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Our Ref: PSC/PSD/TS/ED10/2016

Friday, 13 May 2016

Arnold Schilder
Chairman
International Auditing and Assurance Standards Board
International Federation of Accountants
529 Fifth Avenue 6th Floor
New York, NY 100017

Dear Schilder,

RE: Invitation to Comment, Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control, and Group Audits

The Institute of Certified Public Accountants of Kenya (ICPAK) welcomes the opportunity to contribute to the Invitation to Comment (ITC), *Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control, and Group Audits*, issued by the International Auditing and Assurance Standards Board (IAASB).

ICPAK welcomes the IAASB efforts for enhancing audit quality, as part of the IAASB Work Plan for 2015-2016. We believe that there is need to rethink and enhance audit quality and commend the Boards decision to prioritise need to enhance audit quality project immediately after finalising the auditor reporting project. However, the IAASB needs to appreciate that one cannot “enhance quality” by issuing standards and guidance, because quality is a ‘state of mind’, in the same way as professional scepticism is.

Regarding the IAASB considerations for strengthening the requirements on quality control, we welcome the IAASB considerations mentioned in the Overview of the ITC since sound quality control enhances the quality of an audit. We would also welcome further analysis by the IAASB on whether a Quality Management Approach (‘QMA’) could be applied at the engagement level, as part of an audit process, such as the audit of accounting estimates, to enhance the audit quality of areas which are key in an audit.

If the Board decide to proceed with the proposals, our comments and detailed responses to the questions for respondents as set out in the consultation paper are detailed hereafter.

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Should you require any additional information, please contact the undersigned on icpak@icpak.com or nixon.omindi@icpak.com.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Nixon Omindi', is positioned below the text 'Yours Sincerely,'.

Nixon Omindi
For Professional Standards Committee

ENHANCING AUDIT QUALITY IN THE PUBLIC INTEREST: A FOCUS ON PROFESSIONAL SKEPTICISM, QUALITY CONTROL AND GROUP AUDITS

TEMPLATE FOR RESPONSES

The following template is intended to facilitate responses to the IAASB's Invitation to Comment (ITC), *Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control and Group Audits*. The questions set out below are replicated from the questions in the ITC on pages 87–95. Question numbers are coded to the consultation topics as follows:

- **G = General Question**
- **PS = Professional Skepticism**
- **QC = Quality Control**
- **GA = Group Audits**

RESPONDENT'S INFORMATION

Name: <i>(Please also fill in name in header for ease of reference)</i>	<i>Institute of Certified Public Accountants of Kenya (ICPAK)</i>
Description of the capacity in which you are responding (e.g., IFAC member body, audit oversight body, firm, SMP, individual, etc.)	<i>IFAC Member Body</i>
Name of contact person at organization (if applicable):	<i>Omind Nixon</i>
E-mail address:	<i>nixon.omindi@icpak.com</i>

GENERAL QUESTIONS

G1. Table 1 describes what we believe are the most relevant public interest issues that should be addressed in the context of our projects on professional skepticism, quality control, and group audits. In that context:

- (a) Are these public interest issues relevant to our work on these topics?
- (b) Are there other public interest issues relevant to these topics? If so, please describe them and how, in your view, they relate to the specific issues identified.
- (c) Are there actions you think others need to take, in addition to those by the IAASB, to address the public interest issues identified in your previous answers? If so, what are they and please identify who you think should act.

G1(a)	<i>Yes</i>
G1(b)	<i>Yes, we believe the IAASB should consider addressing whether ‘one size fits all’ remain appropriate for auditing standards, or should there be different standards for public interest entities and other entities mirroring, in a way, full IFRS and the IFRS for SMEs?</i>
G1(c)	<i>No</i>

G2. To assist with the development of future work plans, are there other actions (not specific to the topics of professional skepticism, quality control, and group audits) that you believe should be taken into account? If yes, what are they and how should they be prioritized?

G2	<p><i>We opine that the whole structure of the profession, which has hardly changed in over 100 years needs to be reviewed. We believe there is need to specifically focus on the following:</i></p> <ol style="list-style-type: none"> <i>1. Auditing should be seen as a career/profession in its own right, rather than a training ground for accountants. Why are there so few auditors over the age of 40 other than partners?</i> <i>2. Why are there few, if any, Institutes of External Auditors, only Institutes of Public Accountants (and Institutes of Internal Auditors)?</i> <i>3. Should there be separate examinations for auditors before getting a licence/practicing certificate?</i> <i>4. Should there be separate licensing systems for auditors of public interest entities and those of other entities?</i> <i>5. Should there be periodic re-examination of licensed auditors, which is consistent to encourage mobility across jurisdictions.</i> <i>6. Is it appropriate for auditors to be selected by competitive tender, which tends to focus on cost rather than quality, since quality is difficult to assess, especially on the basis of a proposal? Auditing is then generally on a ‘fixed fee’ basis, which discourages professional scepticism and in depth investigation of possible risks.</i> <i>7. If auditors are expected to safeguard the public interest, should they be appointed by the public rather than by the auditee?</i>
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G3. Are you aware of any published, planned or ongoing academic research studies that may be relevant to the three topics discussed in this consultation? If so, please provide us with relevant details.

G3	<i>No</i>
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PROFESSIONAL SKEPTICISM

PS1. Is your interpretation of the concept of professional skepticism consistent with how it is defined and referred to in the ISAs? If not, how could the concept be better described?

PS1	Yes
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PS2. What do you believe are the drivers for, and impediments to, the appropriate application of professional skepticism? What role should we take to enhance those drivers and address those impediments? How should we prioritize the areas discussed in paragraph 37?

PS2	<i>The problem is that professional scepticism (and independence) is a “state of mind”. It is influenced by a person’s nature, upbringing, national and corporate culture, education, experience and role models/mentors. Auditing is a vocation, and not everyone will be suited to it. Professional scepticism cannot be enhanced by guidelines and standards. It is, however, enhanced by experience. For instance, an auditor who has been confronted by fraud committed by a trusted client becomes more sceptical in future.</i>
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PS3. Is the listing of areas being explored in paragraph 38–40 complete? If not, what other areas should we or the Joint Working Group consider and why? What do you think are the most important area to be considered?

PS3	Yes
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PS4. Do you believe the possible actions we might take in the context of our current projects relating to quality control and group audits will be effective in promoting improved application of professional skepticism? If not, why?

PS4	<i>Yes, providing guidance will assist in promoting improved application of professional skepticism</i>
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PS5. What actions should others take to address the factors that inhibit the application of professional skepticism and the actions needed to mitigate them (e.g., the IAESB, the IESBA, other international standards setters or NSS, those charged with governance (including audit committee members), firms, or professional accountancy organizations)? Are there activities already completed or underway of which we and the Joint Working Group should be aware?

PS5	<i>No suggestions.</i>
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QUALITY CONTROL (INCLUDING QUESTIONS EXPLORING CROSSOVER ISSUES/ISSUES RELEVANT TO MORE THAN ONE PROJECT)

The following questions relate to quality control matters set out in paragraphs 45–190. If you believe actions relating to quality control beyond those discussed in these paragraphs should be prioritized, please describe such actions and your supporting rationale as to why they require priority attention.

QC1. We support a broader revision of ISQC 1 to include the use of a QMA as described in paragraphs 45–67.

- (a) Would use of a QMA help to improve audit quality? If not, why not? What challenges might there be in restructuring ISQC 1 to facilitate this approach?
- (b) If ISQC 1 is restructured to require the firm’s use of a QMA, in light of the objective of a QMA and the possible elements described in paragraphs 64 and Table 3, are there other elements that should be included? If so, what are they?
- (c) In your view, how might a change to restructure ISQC 1 impact the ISAs, including those addressing quality control at the engagement level?
- (d) If ISQC 1 is not restructured to require the firm’s use of a QMA, do you believe that we should otherwise address the matters described in paragraph 59 and table 2, and if so, how?

QC1(a)	<i>Yes, use of a QMA could help improve audit quality. However, it should be recognised that too heavy a hand on quality control tends to result in a checklist/compliance type of approach, at the expense of professional judgement.</i>
QC1(b)	<i>The main requirement of ISQC 1 at present is for a firm to “develop policies and procedures”. There should be more practical guidance on and illustration of the form these policies and procedures should take, and how they can be varied depending on the size of the firm. Consideration should still be given to having different standards for audits of public interest entities and those of other entities.</i>
QC1(c)	<i>Obviously there needs to be consistency between the approach in ISQC 1 and ISAs. ISQC 1 includes a number of concepts that are currently dealt with in more detail in ISA 220.</i>
QC1(d)	<i>See (b) above.</i>

QC2. *Engagement Partner Roles and Responsibilities*

- (a) Paragraphs 69–86 set out matters relating to the roles and responsibilities of the engagement partner.
 - (i) Which of the actions outlined in paragraphs 85–86 would be most meaningful to address issues related to engagement partner responsibilities?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Describe any potential consequences of possible actions that you believe we need to consider further.

- (b) Do you think it is necessary for the ISAs to include requirements or otherwise address the circumstances described in paragraph 79 in which an individual other than the engagement partner is required to or otherwise customarily sign(s) the auditor’s report or is named therein? If yes, please explain why, and provide your views about how this could be done (including describing the work effort you believe would be necessary for such an individual).

QC2(a)(i)	<i>Yes. Providing further clarity in ISA 220 about what is meant by performance, direction, supervision and review by the engagement partner, and having more specificity as to the engagement partners’ responsibilities</i>
QC2(a)(ii)	<i>This will address the different interpretations and views held by auditors and they will be on the same page with similar understanding of what is required of them</i>
QC2(a)(iii)	<i>The actions are sufficient to address the issue at hand.</i>
QC2(a)(iv)	<i>We have none at the moment.</i>
QC2(b)	<i>Indeed, it is necessary for ISAs to include the requirements, having the engagement partner sign audit report improves the audit quality as it increases accountability which could lead the partner to exercise greater care in performing the audit. To enable this, the standard should emphasise on accountability where every engagement be directly responsible for any risk arising from the audit he/she is conducting.</i>

QC3. Others Involved in the Audit

- (a) Paragraphs 87–104 set out matters relating to involvement of others in the audit:
- (i) Which of the actions outlined in paragraphs 100–104 would be most meaningful to address issues related to others participating in the audit?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Should we develop further requirements or application material for circumstances when other auditors are involved in an audit engagement (i.e., auditors that don’t meet the definition of component auditors)?

QC3(a)(i)	<i>Transparency in the auditor’s report about the involvement of others in the (group) audit will be beneficial.</i>
QC3(a)(ii)	<i>These actions are necessary since the experts and other auditor also play a big role in the final report and they need to be held accountable.</i>
QC3(a)(iii)	<i>No</i>

QC3(a)(iv)	<i>The above actions will have monetary effects on the overall audit fees. It would also be useful to consider providing illustrative examples of how the report incorporating the disclosures of the auditor expert and other auditors will look like.</i>
QC3(b)	<i>Yes, It will be important to provide requirements and guidance where other auditors other than component auditors are involved in the audit.</i>

QC4. *The Firms’ Role in Supporting Quality*

- (a) Paragraphs 106–123 set out matters relating to networks of firms and use of ADMs.
 - (i) Which of the actions outlined in paragraphs 114–116 and 122–123 would be most meaningful to address issues related to firms operating as part of a network of firms and firms’ changing business models and structures?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Specifically:
 - (i) What could we do to address the issues identified in the context of networks of firms? For example, should we develop more detailed requirements and application material to address reliance on network-level policies and procedures at a firm or engagement level?
 - (ii) Do you think it would be feasible for us to develop requirements and guidance for networks? Please provide a basis for your views.
 - (iii) Paragraphs 117–123 set out matters relating to the use of ADMs and related issues.
 - a. How should our standards emphasize the importance of appropriate quality control processes in relation to use of ADMs?
 - b. Are you aware of ADMs that raise issues not discussed in paragraphs? If so, please provide details.

QC4(a)(i)	<p><i>Revisiting the existing requirements of ISQC1 to clarify when firms can rely on network quality control policies.</i></p> <p><i>It is also important to recognizing that the network and firm structures are affected by laws and regulation in the jurisdiction within which the entity is operating and as a result the networks may be structured differently.</i></p> <p><i>The implication of using ADMs and how matters arising due to the ADMs will be handled and addressed in the standards (For example when it comes to engagement partner responsibility, definition of the engagement team etc.)</i></p>
QC4(a)(ii)	<i>The above are important so as to understand issues facing networks and attempt to give a guide</i>

QC4(a)(iii)	No
QC4(a)(iv)	None
QC4(b)(i)	<i>The firms are the once to come up with the structures because each firm operates differently and in different jurisdiction</i>
QC4(b)(ii)	No (refer above)
QC4(b)(iii)a	
QC4(b)(iii)b	No

QC5–QC10 address the more significant issues relating to quality control specific matters

QC5. *Governance of the Firm, Including Leadership Responsibilities for Quality*

- (a) Paragraphs 125–135 set out matters relating to governance of firms, including leadership responsibilities for quality.
- (i) Which of the possible actions outlined in paragraphs 131–135 would be most meaningful in addressing issues related to firm governance and leadership responsibility for quality?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Specifically:
- (i) Do you believe it is necessary for us to explore how the governance of a firm could be addressed in ISQC 1?
 - (ii) Should ISQC 1 specifically address accountability of firm leadership, or appropriate personnel within firm leadership, for matters related to quality, including independence-related matters? If so, how should this be done, and what direction should ISQC 1 provide to firms in appointing appropriate individuals to assume these responsibilities?
 - (iii) Would the use by firms of a QMA provide better support or context for the importance of quality-related responsibilities for firm leadership, and related accountability, and therefore better facilitate the ability of firms to address these matters?

QC5(a)(i)	<ul style="list-style-type: none"> ➤ <i>Recognizing that firm structures vary</i> ➤ <i>Clarity on what is expected from firm leadership and governance</i> ➤ <i>Identifying appropriate personnel within firm leadership who will be responsible and accountable for independence matters.</i>
QC5(a)(ii)	<i>to hold the firm leaders to task where they fail to deliver on their duties there needs to</i>

	<i>be a clear explanation with regard to what is expected of them.</i>
QC5(a)(iii)	<i>No.</i>
QC5(a)(iv)	<i>None.</i>
QC5(b)(i)	<i>Yes, it is necessary to explore governance of firms and address this in ISQC1 so that firms are on the same page and understand what is expected of them.</i>
QC5(b)(ii)	<i>No.</i>
QC5(b)(iii)	

QC6. *Engagement Quality Control Reviews and Engagement Quality Control Reviewers*

(a) Paragraphs 136–146 set out matters relating to engagement quality control reviews and engagement quality control reviewers.

- (i) Which of the possible actions outlined in paragraphs 143–146 would be most meaningful in addressing issues related to EQC reviews and EQC reviewers?
- (ii) Why do you believe these actions are necessary?
- (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
- (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.

(b) Specifically:

- (i) Should ISQC 1 mandate the performance of EQC reviews beyond audits of listed entities? If yes, what other entities should be considered and how could we best define these entities? If no, please explain your reasoning.
- (ii) Do you believe it is necessary for ISQC 1 to require that firms define the minimum period of time between when an individual has been the engagement partner and when that individual would be eligible to serve as the EQC reviewer on the same engagement? If yes, how do you think this should be done and why? If no, please explain why.
- (iii) Would you support the development of a separate EQC review standard? Please explain the reasoning for your response.

QC6(a)(i)	<i>Adding a new requirement, or clarifying the existing requirement, to focus on the selection of engagements for review based on identified risks of the engagements, such that engagements with higher audit risk or, if a firm is using a QMA, those that pose greater risk of negatively affecting the firm’s ability to meet its quality objectives would be more likely to be selected.</i>
QC6(a)(ii)	

QC6(a)(iii)	
QC6(a)(iv)	
QC6(b)(i)	<i>Yes The entities can be defined as Public Interest entities</i>
QC6(b)(ii)	<i>There should be a cooling period say 5 years before the individual can become the EQC reviewer.</i>
QC6(b)(iii)	<i>No, this can be incorporated in the ISQC1</i>

QC7. Monitoring and Remediation

(a) Paragraphs 147–159 set out matters relating to monitoring and remediation.

- (i) Which of the possible actions outlined in paragraphs 156–159 would be most meaningful in addressing issues related to monitoring and remediation?
- (ii) Why do you believe these actions are necessary?
- (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
- (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.

(b) Specifically:

- (i) Do you support the incorporation of a new requirement(s) in ISQC 1 for firms to understand the causal factors of audit deficiencies relating to inspection findings and other reviews? If not, why? Are there any potential consequences or other challenges of taking this action that you believe we need to consider?
- (ii) Do you support the incorporation of a new requirement(s) in ISQC 1 for the results of the firm’s monitoring of the effectiveness and appropriateness of the remedial actions to be considered in the design and assessment of the effectiveness of the firm’s system of quality control? Please provide further detail to explain your response.

QC7(a)(i)	<ul style="list-style-type: none"> ▪ <i>Strengthened requirements and new application material within ISQC 1 to improve Audit Quality</i> ▪ <i>Use of a QMA could help improve audit quality</i> ▪ <i>Monitoring by firm leadership which will ensure continuous improvement</i>
QC7(a)(ii)	<i>These actions are necessary to ensure an effective system of quality control is in place which is assessed and where deficiencies are noted corrective action is taken as appropriate</i>
QC7(a)(iii)	<i>No</i>
QC7(a)(iv)	<i>None</i>

QC7(b)(i)	<i>Yes</i>
QC7(b)(ii)	<i>No, the requirements can be incorporated within monitoring</i>

QC8. *Engagement Partner Performance and Rewards Systems*

Paragraphs 160–170 set out matters relating to engagement partner performance and rewards systems.

- (a) Do you believe that establishing a link between compensation and quality in ISQC 1 would enhance audit quality? Why or why not?
- (b) What actions (if any) do you believe we should take in this regard? Are there potential consequences of possible actions that you believe we need to consider?

QC8(a)	<i>This may not be viable because firms set the compensation rates for the partners without consulting IAASB or any other regulator. There is also no common measure for quality that can be used to say that the quality for audit firm B is better than that of firm C THEREFORE B payed higher than A since the revenue they get varies based on client base.</i>
QC8(b)	<i>None</i>

QC9. *Human Resources and Engagement Partner Competency*

- (a) Paragraphs 171–187 set out matters relating to human resources and engagement partner competency.
 - (i) Which of the possible actions outlined in paragraphs 176–178 and 187 would be most meaningful in addressing issues relating to human resources and engagement partner competency?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Specifically, which of the possible actions outlined, or other actions not described, in paragraphs 176–178 and 187 would most positively impact audit quality:
 - (i) Arising from issues related to knowledge, skills, competence and availability of a firm’s partners and staff?
 - (ii) Related to engagement partner competency?
 - (iii) Why do you believe these actions are necessary? If you would not support a particular action, please explain why, including any potential consequences of those actions that you believe we need to consider.

QC9(a)(i)	<i>Having additional application material to support the requirements for a firm to have</i>
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	<p><i>competent and adequate staff</i></p> <p><i>Promoting career development and promotion by giving timely performance appraisals</i></p> <p><i>Succession planning for staff</i></p>
QC9(a)(ii)	<i>These actions are crucial to ensure quality audits, competent and motivated staff</i>
QC9(a)(iii)	<i>No additional</i>
QC9(a)(iv)	<i>None</i>
QC9(b)(i)	<i>Experience</i>
QC9(b)(ii)	<i>None</i>
QC9(b)(iii)	<i>The actions will ensure a firm has competent staff and partners</i>

QC10. *Transparency Reporting*

Paragraphs 188–190 set out matters relating to transparency reporting.

- (a) Do you believe we are able to positively contribute to the evolving developments related to transparency reporting? If so, what, in your view, would be the most appropriate action we could take at this time?
- (b) If you would not support us taking actions as described in paragraph 190(b), please explain why, including any potential consequences of those actions that you believe we need to consider.

QC10(a)	<i>Yes, IAASB is able to positively contribute to the evolving developments related to transparency reporting. What IAASB can do is to encourage member bodies/regulators to demand of transparency reporting</i>
QC10(b)	<i>This should be left to the regulatory bodies in the different jurisdictions</i>

The following questions are overall questions relating to quality control:

QC11. Are there any other issues relating to quality control that we have not identified? If yes, please provide details. What actions should we take to address these issues?

QC11	<i>None identified</i>
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QC12. Are there any other specific actions that others could take in relation to quality control? If yes, please provide details.

QC12	<i>No</i>
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QC13. Are there any specific considerations for SMPs related to the issues and potential actions described in this section? Are there any other considerations for SMPs of which we should be aware? If so, please provide details and views about these matters.

RE: ICPAK submissions to the “Invitation to Comment, Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control, and Group Audits”

QC13	<i>No</i>
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QC14. Are there any specific public sector considerations related to the issues and potential actions described in this section? Are there any other public sector considerations of which we should be aware? If so, please provide details and views about these matters.

QC14	<i>No</i>
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GROUP AUDITS

The following questions relate to group audit matters set out in paragraphs 191–305. If you believe actions relating to group audits beyond those discussed in these paragraphs should be prioritized, please describe such actions and your supporting rationale as to why they require priority attention.

GA1. We plan to revise ISA 600 (and other standards as appropriate) to respond to issues with group audits.

- (a) Should we increase the emphasis in ISA 600 on the need to apply all relevant ISAs in an audit of group financial statements? Will doing so help to achieve the flexibility that is needed to allow for ISA 600 to be more broadly applied and in a wide range of circumstances (see paragraphs 194–198)? If not, please explain why. What else could we do to address the issues set out in this consultation?
- (b) Would the actions we are exploring in relation to ISA 600 improve the quality of group audits? If not, why?
- (c) Should we further explore making reference to another auditor in an auditor’s report? If yes, how does this impact the auditor’s work effort?
- (d) What else could the IAASB do to address the issues highlighted or other issues of which you are aware? Why do these actions need priority attention?

GA1(a)	<i>We do not think this is necessary.</i>
GA1(b)	<i>We are doubtful.</i>
GA1(c)	<i>No</i>
GA1(d)	<i>We believe developing guidance for component auditors would be helpful. It should be emphasised to local regulators that auditor rotation at a component level does not enhance audit quality at the group level. Local regulators should not demand auditor rotation where they are satisfied that auditor rotation takes place at the group level.</i>

GA2–GA9 address the more significant issues relating to group audits in greater detail.

GA2. *Acceptance and Continuance of the Group Audit Engagement*

- (a) Paragraphs 204–217 set out matters relating to acceptance and continuance of the group audit engagement.
 - (i) Which of the possible actions outlined in paragraphs 215–217 would be most meaningful in addressing issues related to acceptance and continuance procedures?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Specifically:

RE: ICPAK submissions to the “Invitation to Comment, Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control, and Group Audits”

- (i) Are access issues as described in paragraph 207(a) still frequently being experienced in practice? If yes, please provide details and, where possible, explain how these are being addressed today.
- (ii) Do you agree that ISA 600 can or should be strengthened in relation to addressing access issues as part of acceptance and continuance?
- (iii) Would expanding the understanding required for acceptance and continuance, as described in paragraph 215 (b), be achievable in the case of a new audit engagement?

GA2(a)(i)	<ul style="list-style-type: none"> ➤ <i>Strengthening the link in ISA 600 and the requirement in ISQC1</i> ➤ <i>Emphasizing that the engagement terms apply include the group management</i>
GA2(a)(ii)	<i>The actions would address issues related to acceptance and continuance</i>
GA2(a)(iii)	<i>No</i>
GA2(a)(iv)	<i>None noted</i>
GA2(b)(i)	<i>No</i>
GA2(b)(ii)	<i>Yes</i>
GA2(b)(iii)	<i>Yes</i>

GA3. Communications between the Group Engagement Team and Component Auditors

- (a) Paragraphs 218–225 set out matters relating to communications between the group engagement team and component auditors.
 - (i) Which of the possible actions outlined in paragraph 224 would be most meaningful in addressing issues relating to communication between the group engagement team and the component auditor?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why?
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.

GA3(a)(i)	<i>Strengthening the requirements and clearly defining the expectations</i>
GA3(a)(ii)	<i>These actions are important in addressing unclear issues between the engagement team and component auditors</i>
GA3(a)(iii)	<i>None</i>
GA3(a)(iv)	<i>None</i>

GA4. Using the Work of the Component Auditors

- (a) Paragraphs 226–242 set out matters relating to using the work of the component auditors.
- (i) Which of the possible actions outlined in paragraph 234 and 242 would be most meaningful in addressing issues related to using the work of the component auditor?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Specifically:
- (i) Should the nature, timing and extent of involvement of the group engagement team in the work of the component auditor vary depending on the circumstances? If yes, how could changes to the standard best achieve this objective?
 - (ii) Should ISA 600 be strengthened to require the group engagement partner to make an explicit determination about whether the group engagement team can use the work of a potential component auditor?

GA4(a)(i)	<i>The engagement team should make a determination whether they will need services of a component auditor and how to go about in determining the nature and extent of work</i>
GA4(a)(ii)	<i>None</i>
GA4(a)(iii)	<i>None</i>
GA4(a)(iv)	<i>None</i>
GA4(b)(i)	<i>Yes ,This is to be left to the engagement team to determine according to the work to be carried out</i>
GA4(b)(ii)	<i>No</i>

GA5. Identifying and Assessing the Risks of Material Misstatement in a Group Audit

- (a) Paragraphs 243–253 set out matters relating to identifying and assessing significant risks in a group audit:
- (i) Which of the possible actions outlined in paragraphs 251–253 would be most meaningful to address issues relating to identifying significant risks for the group audit?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.

GA5(a)(i)	
GA5(a)(ii)	
GA5(a)(iii)	
GA5(a)(iv)	

GA6. Issues Relating to Component Materiality and Other Aspects of Materiality Relevant to Group Audits

- (a) Paragraphs 254–261 set out issues relating to applying the concept of materiality in a group audit. Do you agree with the possible actions recommended in paragraph 261 to clarify the different aspects of materiality in a group audit? If not, please indicate which actions are not appropriate and describe why.
- (b) Recognizing that significant changes to ISA 320 will not be contemplated until a review of ISA 320 has been performed in its entirety (potentially as part of a future project to address 9materiality more broadly), please describe any other relevant issues or additional actions that you think may be appropriate relating to component materiality, component performance materiality or the clearly trivial threshold at the component level.

GA6(a)	<i>Yes</i>
GA6(b)	<i>None</i>

GA7. Responding to Identified Risks of Material Misstatement in a Group Audit (Including Issues Relating to the Group Engagement Team’s Involvement in the Consolidation Process)

- (a) Paragraphs 262–292 set out matters relating to responding to identified risk of material misstatement in a group audit (including the group engagement team’s involvement in the consolidation process).
 - (i) Which of the actions outlined in paragraphs 272–273, 279, 288 and 292 would be most meaningful to address issues relating to responding to identified risks of material misstatement in a group audit?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of possible actions that you believe we need to consider further.
- (b) Specifically:
 - (i) What are your views on scoping the audit based on identifying and assessing the risks of material misstatement for the group as a whole, rather than focusing the determination of the necessary work effort on the determination of whether components are considered significant or non-significant? Are there any practical challenges that we need to consider further?

- (ii) Are there other possible actions related to auditing groups where there are a large number of non-significant components that we should explore? Are there other approaches to auditing such groups that need to be considered? Do the possible actions presented lead to any additional practical challenges?
- (iii) Should the standard be strengthened for the group engagement team to be more involved at the sub-consolidation level in the appropriate circumstances? Are there further issues or practical challenges that have not been considered?
- (iv) Should the requirements or application material relating to subsequent event procedures be strengthened or clarified? Are there further issues or practical challenges that have not been considered?

GA7(a)(i)	
GA7(a)(ii)	
GA7(a)(iii)	
GA7(a)(iv)	
GA7(b)(i)	
GA7(b)(ii)	
GA7(b)(iii)	
GA7(b)(iv)	

GA8. *Review and Evaluation of the Work of Component Auditors by the Group Engagement Team*

- (a) Paragraphs 293–303 set out matters relating to the review and evaluation of the work of component auditors by the group engagement team.
 - (i) Which of the actions outlined in paragraphs 299 and 303 would be most meaningful in addressing issues relating to the review and evaluation of the work of component auditors by the group engagement team?
 - (ii) Why do you believe these actions are necessary?
 - (iii) Are there other relevant issues that we should consider, or actions that would be more effective than those described? If you would not support a particular action, please explain why.
 - (iv) Please also describe any potential consequences of those actions that you believe we need to consider further.

GA8(a)(i)	<i>Strengthening the requirements in paragraph 42 (b) of ISA 600 to clarify the role of the engagement team in relation to reviewing the working papers of the component auditors and the documentation requirements</i>
GA8(a)(ii)	<i>These actions are necessary because the engagement auditor is ultimately</i>

RE: ICPAK submissions to the “Invitation to Comment, Enhancing Audit Quality in the Public Interest: A Focus on Professional Skepticism, Quality Control, and Group Audits”

	<i>responsible for the audit</i>
GA8(a)(iii)	<i>No</i>
GA8(a)(iv)	<i>None</i>

GA9. *The Impact of New and Revised Auditing Standards*

How should the matters set out in paragraphs 304–305 be addressed in our plans to revise ISA 600? Are there any other implications from our new or revised standards that should be considered?

GA9	
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The following questions are overall questions relating to group audits:

GA10. Are there any other issues relating to group audits that we have not identified? If yes, please provide details. What actions should we take to address these issues?

GA10	<i>None</i>
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GA11. Are there any other specific actions that others could take in relation to group audits? If yes, please provide details.

GA11	<i>None noted</i>
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GA12. Are there any specific considerations for SMPs related to the issues and potential actions described in this section? Are there any other considerations for SMPs of which we should be aware? If so, please provide details and views about these matters.

GA12	<i>None</i>
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GA13. Are there any specific public sector considerations related to the issues and potential actions described in this section? Are there any other public sector considerations of which we should be aware? If so, please provide details and views about these matters.

GA13	<i>None noted</i>
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