigned roles</u> firm’s system of quality management. <u>For example, in accordance with paragraph 53, the firm is responsible for the evaluation of the system of quality management, and assigns the performance of the evaluation to the individual(s) assigned ultimate responsibility and accountability for the system of quality management.</u></p> <p><u>A34. An individual(s) assigned responsibility for the matters in paragraph 20 is typically a partner of the firm so that they have appropriate influence and authority within the firm to fulfill the requirements of paragraph 21. However, based on the legal structure of the firm, there may be circumstances when an individual(s) may not be a partner of the firm or employed by the firm but the individual(s) has the appropriate influence and authority within the firm to perform their assigned role because of arrangements made by the firm or the firm’s network.</u></p> <p>A35. How the firm assigns roles, responsibilities and authority within the firm may vary and law or regulation may impose certain requirements for the firm that affect the leadership and management structure or their assigned responsibilities. <u>An individual(s) assigned responsibility for a matter(s) in paragraph 20 may further assign roles, procedures, tasks or actions to other individuals to assist them in fulfilling their responsibilities. However, an individual(s) assigned responsibility for a matter(s) in paragraph 20 remains responsible and accountable for the responsibilities assigned to them.</u></p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>Scalability example to demonstrate how assigning roles and responsibilities may be undertaken</i></p> </div>
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<p>(iii) The monitoring and remediation process and</p>	<ul style="list-style-type: none"> • In a less complex firm, ultimate responsibility and accountability for the system of quality management may be assigned to a single managing partner with sole responsibility for the oversight of the firm. This individual may also assume responsibility for all aspects of the system of quality management, including operational responsibility for the system of quality management, compliance with independence requirements and the monitoring and remediation process. • In a more complex firm, there may be multiple levels of leadership that reflect the organizational structure of the firm, and the firm may have an independent governing body that has non-executive oversight of the firm, which may comprise external individuals. Furthermore, the firm may assign operational responsibility for specific aspects of the system of quality management <u>beyond those specified in addition to those required by</u> paragraph 20(c), such as operational responsibility for compliance with ethical requirements <u>or operational responsibility for managing a service line.</u> <p>A24BA. In some circumstances, the individual(s) assigned ultimate responsibility and accountability for the system of quality management may assign specific roles, procedures, tasks or actions to other individuals. For example, the individual(s) may determine it appropriate to assign roles, procedures, tasks or actions to other individuals with specialized experience or knowledge to support the fulfillment of the requirements of this ISQM. However, the individual(s) assigned ultimate responsibility and accountability for the system of quality management remains responsible for the system of quality management.</p> <p>A36. Compliance with independence requirements is essential to the performance of audits, or reviews of financial statements, or other assurance engagements, and is an expectation of stakeholders relying on the firm's reports. The individual(s) assigned operational responsibility for compliance with independence requirements is ordinarily responsible for the oversight of all matters related to independence so that a robust and consistent approach is designed and implemented by the firm to deal with independence requirements.</p>
<p>21.(e) In assigning the roles in sub- paragraph 20, and any other responsibilities for specific aspects of the system of quality management,</p>	<p><u>A37. Law, regulation or professional standards may establish requirements for an individual assigned responsibility for a matter(s) in paragraph 20, such as requirements for professional licensing, professional education or continuing professional development.</u></p>

<p><u>the firm shall</u> determine that the individual(s): (Ref: Para. A37)</p> <p>(a) Has<u>ve</u> the appropriate experience, knowledge, influence and authority within the firm, and sufficient time, to fulfill their assigned responsibility; and (Ref: Para. A38)</p> <p>(b#) Understand<u>s</u> their <u>assigned</u> roles to which they are being assigned responsibility and that they are accountable for fulfilling them.</p>	<p>A38. The appropriate experience and knowledge for the individual(s) assigned operational responsibility for the system of quality management may include an understanding of the firm’s strategic decisions and actions and experience with the firm’s business operations.</p> <p>A24E. To fulfill their assigned responsibility, the individual may need to understand how their role contributes to the system of quality management as a whole.</p>
<p>22. The firm shall determine that the individual(s) assigned operational responsibility for the system of quality management, compliance with independence requirements and the monitoring and remediation process have a direct line of communication to the individual(s) assigned ultimate responsibility and accountability for the system of quality management.</p>	
<p>The Firm’s Risk Assessment Process</p>	<p>The Firm’s Risk Assessment Process (Ref: Para. 23)</p>
<p>23. The firm shall design and implement a risk assessment process to establish quality</p>	<p>A39. How the firm designs the firm’s risk assessment process may be affected by the nature and circumstances of the firm, including how the firm is structured and organized.</p>

objectives, identify and assess quality risks and design and implement responses to address the ~~assessed~~ quality risks. (Ref: Para. A39–A41)

Scalability examples to demonstrate how the firm’s risk assessment process may differ

- ~~In a~~ less complex firm, ~~may have an informal risk assessment process, which is undertaken by~~ the individual(s) assigned operational responsibility for the system of quality management ~~may have a sufficient understanding of the firm and its engagements to undertake the risk assessment process independently, and may document the quality objectives, quality risks and responses in a simple form. The risk assessment process may be undertaken for the system of quality management as a whole, rather than individually for each component.~~
- ~~In a~~ more complex firm, ~~there may be~~ ~~may have~~ a ~~structured and~~ formal risk assessment process, involving multiple individuals ~~and numerous activities~~. The process may be centralized (e.g., the quality objectives, quality risks and responses are established centrally for all business units, functions and service lines) or decentralized (e.g., the quality objectives, quality risks and responses are established at a business unit, function or service line level, with the outputs combined at the firm level). The firm’s network may also provide the firm with quality objectives, quality risks and responses to be included in the firm’s system of quality management.

A40. The process of establishing quality objectives, identifying and assessing quality risks and designing and implementing responses is iterative, and the requirements of this ISQM are not intended to be addressed in a linear manner. ~~For example: [Example box removed] Examples of the iterative and nonlinear nature of the firm’s risk assessment process~~

- In identifying and assessing quality risks, the firm ~~may~~ ~~determines~~ that an additional quality objective(s) needs to be established.
- When designing and implementing responses, the firm ~~may~~ ~~determines~~ that a quality risk was not identified and assessed.

A41. Information sources that enable the firm to establish quality objectives, identify and assess quality risks and design and implement responses form part of the firm’s information and communication component and include:

- The results of the firm’s monitoring and remediation process ~~(see paragraphs 42 and A170).~~

	<ul style="list-style-type: none"> • Information from the network or service providers, including: <ul style="list-style-type: none"> ○ Information about network requirements or network services (see paragraph 48); and ○ Other information from the network, including information about the results of monitoring activities undertaken by the network across the network firms (see paragraphs 50–51). <p>Other information, both internal or external, may also be relevant to the firm’s risk assessment process, such as:</p> <ul style="list-style-type: none"> • Information regarding complaints and allegations about <u>failures to perform work in accordance with professional standards and applicable legal and regulatory requirements, or non-compliance with the firm’s policies or procedures</u>the commitment to quality of the firm or its personnel. • The results of external inspections. • Information from regulators about the entities for whom the firm performs engagements which is made available to the firm, such as information from a securities regulator about an entity for whom the firm performs engagements (e.g., irregularities in the entity’s financial statements or non-compliance with securities regulation). • Changes in the system of quality management that affect other aspects of the system, for example, changes in the firm’s resources. • Other external sources, such as regulatory actions and litigation against the firm or other firms in the jurisdiction that may highlight areas for the firm to consider.
<p>24. The firm shall establish the quality objectives specified by this ISQM and any additional quality objectives considered necessary by the firm to achieve the objectives of the system of quality management. (Ref: Para. A42–A44)</p>	<p><i>Establish Quality Objectives</i> (Ref: Para. 24)</p> <p>A42. [Example box removed] Example of circumstances that may give rise to the need for additional quality objectives Law <u>or</u>, regulation or the requirements of national standards, may <u>establish requirements that give rise to additional quality objectives, such as when</u> require the firm <u>is required</u> to appoint non-executive individuals to the firm’s governance structure, and the firm establishes additional quality objectives to address the requirements.</p>

	<p>A43. The nature and circumstances of the firm and its engagements may be such that the firm may not find it necessary to establish additional quality objectives.</p> <p>A44. The firm may establish sub-objectives to enhance the firm’s identification and assessment of quality risks, and design and implementation of responses.</p>					
<p>25. The firm shall identify and assess quality risks to provide a basis for the design and implementation of responses. In doing so, the firm shall:</p> <p>(a) Obtain an understanding of the conditions, events, circumstances, actions or inactions that may adversely affect the achievement of the quality objectives, including: (Ref: Para. A45–A47)</p> <p>(i) With respect to the nature and circumstances of the firm, <u>those relating to:</u></p> <p>a. The complexity and operating characteristics of the firm;</p> <p>b. The strategic and operational decisions and actions, business</p>	<p><i>Identify and Assess Quality Risks</i> (Ref: Para. 25)</p> <p>A45. There may be conditions, events, circumstances, actions or inactions <u>not described in paragraph 25(a)</u> that may adversely affect the achievement of a quality objective that have not been described in paragraph 22E(a).</p> <p>A46. A risk arises from how, and the degree to which, a condition, event, circumstance, action or inaction may adversely affect the achievement of a quality objective. Not all risks are quality risks. <u>The firm exercises professional judgment in determining whether a risk is a quality risk, which is based on the firm’s consideration of whether there is a reasonable possibility of the risk occurring, and individually, or in combination with other risks, adversely affecting the achievement of one or more quality objectives.</u></p> <table border="1" data-bbox="779 829 1938 1382"> <tr> <td data-bbox="779 829 1356 1013"> <p><i>Examples of the firm’s understanding of the conditions, events, circumstances, actions or inactions that may adversely affect the achievement of the quality objectives</i></p> </td> <td data-bbox="1356 829 1938 1013"> <p><i>Examples of quality risks that may arise</i></p> </td> </tr> <tr> <td data-bbox="779 1013 1356 1382"> <p>The strategic and operational decisions and actions, business processes and business model of the firm: The <u>firm’s overall financial goals are overly dependent on the extent</u> of services provided by the firm not within the scope of this ISQM are significant to the firm’s overall financial goals.</p> </td> <td data-bbox="1356 1013 1938 1382"> <p>In the context of governance and leadership, this may give rise to a number of quality risks such as:</p> <ul style="list-style-type: none"> Resources are allocated or assigned in a manner that prioritizes the services not within the scope of this ISQM and may negatively affect the quality of engagements within the scope of this ISQM. </td> </tr> </table>		<p><i>Examples of the firm’s understanding of the conditions, events, circumstances, actions or inactions that may adversely affect the achievement of the quality objectives</i></p>	<p><i>Examples of quality risks that may arise</i></p>	<p>The strategic and operational decisions and actions, business processes and business model of the firm: The <u>firm’s overall financial goals are overly dependent on the extent</u> of services provided by the firm not within the scope of this ISQM are significant to the firm’s overall financial goals.</p>	<p>In the context of governance and leadership, this may give rise to a number of quality risks such as:</p> <ul style="list-style-type: none"> Resources are allocated or assigned in a manner that prioritizes the services not within the scope of this ISQM and may negatively affect the quality of engagements within the scope of this ISQM.
<p><i>Examples of the firm’s understanding of the conditions, events, circumstances, actions or inactions that may adversely affect the achievement of the quality objectives</i></p>	<p><i>Examples of quality risks that may arise</i></p>					
<p>The strategic and operational decisions and actions, business processes and business model of the firm: The <u>firm’s overall financial goals are overly dependent on the extent</u> of services provided by the firm not within the scope of this ISQM are significant to the firm’s overall financial goals.</p>	<p>In the context of governance and leadership, this may give rise to a number of quality risks such as:</p> <ul style="list-style-type: none"> Resources are allocated or assigned in a manner that prioritizes the services not within the scope of this ISQM and may negatively affect the quality of engagements within the scope of this ISQM. 					

<p>processes and business model of the firm;</p>		<ul style="list-style-type: none"> Decisions about financial and operational priorities do not <u>fully or adequately</u> consider the importance of quality in performing engagements within the scope of this ISQM.
<p>c. The characteristics and management style of leadership;</p>	<p>The characteristics and management style of leadership: The firm is a smaller firm with a few engagement partners with shared authority.</p>	<p>In the context of governance and leadership, this may give rise to a number of quality risks such as:</p> <ul style="list-style-type: none"> Leadership's responsibilities and accountability for quality are not clearly defined and assigned. The actions and behaviors of leadership that do not promote quality are not <u>questioned</u>challenged.
<p>d. The resources of the firm, including the resources provided by service providers;</p>	<p>The complexity and operating characteristics of the firm: The firm has recently been engaged <u>in</u>completed a merger with another firm.</p>	<p>In the context of resources, this may give rise to a number of quality risks including:</p> <ul style="list-style-type: none"> Technological resources used by the two merged firms may be incompatible. Engagement teams may use intellectual resources developed by a firm prior to the merger, which are no longer consistent with the new methodology being used by the new merged firm.
<p>e. Law, regulation, professional standards and the environment in which the firm operates; and</p>	<p>A47. Given the evolving nature of the system of quality management, the responses designed and implemented by the firm may give rise to conditions, events, circumstances, actions or inactions that result in <u>further</u> quality risks. For example, the firm may implement a resource (e.g., an IT resource) to address a quality risk, and quality risks may arise from the use of such resource.</p>	
<p>f. In the case of a firm that belongs to a network, the nature and extent of the network requirements and network services, if any.</p>		

<p>(ii) With respect to the nature and circumstances of the engagements performed by the firm, <u>those relating to:</u></p> <p>a. The types of engagements performed by the firm and the reports to be issued; and</p> <p>b. The types of entities for which such engagements are undertaken;</p> <p>(b) Take into account how, and the degree to which, the conditions, events, circumstances, actions or inactions described in paragraph 25(a) may adversely affect the achievement of the quality objectives. (Ref: Para. A48).</p>	<p>A48. The consideration of how, and the degree to which <u>a risk, individually, or in combination with other risks, the conditions, events, circumstances, actions or inactions</u> may adversely affect the achievement of the quality objective(s) <u>may vary based on the conditions, events, circumstances, actions or inactions giving rise to the risk and how they affect the quality objective(s), such as: supports the firm's judgments in identifying whether a risk is a quality risk, and the assessment of the quality risk. [Relocated from example box] Examples of considerations in assessing a quality risk</u></p> <ul style="list-style-type: none"> • How frequently the <u>condition, event, circumstance, action or inaction quality risk</u> is expected to occur. • How much time it would take for the <u>condition, event, circumstance, action or inaction quality risk</u> to have an effect, and whether in that time the firm would have an opportunity to respond to mitigate the effect of the <u>condition, event, circumstance, action or inaction quality risk</u>. • How long the <u>condition, event, circumstance, action or inaction quality risk</u> would affect the <u>achievement of the quality objective</u> firm once it has occurred. <p>The assessment of quality risks need not comprise formal ratings or scores.</p>
<p>26. The firm shall design and implement responses to address the assessed quality risks in a manner that is based on, and</p>	<p><i>Design and Implement Responses to Assessed Quality Risks</i> (Ref: Para. 16(u), 26)</p> <p>A49. The nature, timing and extent of the responses are affected by <u>based on</u> the reasons for the assessment given to the quality risks, <u>which is the considered occurrence and effect on the achievement of one or more quality objectives, which includes:</u></p>

<p>responsive to, the reasons for the assessments given to the quality risks. The firm's responses shall also include the responses specified in paragraph 34. (Ref: Para. A49–A51)</p>	<p>The conditions, events, circumstances, actions or inactions giving rise to the quality risk.</p> <p>The assessment of the quality risk.</p> <p>A50. The responses designed and implemented by the firm may operate at the firm level or engagement level, or there may be a combination of responsibilities for actions to be taken at the firm and engagement level.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>Example of a response that operates at both the firm and engagement level</i></p> <p>The firm establishes policies or procedures for consultation which include with whom consultation should be undertaken by engagement teams and the specific matters for which consultation is required. The firm appoints suitably qualified and experienced individuals to provide the consultations. The engagement team is responsible for identifying when matters for consultation occur and initiating consultation, and implementing the conclusions from consultation.</p> </div> <p>A51. The need for formally documented policies or procedures may be greater for firms that have many personnel or that are geographically dispersed, in order to achieve consistency across the firm.</p>
<p>27. The firm shall establish policies or procedures that are designed to identify information that indicates that additional quality objectives, or additional or modified quality risks or responses, are needed due to changes in the nature and circumstances of the firm or its engagements. If such information is identified, the firm shall consider the information and when appropriate: (Ref: Para. A52–A54)</p> <p>(a) Establish, <u>or</u> modify, additional quality objectives;</p>	<p><i>Changes in the Nature and Circumstances of the Firm or its Engagements</i> (Ref: Para. 27)</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>A52. <i>Scalability example to demonstrate how policies or procedures for identifying information about changes in the nature and circumstances of the firm and its engagements may vary</i></p> <ul style="list-style-type: none"> • In a less complex firm, the firm may have informal policies or procedures to identify information about changes in the nature and circumstances of the firm or its engagements, particularly when the individual(s) responsible for establishing quality objectives, identifying and assessing quality risks and designing and implementing responses is able to identify such information in the normal course of their activities. • In a more complex firm, the firm may need to establish more formal policies or procedures to identify and consider information about changes in the nature and circumstances of the firm or its engagements. This may include, for example, a periodic review of information relating to the nature and circumstances of the firm and its engagements, including or ongoing tracking of trends and occurrences in the firm's internal and external environment. </div>

<p>(b) Identify and assess additional quality risks, modify the quality risks or reassess the quality risks; or</p> <p>(c) Design and implement additional responses, or modify the responses.</p>	<p>A53. Additional quality objectives may need to be established, or quality risks and responses added to or modified, as part of the remedial actions undertaken by the firm to address an <u>identified</u> deficiency in accordance with paragraph 42.</p> <p><u>A54. The firm may have established additional quality objectives in addition to those specified by this ISQM. The firm may identify information that indicates that the additional quality objectives are no longer needed, or need to be modified.</u></p>
<p>Governance and Leadership</p>	<p>Governance and Leadership</p>
<p>28. The firm shall establish the following quality objectives that address the <u>firm's governance and leadership, which establishes aspects of the firm's environment that supports the design, implementation and operation of the system of quality management:</u></p> <p>(a) The firm <u>demonstrates a commitment to quality and through a culture that of quality exists throughout the firm, including</u> recognizing and reinforcing: (Ref: Para. A55–A56)</p> <p>(i) The firm's role in serving the public interest by consistently performing quality engagements;</p>	<p><u>Culture Commitment to Quality</u> (Ref: Para. 28(a))</p> <p>A55. The firm's culture is an important factor in influencing the behavior of personnel and other individuals. Relevant ethical requirements ordinarily establish the principles of professional ethics, and are further addressed in the relevant ethical requirements component of this ISQM. <i>[Example box removed]</i> <u>Examples of P</u>professional values and attitudes <u>may include:</u></p> <ul style="list-style-type: none"> • Professional manner, for example, timeliness, courteousness, respect, accountability, responsiveness, and dependability. • A commitment to teamwork. • Maintaining an open mind to new ideas or different perspectives in the professional environment. • Pursuit of excellence. • A commitment to continual improvement (e.g., setting expectations beyond the minimum requirements and placing a focus on continual learning). • Social responsibility. <p>A56. The firm's strategic decision-making process, including the establishment of a business strategy, may include matters such as the firm's decisions about financial and operational matters, the firm's financial goals, how financial resources are managed, growth of the firm's market share, industry specialization or new service offerings. The firm's financial and operational priorities may directly or indirectly affect the firm's commitment to quality, <u>and culture of quality.</u> <i>[Example box removed]</i></p>

<p>(ii) The importance of professional ethics, values and attitudes;</p> <p>(iii) The responsibility of all personnel individuals for quality relating to the performance of engagements or activities within the system of quality management, and their expected behavior; and</p> <p>(iv) The importance of quality in the firm's strategic decisions and actions, including the firm's financial and operational priorities.</p> <p>(b) Leadership is responsible and accountable to the firm for quality. (Ref: Para. A57)</p> <p>(c) Leadership demonstrates a commitment to quality through their actions and behaviors. (Ref: Para. A58)</p> <p>(d) The organizational structure and assignment of roles, responsibilities and authority is appropriate to enable the</p>	<p>Example of how the firm's financial and operational priorities may affect the firm's commitment to quality and culture of quality for example, the firm may have incentives that are focused on financial and operational priorities that may discourage behaviors that demonstrate a commitment to quality.</p> <p><i>Leadership</i> (Ref: Para. 28(b) and 28(c))</p> <p>A57. The responses designed and implemented by the firm to hold leadership responsible and accountable for quality include the performance evaluations required by paragraph 56.</p> <p>A58. Although leadership establishes the tone at the top through their actions and behaviors, clear, consistent and frequent actions and communications at all levels within the firm collectively contribute may be essential to promoting the firm's culture and demonstrates a commitment to of quality.</p> <p><i>Organizational Structure</i> (Ref: Para. 28(d))</p> <p>A59. The organizational structure of the firm may include operating units, operational processes, divisions or geographical locations and other structures. In some instances, the firm may concentrate or centralize processes or activities in a service delivery center, and engagement teams may include personnel individuals from the firm's service delivery center who perform specific tasks that are repetitive or specialized in nature.</p> <p>A31A. How the firm assigns roles, responsibilities and authority within the firm may vary.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Scalability examples to demonstrate how assigning roles and responsibilities may vary</p> <p>In a less complex firm, the individual with oversight of the firm may assume all of the roles and responsibilities related to the system of quality management.</p> <p>In a more complex firm, there may be multiple levels of leadership that reflect the organizational structure of the firm, and the firm may have an independent governing body that has non-executive oversight of the firm, which may comprise external individuals.</p> </div> <p><i>Resources</i> (Ref: Para. 28(e))</p>
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<p>design, implementation and operation of the firm’s system of quality management. (Ref: Para. A32, A33, A35, A59)</p> <p>(e) Resource needs, including financial resources, are planned for and resources are obtained, allocated or assigned in a manner that is consistent with the firm’s commitment to quality. (Ref: Para. A60–A61)</p>	<p>A60. The individuals(s) assigned ultimate responsibility and accountability or operational responsibility for the system of quality management are<u>is</u> in most cases able to influence the nature and extent of resources that the firm obtains, develops, uses and maintains, and how those resources are allocated or assigned, including the timing of when they are used.</p> <p>A61. Resource needs may change over time, however it may not be practicable to anticipate all resource needs. The firm’s resource planning may involve determining the resources currently required, forecasting the firm’s future resource needs, and establishing processes to deal with unanticipated resource needs when they arise.</p>
<p>Relevant Ethical Requirements</p>	<p>Relevant Ethical Requirements (Ref: Para. 29)</p>
<p>29. The firm shall establish the following quality objectives that address the fulfillment of responsibilities in accordance with relevant ethical requirements, including those related to independence: (Ref: Para. A62–A64, A66)</p> <p>(a) The firm and its personnel:</p> <p>(i) Understand the relevant ethical requirements to which the firm and the firm’s engagements are subject. (Ref: Para. A23, A25)</p>	<p>A62. The IESBA Code sets out the fundamental principles of ethics that establish the standards of behavior expected of a professional accountant and establishes the International Independence Standards. The fundamental principles are integrity, objectivity, professional competence and due care, confidentiality and professional behavior. The IESBA Code also specifies the approach that a professional accountant is required to apply to comply with the fundamental principles and, <u>when applicable</u>, the International Independence Standards. <u>In addition, the IESBA Code</u>and addresses specific topics relevant to complying with the fundamental principles. Law or regulation in a jurisdiction may also contain provisions addressing ethical requirements, including independence, <u>such as</u> (e.g., privacy laws affecting the confidentiality of information).</p> <p>A63. In some cases, the matters addressed by the firm in its system of quality management may be more specific than, or additional to, the provisions of relevant ethical requirements.</p>

<p>(ii) Fulfill their responsibilities in relation to the relevant ethical requirements to which the firm and the firm's engagements are subject.</p> <p>(b) Others, including the network, network firms, <u>individuals/personnel</u> in the network or network firms, or service providers, who are subject to the relevant ethical requirements to which the firm and the firm's engagements are subject:</p> <p>(i) Understand the relevant ethical requirements that apply to them; and (Ref: Para. A23, A25, A65)</p> <p>(ii) Fulfill their responsibilities in relation to the relevant ethical requirements that apply to them.</p>	<p><i>Examples of matters that a firm may include in its system of quality management that are more specific than, or additional to, the provisions of relevant ethical requirements</i></p> <ul style="list-style-type: none"> • The firm prohibits the acceptance of gifts and hospitality from a client, even if the value is trivial and inconsequential. • The firm sets rotation periods for all engagement partners, including those performing other assurance or related services engagements, and extends the rotation periods to all senior engagement team members. <p>A64. Other components may affect or relate to the relevant ethical requirements component.</p> <p><i>Examples of relationships between the relevant ethical requirements component and other components :</i></p> <ul style="list-style-type: none"> • The information and communication component may address the communication of various matters related to relevant ethical requirements, including: <ul style="list-style-type: none"> ○ The firm communicating the independence requirements to all personnel and others subject to independence requirements. ○ Engagement teams and other individuals in the firm communicating relevant information to the firm without fear of reprisals, such as situations that may create threats to independence, or breaches of relevant ethical requirements. • As part of resources, the firm may: <ul style="list-style-type: none"> ○ Assign individuals to manage and monitor compliance with relevant ethical requirements or to provide consultation on matters related to relevant ethical requirements. ○ Use IT applications to monitor compliance with relevant ethical requirements, including recording and maintaining information about independence.
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	<p>A65. The relevant ethical requirements that apply to others depend on the provisions of the relevant ethical requirements and how the firm uses others in its system of quality management, including or in the performance of engagements.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>Examples of relevant ethical requirements that apply to others</i></p> <ul style="list-style-type: none"> • Relevant ethical requirements may include requirements for independence that apply to network firms or employees of network firms, for example, the IESBA Code includes independence requirements that apply when the firm belongs to a network firms. • The definition of engagement team under rRelevant ethical requirements may include a definition of engagement team or other similar concept, and the definition may include any individuals who performs assurance procedures on the engagement (e.g., a component auditor or a service provider engaged to attend a physical inventory count at a remote location). Accordingly, any requirements of the relevant ethical requirements that apply to the engagement team as defined in the relevant ethical requirements, or other similar concept, may also be relevant to such individuals. • The principle of confidentiality may apply to thea firm's network, other network firms or service providers, given thatwhen they may have access to client information obtained by the firm. </div> <p><i>Public Sector Considerations</i></p> <p>A66. In achieving the quality objectives in this ISQM related to independence, public sector auditors may address independence in the context of the public sector mandate and statutory measures.</p>
<p>Acceptance and Continuance of Client Relationships and Specific Engagements</p>	<p>Acceptance and Continuance of Client Relationships and Specific Engagements</p>
<p>30. The firm shall establish the following quality objectives that address the acceptance and</p>	<p><i>The Nature and Circumstances of the Engagement and the Integrity and Ethical Values of the Client</i> (Ref: Para. 30(a)(i))</p> <p>A67. The information obtained about the nature and circumstances of the engagement may include:</p>

<p>continuance of client relationships and specific engagements:</p> <p>(a) Judgments by the firm about whether to accept or continue a client relationship or specific engagement are appropriate based on:</p> <p>(i) Relevant information obtained about the nature and circumstances of the engagement and the integrity and ethical values of the client (including management, and, when appropriate, those charged with governance) that is sufficient to support such judgments; and (Ref: Para. A67–A71)</p> <p>(ii) The firm’s ability to perform the engagement in accordance with professional standards and applicable legal and regulatory requirements. (Ref: Para. A72)</p>	<ul style="list-style-type: none"> • The industry of the entity for which the engagement is being undertaken and relevant regulatory factors; • The nature of the entity, for example, its operations, organizational structure, ownership and governance, its business model and how it is financed; and • The nature of the underlying subject matter and the <u>applicable</u> criteria- <i>[Example box removed]</i> Example of underlying subject matter and criteria, for example, in the case of integrated reporting: <ul style="list-style-type: none"> ○ The underlying subject matter may include social, environmental and health and safety information; and ○ The <u>applicable</u> criteria may be performance measures established by a recognized body of experts. <p>A68. The information obtained to support the firm’s judgments about the integrity and ethical values of the client may include the identity and business reputation of the client’s principal owners, key management, and those charged with its governance.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>Examples of factors that may affect the nature and extent of information obtained about the integrity and ethical values of the client</i></p> <ul style="list-style-type: none"> • The nature of the entity for which the engagement is being performed, including the complexity of its ownership and management structure. • The nature of the client’s operations, including its business practices. • Information concerning the attitude of the client’s principal owners, key management and those charged with its governance towards such matters as aggressive interpretation of accounting standards and the internal control environment. • Whether the client is aggressively concerned with maintaining the firm’s fees as low as possible. • Indications of a client-imposed limitation in the scope of work. • Indications that the client might be involved in money laundering or other criminal activities. </div>
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<p>(b) The financial and operational priorities of the firm do not lead to inappropriate judgments about whether to accept or continue a client relationship or specific engagement. (Ref: Para. A73–A74)</p>	<div data-bbox="793 191 1942 358" style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> • The reasons for the proposed appointment of the firm and non-reappointment of the previous firm. • The identity and business reputation of related parties. </div> <p>A69. The firm may obtain the information from a variety of internal and external sources, <u>including:-</u> [Example box removed] Examples of sources of information about the integrity and ethical values of the client</p> <ul style="list-style-type: none"> • In the case of an existing client, information from current or previous engagements, if applicable, or inquiry of other personnel who have performed other engagements for the client. • In the case of a new client, inquiry of existing or previous providers of professional accountancy services to the client, in accordance with relevant ethical requirements. • Discussions with other third parties, such as bankers, legal counsel and industry peers. • Background searches of relevant databases (which may be intellectual resources). In some cases, the firm may use a service provider to perform the background search. <p>A70. Information that is obtained during the firm’s acceptance and continuance process <u>may often also</u> be in most cases also relevant to the engagement team when planning and performing the engagement. Professional standards may specifically require the engagement team to obtain or consider such information. For example, ISA 220 (Revised)¹⁰ requires the engagement partner to take into account information obtained in the acceptance and continuance process in planning and performing the audit engagement.</p> <p>A71. Professional standards or legal and regulatory requirements may include specific provisions that need to be addressed before accepting or continuing a client relationship or specific engagement and may also require the firm to make inquiries of an existing or predecessor firm when accepting an engagement. For example, when there has been a change of auditors, ISA 300¹¹ requires the auditor, prior to starting an initial audit, to communicate with the predecessor auditor in compliance</p>
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¹⁰ Proposed ISA 220 (Revised), paragraph 23+

¹¹ ISA 300, *Planning an Audit of Financial Statements*, paragraph 13(b)

with relevant ethical requirements. The IESBA Code also includes requirements for the consideration of conflicts of interests in accepting or continuing a client relationship or specific engagement and communication with the existing or predecessor firm when accepting an engagement that is an audit or review of financial statements.

The Firm's Ability to Perform Engagements (Ref: Para. 30(a)(ii))

A72. The firm's ability to perform the engagement in accordance with professional standards and applicable legal and regulatory requirements may be affected by:

- The availability of appropriate resources to perform the engagement;
- Having access to information to perform the engagement, or to the persons who provide such information; and
- Whether the firm and the engagement team, its personnel and other individuals involved in the engagement are able to fulfill their responsibilities in relation to the relevant ethical requirements.

Examples of factors the firm may consider in determining whether appropriate resources are available to perform the engagement

- The circumstances of the engagement and the reporting deadline.
- The availability of individuals with the appropriate competence and capabilities, including sufficient time, to perform the engagement. This includes having:
 - Individuals to take overall responsibility to direct and supervise the engagement ~~and take overall responsibility~~; and
 - Individuals with knowledge of the relevant industry or the underlying subject matter or criteria to be applied in the preparation of the subject matter information and experience with relevant regulatory or reporting requirements.
 - Individuals to perform audit procedures related to a component for purposes of an audit of group financial statements.
- The availability of experts, if needed.

	<ul style="list-style-type: none"> • If an engagement quality review is needed, whether there is an individual available who meets the eligibility requirements in ISQM 2. • The need for technological resources, for example, IT applications that enable the engagement team to perform procedures on the entity’s data. • The need for intellectual resources, for example, a methodology, industry or subject matter-specific guides, or access to information sources. <p><i>The Firm’s Financial and Operational Priorities</i> (Ref: Para. 30(b))</p> <p>A73. Financial priorities may focus on the profitability of the firm, and fees obtained for the performance of engagements have an effect on the firm’s financial resources. Operational priorities may include strategic focus areas, such as growth of the firm’s market share, industry specialization or new service offerings. There may be circumstances when the firm is satisfied with the fee quoted for an engagement but, notwithstanding the firm’s operational and financial priorities, it is not appropriate for the firm to accept or continue the engagement or client relationship (e.g., when the client lacks integrity and ethical values).</p> <p>A74. There may be other circumstances when the fee quoted for an engagement is not sufficient given the nature and circumstances of the engagement, and it may diminish the firm’s ability to perform the engagement in accordance with professional standards and applicable legal and regulatory requirements. The IESBA Code addresses fees and other types of remuneration, including circumstances that may create a threat to compliance with the fundamental principle of professional competence and due care if the fee quoted for an engagement is too low.</p>
<p>Engagement Performance</p>	<p>Engagement Performance</p>
<p>31. The firm shall establish the following quality objectives that address the performance of quality engagements:</p> <p>(a) Engagement teams understand and fulfill their</p>	<p><i>Responsibilities of the Engagement Team and Direction, Supervision and Review</i> (Ref: Para. 31(a) and 31(b))</p> <p>A75. <u>Professional standards or legal and regulatory requirements may include specific provisions regarding the overall responsibility of the engagement partner. For example, ISA 220 (Revised) deals with</u> the overall responsibility of the engagement partner for managing and achieving quality on the engagement and for being sufficiently and appropriately involved throughout the</p>

responsibilities in connection with the engagements, including, as applicable, the overall responsibility of ~~the~~ engagement partners for managing and achieving quality on the engagement and being sufficiently and appropriately involved throughout the engagement. (Ref: Para. A75)

- (b) The nature, timing and extent of direction and supervision of engagement teams and review of the work performed is appropriate ~~based on the nature and circumstances of the engagements and the resources assigned or made available to the engagement teams,~~ and the work performed by less experienced engagement team members ~~of the engagement teams~~ is directed, supervised and reviewed by more experienced engagement team members. (Ref: Para. A76–A77)

engagement, including responsibility for appropriate direction and supervision of the engagement team and review of their work performed.

A76. *Examples of ~~responsibilities for direction, supervision and review~~*

- Examples of ~~responsibilities for direction and supervision of the engagement team~~ include:
 - Tracking the progress of the engagement;
 - ~~Considering the following with respect to competence and capabilities of individual members of the engagement team: whether they have sufficient time to carry out their work,~~
 - ~~Whether~~ whether they understand their instructions; and
 - ~~Whether~~ whether the work is being carried out in accordance with the planned approach to the engagement;
 - Addressing matters arising during the engagement, considering their significance and modifying the planned approach appropriately; and
 - Identifying matters for consultation or consideration by more experienced engagement team members during the engagement.
- Examples of ~~responsibilities for a review of work performed~~ include ~~considering~~ whether:
 - The work has been performed in accordance with the firm's policies or procedures, professional standards and applicable legal and regulatory requirements;
 - Significant matters have been raised for further consideration;
 - Appropriate consultations have been undertaken and the resulting conclusions have been documented and implemented;
 - There is a need to revise the nature, timing and extent of planned ~~work performed~~;
 - The work performed supports the conclusions reached and is appropriately documented;

<p>(c) Engagement teams exercise appropriate professional judgment and, when applicable to the type of engagement, professional skepticism. (Ref: Para. A78)</p> <p>(d) Consultation on difficult or contentious matters is undertaken and the conclusions agreed are implemented. (Ref: Para. A79–A81)</p> <p>(e) Differences of opinion within the engagement team, or between the engagement team and the engagement quality reviewer or <u>individuals</u>personnel performing activities within the firm’s system of quality management are brought to the attention of the firm and resolved. (Ref: Para. A82)</p> <p>(f) Engagement documentation is assembled on a timely basis after the date of the engagement report, and is appropriately maintained and</p>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <ul style="list-style-type: none"> ○ The evidence obtained for an assurance engagement is sufficient and appropriate to support the report; and ○ The objectives of the engagement procedures have been achieved. </div> <p>A77. [Example box removed]Examples of responsibilities for supervision and review In some circumstances, the firm may use <u>personnel from the firm’s</u>a service delivery center <u>in performing the engagement, i.e., the personnel</u>and individuals from the service delivery center may be included in the engagement team. In such cases, the firm’s policies or procedures <u>may specifically address</u>ing <u>the direction</u> and, supervision <u>of personnel</u> and review <u>of their work, such as</u>may specify:</p> <ul style="list-style-type: none"> • What aspects of the engagement may be assigned to <u>personnel</u>individuals in the service delivery center; and • How the engagement partner, or their designee, is expected to direct, supervise and review the work undertaken by <u>personnel</u>individuals in the service delivery center; and • The firm may also establish methods<u>protocols</u> for communication between the engagement team and <u>personnel</u>individuals in the service delivery center to facilitate direction, supervision and review of the work undertaken by individuals in the service delivery center. <p><i>Professional Judgment and Professional Skepticism</i> (Ref: Para. 31(c))</p> <p>A78. Professional skepticism supports the quality of judgments made on the engagement and, through these judgments, the overall effectiveness of the engagement team in performing the engagement. Other pronouncements of the IAASB may address the exercise of professional judgment or professional skepticism at the engagement level. For example, ISA 220 (Revised)¹² <u>provides examples of</u>explains the impediments to the exercise of professional skepticism at the engagement level, <u>unconscious auditor biases that may impede the exercise of professional skepticism</u>, and <u>possible</u> actions that the engagement <u>team partner</u> may take to <u>mitigated</u>deal with such impediments.</p>
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¹² Proposed ISA 220 (Revised), paragraphs A3327–A3529

<p>retained to meet the needs of the firm and comply with law, regulation, relevant ethical requirements, or other professional standards. (Ref: Para. A83–A85)</p>	<p><i>Consultation</i> (Ref: Para. 31(d))</p> <p>A79. Consultation typically involves a discussion at the appropriate professional level, with individuals within or outside the firm who have specialized expertise, on difficult or contentious matters. An environment that reinforces the importance and benefit of consultation and encourages engagement teams to consult may contribute to supporting a firm—culture that demonstratespromotes a commitment to quality.</p> <p>A80. Difficult or contentious matters on which consultation is needed may either be specified by the firm, or the engagement team may identify matters that require consultation. The firm may also specify how conclusions should be agreed and implemented.</p> <p>A81. ISA 220 (Revised)¹³ includes requirements for the engagement partner related to consultation.</p> <p><i>Differences of Opinion</i> (Ref: Para. 31(e))</p> <p>A82. The firm may encourage that differences of opinion are identified at an early stage, and may specify the steps to be taken in raising and dealing with them, including how the matter should be resolved and, how the related conclusions should be implemented and conclusions—documented. In some circumstances, resolving differences of opinion may be achieved through consulting with another practitioner or firm, or a professional or regulatory body.</p> <p><i>Engagement Documentation</i> (Ref: Para. 31(f))</p> <p>A83. Law or regulation may prescribe the time limits by which the assembly of final engagement files for specific types of engagements areis to be completed. Where no such time limits are prescribed in law or regulation, the time limit may be determined by the firm. [Example box removed] Example of time limit for assembly of final engagement filesIn the case of an audit of financial statements or an other assurance engagement, an appropriate time limit within which to complete the assembly of the final engagement file is ordinarily The firm establishes policies or procedures for audits of financial statements that require engagement files to be assembled withinnot more than 60 days after the date of the auditor’s report.</p>
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¹³ Proposed ISA 220 (Revised), paragraph 352

	<p>A84. The retention and maintenance of engagement documentation may include managing the safe custody, integrity, accessibility or retrievability of the underlying data and the related technology. The retention and maintenance of engagement documentation may involve the use of IT applications. The integrity of engagement documentation may be compromised if it is altered, supplemented or deleted without authorization to do so, or if it is permanently lost or damaged.</p> <p>A85. Law, regulation, relevant ethical requirements or other professional standards may prescribe the retention periods for engagement documentation. If the retention periods are not prescribed, the firm may, in determining a retention period, consider the nature of the engagements performed by the firm and the firm's circumstances, including whether the engagement documentation is needed to provide a record of matters of continuing significance to future engagements. <i>[Example box removed]</i> Example of retention period for engagement documentation—In the case of an audit of financial statements or an other assurance engagement, the firm establishes policies or procedures for audits of financial statements that require engagement files to be retentionained period is ordinarily no shorter thanfor five years from the date of the auditor's engagement report, or, if later, the date of the auditor's report on the group financial statements, when applicable.</p>
<p>Resources</p>	<p>Resources (Ref: Para. 32)</p>
<p>32. The firm shall establish the following quality objectives that address appropriately obtaining, developing, using, maintaining, allocating and assigning resources in a timely manner to enable the design, implementation and operation of the system of quality management: (Ref: Para. A86–A87)</p> <p>(a) Personnel are hired, developed and retained and have the competence and</p>	<p>A86. Resources for the purposes of the resources component include:</p> <ul style="list-style-type: none"> • Human resources. • Technological resources, for example, IT applications. • Intellectual resources, for example, written policies or procedures, a methodology or guides. <p>Financial resources are also relevant to the system of quality management because they are necessary for obtaining, developing and maintaining the firm's human resources, technological resources and intellectual resources. Given that the management and allocation of financial resources is strongly influenced by leadership, the quality objectives in governance and leadership, such as those that address financial and operational priorities, address financial resources.</p> <p>A87. Resources may be internal to the firm, or may be obtained externally from the firm's network, another network firm or service provider. Resources may be used in performing activities within the firm's system of quality management, or in performing engagements as part of operating the system</p>

<p>capabilities to: (Ref: Para. A88–A90)</p>	<p>of quality management. In circumstances when a resource is obtained from the firm's network or another network firm, paragraphs 48–52 form part of the responses designed and implemented by the firm in achieving the objectives in this component.</p>
<p>(i) Consistently perform quality engagements, including having knowledge or experience relevant to the engagements the firm performs; or</p>	<p><i>Human Resources</i> (Ref: Para. 32(a))</p>
<p>(ii) Perform activities or carry out responsibilities in relation to the operation of the firm's system of quality management.</p>	<p>A88. Competence is the ability of the individual to perform a role and goes beyond knowledge of principles, standards, concepts, facts, and procedures; it is the integration and application of technical competence, professional skills, and professional ethics, values and attitudes. Competence can be developed through a variety of methods, including professional education, continuing professional development, training, work experience or coaching of less experienced engagement team members by more experienced engagement team members.</p>
<p>(baa) Personnel demonstrate a commitment to quality through their actions and behaviors, develop and maintain the appropriate competence to perform their roles, and are held accountable or recognized through timely evaluations, compensation, promotion and other incentives. (Ref: Para. A91–A93)</p>	<p>A89. Law or, regulation or professional standards may establish requirements addressing competence and capabilities, such as: <i>[Example box removed]</i> Example of requirements in law or regulation that address competence and capabilities Law, regulation or national standards of a jurisdiction may establish requirements for the professional licensing of engagement partners, including requirements regarding their professional education and continuing professional development.</p>
<p>(cab) Human resources Individuals are obtained from external sources (i.e., the network,</p>	<p>A90. Examples of matters that the firm may responses to address regarding hiring, developing and retaining personnel</p> <ul style="list-style-type: none"> • The firm may develop a recruitment strategy focused on selecting individuals who have, or are able to develop, appropriate competence. • The firm's training programs may focus on developing the competence of personnel and continuing professional development. • The firm may establish evaluation mechanisms that are undertaken at appropriate intervals and include competency areas and other performance measures. • The firm may set compensation, promotion and other incentives, for all personnel, including engagement partners and individuals assigned roles and responsibilities related to the firm's system of quality management.
<p>Personnel's Commitment to Quality and Accountability and Recognition for Quality (Ref: Para. 32(b))</p>	

<p>another network firm or a service provider) when the firm does not have sufficient or appropriate personnel to enable the operation of firm's system of quality management or performance of engagements. (Ref: Para. A94)</p>	<p>A91. Timely evaluations and feedback help support and promote the continual development of the competence of personnel. Less formal methods of evaluation and feedback may be used, such as in the case of firms with fewer personnel.</p>
<p>(db) Engagement team members are assigned to each engagement, including an engagement partner, who have appropriate competence and capabilities, including being given sufficient time, to consistently perform quality engagements. (Ref: Para. A88–A89, A95–A97)</p>	<p>A92. Positive actions or behaviors demonstrated by personnel may be recognized through various means, such as through compensation, promotion, or other incentives. In some circumstances, simple or informal incentives that are not based on monetary rewards may be appropriate.</p>
<p>(ee) Individuals are assigned to perform activities within the system of quality management who have appropriate competence and capabilities, including sufficient time, to perform such activities.</p>	<p>A93. The manner in which the firm holds personnel accountable for actions or behaviors that negatively affect quality, such as failing to demonstrate a commitment to quality, develop and maintain the competence to perform their role or implement the firm's responses as designed, may depend on the nature of the action or behavior, including its severity and frequency of occurrence. <i>[Example box removed]</i> Examples of a Actions the firm may take when personnel demonstrate actions or behaviors that negatively affect quality <u>may include:</u></p> <ul style="list-style-type: none"> • Training or other professional development. • Considering the effect of the matter on the evaluation, compensation, promotion or other incentives of those involved. • Disciplinary action, if appropriate.
	<p>Individuals <u>Human Resources</u> Obtained from External Sources (Ref: Para. 32(c))</p>
	<p>A94. <u>Professional standards may include responsibilities for the engagement partner regarding the appropriateness of resources. The need to obtain human resources from external sources may be identified by the firm, or the engagement team.</u> For example, proposed ISA 220 (Revised)¹⁴ addresses the responsibility of the engagement partner for determining that sufficient and appropriate resources to perform the engagement are assigned or made available to the engagement team in a timely manner in accordance with the firm's policies or procedures.</p>

¹⁴ Proposed ISA 220 (Revised), paragraph 25

(fe) Appropriate technological resources are obtained or developed, implemented, and maintained, and appropriately used, to enable the operation of the firm's system of quality management and the performance of engagements. (Ref: Para. A98–A101, A104)

(gf) Appropriate intellectual resources are obtained or developed, implemented, and maintained, and appropriately used, to enable the operation of the firm's system of quality management and the consistent performance of quality engagements, and such intellectual resources are consistent with professional standards and applicable legal and regulatory requirements, where applicable. (Ref: Para. A102–A104)

Engagement Team Members Assigned to Each Engagement (Ref: Para. 32(d))

A95. Engagement team members may be assigned to engagements in a number of ways, for example may include:

- The firm ordinarily assigns personnel assigned by the firm, including personnel individuals from a service delivery center of the firm.
- If the firm uses individuals from a the firm's network or another network firm to perform procedures on the engagement (e.g., including a component auditors or and individuals from a service delivery center of the a network or another network firm), these individuals engagement team members are ordinarily generally assigned by the network or other network firm.
- If the firm uses individuals from a service provider to perform procedures on the engagement (e.g., including a component auditors from a firm that is not within the firm's network), these engagement team members individuals are ordinarily generally assigned by the service provider.

~~A120A. Proposed ISA 220 (Revised)¹⁵ addresses the responsibilities of the engagement partner with respect to the competence and capabilities of the engagement team, including component auditors, and ISA 600¹⁶ addresses the application of ISA 220 (Revised) in the context of a group engagement. When using individuals from a network, another network firm or a service provider on an engagement, the requirements of this ISQM address:~~

- ~~• The appropriate use of the network, other network firm or service provider on the engagement, through the quality objective in paragraph 38(g) and the requirements in paragraphs 58–63; and~~
- ~~• The competence and capabilities of individuals assigned to the engagement by the network, other network firm or service provider to the engagement team, through the quality objective in paragraph 38(b).~~

¹⁵ Proposed ISA 220 (Revised), paragraph 26

¹⁶ ISA 600, paragraph 19

(hg) Human, technological or intellectual resources from service providers are appropriate for use in the firm's system of quality management and in performingance ~~of~~ engagements, taking into account the quality objectives in paragraph 32 (d),(e),(f) and (g). (Ref: Para. A105–A108)

~~• The appropriate use of the network, other network firm or service provider on the engagement~~

~~A120B. The policies or procedures designed and implemented by the firm to address the appropriate use of the network, other network firm or service provider on the engagement may be implemented at the firm level or the engagement level, or a combination of both. For example, the firm's policies or procedures may require the engagement team to gather information about a service provider used on the engagement, and the policies or procedures may specify the conditions that need to be met for it to be appropriate to use the service provider.~~

~~A120C. The network may establish requirements for circumstances when the firm uses the network or another network firm to support the performance of engagements, such as network policies or procedures that address how the firm interacts with the network or another network firm. The nature and extent of the understanding of the network or other network firm, evaluation of whether it is appropriate to use the network or other network firm in performing the engagement, and determination of any further actions that need to be taken such that it is appropriate to use them may vary based on matters such as:~~

~~• The requirements established by the network, and the extent to which the network undertakes monitoring across the network. For example, the understanding and evaluation of the network or other network firm may be:~~

~~○ Less when there is a high degree of commonality across the network firms' systems of quality management, and the network actively monitors compliance with the network requirements; and~~

~~○ More when there is limited commonality in the systems of quality management across the network and the network does not undertake monitoring across the network.~~

~~• The information communicated from the network about the overall results of the network's monitoring activities across the network firms.~~

~~• The frequency with which the network or other network firm is used across the firm, and the nature of the procedures they perform on the engagement.~~

~~A120D. The nature and extent of the procedures to determine that it is appropriate to use a service provider on an engagement may vary depending on a number of factors, including the frequency~~

~~with which the service provider is used, and the nature of the procedures performed by the service provider on the engagement.~~

~~The competence and capabilities of the individuals assigned to the engagement by the network, other network firm or service provider~~

A96. ~~Proposed ISA 220 (Revised)¹⁷ addresses the responsibility of the engagement partner to determine that members of the engagement team, and any auditor's external experts and internal auditors who provide direct assistance who are not part of the engagement team, collectively have the appropriate competence and capabilities, including sufficient time, to perform the engagement. ISA 600¹⁸ expands on how ISA 220 (Revised) is to be applied in relation to an audit of group financial statements. The policies or procedures responses designed and implemented by the firm to address the competence and capabilities of individuals on engagement team members assigned to the engagement may include policies or procedures that address:~~

- ~~How the engagement partner team determines that the competence and capabilities of the individuals engagement team members assigned to the engagement, including those assigned by the firm's network, another network firm or service provider, have the competence and capabilities to perform the engagement,; and~~
- ~~How concerns about the competence and capabilities of the individuals engagement team members, in particular those assigned by the firm's network, another network firm or service provider, may be resolved. For example, the firm's policies or procedures may specify that:~~
 - ~~The group engagement team first discuss concerns with the component auditor and request that they address them.~~
 - ~~The group engagement team is required to consult within the firm if the group engagement team is unable to resolve the concerns with the component auditor.~~

¹⁷ [Proposed ISA 220 \(Revised\), paragraph 26](#)

¹⁸ [ISA 600, Special Considerations—Audits of Group Financial Statements \(Including the Work of Component Auditors\), paragraph 19](#)

A97. The requirements in paragraphs 48–52 are also applicable when using individuals from the firm's network or another network firm on an engagement, including component auditors (see, for example, paragraph A178).

Examples of the firm's policies or procedures for addressing the competence and capabilities of component auditors

In the case of a firm that belongs to a network, the firm's policies or procedures may indicate that in considering the competence and capabilities of the component auditors:

For component auditors from other firms within the network, the engagement team may use the information provided by the firm about the commonality of the policies or procedures across the network, such as commonality of training programs and evaluation methods.

For component auditors from other firms not within the firm's network, the engagement team may request the relevant information directly from the individuals assigned by the other firm.

The firm's policies or procedures may further address how the group engagement team should address circumstances when the competence and capabilities of a component auditor is inappropriate. For example, the firm's policies or procedures may specify that:

The group engagement team first discuss the matter with the component auditor and request that they address the concerns.

The group engagement team is required to consult within the firm if the group engagement team is unable to resolve the matter with the component auditor.

Technological Resources (Ref: Para. 32(f))

A98. Technological resources, which are typically IT applications, form part of the firm's IT environment. The firm's IT environment also includes the supporting IT infrastructure and the IT processes and human resources involved in those processes:

- An IT application is a program or a set of programs that is designed to perform a specific function directly for the user or, in some cases, for another application program.
- The IT infrastructure is comprised of the IT network, operating systems, and databases and their related hardware and software.

	<ul style="list-style-type: none">• The IT processes are the firm's processes to manage access to the IT environment, manage program changes or changes to the IT environment and manage IT operations, which includes monitoring the IT environment. <p>A99. A technological resource may serve multiple purposes within the firm and some of the purposes may be unrelated to the system of quality management. Technological resources that are relevant for the purposes of this ISQM are:</p> <ul style="list-style-type: none">• Technological resources that are directly used in designing, implementing or operating the firm's system of quality management;• Technological resources that are used directly by engagement teams in performing engagements; and• Technological resources that are essential to enabling the effective operation of the above, such as, in relation to an IT application, the IT infrastructure and IT processes supporting the IT application. <div data-bbox="793 773 1940 1336" style="border: 1px solid black; padding: 5px;"><p><i>Scalability examples to demonstrate how the technological resources that are relevant for the purposes of this ISQM may differ</i></p><ul style="list-style-type: none">• In a less complex firm, the technological resources may comprise of a commercial IT application used by engagement teams, which has been purchased from a service provider. The IT processes that support the operation of the IT application may also be relevant, although they may be simple (e.g., processes for authorizing access to the IT application and processing updates to the IT application).• In a more complex firm, the technological resources may be more complex and <u>may</u> comprise of:<ul style="list-style-type: none">○ Multiple IT applications, including custom developed applications or applications developed by the firm's network, such as:<ul style="list-style-type: none">• IT applications used by engagement teams (e.g., engagement software and automated audit tools).</div>
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	<div data-bbox="793 196 1942 451" style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> • IT applications developed and used by the firm to manage aspects of the system of quality management (e.g., IT applications to monitor independence or assign personnel individuals to engagements). ○ The IT processes that support the operation of these IT applications, including the individuals responsible for managing the IT infrastructure and IT processes and the firm’s processes for managing program changes to the IT applications. </div> <p>A100. [Example box removed] Example of matters that may be considered by tThe firm <u>may consider the following matters</u> in obtaining, developing, implementing and maintaining an IT application:</p> <ul style="list-style-type: none"> • The data inputs are complete and appropriate:- • Confidentiality of the data is preserved:- • The IT application operates as designed and achieves the purpose for which it is intended:- • The outputs of the IT application achieve the purpose for which they will be used:- • The general IT controls necessary to support the IT application’s continued operation as designed are appropriate:- • The need for specialized skills to utilize the IT application effectively, including the training of individuals who will use the IT application:- <u>and</u> • The need to develop procedures that set out how the IT application operates. <p>A101. The firm may specifically prohibit the use of IT applications or features of IT applications until such time that it has been determined that they operate appropriately and have been approved for use by the firm. <u>Alternatively, the firm may establish policies or procedures to address circumstances when the engagement team uses an IT application that is not approved by the firm. Such policies or procedures may require the engagement team to determine that the IT application is appropriate for use prior to using it on the engagement, through considering the matters in paragraph A100. ISA 220 (Revised)¹⁹ addresses the engagement partner’s responsibilities for engagement resources.</u></p>
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¹⁹ Proposed ISA 220 (Revised), paragraphs 25–28

Intellectual Resources (Ref: Para. 32(g))

A102. Intellectual resources include the information the firm uses to promote consistency in ~~the~~ perform~~ingance-of~~ engagements.

Examples of intellectual resources

Written policies or procedures, a methodology, industry or subject matter-specific guides, accounting guides, standardized documentation or access to information sources (e.g., subscriptions to websites that provide in-depth information about entities or other information that is typically used in ~~the~~ perform~~ingance-of~~ engagements).

A103. Intellectual resources may be made available through technological resources, for example, ~~[Example box removed] Example of intellectual resources made available through technological resources~~ ~~The~~ firm's methodology may be embedded in the IT application that facilitates the planning and performance of the engagement.

Use of Technological and Intellectual Resources (Ref: Para. 32(f)–32(g))

A104. The firm may establish policies or procedures regarding the use of the firm's technological and intellectual resources. Such policies or procedures may:

- Require the use of certain IT applications or intellectual resources in performing engagements, or relating to other aspects of the engagement, such as in archiving the engagement file.
- Specify the qualifications or experience that individuals need to use the resource, including the need for an expert or training, for example, the firm may specify the qualifications or expertise needed to use an IT application that analyzes data, given that specialized skills may be needed to interpret the results.
- Specify the responsibilities of the engagement partner regarding the use of technological and intellectual resources, ~~including circumstances when technological and intellectual resources are used on the engagement that have been obtained by the engagement team (i.e., the firm has not provided the resource).~~

- Set out how the technological or intellectual resources are to be used, including how individuals should interact with an IT application or how the intellectual resource should be applied, and the availability of support or assistance in using the technological or intellectual resource.

~~[Example box removed] Example of when qualifications or expertise are needed to use a technological or intellectual resource The firm may specify the qualifications or expertise needed to use an IT application that analyzes data, given that specialized skills may be needed to interpret the results.~~

Service Providers (Ref: Para. 16(v), 32(h))

A105. In some circumstances, the firm may use resources that are provided by a service provider, particularly in circumstances when the firm does not have access to the appropriate resources internally. Notwithstanding that a firm may use resources from a service provider, the firm remains responsible for its system of quality management.

Examples of resources from a service provider

- Individuals engaged to perform the firm's monitoring activities or engagement quality reviews, or to provide consultation on technical matters.
- A commercial IT application used to perform audit engagements.
- Individuals performing procedures on the firm's engagements, for example, component auditors from other firms not within the firm's network or individuals engaged to attend a physical inventory count at a remote location.
- An auditor's external expert engaged by the firm to assist the engagement team in obtaining audit evidence.

A106. In identifying and assessing quality risks, the firm is required to obtain an understanding of the conditions, events, circumstances, actions or inactions that may adversely affect the achievement of the quality objectives, which includes those relating to service providers. In doing so, the firm may consider the nature of the resources provided by service providers, how and the extent to which they will be used by the firm, and the general characteristics of the service providers used by

	<p>the firm (e.g., the varying types of other professional services firms that are used), in order to identify and assess quality risks related to the use of such resources.</p> <p>A107. In determining whether a resource from a service provider is appropriate for use in the firm’s system of quality management and performance of engagements, the firm may obtain information about the service provider and the resource they provide from a number of sources. Matters the firm may consider include:</p> <ul style="list-style-type: none"> • The related quality objective and quality risks. For example, in the case of a methodology from a service provider, there may be quality risks related to would need to achieve the quality objective in paragraph 32(g), i.e., such as a quality risk that the service provider does not update the methodology to reflect changes in be appropriate and consistent with professional standards and applicable legal and regulatory requirements. • The nature and scope of the resources, and the conditions of the service (e.g., in relation to an IT application, how often updates will be provided, limitations on the use of the IT application and how the service provider addresses confidentiality of data). • The extent to which the resource is used across the firm, how the resource will be used by the firm and whether it is suitable for that purpose. • The extent of customization of the resource for the firm. • The firm’s previous use of the service provider. • The service provider’s experience in the industry and reputation in the market. <p>A108. The firm may have a responsibility to take further actions in using the resource from a service provider so that the resource functions effectively. For example, the firm may need to communicate information to the service provider in order for the resource to function effectively, or, in relation to an IT application, the firm may need to have supporting IT infrastructure and IT processes in place.</p>
<p>Information and Communication</p>	<p>Information and Communication (Ref: Para. 33)</p>
<p>33. The firm shall establish the following quality objectives that address obtaining, generating or using information regarding the</p>	<p>A109. Obtaining, generating or communicating information is generally an ongoing process that involves all personnel and encompasses the dissemination of information within the firm and externally. Information and communication is pervasive to all components of the system of quality management.</p>

<p>system of quality management, and communicating information within the firm and to external parties on a timely basis to enable the design, implementation and operation of the system of quality management: (Ref: Para. A109)</p>	<p><i>The Firm's Information System</i> (Ref: Para. 33(a))</p>
<p>(a) The information system identifies, captures, processes and maintains relevant and reliable information that supports the system of quality management, whether from internal or external sources. (Ref: Para. A110–A111)</p>	<p>A110. Reliable <u>and relevant</u> information includes information that is accurate, complete, timely and valid to enable the proper functioning of the firm's system of quality management and to support decisions regarding the system of quality management.</p>
<p>(b) The culture of the firm <u>recognizes</u> <u>and reinforces</u> <u>promotes</u> <u>and emphasizes</u> the responsibility of <u>personnel</u> <u>individuals</u> to exchange information with the firm and with one another. (Ref: Para. A112)</p>	<p>A111. The information system may include the use of manual or IT elements, which affect the manner in which information is identified, captured, processed, maintained and communicated. The procedures to identify, capture, process, maintain and communicate information may be enforced through IT applications, and in some cases may be embedded within the firm's responses for other components. In addition, digital records may replace or supplement physical records.</p>
<p>(c) Relevant and reliable information is exchanged throughout the firm <u>and with engagement</u> <u>teams</u>, including: (Ref: Para. A113)</p>	<div style="border: 1px solid black; padding: 5px;"> <p><i>Scalability example to demonstrate how the information system may be designed in a less complex firm:</i></p> <p>Less complex firms with fewer personnel, and direct involvement of leadership may not need rigorous policies and procedures that specify how information should be identified, captured, processed and maintained.</p> </div>
	<p><i>Communication Within the Firm</i> (Ref: Para. 33(b), 33(c))</p>
	<p>A112. The firm may <u>recognize</u> <u>promote</u> and <u>reinforce</u> <u>emphasize</u> the responsibility of <u>personnel</u> <u>individuals</u> <u>and engagement teams</u> to exchange information with the firm and with one another by establishing communication channels to facilitate communication across the firm.</p>
	<div style="border: 1px solid black; padding: 5px;"> <p><i>Examples of communication among the firm, <u>personnel and engagement teams</u> and other individuals</i></p> <ul style="list-style-type: none"> • The firm communicates the responsibility for implementing the firm's responses to <u>personnel and engagement teams</u> and other individuals. • The firm communicates changes to the system of quality management to <u>personnel and engagement teams</u> and other individuals, to the extent that the changes are relevant to their responsibilities and enables <u>personnel and</u> the engagement teams and other individuals to take prompt and appropriate action in accordance with their responsibilities. </div>

<p>(i) Information is communicated to <u>personnel</u> and engagement teams and other individuals, and the nature, timing and extent of the information is sufficient to enable them to understand and carry out their responsibilities relating to the performance of engagements or activities within the system of quality management <u>or engagements</u>.</p> <p>(ii) <u>Personnel</u> and <u>engagement teams</u> communicate information to the firm when performing engagements or activities within the system of quality management <u>or engagements</u>.</p> <p>(d) Relevant and reliable information is communicated to external parties, including:</p>	<ul style="list-style-type: none"> • The firm communicates information that is obtained during the firm’s acceptance and continuance process that is relevant to engagement teams in planning and performing engagements. • Engagement teams communicate to the firm information about: <ul style="list-style-type: none"> ○ The client that is obtained during the performance of an engagement that may have caused the firm to decline the client relationship or specific engagement had that information been known prior to accepting or continuing the client relationship or specific engagement. ○ The operation of the firm’s responses (e.g., concerns about the firm’s processes for assigning <u>personnel</u>individuals to engagements), which in some cases, may indicate a deficiency in the firm’s system of quality management. • <i>[Moved from last bullet]</i> Engagement teams communicate information to the engagement quality reviewer or individuals providing consultation. • <u>Group engagement teams communicate matters to component auditors in accordance with the firm’s policies or procedures, including matters related to quality management at the engagement level.</u> • The individual(s) assigned operational responsibility for compliance with independence requirements communicates to relevant <u>personnel and engagement teams</u>individuals changes in the independence requirements and the firm’s policies or procedures to address such changes. • <i>[Moved to 5th bullet]</i> <p><i>Communication with External Parties</i></p> <p>Communication <u>to or within</u> the <u>Firm’s</u> Network and <u>to</u> Service Providers (Ref: Para. 33(d)(i))</p> <p>A113. In addition to the firm communicating information to <u>or within</u> the <u>firm’s</u> network or <u>to</u> a service provider, the firm may need to obtain information from the network or a service provider that supports the firm in the design, implementation and operation of its system of quality management.</p>
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<p>(i) Information is communicated by the firm to <u>or within</u> the <u>firm's</u> network or to service providers, if any, enabling the network or service providers to fulfill their responsibilities relating to the network requirements or network services or resources provided by them. (Ref: Para. A113)</p>	<p><i>Example of information obtained by the firm from <u>within</u> the <u>firm's</u> network</i></p> <p>The firm obtains information from the network <u>or other network firms</u> <u>about clients of other firms within the network, where there are independence requirements that affect the firm as the relevant ethical requirements include requirements for independence that apply when the firm belongs to a network.</u></p>
<p>(ii) Information is communicated externally when required by law, regulation or professional standards, or to support external parties' understanding of the system of quality management. (Ref: Para. A114–A115)</p>	<p>Communication <u>with Others External to the Firm</u> <u>Required by Law or Regulation</u> (Ref: Para. 33(d)(ii))</p> <p>A114. <i>Examples of when law, regulation or professional standards may require the firm to communicate information to external parties</i></p> <ul style="list-style-type: none"> The firm becomes aware of non-compliance with laws and regulations by a client, and relevant ethical requirements require the firm to report the non-compliance with laws and regulations to an appropriate authority outside the client entity, or to consider whether such reporting is an appropriate action in the circumstances. Law <u>or</u>, regulation <u>or national standards</u> requires the firm to publish a transparency report and specifies the nature of the information that is required to be included in the transparency report. <u>Securities stock exchange rules or law or</u> regulations may requires the firm to communicate certain matters to those charged with governance. <p>Communication to External Parties to Support an Understanding of the System of Quality Management (Ref: Para. 40(d)(ii))</p> <p>A115. In some cases, law or regulation may preclude the firm from communicating information related to its system of quality management externally.</p> <p><i>Examples of when the firm may be precluded from communicating information externally</i></p> <ul style="list-style-type: none"> Privacy or secrecy law or regulation prohibits disclosure of certain information.

	<ul style="list-style-type: none"> • Law, regulation or relevant ethical requirements include provisions addressing the duty of confidentiality.
<p>Specified Responses</p>	<p>Specified Responses (Ref: Para. 34)</p>
<p>34. In designing and implementing responses <u>in accordance with paragraph 26 and in order to achieve the quality objectives</u>, the firm shall include the following responses in accordance with paragraph 22F: (Ref: Para. A116)</p> <p>(aa) The firm establishes policies or procedures for:</p> <p>(i) Identifying, evaluating and addressing threats to compliance with the relevant ethical requirements; and (Ref: Para. A117)</p> <p>(ii) Identifying, communicating, evaluating and reporting of any breaches of the relevant ethical requirements and appropriately responding to the causes and</p>	<p>A116. The specified responses <u>may address multiple quality risks related to more than one quality objective across different components. For example, policies or procedures for complaints and allegations may address quality risks related to quality objectives in resources (e.g., personnel's commitment to quality), relevant ethical requirements and governance and leadership. The specified responses</u> alone are not sufficient to achieve the objectives of the system of quality management and may address quality risks that are relevant to multiple components.</p> <p><i>Relevant Ethical Requirements</i> (Ref: Para. 34(a)–34(b))</p> <p>A117. Relevant ethical requirements may contain provisions regarding the identification and evaluation of threats and how they should be addressed. For example, the IESBA Code provides a conceptual framework for this purpose and, in applying the conceptual framework, requires that the firm use the reasonable and informed third party test.</p> <p>A118. <i>[Moved from paragraph A153AC]</i> Relevant ethical requirements may specify how the firm is required to respond to a breach. For example, the IESBA Code sets out requirements for the firm in the event of a breach of the IESBA Code and includes specific requirements addressing breaches of the International Independence Standards, which includes requirements for communication with external parties.</p> <p>A119. Matters that may need to be addressed by the firm <u>may address</u> relating to breaches of the relevant ethical requirements include:</p> <ul style="list-style-type: none"> • The communication of breaches of the relevant ethical requirements to appropriate <u>personnel/individual(s)</u> within the firm; • The evaluation of the significance of a breach and its effect on compliance with relevant ethical requirements;

<p>consequences of the breaches in a timely manner. (Ref: Para. A118–A119)</p> <p>(b) The firm obtains, at least annually, a documented confirmation of compliance with independence requirements from all personnel required by relevant ethical requirements to be independent.</p> <p>(c) The firm establishes policies or procedures for receiving, investigating and resolving complaints and allegations about <u>failures to perform work in accordance with applicable legal and regulatory requirements, or non-compliance with the firm's policies or procedures the commitment to quality of the firm or its personnel</u>. (Ref: Para. A120–A121)</p> <p>(d) The firm establishes policies or procedures that address circumstances when:</p> <p>(i) The firm becomes aware of information</p>	<ul style="list-style-type: none"> • The actions to be taken to satisfactorily address the consequences of a breach, including that such actions be taken as soon as practicable; • Determining whether to report a breach to external parties, such as those charged with governance of the entity to which the breach relates or an external oversight authority; and • Determining the appropriate actions to be taken in relation to the individual(s) responsible for the breach. <p>A153AC. [Moved to paragraph A118]</p> <p><i>Complaints and Allegations</i> (Ref: Para. 34(c))</p> <p>A120. Establishing policies or procedures for dealing with complaints and allegations about a failure to perform work in accordance with professional standards and applicable legal and regulatory requirements, or non-compliance with the firm's policies or procedures, may assist the firm in preventing engagement reports from being issued that are inappropriate. It also may assist the firm in:</p> <ul style="list-style-type: none"> • Identifying and dealing with individual(s), including leadership, who do not act or behave in a manner that <u>demonstrates a commitment to quality and</u> supports the firm's commitment to quality; or • Identifying <u>deficiencies findings</u> in the system of quality management. <p>A121. Complaints and allegations may originate from within or outside the firm and they may be made by <u>personnel, or others</u>individuals internal or external to the firm (e.g., clients, <u>component auditors</u> or <u>individuals</u>others within the firm's network).</p> <p><i>Information That Becomes Known Subsequent to Accepting or Continuing a Client Relationship or Specific Engagement</i> (Ref: Para. 34(d))</p> <p>A122. Information that becomes known subsequent to accepting or continuing a client relationship or specific engagement may:</p> <ul style="list-style-type: none"> • Have existed at the time of the firm's decision to accept or continue the client relationship or specific engagement and the firm was not aware of such information; or
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<p>subsequent to accepting or continuing a client relationship or specific engagement that would have caused it to decline the client relationship or specific engagement had that information been known prior to accepting or continuing the client relationship or specific engagement; or (Ref: Para. A122–A123)</p> <p>(ii) The firm is obligated by law or regulation to accept a client relationship or specific engagement. (Ref: Para. A123)</p> <p>(edA) The firm establishes policies or procedures that address: (Ref: Para. A124–A126)</p> <p>(i) Require <u>communication with those charged with governance when performing an audit of financial statements of</u></p>	<ul style="list-style-type: none"> • Relate to new information that has arisen since the decision to accept or continue the client relationship or specific engagement. <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>Examples of matters addressed in the firm's policies or procedures for circumstances when information becomes known subsequent to accepting or continuing a client relationship or specific engagement that may have affected the firm's decision to accept or continue a client relationship or specific engagement</i></p> <ul style="list-style-type: none"> • Undertaking consultation within the firm or with legal counsel. • Considering whether there is a professional, legal or regulatory requirement for the firm to continue the engagement. • Discussing with the appropriate level of the client's management and with those charged with governance or the engaging party the action that the firm might take based on the relevant facts and circumstances. and • <u>When it is determined that withdrawal is an appropriate action:</u> <ul style="list-style-type: none"> ○ <u>informing the client's management and those charged with governance or the engaging party</u> them of this decision and the reasons for the withdrawal. ○ If the firm withdraws from the engagement, <u>Considering whether there is a professional, legal or regulatory requirement for the firm to report the withdrawal from the engagement, or from both the engagement and the client relationship, together with the reasons for the withdrawal, to regulatory authorities.</u> </div> <p>A123. In some circumstances, jurisdictional law or regulation may impose an obligation on the firm to accept or continue a client engagement, or in the case of the public sector, the firm may be appointed through statutory provisions.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>A153G. <i>Example of matters addressed in the firm's policies or procedures in circumstances when the firm is aware of information that would have caused the firm to decline or discontinue an engagement, however the firm is obligated to accept or continue anthe engagement or the firm is unable to withdraw from anthe engagement, <u>and the firm is aware of information that would have caused the firm to decline or discontinue the engagement</u></i></p> </div>
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<p>listed entities about how the system of quality management supports the consistent performance of quality engagements; (Ref: Para. A127–A128, A132)</p> <p>(ii) Address wWhen it is otherwise appropriate to communicate with external parties about the firm’s system of quality management, and shall require communication with these charged with governance when performing an audit of financial statements of a listed entity; and (Ref: Para. A129)</p> <p>(iii) When the firm communicates with external parties, the matters to be communicated, Address the information to be provided when communicating</p>	<ul style="list-style-type: none"> • The firm considers the effect of the information obtained in determining whether to accept or continue a client relationship or specific engagement on the performance of the engagement. • The firm communicates the information to the engagement partner, and requests the engagement partner to increase the extent and frequency of their direction and supervision of <u>the</u> engagement team members and review of their work. • The firm assigns more experienced personnel individuals to the engagement. • The firm determines that an engagement quality review should be performed. <p><i>Communication with External Parties about the Firm’s System of Quality Management</i> (Ref. Para: 34(e))</p> <p>A124. The firm’s ability to maintain stakeholder confidence in the quality of its engagements may be enhanced through <u>relevant, reliable effective and transparent</u> communication between by the firm and its stakeholders. In circumstances when the firm is transparent about the activities that it has undertaken to address quality, and the effectiveness of those activities, stakeholders’ perception of the quality of engagements performed by the firm may be improved.</p> <p>A125. External parties who may use information about the firm’s system of quality management, and the extent of their interest in the firm’s system of quality management, may vary based on the nature and circumstances of the firm and its engagements.</p> <p><i>Examples of external parties who may use information about the firm’s system of quality management</i></p> <ul style="list-style-type: none"> • Management or those charged with governance of the firm’s clients may use the information to determine whether to appoint the firm to perform an engagement. • External oversight authorities may have indicated a desire for the information to support their responsibilities in monitoring <u>the</u> quality of engagements across a jurisdiction. • Other firms who use the work of the firm in the performing <u>ingance of</u> engagements (e.g., in relation to a group audit) may have requested such information.
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<p>externally in accordance with paragraphs 34(e)(i) and 34(e)(ii), including and the nature, timing and extent and appropriate form of such communication. (Ref: Para. A130–A131)</p> <p>(fe) The firm establishes policies or procedures that address engagement quality reviews in accordance with proposed ISQM 2, and require an engagement quality review for:</p> <p>(i) Audits of financial statements of listed entities;</p> <p>(ii) Audits or other engagements for which an engagement quality review is required by law or regulation; and (Ref: Para. A133)</p> <p>(iii) Audits or other engagements for which the firm determines that an</p>	<ul style="list-style-type: none"> • Other users of the firm’s engagement reports, such as investors who use engagement reports in their decision making, may have indicated a desire for the information. <p>A126. [Example box from paragraph A153GD removed and relocated here] The information provided to those charged with governance about how the system of quality management supports the consistent performance of quality engagements, or communications with external parties <u>Examples of matters that may be communicated by the firm</u> about <u>the</u> system of quality management <u>may include:</u></p> <ul style="list-style-type: none"> • The nature and circumstances of the firm, such as the organizational structure, business model, strategy and operating environment. • The firm’s governance and leadership, such as its culture, <u>– how it demonstrates and</u> commitment to quality, and assigned roles, responsibilities and authority with respect to the system of quality management. • How the firm fulfills its responsibilities in accordance with relevant ethical requirements, including those related to independence. • Factors that contribute to quality engagements, for example, such information may be presented in the form of engagement quality indicators with narrative to explain the indicators. • The results of the firm’s monitoring activities and external inspections, and how the firm has remediated identified deficiencies or is otherwise responding to them. • The evaluation undertaken in accordance with paragraphs 53–54 of whether the system of quality management provides the firm with reasonable assurance that the objectives of the system are being achieved, including the basis for the judgments made in undertaking the evaluation. • How the firm has responded to emerging developments and changes in the circumstances of the firm or its engagements, including how the system of quality management has been adapted to respond to such changes. • The relationship between the firm and the network, the overall structure of the network, a description of network requirements and network services, the responsibilities of the firm and
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<p>engagement quality review is an appropriate response to address one or more quality risk(s). (Ref: Para. A134-A137)</p>	<p>the network (including that the firm is ultimately responsible for the system of quality management), and information about the overall scope and results of network monitoring activities across the network firms.</p> <p>A127. How the communication with those charged with governance is undertaken (i.e., by the firm or the engagement team) may depend on the firm's policies or procedures and the circumstances of the engagement.</p> <p>A128. Effective two-way communication with those charged with governance is important in assisting them in understanding matters related to the audit, and enables the auditor to develop a constructive working relationship with those charged with governance. ISA 260 (Revised) deals with the auditor's responsibility to communicate with those charged with governance in an audit of financial statements, and addresses the auditor's determination of <u>the appropriate person(s) within the entity's governance structure</u> with whom to communicate²⁰ and the communication process.²¹ In some circumstances, it may be appropriate to communicate with those charged with governance of entities other than listed entities (or when performing other engagements), for example, entities <u>which may have public interest considerations or public accountability characteristics, such as for whom the firm performs audits of financial statements that have:</u></p> <ul style="list-style-type: none"> • Public interest or public accountability characteristics, such as eEntities that hold a significant amount of assets in a fiduciary capacity for a large number of stakeholders including financial institutions, such as certain banks, insurance companies, and pension funds. • Entities with a high public profile, or whose management or owners have a high public profile. • Entities with a large number or diverse range of shareholders. <p>A129. The firm's determination of when it is appropriate to communicate with external parties about the firm's system of quality management, the matters to be communicated, and the nature, timing and extent and appropriate form of such communication, is a matter of professional judgment and may be influenced by matters such as:</p>
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²⁰ ISA 260 (Revised), Communication with Those Charged with Governance, paragraphs 11–13

²¹ ISA 260 (Revised), paragraphs 18–22

- The types of engagements performed by the firm, and the types of entities for which such engagements are undertaken.
- The nature and circumstances of the firm.
- The nature of the firm's operating environment, such as customary business practice in the firm's jurisdiction and the characteristics of the financial markets in which the firm operates.
- The extent to which the firm has already communicated with external parties in accordance with law or, regulation ~~or national standards~~ (i.e., whether further communication is needed, and if so, the matters to be communicated).
- The expectations of stakeholders in the firm's jurisdiction, including the understanding and interest that external parties have expressed about the engagements undertaken by the firm, and the firm's processes in performing the engagements.
- Jurisdictional trends.
- The information that is already available to external parties.
- How external parties may use the information, and their general understanding of matters related to firms' system of quality management and audits or reviews of financial statements, or other assurance or related services engagements.
- The cost of external communication (monetary or otherwise) and whether it would reasonably be expected to outweigh the public interest benefits of such communication.

The above matters may also affect the information provided by the firm in the communication, and the nature, timing and extent and appropriate form of communication.

A130. *[Moved from paragraph A153GD]* The firm may consider the following attributes in preparing ~~the~~ information that is communicated to external parties ~~about the firm's system of quality management:~~

- The information is specific to the circumstances of the firm. Relating the matters in the firm's communication directly to the specific circumstances of the firm may help to minimize the potential that such information becomes overly standardized and less useful over time.
- The information is presented in a clear and understandable manner, and the manner of presentation is neither misleading nor would inappropriately influence the users of the

communication (e.g., the information is presented in a manner that is appropriately balanced towards positive and negative aspects of the matter being communicated).

- The information is accurate and complete in all material respects and does not contain information that is misleading.
- The information takes into consideration the information needs of the users for whom it is intended. In considering the information needs of the users, the firm may consider matters such as the level of detail that users would find meaningful and whether users have access to relevant information through other sources (e.g., the firm's website).

A131. The firm uses professional judgment in determining, in the circumstances, the appropriate form of communication with the external party, including communication with those charged with governance when performing an audit of financial statements of listed entities, which may be made orally or in writing that is suitable in the circumstances. Accordingly, the form of communication may vary.

Examples of form of communication to external parties

- A webpage, videos or interviews.
- A publication such as a transparency report or audit quality report.
- Targeted communication to specific stakeholders (e.g., information about the results of the firm's monitoring and remediation process).
- Direct conversations and interactions with the external party, including through social media (e.g., discussions between the engagement team and those charged with governance).

~~A153GD.~~ [Moved to paragraphs A126 and A130]

Public Sector Considerations (Ref: Para. 34(e)(i))

A132. The firm may determine it is appropriate to communicate to those charged with governance of a public sector entity about how the firm's system of quality management supports the consistent

performance of quality engagements, taking into account the size and complexity of the public sector entity, the range of their stakeholders and the nature of the services they provide.

Engagements Subject to an Engagement Quality Review

Engagement Quality Review Required by Law or Regulation (Ref: Para. 34(f)(ii))

A133. Law or regulation may require an engagement quality review to be performed, for example, for audit engagements for entities that:

- Are public interest entities as defined in a particular jurisdiction;
- Operate in the public sector or which are recipients of government funding, or entities with public accountability;
- Operate in certain industries (e.g., financial institutions such as banks, insurance companies and pension funds);
- Meet a specified asset threshold; or
- Are under the management of a court or judicial process (e.g., liquidation).

Engagement Quality Review as a Response to Address One or More Quality Risk(s) (Ref: Para. 34(f)(iii))

A134. The conditions, events, circumstances, actions or inactions understood by the firm in accordance with paragraph 25(a)(ii) relate to the nature and circumstances of the engagements performed by the firm. In designing and implementing responses, the firm may determine that an engagement quality review is an appropriate response that is based on, and responsive to, the reasons for the assessments given to the quality risks arising from certain conditions, events, circumstances, actions or inactions.

	<p><i>Examples of conditions, events, circumstances, actions or inactions giving rise to one or more quality risk(s) for which an engagement quality review may be an appropriate response</i></p> <p>Those relating to the types of engagements performed by the firm and reports to be issued:</p> <ul style="list-style-type: none">• Engagements that involve a high level of complexity or judgment, such as:<ul style="list-style-type: none">○ Audits of financial statements for entities operating in an industry that typically has accounting estimates with a high degree of estimation uncertainty (e.g., certain large financial institutions or mining entities), or for entities for which uncertainties exist related to events or conditions that may cast significant doubt on their ability to continue as a going concern.○ Assurance engagements that require specialized skills and knowledge in measuring or evaluating the underlying subject matter against the applicable criteria (e.g., a greenhouse gas statement in which there are significant uncertainties associated with the quantities reported therein).• Engagements on which issues have been encountered, such as audit engagements with recurring internal or external inspection findings, unremediated deficiencies in internal control, or a material restatement of comparative information in the financial statements.• Engagements for which unusual circumstances have been identified during the firm's acceptance and continuance process (e.g., a new client that had a disagreement with its previous auditor or assurance practitioner).• Engagements that involve reporting on financial or non-financial information that is expected to be included in a regulatory filing, or that may involve a higher degree of judgment, such as pro forma financial information to be included in a prospectus. <p>Those relating to the types of entities for which engagements are undertaken:</p> <ul style="list-style-type: none">• Entities in emerging industries, or for which the firm has no previous experience.• Entities for which concerns were expressed in communications from securities or prudential regulators.• Entities other than listed entities, which may have public interest considerations or public
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	<p>accountability characteristics, for example:</p> <ul style="list-style-type: none">○ Entities that hold a significant amount of assets in a fiduciary capacity for a large number of stakeholders including financial institutions, such as certain banks, insurance companies, and pension funds for which an engagement quality review is not otherwise required by law or regulation.○ Entities with a high public profile, or whose management or owners have a high public profile.○ Entities with a large number or diverse range of shareholders. <p>A135. The firm's responses to address quality risks may include other forms of engagement reviews that are not an engagement quality review. For example, for audits of financial statements, the firm's responses may include reviews of the engagement team's procedures relating to significant risks, or reviews of certain significant judgments, by individuals within the firm who have specialized technical expertise. In some cases, these other types of engagement reviews may be undertaken in addition to an engagement quality review.</p> <p>A136. In some cases, the firm may determine that there are no audits or other engagements for which an engagement quality review or another form of engagement review is an appropriate response to address the quality risk(s).</p> <p>Public sector considerations</p> <p>A137. The firm may identify and assess quality risks specific to public sector entities due to their size and complexity, the range of their stakeholders or the nature of the services they provide. In these circumstances, the firm may determine that an engagement quality review is an appropriate response to address such quality risk(s). Law or regulation may establish additional reporting requirements for a public sector entity (e.g., a separate report on instances of non-compliance with law or regulation to the legislature or other governing body or communicating such instances in the auditor's report on the financial statements). In such cases, the firm may also consider the importance to users of that reporting in identifying and assessing quality risks and determining whether an engagement quality review is an appropriate response.</p>
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<p>Monitoring and Remediation Process</p> <p>35. The firm shall establish a monitoring and remediation process to: (Ref: Para. A138)</p> <p>(a) Provide relevant, reliable and timely information about the design, implementation and operation of the system of quality management.</p> <p>(b) Take appropriate actions to respond to identified deficiencies such that deficiencies are remediated on a timely basis.</p>	<p>Monitoring and Remediation Process (Ref: Para. 35–47)</p> <p>A138. In addition to enabling the firm's evaluation of the system of quality management, the monitoring and remediation process facilitates the proactive and continual improvement of engagement quality and the system of quality management. For example:</p> <ul style="list-style-type: none"> Given the inherent limitations of a system of quality management, the identification of deficiencies is not unusual and it is an important aspect of the system of quality management, because prompt identification of deficiencies enables the firm to remediate them in a timely and effective manner, and contributes to a culture of continuous improvement. The monitoring activities may provide information that enables the firm to prevent a deficiency through responding to a finding that could, over a period of time, lead to a deficiency.
<p><i>Designing and Performing Monitoring Activities</i></p> <p>36. The firm shall design and perform monitoring activities to provide a basis for the identification of deficiencies.</p>	<p><i>Designing and Performing Monitoring Activities</i> (Ref: Para. 36–39)</p>
<p>37. In determining the nature, timing and extent of the monitoring activities, the firm shall take into account: (Ref: Para. A139–A142)</p> <p>(a) The reasons for the assessments given to the quality risks;</p>	<p>A139. The firm's monitoring activities may comprise a combination of ongoing monitoring activities and periodic monitoring activities. Ongoing monitoring activities are generally routine activities, built into the firm's processes and performed on a real-time basis, reacting to changing conditions. Periodic monitoring activities are conducted at certain intervals by the firm. In most cases, ongoing monitoring activities provide information about the system of quality management in a timelier manner.</p> <p>A140. Monitoring activities may include the inspection of in-process engagements. Inspections of engagements are designed to monitor that an aspect of the system of quality management is</p>

<p>(b) The design of the responses;</p> <p>(c) The design of the firm's risk assessment process and monitoring and remediation process; (Ref: Para. A143–A144)</p> <p>(d) Changes in the system of quality management; (Ref: Para. A145)</p> <p>(e) The results of previous monitoring activities, whether previous monitoring activities continue to be relevant in evaluating the firm's system of quality management and whether remedial actions to address previously identified deficiencies were effective; and (Ref: Para. A146–A147)</p> <p>(f) Other relevant information, including complaints and allegations about <u>failures to perform work in accordance with professional standards and applicable legal and regulatory requirements or non-compliance with the firm's policies or procedures</u> actions or behaviors that do not</p>	<p>designed, implemented and operating in the manner intended. In some circumstances, the system of quality management may include responses that are designed to review engagements while in process that appear similar in nature to an inspection of in-process engagements (e.g., reviews that are designed to detect failures or shortcomings in the system of quality management so that they can prevent an <u>n-assessed</u> quality risk from occurring). The purpose of the activity will guide its design and implementation, and where it fits within the system of quality management (i.e., whether it is an inspection of an in-process engagement that is a monitoring activity or a review of an engagement that is a response to address an <u>n-assessed</u> quality risk).</p> <p>A141. The nature, timing and extent of the monitoring activities may also be affected by other matters, including:</p> <ul style="list-style-type: none"> • The size, structure and organization of the firm. • The involvement of the <u>firm's</u> network in monitoring activities. • The resources that the firm intends to use to enable monitoring activities, such as the use of IT applications. <p>A142. When performing monitoring activities, the firm may determine that changes to the nature, timing and extent of the monitoring activities are needed, such as when findings indicate the need for more extensive monitoring activities.</p> <p>The Design of the Firm's Risk Assessment Process and Monitoring and Remediation Process (Ref: Para. 37(c))</p> <p>A143. How the firm's risk assessment process is designed (e.g., a centralized or decentralized process, or the frequency of review) may affect the nature, timing and extent of the monitoring activities, including monitoring activities over the firm's risk assessment process.</p> <p>A144. The overall design of the monitoring activities <u>that are undertaken to obtain information about,</u> including the extent to which the firm may need to specifically monitor the monitoring and remediation process, may be affected by <u>the design of the monitoring and remediation process, and the nature and circumstances of the firm</u> the nature and combination of monitoring activities undertaken by the firm, including whether the monitoring activities are preventive or detective, and their timing and extent.</p>
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~~demonstrate a commitment to quality~~, information from external inspections and information from service providers. (Ref: Para. A148–A150)

Scalability example to demonstrate ~~considerations affecting the monitoring activities for the monitoring and remediation process~~

- In a less complex firm, ~~the monitoring activities for the monitoring and remediation process may comprise a consideration by leadership, based on their frequent 's-daily interaction with the system of quality management and findings from, of the nature, timing and extent of the monitoring activities undertaken, the results of the monitoring activities, and the firm's actions to address the results over the firm's responses may provide sufficient information about the effectiveness of the monitoring and remediation activities in achieving their purpose. In such circumstances, the firm may determine it appropriate to not undertake formalized monitoring of the monitoring and remediation process.~~
- In a more complex firm, ~~the monitoring activities for the monitoring and remediation process~~ may be specifically designed to determine that the monitoring and remediation process is providing relevant, reliable and timely information about the system of quality management, and responding appropriately to identified deficiencies.

Changes in the System of Quality Management (Ref: Para. 37(d))

A145. Changes in the system of quality management may include:

- Changes to address an identified deficiency in the system of quality management.
- Changes to the quality objectives, quality risks or responses as a result of changes in the nature and circumstances of the firm and its engagements.

When changes occur, previous monitoring activities undertaken by the firm may no longer provide the firm with information to support the evaluation of the system of quality management and, therefore, the firm's monitoring activities may include monitoring of those areas of change.

Previous Monitoring Activities (Ref: Para. 37(e), 43(b))

A146. The results of the firm's previous monitoring activities may indicate areas of the system where a deficiency may arise, particularly areas where there is a history of identified deficiencies.

	<p>A147. Previous monitoring activities undertaken by the firm may no longer provide the firm with information to support the evaluation of the system, including on areas of the system of quality management that have not changed, particularly when time has elapsed since the monitoring activities were undertaken.</p> <p>Other Relevant Information (Ref: Para. 16(h), 37(f))</p> <p>A148. In addition to the sources of information indicated in paragraph 37(f), other relevant information may include:</p> <ul style="list-style-type: none"> • Information communicated by the <u>firm's</u> network in accordance with paragraphs 50(c) and 51(b) about the firm's system of quality management, including the network requirements or network services that the firm has included in its system of quality management. • Information communicated by a service provider about the resources the firm uses in its system of quality management. • Information available from regulators <u>about the entities for whom the firm performs engagements, which is made available to the firm,</u> such as information from a securities regulator about an entity for whom the firm performs engagements (e.g., irregularities in the if <u>entity's</u> financial statements). <p>A149. The results of external inspections or other relevant information, both internal and external, may indicate that previous monitoring activities undertaken by the firm failed to identify a deficiency in the system of quality management. This information may affect the firm's consideration of the nature, timing and extent of the monitoring activities.</p> <p>A150. External inspections are not a substitute for the firm's internal monitoring activities. Nevertheless, the results of external inspections inform the nature, timing and extent of the monitoring activities.</p>
<p>38. The firm shall include the inspection of completed engagements in its monitoring activities and shall determine which engagements and engagement partners to select. In</p>	<p><i>Engagement Inspections</i> (Ref: Para. 38)</p> <div style="border: 1px solid black; padding: 5px;"> <p>A151. <i>Examples of matters in paragraph 37 that may be considered by the firm in selecting completed engagements for inspection</i></p> </div>

doing so, the firm shall: (Ref: Para. A141, A151–A154)

(a) Take into account the matters in paragraph 37;

(b) Consider the nature, timing and extent of other monitoring activities undertaken by the firm and the engagements and engagement partners subject to such monitoring activities; and

(c) Select at least one completed engagement for each engagement partner on a cyclical basis determined by the firm.

- In relation to the conditions, events, circumstances, actions or inactions giving rise to the quality risks:
 - The types of engagements performed by the firm, and the extent of the firm’s experience in performing the type of engagement.
 - The types of entities for which engagements are undertaken, for example:
 - Entities that are listed,
 - Entities operating in emerging industries.
 - Entities operating in industries associated with a high level of complexity or judgment.
 - Entities operating in an industry that is new to the firm.
 - The tenure and experience of engagement partners.
- The results of previous inspections of completed engagements, including for each engagement partner.
- In relation to other relevant information:
 - Complaints or allegations ~~regarding about~~ an engagement partner’s ~~commitment to quality~~.
 - The results of external inspections, including for each engagement partner.
 - The results of the firm’s evaluation of each engagement partner’s commitment to quality.

A152. ~~[Example box deleted] Examples of how other monitoring activities undertaken by the firm may affect the inspection of completed engagements~~—The firm may undertake multiple monitoring activities, other than inspection of completed engagements, that focus on determining whether engagements have complied with policies or procedures. These monitoring activities may be undertaken on certain engagements or engagement partners. The nature and extent of these monitoring activities, and the results, may be used by the firm in determining:

- Which completed engagements to select for inspection;
- Which engagement partners to select for inspection;
- How frequently to select an engagement partner for inspection; **OR**
- Which aspects of the engagement to consider when performing the inspection of completed engagements.

A153. The inspection of completed engagements for engagement partners on a cyclical basis may assist the firm in monitoring whether engagement partners have fulfilled their overall responsibility for managing and achieving quality on the engagements they are assigned to.

Examples of how the firm may apply a cyclical basis for the inspection of completed engagements for each engagement partner

The firm may establish policies or procedures that require the inspection of a completed engagement for each engagement partner performing audits of financial statements ~~of listed entities~~ once every three years, and for all other engagement partners, once every five years. The firm may include in the policies or procedures:

- The criteria for selecting completed engagements;
- The selection of engagement partners in a manner that is unpredictable; and
- The selection of engagement partners more, or less, frequently than the standard period set out in the policy. For example, the firm's policies or procedures **may**:
 - Address the selection of engagement partners more frequently than the standard period set out in the policy if certain conditions or circumstances exist, such as when:
 - Multiple deficiencies have been identified by the firm that have been evaluated as severe, and the firm determines that a more frequent cyclical inspection is needed across all engagement partners.

- The engagement partner performs engagements for entities operating in a certain industry where there are high levels of complexity or judgment increased complexities.
- An engagement performed by the engagement partner has been subject to other monitoring activities, and the results of the other monitoring activities were unsatisfactory.
- The engagement partner has performed an engagement for an entity operating in an industry in which the engagement partner has limited experience.
- The engagement partner is a newly appointed engagement partner, or has recently joined the firm from another firm or another jurisdiction.
- May a Allow the selection of an engagement partner to be deferred (e.g., for a year) if certain conditions or circumstances exist, such as when:
 - Engagements performed by the engagement partner have been subject to other monitoring activities in the last three years; and
 - The results of the other monitoring activities provide sufficient information about the engagement partner, i.e., performing the inspection of completed engagements would unlikely provide the firm with further information about the engagement partner.

A154. The matters considered in an inspection of an engagement depends on how the inspection will be used to monitor the system of quality management. Ordinarily, the inspection of an engagement includes determining that responses designed to be that are implemented at the engagement level (e.g., the firm's policies and procedures in respect of engagement performance), have been implemented as designed and are operating effectively. [Example box removed] Example of a response at the engagement level that is considered by the firm in an inspection of an engagement
~~In inspecting engagements, the firm determines whether engagement teams have appropriately applied the firm's policies and procedures in respect of engagement performance.~~

<p>39. The firm shall establish policies or procedures that:</p> <p>(a) Require the individuals performing the monitoring activities to have the competence and capabilities, including sufficient time, to perform the monitoring activities effectively; and</p> <p>(b) Address the objectivity of the individuals performing the monitoring activities. Such policies or procedures shall prohibit the engagement team members or the engagement quality reviewer of an engagement from performing any inspection of that engagement. (Ref: Para. A155–A156)</p>	<p>Individuals Performing the Monitoring Activities (Ref: Para. 39(b))</p> <p>A155. The provisions of relevant ethical requirements are relevant in designing the policies or procedures addressing the objectivity of the individuals performing the monitoring activities. A self-review threat may arise when an individual who performs:</p> <ul style="list-style-type: none"> • An inspection of an engagement was: <ul style="list-style-type: none"> ○ In the case of an audit of financial statements, an engagement team member or the engagement quality reviewer of that engagement or an engagement for a subsequent financial period; or ○ For all other engagements, an engagement team member or the engagement quality reviewer of that engagement. • Another type of monitoring activity had participated in designing, executing or operating the response being monitored. <p>A156. In some circumstances, for example, in the case of a smallerless complex firm, there may not be an individualpersonnel within the firm who havehas the competence, capabilities, time or objectivity to perform the monitoring activitiesy. In these circumstances, the firm may use network services or a service provider to perform the monitoring activities.</p>
<p><i>Evaluating Findings and Identifying Deficiencies</i></p> <p>40. The firm shall evaluate findings to determine whether deficiencies exist, including in the monitoring and remediation process. (Ref: Para. A157–A161)</p>	<p><i>Evaluating Findings and Identifying Deficiencies</i> (Ref: Para. 16(a), 40–41)</p> <p>A157. The firm accumulates findings from the performance ofresults of monitoring activities, results of external inspections and other relevant sources. The information accumulated from the monitoring activities, external inspections and other relevant sources may reveal other observations about the firm’s system of quality management, such as:</p> <ul style="list-style-type: none"> • Actions, behaviors or conditions that have given rise to positive outcomes in the context of quality or the effectiveness of the system of quality management; or • Similar circumstances where no findings were noted Observations that similar monitoring activities did not note findings—(e.g., in relation to engagements, observations that where no

findings were noted, ~~and the engagements have a similar nature to the engagements where findings were noted from monitoring activities on some engagements when there were findings from monitoring activities on other engagements~~).

Other observations may be useful to the firm as they may assist the firm in investigating the root cause(s) of identified deficiencies, indicate practices that the firm can support or apply more extensively (e.g., across all engagements) or highlight opportunities for the firm to enhance the system of quality management.

A158. The firm ~~may exercise~~ professional judgment in determining whether findings, individually or in combination with other findings, ~~are of such significance that they~~ give rise to a deficiency in the system of quality management. ~~Significance~~ ~~The judgment is~~ ~~made~~ ~~judged~~ by the firm, taking into consideration the relative importance of the findings in the context of the quality objectives, quality risks, responses or other aspects of the system of quality management to which they relate. The firm's judgments may be affected by quantitative and qualitative factors relevant to the findings. In some circumstances, the firm may determine it appropriate to obtain more information about the findings in order to determine whether a deficiency exists. Not all findings, including engagement findings, will be a deficiency.

A159. *Examples of quantitative and qualitative factors that a firm may consider in determining whether findings ~~are of such significance that they~~ give rise to a deficiency*

Quality risks and responses

- If the findings relate to a response:
 - How the response is designed, for example, the nature of the response, ~~and~~ the frequency of its occurrence (if applicable), and the relative importance of the response to addressing the ~~assessed~~ quality risk(s) and achieving the quality objective(s) to which it relates.
 - The nature of the ~~assessed~~ quality risk to which the response relates, and the extent to which the findings indicate that the ~~assessed~~ quality risk has not been addressed.

- Whether there are other responses that address the same ~~assessed~~ quality risk and whether there are findings for those responses.

Nature of the findings and their pervasiveness

- The nature of the findings. For example, findings related to leadership actions and behaviors may be qualitatively significant, given the pervasive effect this could have on the system of quality management as a whole.
- Whether the findings, in combination with other findings, indicate a trend or systemic issue. For example, similar engagement findings that appear on multiple engagements may indicate a systemic issue.

Error rates and population size

- ~~The~~ The design of the monitoring activity from which the findings arose. For example, the firm may consider the tolerable error rate of the activity and whether it was designed to focus on specific areas of risk or the whole population.
- The extent of the monitoring activity from which the findings arose, including the ~~number of selections~~~~size of sample selected~~ relative to the size of the entire population.
- The extent of the findings in relation to the ~~selection~~~~ample of the population~~ covered by the monitoring activity, ~~and in relation to the tolerable error rate~~. For example, in the case of inspection of engagements, the number of engagements selected where the findings were identified, relative to the total number of engagements selected, ~~and the tolerable error rate set by the firm~~.

A160. Evaluating findings and identifying deficiencies, ~~and~~ evaluating the severity and pervasiveness of ~~an identified~~ deficiency, including investigating the root cause(s) of ~~an identified~~ deficiency, are part of an iterative and non-linear process.

	<p><i>Examples of how the process of evaluating findings and identifying deficiencies, evaluating identified deficiencies, including investigating the root cause(s) of <u>identified</u> deficiencies, is iterative and non-linear</i></p> <ul style="list-style-type: none"> In investigating the root cause(s) of an <u>identified</u> deficiency, the firm <u>may identify</u> a circumstance <u>that has similarities to other circumstances where there were that is consistent with other findings that were</u> not considered a deficiency. As a result, the firm adjusts its evaluation of the other findings and classifies them as a deficiency. In evaluating the severity and pervasiveness of an <u>identified</u> deficiency, the firm <u>may identify</u> a trend or systemic issue that correlates with other findings that are not considered deficiencies. As a result, the firm adjusts its evaluation of the other findings and also classifies them as deficiencies. <p>A161. The results of monitoring activities, results of external inspections and other relevant information (e.g., network monitoring activities or complaints and allegations) may reveal information about the effectiveness of the monitoring and remediation process. <i>[Example box removed] Example of how results of external inspections may reveal information about the effectiveness of the monitoring and remediation process</i> For example, the the results of external inspections may provide information about the system of quality management that has not been identified by the firm’s monitoring and remediation process, which may highlight a deficiency in that process.</p>
<p><i>Evaluating Identified Deficiencies</i></p> <p>41. The firm shall evaluate the severity and pervasiveness of identified deficiencies by: (Ref: Para. A160, A162–A163)</p> <p>(a) Investigating the root cause(s) of the identified deficiencies. In determining the nature, timing and extent of the procedures to</p>	<p><i>Evaluating Identified Deficiencies (Ref: Para. 41)</i></p> <p>A162. Factors the firm may consider in evaluating the severity and pervasiveness of an identified deficiency include:</p> <ul style="list-style-type: none"> The nature of the identified deficiency, including the aspect of the firm’s system of quality management to which the deficiency relates, and whether the deficiency is in the design, implementation or operation of the system of quality management; In the case of <u>identified</u> deficiencies related to responses, whether there are compensating responses to address the <u>assessed</u> quality risk to which the response relates; The root cause(s) of the identified deficiency;

<p>investigate the root cause(s), the firm shall take into account the nature of the identified deficiencies and their possible severity. (Ref: Para. A164–A168)</p>	<ul style="list-style-type: none"> • The frequency with which the matter giving rise to the <u>identified</u> deficiency occurred; and • The magnitude of the identified deficiency, how quickly it occurred and the duration of time that it existed and had an effect on the system of quality management.
<p>(b) Evaluating the effect of the identified deficiencies, individually and in aggregate, on the system of quality management.</p>	<p>A163. The severity and pervasiveness of <u>identified</u> deficiencies affects the evaluation of the system of quality management that is undertaken by the individual(s) assigned ultimate responsibility and accountability for the system of quality management.</p>
	<p><i>Root Cause of the Identified Deficiencies</i> (Ref: Para. 41(a))</p>
	<p>A164. The objective of investigating the root cause(s) of identified deficiencies is to understand the underlying circumstances that caused the deficiencies to enable the firm to:</p>
	<ul style="list-style-type: none"> • Evaluate the severity and pervasiveness of the <u>identified</u> deficiency; and • Appropriately remediate the <u>identified</u> deficiency.
	<p>Performing a root cause analysis involves those performing the assessment exercising professional judgment based on the evidence available.</p>
	<p>A165. The nature, timing and extent of the procedures undertaken to understand the root cause(s) of an identified deficiency may also be affected by the nature and circumstances of the firm, such as:</p>
	<ul style="list-style-type: none"> • The complexity and operating characteristics of the firm. • The size of the firm. • The geographical dispersion of the firm. • How the firm is structured or the extent to which the firm concentrates or centralizes its processes or activities.
	<p><i>Examples of how the nature of identified deficiencies and their possible severity and the nature and circumstances of the firm may affect the nature, timing and extent of the procedures to understand the root cause(s) of the identified deficiencies</i></p> <ul style="list-style-type: none"> • The nature of the identified deficiency: The firm’s procedures to understand the root cause(s) of an identified deficiency may be more rigorous in circumstances when an

	<p>engagement report related to an audit of financial statements of a listed entity was issued that was inappropriate or the identified deficiency relates to leadership’s actions and behaviors regarding quality.</p> <ul style="list-style-type: none"> • The possible severity of the <u>identified</u> deficiency: The firm’s procedures to understand the root cause(s) of an identified deficiency may be more rigorous in circumstances when the deficiency has been identified across multiple engagements or there is an indication that policies or procedures have high rates of non-compliance. • Nature and circumstances of the firm: <ul style="list-style-type: none"> • In the case of a less complex firm with a single location, the firm’s procedures to understand the root cause(s) of an <u>identified</u> deficiency may be simple, since the information to inform the understanding may be readily available and concentrated, and the root cause(s) may be more apparent. • In the case of a more complex firm with multiple locations, the procedures to understand the root cause(s) of an <u>identified</u> deficiency may include using individuals specifically trained on investigating the root cause(s) of identified deficiencies, and developing a methodology with more formalized procedures for identifying root cause(s). <p>A166. In investigating the root cause(s) of identified deficiencies, the firm may consider why deficiencies did not arise in other circumstances that are of a similar nature to the matter to which the <u>identified</u> deficiency relates. Such information may also be useful in determining how to remediate an identified deficiency.</p> <p><i>Example of when a deficiency did not arise in other circumstances of a similar nature, and how this information assists the firm in investigating the root cause(s) of identified deficiencies</i></p> <p>The firm <u>may</u> determine that a deficiency exists because similar findings have occurred across multiple engagements. However, the findings do have not occur<u>red</u> in several other engagements within the same population being tested. By contrasting the engagements, the firm concludes that the root cause of the <u>identified</u> deficiency is a lack of appropriate involvement by the engagement partners at key stages of the engagements.</p>
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	<p>A167. Identifying a root cause(s) that is appropriately specific may support the firm's process for remediating identified deficiencies.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>Example of identifying a root cause(s) that is appropriately specific</i></p> <p>The firm may identify ies that engagement teams performing audits of financial statements are failing to obtain sufficient appropriate audit evidence on accounting estimates where management's assumptions have a high degree of subjectivity. While the firm notes that these engagement teams are not exercising appropriate professional skepticism, the underlying root cause of this issue may relate to another matter, such as a cultural environment that does not encourage engagement team members to questionchallenge individuals with greater authority or insufficient direction, supervision and review of the work performed on the engagements.</p> </div> <p>A168. In addition to investigating the root cause(s) of identified deficiencies, the firm may also investigate the root cause(s) of positive outcomes as doing so may reveal opportunities for the firm to improve, or further enhance, the system of quality management.</p>
<p><i>Responding to Identified Deficiencies</i></p> <p>42. The firm shall design and implement remedial actions to address identified deficiencies that are responsive to the results of the root cause analysis. (Ref: Para. A169–A171)</p>	<p><i>Responding to Identified Deficiencies</i> (Ref: Para. 42)</p> <p>A169. The nature, timing and extent of remedial actions may depend on a variety of other factors, including:</p> <ul style="list-style-type: none"> • The root cause(s). • The severity and pervasiveness of the identified deficiency and therefore the urgency with which it needs to be addressed. • The effectiveness of the remedial actions in addressing the root cause(s), such as whether the firm needs to implement more than one remedial action in order to effectively address the root cause(s), or needs to implement remedial actions as interim measures until the firm is able to implement more effective remedial actions. <p>A170. In some circumstances, the remedial action may include establishing additional quality objectives, or quality risks or responses may be added or modified, because it is determined that they are not appropriate.</p>

	<p>A171. In circumstances when the firm determines that the root cause of an identified deficiency relates to a resource provided by a service provider, the firm may also:</p> <ul style="list-style-type: none"> • Consider whether to continue using the resource provided by the service provider. • Communicate the matter to the service provider. <p>The firm is responsible for addressing the effect of the <u>identified</u> deficiency of the <u>related to a</u> resource provided by a service provider on the system of quality management and taking action to prevent the deficiency from reoccurring with respect to the firm's system of quality management. However, the firm is not <u>ordinarily</u> responsible for remediating the <u>identified</u> deficiency on behalf of the service provider or further investigating the root cause of the <u>identified</u> deficiency at the service provider.</p>
<p>43. The individual(s) assigned operational responsibility for <u>the</u> monitoring and remediation <u>process</u> shall evaluate whether the remedial actions:</p> <p>(a) Are appropriately designed to address the identified deficiencies and their related root cause(s) and determine that they have been implemented; and</p> <p>(b) Implemented to address previously identified deficiencies are effective.</p>	
<p>44. If the evaluation indicates that the remedial actions are not appropriately designed and implemented or are not effective,</p>	

<p>the individual(s) assigned operational responsibility for <u>the</u> monitoring and remediation <u>process</u> shall take appropriate action to determine that the remedial actions are appropriately modified such that they are effective.</p>	
<p>Findings About a Particular Engagement</p> <p>45. The firm shall respond to circumstances when findings indicate that there is an engagement(s) for which procedures required were omitted during the performance of the engagement(s) or the report issued may be inappropriate. The firm's response shall include: (Ref: Para. A172)</p> <p>(a) Taking appropriate action to comply with relevant professional standards and applicable legal and regulatory requirements; and</p> <p>(b) When the report is considered to be inappropriate, considering the implications and taking appropriate action, including</p>	<p>Findings About a Particular Engagement (Ref: Para. 45)</p> <p>A172. In circumstances when procedures were omitted or the report issued is inappropriate, the action taken by the firm may include:</p> <ul style="list-style-type: none"> • Consulting with appropriate <u>individuals</u>personnel regarding the appropriate action. • Discussing the matter with management of the entity or those charged with governance. • Performing the omitted procedures. <p>The actions taken by the firm do not relieve the firm of the responsibility to take further actions relating to the finding in the context of the system of quality management, including evaluating the findings to identify deficiencies and when a deficiency exists, investigating the root cause(s) of the identified deficiency.</p>

<p>considering whether to obtain legal advice.</p>	
<p><i>Ongoing Communication Related to Monitoring and Remediation</i></p> <p>46. The individual(s) assigned operational responsibility for the monitoring and remediation process shall communicate on a timely basis to the individual(s) assigned ultimate responsibility and accountability for the system of quality management and the individual(s) assigned operational responsibility for the system of quality management: (Ref: Para. A173)</p> <p>(a) A description of the monitoring activities performed;</p> <p>(b) The identified deficiencies, including the severity and pervasiveness of such deficiencies; and</p> <p>(c) The remedial actions to address the identified deficiencies.</p>	<p><i>Ongoing Communication Related to the Monitoring and Remediation</i> (Ref: Para. 46)</p> <p>A173. The information communicated about the monitoring and remediation to the individual(s) assigned ultimate responsibility and accountability for the system of quality management may be communicated on an ongoing basis or periodically. SuchThe individual(s) may use the information in multiple ways, for example:</p> <ul style="list-style-type: none"> • As a basis for further communications to personnel about the importance of quality. • To hold individuals accountable for their roles assigned to them. • To identify key concerns about the system of quality management in a timely manner. <p>The information also provides the basis for the evaluation of the system of quality management, as required by paragraphs 53–54.</p>
<p>47. The firm shall communicate the matters described in paragraph 46 to engagement teams and other</p>	

<p>individuals <u>assigned activities within the system of quality management</u> to enable them to take prompt and appropriate action in accordance with their responsibilities.</p>	
<p>Network Requirements or Network Services</p>	<p>Network Requirements or Network Services (Ref: Para. 48)</p>
<p>48. When the firm <u>belongs to operates as part of</u> a network, the firm shall understand, when applicable: (Ref: Para. A19, A174)</p> <p>(a) The requirements established by the network regarding the firm's system of quality management, including requirements for the firm to implement or use resources or services designed or otherwise provided by or through the network (i.e., network requirements);</p> <p>(b) Any services or resources provided by the network that the firm chooses to implement or use in the design, implementation or operation of the firm's system</p>	<p>A174. In some circumstances, the firm may belong to a network. Networks may establish requirements regarding the firm's system of quality management or may make services or resources available that the firm may choose to implement or use in the design, implementation and operation of its system of quality management. Such requirements or services may be intended to promote the consistent performance of quality engagements across the firms that <u>belong to operate as part of</u> the network. The extent to which <u>thea</u> network will provide the firm with quality objectives, quality risks and responses that are common across the network will depend on the firm's arrangements with the network.</p> <div data-bbox="793 873 1942 1351" style="border: 1px solid black; padding: 5px;"> <p><i>Examples of network requirements</i></p> <ul style="list-style-type: none"> • Requirements for the firm to include additional quality objectives or <u>identified</u> quality risks in the firm's system of quality management that are common across the network firms. • Requirements for the firm to include responses in the firm's system of quality management that are common across the network firms. Such responses designed by the network may include network policies or procedures that specify the leadership roles and responsibilities, including how the firm is expected to assign authority and responsibility within the firm, or resources, such as network developed methodologies for <u>the</u> <u>performingance-of</u> engagements or IT applications. • Requirements that the firm be subject to the network's monitoring activities. These monitoring activities may relate to network requirements (e.g., monitoring that the firm has </div>

<p>of quality management (i.e., network services); and</p> <p>(c) The firm’s responsibilities for any actions that are necessary to implement the network requirements or use network services. (Ref: Para. A175)</p> <p>The firm remains responsible for its system of quality management, including professional judgments made in the design, implementation and operation of the system of quality management. The firm shall not allow compliance with the network requirements or use of network services to contravene the requirements of this ISQM. (Ref: Para. A19, A176)</p>	<p>implemented the network’s methodology appropriately), or to the firm’s system of quality management in general.</p> <p><i>Examples of network services</i></p> <ul style="list-style-type: none"> Services or resources that are optional for the firm to use in its system of quality management or in the performance of engagements, such as voluntary training programs, use of component auditors or experts from within the network, or use of a service delivery center established at the network level, or by another firm or group of firms within the same network. <p>A175. The network may establish responsibilities for the firm in implementing the network requirements or network services.</p> <p><i>Examples of responsibilities for the firm in implementing network requirements or network services</i></p> <ul style="list-style-type: none"> The firm is required to have certain IT infrastructure and IT processes in place to support an IT application provided by the network that the firm uses in the system of quality management. The firm is required to provide firm-wide training on the methodology provided by the network, including when updates are made to the methodology. <p>A176. The firm’s understanding of the network requirements or network services and the firm’s responsibilities relating to the implementation thereof may be obtained through inquiries of, or documentation provided by, the network about matters such as:</p> <ul style="list-style-type: none"> The network’s governance and leadership. The procedures undertaken by the network in designing, implementing and, if applicable, operating, the network requirements or network services. How the network identifies and responds to changes that affect the network requirements or network services or other information, such as changes in the professional standards or information that indicates a deficiency in the network requirements or network services.
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	<ul style="list-style-type: none"> How the network monitors the appropriateness of the network requirements or network services, which may include through the network firms' monitoring activities, and the network's processes for remediating identified deficiencies. 				
<p>49. Based on the understanding <u>obtained in paragraph 48</u>, the firm shall:</p> <p>(a) Determine how the network requirements or network services are relevant to, and are taken into account in, the firm's system of quality management, including how they are to be implemented; and (Ref: Para. A17796)</p> <p>(b) Evaluate whether and, if so, how the network requirements or network services need to be adapted or supplemented by the firm to be appropriate for use in its system of quality management. (Ref: Para. A178–A179)</p>	<p><i>Network Requirements or Network Services in the Firm's System of Quality Management</i> (Ref: Para. 49)</p> <p>A177. The characteristics of the network requirements or network services are a factor-condition, event, circumstance, action or inaction in identifying and assessing quality risks as part of the firm's risk assessment process.</p> <div data-bbox="793 542 1940 800" style="border: 1px solid black; padding: 5px;"> <p><i>Example of a network requirement or network service that gives rise to a quality risk</i></p> <p>TheA network may requires the firm to use an IT application for the acceptance and continuance of client relationships and specific engagements that is standardized across the network. This may gives rise to a quality risk that the IT application does not address matters in local law or regulation that need to be considered by the firm in accepting and continuing client relationships and specific engagements.</p> </div> <p>A178. The purpose of the network requirements may include the promotion of consistent performance of quality engagements across the firms that operate as part of belong to the network. The firm may be expected by the network to implement the network requirements, however, the firm may need to adapt or supplement the network requirements such that they are appropriate for the nature and circumstances of the firm and itsthe engagements it performs.</p> <div data-bbox="793 1019 1913 1365" style="border: 1px solid black; padding: 5px;"> <p><i>Examples of how the network requirements or networks services may need to be adapted or supplemented</i></p> <table border="1" data-bbox="793 1117 1913 1365"> <thead> <tr> <th data-bbox="793 1117 1297 1203"><i>Network requirement or network service</i></th> <th data-bbox="1297 1117 1913 1203"><i>How the firm adapts or supplements the network requirement or network service</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="793 1203 1297 1365">The network requires the firm to include certain quality risks in the system of quality management, so that all firms in the network address the quality risks. The</td> <td data-bbox="1297 1203 1913 1365">As part of identifying and assessing quality risks, the firm includesassesses the quality risks that are required by the network.</td> </tr> </tbody> </table> </div>	<i>Network requirement or network service</i>	<i>How the firm adapts or supplements the network requirement or network service</i>	The network requires the firm to include certain quality risks in the system of quality management, so that all firms in the network address the quality risks. The	As part of identifying and assessing quality risks, the firm includes assesses the quality risks that are required by the network.
<i>Network requirement or network service</i>	<i>How the firm adapts or supplements the network requirement or network service</i>				
The network requires the firm to include certain quality risks in the system of quality management, so that all firms in the network address the quality risks. The	As part of identifying and assessing quality risks, the firm includes assesses the quality risks that are required by the network.				

	<p>network does not provide an assessment of the quality risks.</p>	<p>The firm also designs and implements responses to address the assessed quality risks that are required by the network.</p>
	<p>The network requires that the firm design and implement certain responses.</p>	<p>As part of designing and implementing responses, the firm determines:</p> <ul style="list-style-type: none"> • How the responses required by the network will be incorporated into the firm’s system of quality management, given the nature and circumstances of the firm. This may include tailoring the response to reflect the nature and circumstances of the firm and itsthe engagements performed by the firm (e.g., tailoring a methodology to include matters related to law or regulation). • Which assessed quality risks the responses address.
	<p><u>The firm uses individuals from other network firms as component auditors. Network requirements are in place that drive a high degree of commonality across the network firms’ systems of quality management. The network requirements include specific criteria that apply to individuals assigned to work on a component for a group audit.</u></p>	<p><u>The firm establishes policies or procedures that require the engagement team to confirm with the component auditor (i.e., the other network firm) that the individuals assigned to the component meet the specific criteria set out in the network requirements.</u></p>
<p><u>A179. In some circumstances, in adapting or supplementing the network requirements or network services, the firm may identify possible improvements to the network requirements or network services and may communicate these improvements to the network.</u></p>		

<p><i>Monitoring Activities Undertaken by the Network on the Firm's System of Quality Management</i></p> <p>50. In circumstances when the network performs monitoring activities relating to the firm's system of quality management, the firm shall:</p> <p>(a) Determine the effect of the monitoring activities performed by the network on the nature, timing and extent of the firm's monitoring activities performed in accordance with paragraphs 36–38;</p> <p>(b) Determine the firm's responsibilities in relation to the monitoring activities, including any related actions by the firm; and</p> <p>(c) As part of evaluating findings and identifying deficiencies in paragraph 40, obtain the results of the monitoring activities from the network in a timely manner. (Ref: Para. A180)</p>	<p><i>Monitoring Activities Undertaken by the Network on the Firm's System of Quality Management (Ref: Para. 50(c))</i></p> <p>A199. The monitoring activities undertaken by the network may affect the nature, timing and extent of the firm's monitoring activities.</p> <div data-bbox="793 391 1940 651" style="border: 1px solid black; padding: 5px;"> <p><i>Example of how monitoring activities undertaken by the network affect the firm's monitoring activities</i></p> <p>The network undertakes inspections of completed engagements of the firm. The firm determines, in the context of the scope and results of the network's inspection of the firm's engagements, the extent of engagements that will be selected by the firm in inspecting completed engagements.</p> </div> <p>A180. The results of the network's monitoring activities of the firm's system of quality management may include information such as:</p> <ul style="list-style-type: none"> • A description of the monitoring activities, including their nature, timing and extent; • Findings from the monitoring activities, and identified deficiencies identified, and other observations about the firm's system of quality management (e.g., positive outcomes or opportunities for the firm to improve, or further enhance, the system of quality management); and • The network's evaluation of the root cause(s) of the identified deficiencies, the assessed effect of the <u>identified</u> deficiencies and recommended remedial actions.
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<p><i>Monitoring Activities Undertaken by the Network Across the Network Firms</i></p> <p>51. The firm shall:</p> <p>(a) Understand the overall scope of the monitoring activities undertaken by the network across the network firms, including monitoring activities to determine that network requirements have been appropriately implemented across the network firms, and how the network will communicate the results of its monitoring activities to the firm;</p> <p>(b) At least annually, obtain information from the network about the overall results of the <u>network's</u> monitoring activities undertaken by the network across the network firms, if applicable, and: (Ref: Para. A181–A183)</p> <p>(i) <u>Communicate</u> the information to engagement teams and other individuals <u>assigned activities within the system of</u></p>	<p><i>Monitoring Activities Undertaken by the Network Across the Network Firms</i> (Ref: Para. 51(b))</p> <p>A181. The information from the network about the overall results of the <u>network's</u> monitoring activities is undertaken <u>ns</u> across the network firms' systems of quality management may be an aggregation or summary of the information described in paragraph A180, including trends and common areas of identified deficiencies across the network, or positive outcomes that may be replicated across the network. Such information may:</p> <ul style="list-style-type: none"> • Be used by the firm: <ul style="list-style-type: none"> ○ In identifying and assessing quality risks. ○ As part of other relevant information considered by the firm in determining whether deficiencies exist in the network requirements or network services used by the firm in its system of quality management. • Be communicated to group engagement partners, in the context of considering the competence and capabilities of component auditors from a firm within the network <u>firm</u> who are subject to common network requirements (e.g., common quality objectives, quality risks and responses). <p>A182. In some circumstances, the firm may obtain information from the network about deficiencies identified in a network firm's system of quality management that affects the firm. The network may also gather information from the network firms regarding the results of external inspections over the network firms' systems of quality management. In some instances, law or regulation in a particular jurisdiction may prevent the network from sharing information with other firms within the network or may restrict the specificity of such information.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>Example of when information about another network firm's system of quality management affects the firm</i></p> <p><i>Another network firm performs work for the firm's engagements, such as in the capacity of a component auditor.</i></p> </div>
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<p><u>quality management</u>, as appropriate, to enable them to take prompt and appropriate action in accordance with their responsibilities; and (Ref: Para. A201–A202A)</p> <p>(j)e) Based on the understanding, and if applicable, the information provided by the network, Consider the effect of the <u>information monitoring activities undertaken by the network across the network firms</u> on the firm's system of quality management.</p>	<p>A183. In circumstances when the network does not provide the information about the overall results of the <u>network's</u> monitoring activities undertaken by the network across the network firms, the firm may take further actions, such as:</p> <ul style="list-style-type: none"> • Discussing the matter with the network; and • Determining the effect on the firm's engagements, and communicating the effect to engagement teams.
<p><i>Deficiencies in Network Requirements or Network Services Identified by the Firm</i></p> <p>52. If the firm identifies a deficiency in the network requirements or network services, the firm shall: (Ref: Para. A184)</p> <p>(a) Communicate to the network relevant information about the identified deficiency; and</p>	<p><i>Deficiencies in Network Requirements or Network Services Identified by the Firm</i> (Ref: Para. 52)</p> <p>A184. As network requirements or network services used by the firm form part of the firm's system of quality management, they are also subject to the requirements of this ISQM regarding monitoring and remediation. The network requirements or network services may be monitored by the network, the firm, or a combination of both.</p>

<p>(b) In accordance with paragraph 42, design and implement remedial actions to address the effect of the identified deficiencyyies in the network requirements or network services. (Ref: Para. A185)</p>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><i>Example of when a network requirement or network service is monitored by both the network and the firm</i></p> <p>A network <u>may</u> undertakes monitoring activities at a network level for a common methodology. The firm <u>may</u> also monitors the methodology through the perform<u>ingance</u> of engagement inspections.</p> </div> <p>A185. In designing and implementing the remedial actions to address the effect of the identified deficiencyyies in the network requirements or network services, the firm may:</p> <ul style="list-style-type: none"> • Understand the planned remedial actions by the network, including whether the firm has any responsibilities for implementing the remedial actions; and • Consider whether supplementary remedial actions need to be taken by the firm to address the identified deficiencyyies and their related root cause(s), <u>such as when:-</u> [Example box removed] <i>Example of circumstances when supplementary remedial actions may be needed by the firm to address an identified deficiency in a network requirement or network service</i> <ul style="list-style-type: none"> ○ The network has not taken appropriate remedial actions; <u>or-</u> ○ The network’s remedial actions will take time to effectively address the identified deficiency.
<p>Evaluating the System of Quality Management</p>	<p>Evaluating the System of Quality Management (Ref: Para. 53)</p>
<p>53. The individual(s) assigned ultimate responsibility and accountability for the system of quality management shall evaluate the system of quality management. The evaluation shall be undertaken as of a point in time, and shall be performed at least annually. (Ref: Para. A186–A188)</p>	<p>A186. The firm is responsible for the evaluation of the system of quality management, and assigns the performance of the evaluation to the individual(s) assigned ultimate responsibility and accountability for the system of quality management. It may not be possible or practical for tThe individual(s) assigned ultimate responsibility and accountability for the system of quality management to evaluate the system of quality management on their own, and the individual(s) may need to assign aspects of the evaluation to other individual(s) in the firm to assist in performing the evaluation. Nevertheless, the individual(s) assigned ultimate responsibility and accountability for the system of</p>

	<p>quality management remains responsible <u>and accountable</u> for <u>performing the evaluation</u> the system of quality management, and complying with the requirements of this ISQM.</p> <p>A187. The point in time at which the evaluation is undertaken may depend on the circumstances of the firm, and may coincide with the fiscal year end of the firm or the completion of an annual monitoring cycle.</p> <p>A188. Scalability examples to demonstrate how the information <u>that provides the basis for</u> support <u>the evaluation of the system of quality management may be obtained</u></p> <ul style="list-style-type: none"> • In a less complex firm, the individual(s) assigned ultimate responsibility and accountability for the system of quality management may be directly involved in the monitoring and remediation and will therefore be aware of the information that supports the evaluation of the system of quality management. • In a more complex firm, the firm may need to establish processes to collate, summarize and communicate the information needed to evaluate the system of quality management.
<p>54. Based on the evaluation <u>performed by</u>, the individual(s) assigned ultimate responsibility and accountability for the system of quality management, <u>the firm</u> shall conclude one of the following: (Ref: Para. A189, A194)</p> <p>(a) The system of quality management provides the firm with reasonable assurance that the objectives of the system of quality management are being achieved; (Ref: Para. A190)</p>	<p><i>Concluding on the System of Quality Management</i> (Ref: Para. 54)</p> <p>A189. In the context of this ISQM, it is intended that the operation of the system as a whole provides the firm with reasonable assurance that the objectives of the system of quality management are being achieved. In concluding on the system of quality management, the individual(s) assigned ultimate responsibility and accountability for the system of quality management <u>firm</u> may use the results of the firm's monitoring and remediation process to <u>and</u> consider the following:</p> <ul style="list-style-type: none"> • The severity and pervasiveness of identified deficiencies, and the effect on the achievement of the objectives of the system of quality management; • The actions taken thus far by the firm to remediate the identified deficiencies, and whether these are appropriate, and have been designed and implemented; and • Whether the effect of identified deficiencies on the system of quality management have been appropriately corrected, such as whether further actions have been taken in accordance with paragraph 45.

<p>(b) Except for matters related to <u>identified</u> deficiencies that have a severe but not pervasive effect on the design, implementation and operation of the system of quality management, the system of quality management provides the firm with reasonable assurance that the objectives of the system of quality management are being achieved; or (Ref: Para. A191)</p>	<p>A190. There may be circumstances when identified deficiencies that are severe (including <u>identified</u> deficiencies that are severe and pervasive) have been appropriately remediated and the effect of them corrected at the point in time of the evaluation. In such cases, the <u>individual(s)-assigned ultimate responsibility and accountability for the system of quality management firm</u> may conclude that the system of quality management provides the firm with reasonable assurance that the objectives of the system of quality management are being achieved.</p>
<p>(c) The system of quality management does not provide the firm with reasonable assurance that the objectives of the system of quality management are being achieved. (Ref: Para. A191–A193)</p>	<p>A191. An <u>identified</u> deficiency may have a pervasive effect on the design, implementation and operation of the system of quality management when, for example:</p> <ul style="list-style-type: none"> • The deficiency affects several components or aspects of the system of quality management. • The deficiency is confined to a specific component or aspect of the system of quality management, but is fundamental to the system of quality management. • The deficiency affects several business units or geographical locations of the firm. • The deficiency is confined to a business unit or geographical location but the business unit or location affected is fundamental to the firm overall. • The deficiency affects a substantial portion of engagements that are of a certain type or nature.
	<p><i>Example of an <u>identified</u> deficiency that may be considered severe but not pervasive</i></p> <p>The firm identifies a deficiency in a smaller regional office of the firm. The <u>identified</u> deficiency relates to non-compliance with many firm policies or procedures. The firm determines that the culture in the regional office, <u>including particularly</u> the actions and behavior of leadership in the regional office <u>which were overly focused on financial priorities</u>, has contributed to the root cause of the identified deficiency. The firm determines that the effect of the <u>identified</u> deficiency is:</p> <ul style="list-style-type: none"> • Severe, because it relates to the culture of the regional office and overall compliance with firm policies or procedures; and • Not pervasive, because it is limited to the smaller regional office.

A192. The ~~the individual(s) assigned ultimate responsibility and accountability for the system of quality management firm~~ may conclude that the system of quality management does not provide the firm with reasonable assurance that the objectives of the system of quality management are being achieved in circumstances when identified deficiencies are severe and pervasive, actions taken to remediate the identified deficiencies are not appropriate, and the effect of the identified deficiencies have not been appropriately corrected.

Example of an identified deficiency that may be considered severe and pervasive

The firm identifies a deficiency in a regional office, which is the largest office of the firm and provides financial, operational and technical support for the entire region that is a hub for many other offices of the firm. The identified deficiency relates to non-compliance with many firm policies or procedures. The firm determines that the culture in the regional office, particularly including the actions and behavior of leadership in the regional office which were overly focused on financial priorities, has contributed to the root cause of the identified deficiency. The firm determines that the effect of the identified deficiency is:

- Severe, because it relates to the culture of the regional office and overall compliance with firm policies or procedures; and
- Pervasive, because the regional office is the largest office and provides support to a hub for many other offices, and the non-compliance with firm policies or procedures may have had a broader effect on the other offices.

A193. It may take time for the firm to remediate identified deficiencies that are severe and pervasive. As the firm continues to take action to remediate the identified deficiencies, the pervasiveness of the identified deficiencies may be diminished and it may be determined that the identified deficiencies are still severe, but no longer severe and pervasive. In such cases, the ~~individual(s) assigned ultimate responsibility and accountability for the system of quality management firm~~ may ~~adjust the conclusion (i.e., they may~~ conclude that, except for matters related to identified deficiencies that have a severe but not pervasive effect on the design, implementation and operation of the system of quality management, the system of quality management provides the firm with reasonable assurance that the objectives of the system of quality management are being achieved).

	<p>A194. This ISQM does not require the firm to obtain an independent assurance report on its system of quality management.</p>
<p>55. If the <u>firm concludes either paragraph 54(b) or 54(c), evaluation indicates that the system of quality management does not provide the firm with reasonable assurance that the objectives of the system are being achieved</u>, the firm shall: (Ref: Para. A195)</p> <p>(a) Take prompt and appropriate action; and</p> <p>(b) Communicate to:</p> <p>(i) Engagement teams and other individuals <u>assigned activities within the system of quality management</u> to the extent that it is relevant to their responsibilities; and (Ref: Para. A196)</p> <p>(ii) External parties in accordance with the firm's policies or procedures required by paragraph 34(e). (Ref: Para. A197)</p>	<p><i>Circumstances When <u>Prompt and Appropriate Action is Taken and Further Communication</u>the <u>Evaluation Indicates the System of Quality Management Does Not Provide Reasonable Assurance that the Objectives of the System are Being Achieved</u></i> (Ref: Para. 55)</p> <p>A195. The firm is responsible for holding the individual(s) assigned ultimate responsibility and accountability for the system of quality management responsible and accountable for the firm's system of quality management. Accordingly, iIn circumstances when the <u>firm concludes either paragraph 54(b) or 54(c) system of quality management does not provide the firm with reasonable assurance that the objectives of the system are being achieved</u>, the <u>firm is responsible for taking prompt and appropriate action taken by the firm, which</u> may include:</p> <ul style="list-style-type: none"> • Taking measures to support the performing<u>ance of</u> engagements through assigning more resources or developing more guidance and to confirm that reports issued by the firm are appropriate in the circumstances, until such time as the identified deficiencies are remediated, and communicating such measures to engagement teams. • Obtaining legal advice. <p>A196. In some circumstances the firm may have an independent governing body that has non-executive oversight of the firm. In such circumstances, communications may include informing the independent governing body.</p> <p>A197. <i>Examples of circumstances when it may be appropriate for the firm to communicate to external parties <u>about the evaluation of the system of quality management</u></i></p> <ul style="list-style-type: none"> • When the firm belongs to a network. • When other firms in the network use the work performed by the firm, for example, in the case of a group audit. • When a report issued by the firm is determined by the firm to be inappropriate as a result of the failure of the system of quality management, and management or those charged with governance of the entity need to be informed.

	<ul style="list-style-type: none"> When law or regulation requires the firm to communicate to an oversight authority or a regulatory body that the system does not provide the firm with reasonable assurance that the objectives of the system are being achieved.
<p>56. The firm shall undertake periodic performance evaluations of the individual(s) assigned ultimate responsibility and accountability for the system of quality management, and the individual(s) assigned operational responsibility for the system of quality management. In doing so, the firm shall take into consideration the evaluation of the system of quality management. (Ref: Para. A198–A200)</p>	<p><i>Performance Evaluations</i> (Ref: Para. 56)</p> <p>A198. Periodic performance evaluations promote accountability. In considering the performance of these an individuals, the firm may take into account:</p> <ul style="list-style-type: none"> The results of the firm’s monitoring activities for aspects of the system of quality management that relate to the responsibility of the individual. In some circumstances, the firm may set targets for the individual and measure the results of the firm’s monitoring activities against those targets. The actions taken by the individual(s) in response to identified deficiencies that relate to the responsibility of that individual, including the timeliness and effectiveness of such actions. <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>Scalability examples to demonstrate how the firm may undertake the performance evaluations</i></p> <ul style="list-style-type: none"> In a less complex firm, the firm may engage a service provider to perform the evaluation, or the results of the firm’s monitoring activities may provide an indication of the performance of the individual(s). In a more complex firm, the performance evaluations may be undertaken by an independent non-executive member of the firm’s governing body, or a special committee overseen by the firm’s governing body. </div> <p>A199. A positive performance evaluation may be rewarded through compensation, promotion and other incentives that focus on the individual’s commitment to quality, and reinforce accountability. On the other hand, the firm may take corrective actions to address a negative performance evaluation that may affect the firm’s achievement of its quality objectives.</p> <p><i>Public Sector Considerations</i></p> <p>A200. In the case of the public sector, it may not be practicable to perform a performance evaluation of the individual(s) assigned ultimate responsibility and accountability for the system of quality</p>

	<p>management, or to take actions to address the results of the performance evaluation, given the nature of the individual's appointment. Nevertheless, performance evaluations may still be undertaken for other individuals in the firm who are assigned operational responsibility for aspects of the system of quality management.</p>
<p>Documentation</p>	<p>Documentation (Ref: Para. 57–59)</p>
<p>57. The firm shall prepare documentation of its system of quality management that is sufficient to: (Ref: Para. A201–A203)</p> <p>(a) Support a consistent understanding of the system of quality management by personnel, including an understanding of their roles and responsibilities with respect to the firm's system of quality management <u>and performing engagements</u>;</p> <p>(b) Support the consistent implementation and operation of the responses; and</p> <p>(c) Provide evidence of the design, implementation and operation of the responses, to support the evaluation of the system of quality management by the individual(s) assigned</p>	<p>A201. Documentation provides evidence that the firm complies with this ISQM, as well as law, regulation or relevant ethical requirements. It may also be useful for training personnel <u>and engagement teams</u>, ensuring the retention of organizational knowledge and providing a history of the basis for decisions made by the firm about its system of quality management. It is neither necessary nor practicable for the firm to document every matter considered, or judgment made, about its system of quality management. Furthermore, compliance with this ISQM may be evidenced by the firm through its information and communication component, documents or other written materials, or IT applications that are integral to the components of the system of quality management.</p> <p>A202. Documentation may take the form of formal written manuals, checklists and forms, may be informally documented (e.g., e-mail communication or postings on websites), or may be held in IT applications or other digital forms (e.g., in databases). Factors that may affect the firm's judgments about the form, content and extent of documentation, including how often documentation is updated, may include:</p> <ul style="list-style-type: none"> • The complexity of the firm and the number of offices; • The nature and complexity of the firm's practice and organization; • The nature of engagements the firm performs and the nature of the entities for whom engagements are performed; • The extent to which the documentation may be reviewed by an external party, such as a professional, legal or regulatory body; • Whether the documentation would support an understanding of the system of quality management by an individual who is knowledgeable of matters related to quality management; • The nature and complexity of the matter being documented, such as whether it relates to an aspect of the system of quality management that has changed or an area of greater quality

<p>ultimate responsibility and accountability for the system of quality management.</p>	<p>risk, and the complexity of the judgments relating to the matter; and</p> <ul style="list-style-type: none"> • The frequency and extent of of changes in the system of quality management. <p>In a less complexsmaller firm, it may not be necessary to have documentation supporting matters communicated because informal communication methods may be effective. Nevertheless, the firm may determine it appropriate to document such communications in order to provide evidence that they occurred.</p> <p>A203. In some instances, an external oversight authority may establish documentation requirements, either formally or informally, for example, as a result of the outcome of external inspection findings. Relevant ethical requirements may also include specific requirements addressing documentation, for example, the IESBA Code requires documentation of particular matters, including certain situations related to conflicts of interest, non-compliance with laws and regulations and independence.</p>
<p>58. <u>In preparing documentation,</u> the firm shall prepare documentation that includes:</p> <p>(a) The identification of the individual(s) assigned ultimate responsibility and accountability for the system of quality management and operational responsibility for the system of quality management;</p> <p>(b) The firm's quality objectives and assessed quality risks; (Ref: Para. A204)</p> <p>(c) A description of the responses and how the firm's</p>	<p>A204. <u>The firm is not required to document the consideration of every condition, event, circumstance, action or inaction for each quality objective, or each risk that may give rise to a quality risk. However, in documenting the assessed quality risks and how the firm's responses address the quality risks, the firm may document the reasons for the assessment given to</u> of the quality risks <u>(i.e., the considered occurrence and effect on the achievement of one or more quality objectives), in order to support the consistent implementation and operation of the responses.</u></p>

<p>responses address the assessed quality risks;</p> <p>(d) Regarding the monitoring and remediation process:</p> <p>(i) Evidence of the monitoring activities performed;</p> <p>(ii) The evaluation of findings, and identified deficiencies and their related root cause(s);</p> <p>(iii) Remedial actions to address identified deficiencies and the evaluation of the design and implementation of such remedial actions; and</p> <p>(iv) Communications about monitoring and remediation; and</p> <p>(e) The basis for the conclusion in paragraph 54 whether the system of quality management provides the firm with reasonable assurance that the objectives of the system of quality</p>	
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<p>management are being achieved.</p>	
<p>59. The firm shall document the matters in paragraph 58 as they relate to network requirements or network services and the evaluation of the network requirements or network services in accordance with paragraph 49(b). (Ref: Para. A205)</p>	<p>A205. The documentation may be provided by the network <u>or other firms, structures or organizations within the network.</u></p>
<p>60. The firm shall establish a period of time for the retention of documentation for the system of quality management that is sufficient to enable the firm to monitor the design, implementation and operation of the firm's system of quality management, or for a longer period if required by law or regulation.</p>	

Appendix 1

Tracking of Paragraph Numbers from March 2020/June 2020 Drafts to This Draft

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
1	1		
2	3	A1	A1
3	4		
4	5		
6A	6	A1A	A3
7	15	A2 A3	A2 A5
9A	7	A4A	A4
10	8		
11A	9		
13A	10		
13B	Deleted		
14	11		
16	12	A6 A7 A8 A9	A6 A7 A8 A9
17	13		
18	14		
19	16		

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
19(a)	16(a)	A9A A9B A10	A10 A11 A12
19(b)	16(b)		
19(c)	16(c)		
19(d)	16(d)		
19(e)	16(e)		
19(f)	16(f)		
19(g)	16(g)	A11	A14
19(gA)	16(h)	A11A A11AA A11B	A15 A16 A17
19(h)	16(i)	A12	A18
19(i)	16(j)		
19(j)	16(k)		
19(k)	16(l)	A13 A14	A19 A20
19(l)	16(m)		
19(n)	16(o)		
19(o)	16(p)		
19(p)	16(q)		

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
19(q)	16(r)	A11C	Deleted
19(r)	16(s)		
19(s)	16(t)	A15 A16 A16A	A23 A24 A25
19(t)	16(u)	A17 A18	A26 A27
19(tA)	16(v)		
19(u)	16(w)		
19(v)	16(x)		
20	18		
21	17	A20	A29
22	19	A21A A22A A24	A30 A33 A31
22A	20	A24A A24AA A24B A24BA A24BB	A32 A33 A35 Deleted A36
22A(c)	21	A24CA A24E	A38 Deleted
22B	22		
22C	23	A24F	A39

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
		A24G A24H	A40 A41
22D	24	A24I A24J A24K	A42 A43 A44
22E	25	A24N A24NB A24Q	A45 A47 A48
22F	26	A24R A24S A24T	A49 A50 A51
22G	27	A24U A24V	A52 A53
23	28	A26 A29 A29A A30A A31 A31A A34 A35	A55 A56 A57 A58 A59 Deleted A60 A61
32	29	A67 A68 A69	A62 A63 A64

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
		A71	A65
		A75	A66
34	30	A77	A67
		A79	A68
		A80	A69
		A81	A70
		A82	A71
		A83	A72
		A85	A73
		A86	A74
36	31	A92	A75
		A93	A76
		A93A	A77
		A96	A78
		A98	A79
		A99	A80
		A99A	A81
		A100	A82
		A108	A83
		A109	A84
		A111	A85
38	32	A113	A86
		A115	A87
		A117	A88
		A118	A89

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
		A119	A90
		A119A	A91
		A119B	A92
		A119C	A93
		A119D	A94
		A120	A95
		A120A	Deleted
		A120B	Deleted
		A120C	Deleted
		A120D	Deleted
		A120E	A96
		A124	A98
		A125	A99
		A130	A100
		A131A	A101
		A132	A102
		A133	A103
		A134	A104
		A134A	A105
		A134B	A106
		A134BA	A107
		A134D	A108
40	33	A135	A109
		A136	A110
		A138	A111

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
		A138A	A111
		A139	A112
		A141A	A113
		A142	A114
		A153	A115
41A	34	A153A	A116
		A153AA	A117
		A153AB	A119
		A153AC	A118
		A153C	A120
		A153D	A121
		A153E	A122
		A153F	A123
		A153G	A123
		A153FA	A124
		A153FB	A125
		A153FC	A128
		A153GA	A129
		A153GC	A131
		A153GD	A126, A130
42	35	A154	A138
44	36		
44A	37	A156	A139
		A157	A140

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
		A158	A141
		A159	A142
		A161A	A143
		A161B	A144
		A162	A145
		A163	A146
		A164	A147
		A165	A148
		A166	A149
		A167	A150
45	38	A168	A151
		A168B	A152
		A169	A153
		A169A	A153
		A170	A154
46	39	A171	A155
		A171A	A156
47	40	A173	A157
		A173A	A158
		A175	A159
		A175A	A160
		A177	A161
48	41	A178A	A162
		A178B	A163

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
		A179	A164
		A180	A165
		A181A	A166
		A182	A167
		A182A	A168
49	42	A184	A169
		A184A	A170
		A184B	A171
50	43		
50A	44		
51	45	A185	A172
52	46	A186	A173
53	47		
58	48	A192	A174
		A194	A175
		A195	A176
59	49	A196	A177
		A197	A178
60	50	A199	Deleted
		A200	A180
61	51	A201	A181
		A202	A182
		A202A	A183

Requirements		Related application material	
Number in March / June 2020 draft	Number in this draft	Number in March / June 2020 draft	Number in this draft
62	52	A203	A184
		A204	A185
65A	53	A209A	A186
		A209B	A187
		A209C	A188
65AA	54	A210A	A189
		A210AA	A190
		A210AB	A191
		A210AC	A192
		A210AD	A193
		A210DA	A194
65C	55	A210DAA	A195
		A210DC	A196
		A210DD	A197
65D	56	A210E	A198
		A210F	A199
		A210G	A200
66	57	A211	A201
		A212	A202
		A213	A203
67	58	A214	A204
68	59	A215	A205
69	60		