

This paper has been prepared to support the IAASB’s consideration of the need to re-expose. See paragraph 8 of Agenda Item 3, which indicates that the Task Force is of the view that the changes made to ED-ISA 210 are responsive to matters respondents have raised on exposure, and do not introduce new principles or represent other changes of substance compared with the exposure draft. This paper shows in marked text the changes processed to ED-ISA 210 based on the comments received.

**PROPOSED INTERNATIONAL STANDARD ON AUDITING 210**

(REDRAFTED)

**AGREEING THE TERMS OF AUDIT ENGAGEMENTS**

(Effective for audits of financial statements for periods beginning on or after ~~1~~December 15, 2009)

**[MARK UP BASED ON EXPOSURE DRAFT]**

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Appendix 1: Example of an Audit Engagement Letter

Appendix 2: Determining the Acceptability of General Purpose Frameworks

~~Proposed~~ International Standard on Auditing (ISA) 210, “Agreeing the Terms of Audit Engagements” should be read in conjunction with ~~proposed~~ ISA 200 (Revised and Redrafted), “Overall Objectives of the Independent Auditor, and the Conduct of an Audit in Accordance with International Standards on Auditing.”

## Introduction

### Scope of this ISA

1. This International Standard on Auditing (ISA) deals with the auditor's responsibilities in agreeing the terms of the audit engagement with management and, where appropriate, those charged with governance. This includes establishing that certain preconditions for an audit, responsibility for which rests with management and, where appropriate, those charged with governance, are present. ISA 220 (Redrafted)<sup>1</sup> deals with those aspects of engagement acceptance that are within the control of the auditor. (Ref: Para. A1) :
  - ~~(a) — agreeing the terms of the audit engagement with the entity; and~~
  - ~~(b) — responding to a request by an entity to change the terms of an audit engagement for an audit of financial statements. It is to be adapted as necessary in the circumstances when applied to audits of other historical financial information.~~

### Effective Date

2. This ISA is effective for audits of financial statements for periods beginning on or after ~~December 15, 2009~~.

### Objective

3. The objective of the auditor is to accept or continue an audit engagement only when the basis upon which it is to be performed has been agreed, through: ~~(Ref: Para. A1-A2)~~
  - (a) Establishing whether the necessary preconditions for an audit are present; and
  - (b) Confirming that there is a common understanding between the auditor and ~~the entity of the terms of the audit engagement and of the respective responsibilities of the auditor,~~ management and, where appropriate, those charged with governance of the terms of the audit engagement.

### Definitions

4. For purposes of the ISAs, the following term has the meaning attributed below:  
Preconditions for an audit – The use by management and, where appropriate, those charged with governance of an acceptable financial reporting framework in the preparation of the financial statements and the agreement of management to the premise<sup>2</sup> on which an audit is conducted.
5. For the purposes of this ISA, references to “management” should be read as “management and, where appropriate, those charged with governance.”

<sup>1</sup> ISA 220 (Redrafted), “Quality Control for an Audit of Financial Statements.”

<sup>2</sup> ISA 200 (Revised and Redrafted), “Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing,” paragraph 13.

## Requirements

### Preconditions for an Audit<sup>3</sup>

- 6.4. In order to establish whether ~~the necessary~~ preconditions for an audit are present, the auditor shall:
- (a) Determine whether the financial reporting framework to be applied in the preparation ~~and presentation~~ of the financial statements is acceptable; and (Ref: Para. ~~A23~~-A10)
  - (b) Obtain the agreement of management ~~and, where appropriate, those charged with governance~~ that it acknowledges they acknowledge and understands its their responsibility: (Ref: Para. ~~A11-A1413~~, ~~A1917~~)
    - (i) For the preparation ~~and presentation~~ of the financial statements in accordance with the applicable financial reporting framework, including where relevant their fair presentation; (Ref: Para. A15)
    - ~~(ii)~~ For such framework; this includes the design, implementation and maintenance of internal control as management determines is necessary relevant to enable the preparation ~~and presentation~~ of financial statements that are free from material misstatement, whether due to fraud or error; and (Ref: Para. ~~A1614~~-~~A1816~~)
    - ~~(iii)~~(ii) To provide the auditor with:
      - a. Access to Aall information of which management is aware, such as records and documentation, and other matters that is are relevant to the preparation ~~and presentation~~ of the financial statements such as records, documentation and other matters;
      - b. Any aAdditional information that the auditor may request from management for the purpose of the audit and, where appropriate, those charged with governance; and
      - c. Unrestricted access to persons ~~those~~ within the entity from whom the auditor determines it necessary to obtain audit evidence.

~~In the case of a fair presentation framework, management and, where appropriate, those charged with governance, are responsible for the preparation and fair presentation of the financial statements in accordance with the financial reporting framework; or the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework.~~

<sup>3</sup>~~—[The underlined text in the proposed ISA indicates conforming amendments as a result of ISA 580 (Revised and Redrafted), as explained in the Explanatory Memorandum. ISA 580 (Revised and Redrafted), which was approved by the IAASB in December 2007, will be published when the Public Interest Oversight Board has confirmed that the IAASB has followed due process in its development. In the interim, respondents can access the text of the ISA at <http://www.ifac.org/IAASB/Meeting-Resource.php?MID=0093&type=Updated+Agenda>.]~~

*Limitation on Scope Prior to Audit Engagement Acceptance*

- 7.5. If management or those charged with governance impose a limitation on the scope of the auditor's work in the terms of a proposed audit engagement such that the auditor believes the limitation will result in the auditor disclaiming an opinion on the financial statements, the auditor shall not accept such a limited engagement as an audit engagement, unless required by law or regulation to do so.

*Other Factors Affecting Reasons for not Proceeding with the Audit Engagement Acceptance*

- 8.6. ~~If Where~~ the preconditions for an audit are not present, the auditor shall discuss the matter(s) with management ~~and, where appropriate, those charged with governance~~. Unless ~~the requirements of paragraph 19 are met, or the auditor is~~ required by law or regulation to do so, the auditor shall not accept the proposed audit engagement:
- (a) ~~If~~ the auditor has determined that the ~~applicable~~ financial reporting framework ~~to be applied in the preparation of the financial statements~~ is unacceptable, ~~except as provided in paragraph 19;~~ or
- (b) ~~If~~ the agreement referred to in paragraph ~~64~~(b) has not been obtained.

**Agreement on Audit Engagement Terms**

- 9.7. The auditor shall agree the terms of the audit engagement with management ~~or those charged with governance~~. (Ref: Para. A20)
- 10.8. ~~The agreed terms of the audit engagement shall include:~~ (Ref: Para. A22-A23) ~~9.~~ Subject to paragraph ~~11.10~~, the agreed terms of the audit engagement shall be recorded in an audit engagement letter or other suitable form of written agreement ~~and shall include:-~~ (Ref: Para. A21-A24)
- (a) The objective and scope of the audit of the financial statements;
- (b) The responsibilities of the auditor;
- (c) The responsibilities of management ~~and, where appropriate, those charged with governance (including those in paragraph 4(b))~~;
- (d) Identification of the applicable financial reporting framework for the preparation ~~and presentation~~ of the financial statements; and
- (e) ~~Reference to T~~the expected form ~~and contents~~ of any reports to be issued by the auditor ~~and a statement that there may be circumstances in which a report may differ from its expected form and content~~.
- 11.10. If law or regulation prescribes in sufficient detail the terms of the audit engagement ~~referred to in paragraph 10, the auditor need, it may not be necessary to~~ record them in an ~~audit engagement letter or other suitable form of~~ written agreement, except for the agreement of management ~~and, where appropriate, those charged with governance~~ that ~~it they~~ acknowledges and understands ~~its the~~ responsibilities ~~as~~ set out in paragraph ~~64~~(b). (Ref: Para. ~~A21, A2518-A2620~~)

~~12.11.~~ If law or regulation prescribes the responsibilities of management ~~and, where appropriate, those charged with governance~~ in relation to financial reporting, the auditor may determine that the law or regulation includes responsibilities that, in the auditor's judgment, are equivalent in effect to those set out in paragraph 64(b). For such responsibilities that are equivalent, the auditor may use the wording of the law or regulation to describe them in the ~~engagement letter or other suitable form of~~ written agreement. For those responsibilities that are not prescribed by law or regulation such that their effect is equivalent, the ~~engagement letter or other suitable form of~~ written agreement shall use reflect the description in paragraph 64(b). (Ref: Para. A2520)

### Recurring Audits

~~13.12.~~ On recurring audits, the auditor shall assess ~~consider~~ whether circumstances require the terms of the audit engagement to be revised and whether there is a need to remind the entity of the existing terms of the audit engagement. (Ref: Para. A2724)

### Acceptance of a Change in the Terms of the Audit Engagement

~~14.13.~~ The auditor shall not agree to a change in the terms of the audit engagement where there is no reasonable justification for doing so. (Ref: Para. A2825-A3027)

~~15.14.~~ If, prior to completing the audit engagement, the auditor is requested to change the audit engagement to an engagement that conveys ~~provides~~ a lower level of assurance, the auditor shall determine whether there it is reasonable justification for doing appropriate to do so. (Ref: Para. A3128-A3229)

~~16.15.~~ ~~If Where~~ the terms of the audit engagement are changed, the auditor and management ~~or those charged with governance~~ shall agree on and record the new terms of the engagement in an engagement letter or other suitable form of written agreement.

~~17.16.~~ If the auditor is unable to agree to a change of the terms of the audit engagement and is not permitted by management to continue the original audit engagement, the auditor shall, ~~unless prohibited by law or regulation:~~

- (a) Withdraw from the audit engagement; and
- (b) Determine whether there is any obligation, either contractual or otherwise, to report the circumstances ~~necessitating the auditor's withdrawal from the audit engagement~~ to other parties, such as those charged with governance, owners or regulators ~~shareholders~~.

### Additional Considerations in Engagement Acceptance

#### *Financial Reporting Standards Supplemented by Law or Regulation—Conflicts*

18. If financial reporting standards established by an authorized or recognized standards setting organization are supplemented by law or regulation, the auditor shall determine whether there are any conflicts between the financial reporting standards and the additional requirements. If such conflicts exist, the auditor shall discuss with management ~~and, where appropriate, those charged with governance~~ the nature of the additional requirements and shall agree whether:

- (a) The additional requirements can be met through additional disclosures in the financial statements; or
- (b) The description of the applicable financial reporting framework in the financial statements can be amended accordingly.

If neither of the above actions is possible, the auditor shall determine whether it will be necessary to modify the auditor's opinion in ~~the auditor's report in~~ accordance with ~~proposed~~ ISA 705 (Revised and Redrafted).<sup>4</sup> (Ref: Para. A3334)

*Financial Reporting Framework Prescribed by Law or Regulation—Other Matters Affecting Acceptance Determined as Unacceptable*

19. If the auditor has determined that the financial reporting framework prescribed by law or regulation ~~would be is~~ unacceptable ~~but for the fact that it is prescribed by law or regulation~~, the auditor ~~shall may nevertheless agree to~~ accept the audit engagement ~~but shall do so~~ only if ~~the following conditions are present~~: (Ref: Para. A3432-A33)
- (a) Management ~~agrees or those charged with governance agree~~ to provide additional disclosures in the financial statements ~~required~~, to avoid the financial statements being misleading; and
  - (b) It is recognized in the terms of the audit engagement that:
    - (i) The auditor's report on the financial statements will incorporate an Emphasis of Matter paragraph, drawing users' attention to the additional disclosures, in accordance with ~~proposed~~ ISA 706 (Revised and Redrafted); and
    - (ii) Unless the auditor is required by law or regulation to express the auditor's opinion on the financial statements by using the phrases ~~"give a true and fair view" or~~ "present fairly, in all material respects," ~~or "give a true and fair view"~~ in accordance with the applicable financial reporting framework, the auditor's opinion on the financial statements will not include such phrases.
20. If ~~the conditions outlined in paragraph 19 are not present management or those charged with governance refuse to provide additional disclosures~~ and the auditor is ~~required prohibited~~ by law or regulation ~~from refusing~~ to undertake the audit engagement, the auditor shall:
- (a) Evaluate the effect of the misleading nature of the financial statements on the auditor's report; and
  - (b) Include appropriate reference to this matter in the terms of the audit engagement.

*Auditor's Report Prescribed by Law or Regulation Wording Used to Express the Opinion*

- ~~21.17.~~ In some cases, law or regulation ~~of the relevant jurisdiction~~ prescribes the ~~layout or~~ wording of the auditor's ~~report opinion~~ in ~~a form or in~~ terms that are significantly different from the requirements of ISAs. In these circumstances, the auditor shall evaluate:

<sup>4</sup> ~~Proposed~~ ISA 705 (Revised and Redrafted), "Modifications to the Opinion in the Independent Auditor's Report."

- (a) Whether users might misunderstand the assurance obtained from the audit of the financial statements and, if so,
- (b) Whether additional explanation in the auditor's report can mitigate possible misunderstanding.<sup>5</sup>

If the auditor concludes that additional explanation in the auditor's report cannot mitigate possible misunderstanding, the auditor shall not accept the audit engagement, unless ~~required~~ prohibited by law or regulation ~~to do from doing~~ so. An audit conducted in accordance with such law or regulation does not comply with ISAs. Accordingly, the auditor shall not include ~~any~~ ~~no~~ reference within the auditor's report to the audit having been conducted in accordance with ISAs.<sup>6</sup> (Ref: Para. ~~A35-A36A30 and A33~~)

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## Application and Other Explanatory Material

### Scope of this ISA Objective (Ref: Para. ~~13~~)

~~A1. Assurance engagements, which include audit engagements, may only be accepted when the practitioner considers that relevant ethical requirements such as independence and professional competence will be satisfied, and when the engagement exhibits certain characteristics.<sup>7</sup> The auditor's responsibilities in respect of ethical requirements in the context of the acceptance of an audit engagement and in so far as they are within the control of the auditor are dealt with in ISA 220 (Redrafted).<sup>8</sup> This ISA deals with those matters (or preconditions) that are within the control of the entity and upon which it is necessary for the auditor and the entity's management to agree.~~

~~A1. Establishing whether the necessary preconditions for an audit are present and agreeing on the terms of the audit engagement are complemented by acceptance and continuance requirements in [proposed] ISA 220 (Redrafted).<sup>9</sup>~~

~~A2. The responsibilities of management and those charged with governance for agreeing the terms of the audit engagement for the entity depend on the governance structure of the entity and relevant legislation.~~

### Preconditions for an Audit

*The Financial Reporting Framework* (Ref: Para. ~~64~~(a))

~~A2.A3.~~ A condition for acceptance of an assurance engagement is that the criteria referred to in

<sup>5</sup> ~~[Proposed]~~ ISA 706 (Revised and Redrafted), "Emphasis of Matter Paragraphs and Other Matter(s) Paragraphs in the Independent Auditor's Report."

<sup>6</sup> See also ISA 700 (Redrafted), "Forming an Opinion and Reporting on Financial Statements," paragraph 43.

<sup>7</sup> "International Framework for Assurance Engagements," paragraph 17.

<sup>8</sup> ISA 220 (Redrafted), paragraphs 9-11.

<sup>9</sup> ~~[Proposed]~~ ISA 220 (Redrafted), "Quality Control for an Audit of Financial Statements," paragraphs [11-12].

the definition of an assurance engagement are suitable and available to intended users.<sup>10</sup> Criteria are the benchmarks used to evaluate or measure the subject matter including, where relevant, benchmarks for presentation and disclosure. Suitable criteria ~~enable are required for~~ reasonably consistent evaluation or measurement of a subject matter within the context of professional judgment. For purposes of the ISAs, the applicable financial reporting framework provides the criteria the auditor uses to ~~audit evaluate or measure the preparation and presentation of~~ the financial statements, including where relevant their fair presentation.

A3.A4. Without an acceptable financial reporting framework, management does not have an appropriate basis for the preparation ~~and presentation~~ of the financial statements and the auditor does not have suitable criteria for ~~auditing evaluating~~ the financial statements. In many cases the auditor may presume that the applicable financial reporting framework is acceptable, as described in paragraphs A8-A9.

#### Determining the Acceptability of the Financial Reporting Framework

A4.A5. Factors that ~~are relevant to may affect~~ the auditor's determination of the acceptability of the ~~applicable~~ financial reporting framework to be applied in the preparation of the financial statements include:

- The nature of the entity (for example, whether it is a business enterprise, a public sector entity or a not for profit organization);
- The purpose of the financial statements (for example, whether they are prepared to meet the common financial information needs of a wide range of users or the financial information needs of specific users);
- The nature of the financial statements (for example, whether the financial statements are a complete set of financial statements or a single financial statement); and
- Whether law or regulation prescribes applicable ~~legislative and regulatory requirements prescribe~~ the applicable financial reporting framework.

A5.A6. Many users of financial statements are not in a position to demand financial statements tailored to meet their specific information needs. While all the information needs of specific users cannot be met, there are financial information needs that are common to a wide range of users. Financial statements prepared ~~and presented~~ in accordance with a financial reporting framework designed to meet the common financial information needs of a wide range of users are referred to as general purpose financial statements.

A6.A7. In some cases, the financial statements will be prepared ~~and presented~~ in accordance with a financial reporting framework designed to meet the financial information needs of specific users. Such financial statements are referred to as special purpose financial statements. The financial information needs of the intended users will determine the applicable financial reporting framework in these circumstances. ~~[Proposed]~~ ISA 800

<sup>10</sup> "International Framework for Assurance Engagements," paragraph 17(b)(ii).

(Revised and Redrafted)<sup>11</sup> discusses the acceptability of financial reporting frameworks designed to meet the financial information needs of specific users.<sup>12</sup>

A7. Deficiencies in the applicable financial reporting framework that indicate that the framework is not acceptable may be encountered after the audit engagement has been accepted. When use of that framework is prescribed by law or regulation, the requirements of paragraphs 19 and 20 apply. When use of that framework is not prescribed by law or regulation, management may decide to adopt another framework that is acceptable. When management does so, as required by paragraph 16, new terms of the audit engagement are agreed to reflect the change in the framework as the previously agreed terms will no longer be accurate.

### General purpose frameworks

A8. At present, there is no objective and authoritative basis that has been generally recognized globally for judging the acceptability of general purpose frameworks. In the absence of such a basis, financial reporting standards established by organizations that are authorized or recognized to promulgate standards to be used by certain types of entities are presumed to be acceptable for general purpose financial statements prepared ~~and presented~~ by such entities, provided the organizations follow an established and transparent process involving deliberation and consideration of the views of a wide range of stakeholders. Examples of such financial reporting standards include:

- International Financial Reporting Standards (IFRSs) promulgated by the International Accounting Standards Board;
- International Public Sector Accounting Standards (IPSASs) promulgated by the International Public Sector Accounting Standards Board; and
- Accounting principles promulgated by an authorized or recognized standards setting organization in a particular jurisdiction, provided the organization follows an established and transparent process involving deliberation and consideration of the views of a wide range of stakeholders.~~jurisdiction.~~

These financial reporting standards are often identified as the applicable financial reporting framework in law or regulation~~legislative and regulatory requirements~~ governing the preparation ~~and presentation~~ of general purpose financial statements.

### Financial reporting frameworks prescribed by law or regulation

A9. In accordance with paragraph 64(a), the auditor is required to determine whether the financial reporting framework, to be applied~~adopted~~ in the preparation ~~and presentation~~ of the financial statements, is acceptable. In some jurisdictions, law or regulation may prescribe the financial reporting framework to be used in the preparation ~~and~~

<sup>11</sup>—~~[Proposed] ISA 800 (Revised and Redrafted), “Special Considerations—Audits of Special Purpose Financial Statements and Specific Elements, Accounts or Items of a Financial Statement,” paragraphs [9-10].~~

<sup>12</sup> ISA 800 (Revised and Redrafted), “Special Considerations—Audits of Financial Statements Prepared in Accordance with Special Purpose Frameworks,” paragraph 8.

~~presentation~~ of general purpose financial statements for certain types of entities. In the absence of indications to the contrary, such a financial reporting framework is presumed to be acceptable for general purpose financial statements prepared ~~and presented~~ by such entities. ~~(In the event that the framework is not considered to be acceptable, paragraphs 19 and 20 apply.)~~

Jurisdictions that do not have authorized or recognized standards setting organizations or financial reporting frameworks prescribed by law or regulation

A10. When an entity is registered or operating in a jurisdiction that does not have an authorized or recognized standards setting organization, or where use of the financial reporting framework is not prescribed by law or regulation, management identifies a ~~or those charged with governance identify an applicable~~ financial reporting framework to be applied in the preparation of the financial statements. Appendix 2 contains guidance on determining the acceptability of financial reporting frameworks in such circumstances.

*Agreement of the Responsibilities of Management* ~~and, where appropriate, Those Charged with Governance~~ (Ref: Para. ~~64~~(b))

A11. An audit in accordance with ISAs is conducted on the premise that management has acknowledged and understands that it has ~~and, where appropriate, those charged with governance have~~ the responsibilities set out in paragraph ~~64~~(b).<sup>13</sup> In certain jurisdictions, such responsibilities may be specified in law or regulation. In others, there may be little or no legal or regulatory definition of such responsibilities. ISAs do not override law or regulation in such matters. However, the concept of an independent audit requires that the auditor's role does not involve the preparation of the financial statements or taking responsibility for the entity's related internal control, and that the auditor has a reasonable expectation of obtaining the information necessary for the audit in so far as management is able to provide or procure it. Accordingly, the ~~This~~ premise is fundamental to the conduct of an ~~effective~~ independent audit. To avoid misunderstanding, agreement is reached with management ~~and, where appropriate, those charged with governance~~ that it acknowledges they acknowledge and understands that it has such ~~their~~ responsibilities; as part of agreeing and recording the terms of the audit engagement in paragraphs ~~9-127-11~~.

A12. The way in which the responsibilities for financial reporting are divided between management and those charged with governance will vary according to the resources and structure of the entity and any relevant law or regulation, and the respective roles of management and those charged with governance within the entity. In most cases, management is responsible for execution while those charged with governance have oversight of management. In some cases, those charged with governance will have, or will assume, responsibility for approving the financial statements or monitoring the entity's internal control related to financial reporting. In larger or public entities, a

<sup>13</sup> ~~[Proposed] ISA 200 (Revised and Redrafted), "Overall Objective of the Independent Auditor, and the Conduct of an Audit in Accordance with International Standards on Auditing," paragraph A2-[8].~~

subgroup of those charged with governance, such as an audit committee, may be charged with certain oversight responsibilities.

A13.A12. ISA 580 (Revised and Redrafted) requires the auditor to request management ~~and, where appropriate, those charged with governance~~ to provide written representations that ~~it has they have~~ fulfilled certain of its these responsibilities.<sup>14</sup> It may therefore be appropriate to make management them aware that receipt of such written representations will be expected, together with written representations required by other ISAs and, where necessary, written representations to support other audit evidence relevant to the financial statements or one or more specific assertions in the financial statements.

A14.A13. Where management ~~and, where appropriate, those charged with governance~~ will not acknowledge its agree to their responsibilities, or agree to provide the written representations, the auditor will be unable to obtain sufficient appropriate audit evidence.<sup>15</sup> In such circumstances, it ~~would may~~ not be appropriate for the auditor to accept the audit engagement, unless engagement. In some cases, however, law or regulation requires may prohibit the auditor to do so. In cases where the auditor is required to accept the from declining an audit engagement. ~~In these cases,~~ the auditor may need to explain to management ~~and, where appropriate, those charged with governance~~ the importance of these matters, and the implications for the auditor's report.

#### Preparation of the Financial Statements (Ref: Para 6(b)(i))

A15. Most financial reporting frameworks include requirements relating to the presentation of the financial statements; for such frameworks, preparation of the financial statements in accordance with the financial reporting framework includes presentation. In the case of a fair presentation framework the importance of the reporting objective of fair presentation is such that the premise agreed with management includes specific reference to fair presentation, or to the responsibility to ensure that the financial statements will "give a true and fair view" in accordance with the financial reporting framework.

#### Internal Control (Ref: Para. 64(b)(ii))

A16. Management maintains internal control in order to prepare financial statements in accordance with the applicable financial reporting framework. An independent audit conducted in accordance with the ISAs does not act as a substitute for the maintenance of internal control necessary for the preparation of financial statements by management. Accordingly, the auditor is required to obtain the agreement of management that it acknowledges and understands that it has responsibility for such internal control as management determines is necessary for this purpose.

A17.A14. It is for management to determine what internal control is necessary for the preparation of the financial statements. The term "internal control" encompasses a wide range of

<sup>14</sup> ISA 580 (Revised and Redrafted), "Written Representations," paragraphs 10-11. ~~[See footnote 2 of the Explanatory Memorandum.]~~

<sup>15</sup> ISA 580 (Revised and Redrafted), paragraph A28. ~~[See footnote 2 of the Explanatory Memorandum.]~~

activities within components that may be described as the control environment; the entity's risk assessment process; the information system, including the related business processes relevant to financial reporting, and communication; control activities; and monitoring of controls. This division, however, does not necessarily reflect how a particular entity may design, implement and maintain its internal control, or how it may classify any particular component.<sup>16</sup> An entity's internal control (in particular, its accounting books and records, or accounting systems) will reflect the needs of management, the complexity of the business, the nature of the risks to which the entity is subject, and relevant laws or regulation. ~~is defined as: "The process designed, implemented and maintained by those charged with governance, management and other personnel to provide reasonable assurance about the achievement of an entity's objectives with regard to the reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations. Internal control assists management in fulfilling its responsibility for the preparation and presentation of the financial statements."~~<sup>17</sup> ~~The entity's objective with regard to the reliability of financial reporting includes the preparation and presentation of financial statements that are in accordance with the applicable financial reporting framework and free from material misstatement, whether due to fraud or error.~~

~~A15. Internal control is an important aspect of the responsibility of management and, where appropriate, those charged with governance for the preparation and presentation of the financial statements in accordance with the applicable financial reporting framework. Accordingly, the auditor obtains their written agreement that they acknowledge and understand that this responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of financial statements that are free from material misstatement, whether due to fraud or error.~~

A18.A16. In some jurisdictions, law or regulation may refer to the responsibility of management ~~and, where appropriate, those charged with governance~~ for the adequacy of accounting books and records, or accounting systems. In some cases, general practice may assume a distinction between accounting books and records or accounting systems on the one hand, and internal control or controls on the other. As accounting books, and records, or and accounting systems, are an integral part of internal control as referred to defined in paragraph A1714, no specific reference is made to them in paragraph 46(b)(ii) for the description of the responsibility of management ~~and, where appropriate, those charged with governance. However, if this responsibility of management and, where appropriate, those charged with governance is described using the wording of the law or regulation, as provided for in paragraph 11, it may include a reference to books, records and systems in addition to a reference to internal control.~~ To avoid misunderstanding, it may be appropriate for the auditor to explain to management ~~and those charged with governance~~ the scope of this responsibility.

<sup>16</sup> ISA 315 (Redrafted), "Identifying and Assessing the Risks of Material Misstatement Through Understanding the Entity and Its Environment," paragraph A47 and Appendix I.

<sup>17</sup> ~~ISA 315 (Redrafted), "Identifying and Assessing the Risks of Material Misstatement Through Understanding the Entity and Its Environment," paragraph 4(e).~~

Considerations ~~Relevant~~Specific to Smaller Entities (Ref: Para. ~~64~~(b))

~~A19.A17.~~ One of the purposes of agreeing the terms of the audit engagement is to avoid misunderstanding about the respective responsibilities of management and, ~~where appropriate, those charged with governance and~~ the auditors. For example, when a third party has assisted with the preparation ~~and presentation~~ of the financial statements, it may be useful to remind management ~~and, where appropriate, those charged with governance~~ that the preparation ~~and presentation~~ of the financial statements in accordance with the applicable financial reporting framework remains its responsibility. ~~This may be particularly relevant in the case of smaller entities.~~

## Agreement on Audit Engagement Terms

*Agreeing the Terms of the Audit Engagement* (Ref: Para. 9)

~~A20.~~ The roles of management and those charged with governance in agreeing the terms of the audit engagement for the entity depend on the governance structure of the entity and relevant law or regulation. Ordinarily, the agreement is with those charged with governance.

*Audit Engagement Letter or Other Form of Written Agreement*<sup>18</sup> (Ref: Para. 10-11)

~~A21.A18.~~ It is in the interests of both the entity and the auditor that the auditor sends an audit engagement letter before the commencement of the audit, to help avoid~~ing~~ misunderstandings with respect to the audit. In some countries, however, the objective and scope of an audit and the responsibilities of management and, ~~where appropriate, those charged with governance, and~~ of the auditor may be sufficiently established by law, that is, they prescribe the matters described in paragraph ~~108~~. Although in these circumstances paragraph 11 permits the auditor to include in the engagement letter only the agreement of management that it acknowledges and understands that it has the responsibilities set out in paragraph 6(b), the auditor may nevertheless consider it appropriate to include the matters described in paragraph 10 and reference to the relevant law or regulation in an engagement letter for the information of management. Even in those situations, the auditor may still find an audit engagement letter informative for these entities.

Form and Content of the Audit Engagement Letter (Ref: Para. ~~108~~)

A22. The form and content of the audit engagement letter may vary for each entity. Information included in the audit engagement letter on the auditor's responsibilities may be based on ~~[proposed]~~ISA 200 (Revised and Redrafted).<sup>19</sup> Paragraphs ~~64~~(b) and ~~121~~ of this ISA deal with the description of the responsibilities of management ~~and, where appropriate, those charged with governance~~. In addition to including the matters

<sup>18</sup> In the paragraphs that follow, any reference to an audit engagement letter is to be taken as a reference to an audit engagement letter or other suitable form of written agreement.

<sup>19</sup> ~~[Proposed]~~ ISA 200 (Revised and Redrafted), paragraphs ~~3-9~~.~~[4-6]~~.

required by paragraphs ~~104(b) and 8~~, an audit engagement letter may make reference to, for example:

- Elaboration of the scope of the audit, including reference to applicable legislation, regulations, ISAs, and ethical and other pronouncements of professional bodies to which the auditor adheres.
- The form of any other communication of results of the audit engagement.
- The fact that because of the ~~test nature and other~~ inherent limitations of an audit, together with the inherent limitations of internal control, there is an unavoidable risk that ~~even~~ some material misstatements may not be detected, even though the audit is properly planned and performed in accordance with ISAs remain undiscovered.
- Arrangements regarding the planning and performance of the audit, including the composition of the audit team.
- The expectation that management ~~and, where appropriate, those charged with governance~~ will provide written representations (see also paragraph A1312).
- The agreement of management ~~or those charged with governance~~ to make available to the auditor draft financial statements and any accompanying other information in time to allow the auditor to complete the audit in accordance with the proposed timetable.
- The agreement of management to inform the auditor of facts that may affect the financial statements, of which management may become aware during the period from the date of the auditor's report to the date the financial statements are issued.
- The basis on which fees are computed and any billing arrangements.
- A request for management ~~or those charged with governance~~ to acknowledge receipt of the audit engagement letter and to agree to the terms of the engagement outlined therein.

A23. When relevant, the following points could also be made in the audit engagement letter:

- Arrangements concerning the involvement of other auditors and experts in some aspects of the audit.
- Arrangements concerning the involvement of internal auditors and other staff of the entity.
- Arrangements to be made with the predecessor auditor, if any, in the case of an initial audit.
- Any restriction of the auditor's liability when such possibility exists.
- ~~The agreement of management or those charged with governance to inform the auditor of facts, that may affect the financial statements, of which management or those charged with governance may become aware during the period from the date of the auditor's report to the date the financial statements are issued.~~

- A reference to any further agreements between the auditor and the entity.
- Any obligations to provide audit working papers to other parties.

An example of an audit engagement letter is set out in Appendix 1.

#### Audits of Components (Ref: Para. 109)

A24.A21. When the auditor of a parent entity is also the auditor of ~~its subsidiary, branch or division (a component)~~, the factors that may influence the decision whether to send a separate audit engagement letter to the component include the following:

- Who appoints the ~~auditor of the~~ component auditor;
- Whether a separate auditor's report is to be issued on the component;
- Legal requirements in relation to audit appointments;
- ~~The extent of any work performed by other auditors~~;
- Degree of ownership by parent; and
- Degree of independence of the component's management from the parent entity.

#### Responsibilities of Management ~~and, where Appropriate, Those Charged with Governance~~ Prescribed by Law or Regulation (Ref: Para. 11-12)

A25.A20. If, in the circumstances described in paragraphs A2148 ~~and~~ A2619, the auditor concludes that it is not necessary to record ~~certain~~ the terms of the audit engagement in an audit engagement letter, the auditor is still required by paragraph 1140 to ~~seek~~ obtain the written agreement from management ~~and, where appropriate, those charged with governance~~ that ~~it they~~ acknowledges and understands that it has the responsibilities set out in paragraph 64(b). However, in accordance with paragraph 1244, such written agreement may ~~use~~ reflect the wording of the law or regulation if such law or regulation establishes responsibilities for management that are equivalent in effect to those described in paragraph 64(b). The accounting profession or national standard setter in a jurisdiction may consider it appropriate to provide guidance as to whether the description in law or regulation is equivalent.

#### Considerations ~~S~~specific to ~~P~~public ~~S~~sector ~~E~~entities

A26.A19. Law or regulation governing the operations of public sector audits generally mandate the appointment of a public sector auditor and commonly set out the public sector auditor's responsibilities and powers, including the power to access an entity's records and other information. When law or regulation prescribes in sufficient detail the terms of the audit engagement, the public sector auditor may nonetheless consider that there are benefits in issuing an audit engagement letters. When law or regulation does not prescribe in sufficient detail the terms of the audit engagement, a letter setting out those elements of paragraph 108 not sufficiently covered by law or regulation, in addition to seeking the agreement of management that it acknowledges and understands its responsibilities as set out in paragraph 6(b), would satisfy this requirement. If the preconditions of an audit are not present, the public sector auditor may still be required

to accept the audit engagement, as provided by paragraph 8, due to the requirements of law or regulation.

### **Recurring Audits** (Ref: Para. ~~1312~~)

~~A27.A24.~~ The auditor may decide not to send a new audit engagement letter or other written agreement each period. However, the following factors may make it appropriate to revise the terms of the audit engagement or to remind the entity of existing terms:

- Any indication that the entity misunderstands the objective and scope of the audit.
- Any revised or special terms of the audit engagement.
- A recent change of senior management ~~or those charged with governance.~~
- A significant change in ownership.
- A significant change in nature or size of the entity's business.
- A change in legal or regulatory requirements.
- A change in the financial reporting framework adopted in the preparation ~~and presentation~~ of the financial statements.
- A change in other reporting requirements.

### **Acceptance of a Change in the Terms of the Audit Engagement**

*Request to Change the Terms of the Audit Engagement* (Ref: Para. ~~1413~~)

~~A28.A25.~~ A request from the entity for the auditor to change the terms of the audit engagement may result from a change in circumstances affecting the need for the service, a misunderstanding as to the nature of an audit as originally requested or a restriction on the scope of the audit engagement, whether imposed by management or ~~those charged with governance or~~ caused by other circumstances. The auditor, as required by paragraph ~~1413~~, considers the justification reason given for the request, particularly the implications of a restriction on the scope of the audit engagement.

~~A29.A26.~~ A change in circumstances that affects the entity's requirements or a misunderstanding concerning the nature of the service originally requested may be considered a reasonable basis for requesting a change in the audit engagement.

~~A30.A27.~~ In contrast, a change may not be considered reasonable if it appears that the change relates to information that is incorrect, incomplete or otherwise unsatisfactory. An example might be where the auditor is unable to obtain sufficient appropriate audit evidence regarding receivables and the entity asks for the audit engagement to be changed to a review engagement to avoid a qualified ~~audit~~ opinion or a disclaimer of opinion.

*Request to Change to a Review or a Related Service* (Ref: Para. ~~1514~~)

~~A31.A28.~~ Before agreeing to change an audit engagement to a review or a related service, an auditor who was engaged to perform an audit in accordance with ISAs may need to

assess, in addition to the ~~above~~ matters referred to in paragraphs A28-A30 above, any legal or contractual implications of the change.

~~A32.~~A29. If the auditor concludes that there is reasonable justification to change the audit engagement to a review or a related service, the audit work performed to the date of change may be relevant to the changed engagement; however, the work required to be performed and the report to be issued would be those appropriate to the revised engagement. In order to avoid confusing the reader, the report on the related service would not include reference to:

- (a) The original audit engagement; or
- (b) Any procedures that may have been performed in the original audit engagement, except where the audit engagement is changed to an engagement to undertake agreed-upon procedures and thus reference to the procedures performed is a normal part of the report.

### **Additional Considerations in Engagement Acceptance**

*Financial Reporting Standards Supplemented by Law or Regulation—~~Conflicts~~* (Ref: Para. 18)

~~A33.~~A31. In some jurisdictions, law or regulation legislative or regulatory requirements may supplement the financial reporting standards established by an authorized or recognized standards setting organization with additional requirements relating to the preparation ~~and presentation~~ of financial statements. In those jurisdictions, the applicable financial reporting framework for the purposes of applying the ISAs encompasses both the identified financial reporting framework and such additional requirements provided they do not conflict with the identified financial reporting framework. This may, for example, be the case when law legislative or regulation prescribes regulatory requirements ~~prescribe~~ disclosures in addition to those required by the financial reporting standards or when they narrow the range of acceptable choices that can be made within the financial reporting standards.<sup>20</sup>

*Financial Reporting Framework Prescribed by Law or Regulation—~~Other Matters Affecting Acceptance~~Determined as Unacceptable* (Ref: Para. ~~17, 19-20~~)

~~A32. — Deficiencies in the applicable financial reporting framework that indicate that the framework is not acceptable may be encountered after the audit engagement has been accepted. When use of that framework is prescribed by law or regulation, the requirements of paragraphs 19 and 20 apply. When use of that framework is not prescribed by law or regulation, management or those charged with governance may decide to adopt another framework that is acceptable. When management or those charged with governance do so, new terms of the audit engagement may need to be agreed to reflect the change in the framework as the previously agreed terms may no longer be accurate.~~

<sup>20</sup> ISA 700 (Redrafted), paragraph 15, includes a requirement regarding the evaluation of whether the financial statements adequately refer to or describe the applicable financial reporting framework.

~~A34.A33.~~ Law or regulation may prescribe that the wording of the auditor's opinion use the phrases ~~“give a true and fair view” or “present fairly, in all material respects,” or “give a true and fair view” in a case where although~~ the auditor concludes that the applicable financial reporting framework prescribed by law or regulation ~~would otherwise have been is~~ unacceptable. In this case, the terms of the prescribed wording of the auditor's ~~report opinion~~ are significantly different from the requirements of ISAs (see paragraph ~~2147~~).

~~Auditor's Report Prescribed by Law or Regulation~~ ~~Wording Used to Express the Opinion~~ (Ref: Para. ~~2147~~)

~~A35.A30.~~ ISAs require that the auditor shall not represent compliance with ISAs unless the auditor has complied with all of the ISAs relevant to the audit.<sup>21</sup> When law or regulation prescribes the ~~layout or~~ wording of the auditor's report ~~in a form or~~ in terms that are significantly different from the requirements of ISAs and the auditor concludes that additional explanation in the auditor's report cannot mitigate possible misunderstanding, the auditor may consider including a statement in the auditor's report that the audit is not conducted in accordance with ISAs. The auditor is, however, encouraged to apply ISAs, including the ISAs that address the auditor's report, to the extent practicable, notwithstanding that the auditor is not permitted to refer to the audit being conducted in accordance with ISAs.

### Considerations Specific to Public Sector Entities

~~A36.A34.~~ In the public sector, specific requirements may exist within the legislation governing the audit mandate; for example, the auditor may be required to report directly to a minister, the legislature or the public if the entity attempts to limit the scope of the audit.

<sup>21</sup> [Proposed] ISA 200 (Revised and Redrafted), paragraph ~~20-221~~.

**Appendix 1**(Ref: Para. [A22-A23](#))**Example of an Audit Engagement Letter**

The following is an example of an audit engagement letter for an audit of general purpose financial statements prepared ~~and presented~~ in accordance with International Financial Reporting Standards. This letter is not authoritative but is intended only to be a guide that may be used in conjunction with the considerations outlined in this ISA. It will need to be varied according to individual requirements and circumstances. It is drafted to refer to the audit of financial statements for a single reporting period and would require adaptation if intended or expected to apply to recurring audits (see paragraph [13+2](#) of this ISA). It may be appropriate to seek legal advice that any proposed letter is suitable.

\*\*\*

To the appropriate representative of those charged with governance of ABC Company senior management:<sup>22</sup>

*[The objective and scope of the audit]*

You<sup>23</sup> have requested that we audit the financial statements of ABC Company....., which comprise the balance sheet as at ....., and the income statement, statement of changes in equity and cash flow statement for the year then ended, and a summary of significant accounting policies and other explanatory information notes. We are pleased to confirm our acceptance and our understanding of this audit engagement by means of this letter. Our audit will be conducted with the objective of our expressing an opinion on the financial statements.

*[The responsibilities of the auditor]*

We will conduct our audit in accordance with International Standards on Auditing (ISAs). Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement. An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

Because of the ~~test nature and other~~ inherent limitations of an audit, together with the inherent limitations of ~~any accounting and internal control system~~, there is an unavoidable risk that even

<sup>22</sup> The addressees and references in the letter ~~to management or those charged with governance~~ would be those that are appropriate in the circumstances of the engagement, including the relevant jurisdiction. It is important to refer to the appropriate persons – see paragraph A20.

<sup>23</sup> Throughout this letter, references to "you," "we," "us," "management," "those charged with governance" and "auditor" would be used or amended as appropriate in the circumstances.

some material misstatements may not be detected, even though the audit is properly planned and performed in accordance with ISAs remain undiscovered.

In making our risk assessments, we consider internal control relevant to the entity's preparation ~~and fair presentation~~ of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. However, we will communicate to you in writing concerning any significant deficiencies in internal control relevant to the audit of the financial statements that we have identified during the audit.

*[The responsibilities of management ~~and, where appropriate, those charged with governance, and identification of the applicable financial reporting framework (for purposes of this example it is assumed that the auditor has not determined that whether the law or regulation prescribes those responsibilities in appropriate terms; the descriptions in paragraph 64(b) of this ISA are is therefore used).]~~*

Our audit will be conducted on the basis that [management and, where appropriate, those charged with governance]<sup>24</sup> acknowledge and understand that they have their responsibility:

(a) For the preparation and fair presentation of the financial statements (or preparation and presentation of financial statements that give a true and fair view) in accordance with International Financial Reporting Standards;<sup>25</sup>

(b) For such ~~this includes the design, implementation and maintenance of~~ internal control as [management] determines is necessary relevant to enable the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error; and

(a) (c) To provide us with:

(i) Access to Aall information of which [management] is aware that is relevant to the preparation of the financial statements, such as records, and documentation, and other matters that are relevant to the preparation and fair presentation of the financial statements;

(ii) Any Aadditional information that ~~we the auditor~~ may request from [management] for the purpose of the audit and, where appropriate, those charged with governance; and

(iii) Unrestricted access to persons those within the entity from whom we determine it necessary to obtain audit evidence.

As part of our audit process, we will request from [management and, where appropriate, those charged with governance], written confirmation concerning representations made to us in connection with the audit.

We look forward to full cooperation from your staff during our audit.

<sup>24</sup> Use terminology as appropriate in the circumstances.

<sup>25</sup> Or, if appropriate, "For the preparation of financial statements that give a true and fair view in accordance with International Financial Reporting Standards."

[*Other relevant information*]

[*Insert other information, such as fee arrangements, billings and other specific terms, as appropriate.*]

**[Reporting]**

~~We expect to report as follows:~~

[~~Insert appropriate reference to the expected form and content of the auditor's report.~~]

~~The form and content of our sample report may need to be amended in the light of our audit findings or include as an attachment.~~

Please sign and return the attached copy of this letter to indicate your acknowledgement of, and agreement with, the arrangements for our audit of the financial statements including our respective responsibilities.

XYZ & Co.

Acknowledged and agreed on behalf of ABC Company by

(signed)

.....

Name and Title

Date

## Appendix 2

(Ref: Para. A10)

### Determining the Acceptability of General Purpose Frameworks

#### Jurisdictions that Do Not Have Authorized or Recognized Standards Setting Organizations or Financial Reporting Frameworks Prescribed by Law or Regulation

1. As explained in paragraph A10 of this ISA, when an entity is registered or operating in a jurisdiction that does not have an authorized or recognized standards setting organization, or where use of the financial reporting framework is not prescribed by law or regulation, management ~~identifies or those charged with governance identify~~ an applicable financial reporting framework. Practice in such jurisdictions is often to use the financial reporting standards established by one of the organizations described in paragraph A8 of this ISA.
2. Alternatively, there may be established accounting conventions in a particular jurisdiction that are generally recognized as the financial reporting framework for general purpose financial statements prepared by certain specified entities operating in that jurisdiction. When such a financial reporting framework is adopted, the auditor is required by paragraph 64(a) of this ISA to determine whether the accounting conventions collectively can be considered to constitute an acceptable financial reporting framework for general purpose financial statements. When the accounting conventions are widely used in a particular jurisdiction, the accounting profession in that jurisdiction may have considered the acceptability of the financial reporting framework on behalf of the auditors. Alternatively, the auditor may make this determination by considering whether the accounting conventions exhibit attributes normally exhibited by acceptable financial reporting frameworks (see paragraph 3 below), or by comparing the accounting conventions to the requirements of an existing financial reporting framework considered to be acceptable (see paragraph 4 below).
3. Acceptable financial reporting frameworks normally exhibit the following attributes that result in information provided in financial statements that is useful to the intended users:
  - (a) Relevance, in that the information provided in the financial statements is relevant to the nature of the entity and the ~~purpose objective~~ of the financial statements. For example, in the case of a business enterprise that prepares general purpose financial statements, relevance is assessed in terms of the information necessary to meet the common financial information needs of a wide range of users in making economic decisions. These needs are ordinarily met by presenting the financial position, financial performance and cash flows of the business enterprise.
  - (b) Completeness, in that transactions and events, account balances and disclosures that could affect conclusions based on the financial statements are not omitted.
  - (c) Reliability, in that the information provided in the financial statements:
    - (i) Where applicable, reflects the economic substance of events and transactions and not merely their legal form; and

- (ii) Results in reasonably consistent evaluation, measurement, presentation and disclosure, when used in similar circumstances.
  - (d) Neutrality, in that it contributes to information in the financial statements that is free from bias.
  - (e) Understandability, in that the information in the financial statements is clear and comprehensive and not subject to significantly different interpretation.
4. The auditor may decide to compare the accounting conventions to the requirements of an existing financial reporting framework considered to be acceptable. For example, the auditor may compare the accounting conventions to IFRSs. For an audit of a small entity, the auditor may decide to compare the accounting conventions to a financial reporting framework specifically developed for such entities by an authorized or recognized standards setting organization. When the auditor makes such a comparison and differences are identified, the decision as to whether the accounting conventions adopted in the preparation and presentation of the financial statements constitute an acceptable financial reporting framework includes considering the reasons for the differences and whether application of the accounting conventions, or the description of the financial reporting framework in the financial statements, could result in financial statements that are misleading.
5. A conglomeration of accounting conventions devised to suit individual preferences is not an acceptable financial reporting framework for general purpose financial statements. Similarly, a compliance framework will not be an acceptable financial reporting framework, unless it is generally accepted in the particular jurisdictions by preparers and users.