

Respondent



19

Anonymous



172:29
Time to complete



1. Select Respondent Type *

Please select the capacity in which you are responding.

Professional Body



2. Organisation Name *

If you answered "Individual" in Question 1, please write "Private".

The Association of Chartered Certified Accountants (ACCA) - South Africa

3. Full Name of Respondent *

Kada Phiri

4. Job Title *

Business Development Manager

5. Email Address *

kada.phiri@accaglobal.com

6. Do you believe that additional disclosures in the auditor's report about the scope of the audit would be useful in enhancing the understanding of the audit that was performed? *

Refer to question 1 in section A of the Consultation Paper.

	Very useful	Useful	Somewhat useful	Not useful	No particular view
Scope of the audit. Refer to section A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. In relation to question 6 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

Please note that the following answer relates to both questions 7 and 13 below as we consider 'scope' to include aspects covered in question 13 as well. It is noted that the IRBA discussion paper may have limited 'scope' (for purposes of question 7) to the context of group audits (based on the illustrations provided). While we are in agreement with that aspect of the disclosure of the scope, we believe the 'scope' disclosure should also encompass a wider audit scope including assigning more responsibilities to the auditor for identifying and reporting fraud. ACCA conducted a global research project relevant to these concerns, published on 9 May 2019, entitled Closing the expectation gap in audit. The findings of our research (<https://www.accaglobal.com/in/en/professional-insights/global-profession/expectation-gap.html>) show that the public sees audit as part of the solution for preventing corporate failure. Furthermore, our research found that there is demand for a wider audit scope including assigning more responsibilities to the auditor for identifying and reporting fraud. Our research on the expectation gap surveyed 11,000 people across 11 countries (including 1,000 in the UK) weighted evenly by sample size, gender and spread across age, education level and household income. The countries in scope of our research are; Greece, Czech Republic, New Zealand, South Africa, Australia, the Netherlands, Singapore, Canada, the UAE, Malaysia and the UK. ACCA is currently working on a follow up project on the expectation gap, focusing on fraud and going concern. As part of this project, a series of roundtables were held with stakeholders of the wider financial reporting ecosystem across the globe. The IAASB's Discussion Paper on Fraud and Going Concern formed a key part of these roundtable discussions and where relevant, feedback received is reflected in this response.

8. Do you believe that disclosing the materiality threshold applied, and an explanation of significant judgements made by the auditor in determining materiality for the audit in the auditor's report, would be useful in enhancing the understanding of the audit that was performed? *

Refer to question 2 in section A of the Consultation Paper.

	Very useful	Useful	Somewhat useful	Not useful	No particular view
Materiality threshold applied, and an explanation of significant judgements made by the auditor in determining materiality for the audit. Refer to section A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. In relation to question 8 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We believe that audit materiality has a direct bearing to the extent to which the auditor would perform various audit procedures, especially the substantive audit procedures. It also influences which account balances will be tested due to their standing against the materiality level. Due to its significance to the audit process, materiality and the threshold applied should be disclosed. The explanation of this also provides the users of the audit report with an understanding of the auditor's considerations in relation to the key drivers of value in the business and the extent to which those key drivers are addressed by the auditor's audit procedures.

10. Do you believe that the disclosure of performance materiality in the auditor's report would be useful in enhancing the understanding of the audit that was performed? *

Refer to question 3 in section A of the Consultation Paper.

	Very useful	Useful	Somewhat useful	Not useful	No particular view
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Very useful Useful Somewhat useful Not useful No particular view

Performance materiality. Refer to section A.

11. In relation to question 10 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

Performance materiality is particularly important as it further reflects the auditor's consideration of factors that influenced them in setting a lower or higher range for performance materiality - these are basically the other way to interpret the auditor's risk considerations. Additionally disclosing the performance materiality provides the users with a quantifiable range of potential misstatements that may have occurred and were undetected as they may have been too low in comparison with the performance materiality. This is so as some account balances may not be subjected to certain tests of detail on the basis of them being non-material.

12. Do you believe that additional disclosures in the auditor's report that explain the extent to which the audit was considered capable of detecting irregularities, including fraud, would be useful in enhancing the understanding of the audit that was performed? *

Refer to question 4 in section B of the Consultation Paper.

Very useful Useful Somewhat useful Not useful No particular view

Explanation of the extent to which the audit was considered capable of detecting irregularities, including fraud. Refer to section B.

13. In relation to question 12 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as any suggestions you may have.

Max 4 000 characters.

Please refer to our answer to question 7 above.

14. Do you believe that disclosures in the auditor's report about how the auditor evaluated management's assessment of the entity's ability to continue as a going concern and, where relevant, key observations arising with respect to that evaluation would be useful in enhancing the understanding of the audit that was performed? *

Refer to question 5 in section C of the Consultation Paper.

	Very useful	Useful	Somewhat useful	Not useful	No particular view
How the auditor evaluated management's assessment of the entity's ability to continue as a going concern and, where relevant, key observations. Refer to section C.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. In relation to question 14 above, please provide your reasons and indicate where applicable, what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

While going concern assessments are to be performed by management, the auditor's considerations and how they evaluated management's assessment does provide assurance that the auditor made their evaluation independently without merely adopting the management assessment. This is particularly important as there is a significant risk that the assessment may not have been adequately performed by management due to limited guidance from a financial reporting perspective or intentional omission of circumstances and misrepresentation of assumptions in order to portray a favorable financial outlook. This is particularly enlightened by the advent of the global pandemic which has threatened

business survivals across the globe. Having a true sight of the entity's going concern position is increasingly important for both investors and those charged with governance and at the same time the risk of inaccurate going concern assessments is higher. Therefore by making the disclosure about the auditor's evaluation of the management assessment provides some level of assurance to the users that the risk of an inappropriate assessment has been reasonably addressed.

16. Do you believe that a conclusion (i.e. a positive statement) that management's use of the going concern basis of accounting in the preparation of the entity's financial statements is appropriate, should be included in the auditor's report? *

Refer to question 6 in section C of the Consultation Paper.

	Yes	Maybe	No	No particular view
Conclusion (i.e. a positive statement) that management's use of the going concern basis of accounting is appropriate. Refer to section C.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

17. In relation to question 16 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

This disclosure will prompt the auditor to make adequate evaluation of the management assessment as the positive statement implies that the auditor has made their judgement call based on information that they considered deeply. Inasmuch as this does not guarantee that the entity is indeed a going concern, the disclosure gives an enhanced level of comfort for the user compared to a situation where only management makes their positive statement.

18. Where there is a material uncertainty related to going concern, do you believe that procedures specific to the auditor's response to the material uncertainty related to going concern should be disclosed in the auditor's report? *

Refer to question 7 in section C of the Consultation Paper.

	Yes	Maybe	No	No particular view
Procedures specific to the auditor's response to a material uncertainty related to going concern. Refer to section C.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

19. In relation to question 18 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

Please refer to our previous answers to questions 14 to 17 as our consideration is consistent to this question.

20. Where the auditor concludes that no material uncertainty related to going concern has been identified, would a statement that the auditor has not identified a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the entity's ability to continue as a going concern for a period of at least 12 months from when the financial statements are authorised for issue be useful to you as a user? *

Refer to question 8 in section C of the Consultation Paper.

Very useful	Useful	Somewhat useful	Not useful	No particular view
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Very useful Useful Somewhat useful Not useful No particular view

A statement that the auditor has not identified a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the entity's ability to continue as a going concern for a period of at least 12 months from when the financial statements are authorised for issue. Refer to section C.

21. In relation to question 20 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

Please refer to our previous answers to questions 14 to 17 as our consideration is consistent to this question.

22. Are there any other matters related to going concern that you believe should be disclosed in the auditor's report? *

Refer to question 9 in section C of the Consultation Paper.

Yes Maybe No No particular view

Any other matters related to going concern that you believe should be disclosed in the auditor's report. Refer to section C.

23. In relation to question 22 above, please provide the details and where applicable, the benefits and drawbacks of disclosure of such matters, as well as any suggestions you may have.

Max 4 000 characters.

We do not have any additional matters to be disclosed. We believe that what is important is the auditors disclosure relating to their evaluation of management's assessment as well as their own consideration as to whether the entity is assessed as a going concern or otherwise.

24. Do you believe that auditor's reports other than on listed entities and where law or regulation requires the application of ISA 701, should disclose Key Audit Matters (KAMs)? *

Refer to question 10 in section D of the Consultation Paper.

	Other PIEs	All Entities	No	No particular view
KAMs in auditor's reports other than on listed entities and where law or regulation requires the application of ISA 701. Refer to section D.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

25. In relation to question 24 above, please explain your reasons for the answer to this question and where applicable, specify the type of entity for which you believe the auditor's reports should disclose KAMs, as well as any suggestions you may have.

Max 4 000 characters.

By disclosing the Key Audit Matters, the auditor of any entity, regardless of its PIE status, will ensure that adequate consideration is made on the KAMs and thus the following benefits will be derived by all auditees and for the benefit of the respective stakeholders. • KAMs encourage better conversations between the auditor and those charged with governance; this in turn contributes to better governance. • KAMs help the auditor to focus on the areas of the audit requiring the most careful judgement; this in turn contributes to higher audit quality. • KAMs give preparers incentives for revisiting financial reporting and disclosures in areas related to those KAMs. This in turn leads to better financial reporting.

26. In your view, are descriptions of the outcome of audit procedures or key observations with respect to Key Audit Matters useful in understanding the KAM? *

Refer to question 11 in section D of the Consultation Paper.

	Very useful	Useful	Somewhat useful	Not useful	No particular view
Descriptions of the outcome of audit procedures or key observations with respect to Key Audit Matters. Refer to section D.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

27. In relation to question 26 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We believe that by outlining the descriptions of the outcomes of audit procedures, the auditor is drawn to ensure that the most effective audit procedures are applied during the audit and as stated in answer to question 25 above, the audit quality is enhanced. Additionally, the users of the audit report can better understand the detail of the KAMs and how any concerns were addressed.

28. Do you believe it is beneficial to stakeholders to have visibility of the professional relationships between an audit firm and the audit client for audits of entities that are not PIEs? *

Refer to question 12 in section E of the Consultation Paper.

Yes	Maybe	No	No particular view
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	Yes	Maybe	No	No particular view
Visibility of the professional relationships between an audit firm and the audit client for audits of entities that are not PIEs. Refer to section E.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

29. In relation to question 28 above, please provide your reasons. Where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder and specify for which types of entities should the disclosure of such professional relationships be. Also indicate any suggestions you may have.

Max 4 000 characters.

The relationship of the auditor and the entity may impact on the independence and perception about the independence of the auditor. If there is visibility, the user is not left to base their perception on unofficial sources of information which may at times be inaccurate and may have the capacity to damage the trust of the user of the audit report. The distinction between PIEs and non-PIEs may be perceived to imply that non-PIEs are under less requirements of independence and effectively susceptible to sub-standard audit quality. Closing this gap is important for the restoration and maintenance of public interest. As such, we encourage IRBA to always exercise prudence when referring to PIEs and non-PIEs, and to make the distinction to the extent that it derives benefit for the users of the auditor's report.

30. If the answer to question 28 is "yes" or "maybe", do you believe this should be disclosed in the auditor's report? *

Refer to question 13 in section E of the Consultation Paper.

	Yes	Maybe	No	No particular view	Not Applicable
Disclosure of professional relationships in the auditor's report. Refer to section E.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

31. In relation to question 30 above, please provide your reasons. Where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder or provide alternative mechanisms for such disclosure.

Max 4 000 characters.

We believe that by disclosing the relationship, the benefits cited in our answer to question 29 may then be achieved.

32. Do you believe the auditor's report is an appropriate mechanism to disclose the matters described in (a), (b), (c) and (d) in paragraph 65 of the Consultation Paper in relation to fees? *

Refer to question 14 in section E of the Consultation Paper.

	Yes	Maybe	No	No particular view
Auditor's report an appropriate mechanism to disclose the matters described in (a), (b), (c) and (d) in paragraph 65. Refer to section E.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

33. In relation to question 32 above, please provide your reasons. Where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder or provide suggestions on other possible mechanisms to achieve such disclosure, including the benefits and the drawbacks.

Max 4 000 characters.

We do not believe that the auditor should make detailed disclosure of all the fees in paragraph 65. However part (d) of paragraph 65 may be relevant as it reflects the level of independence of the auditor as it is a declaration that the auditor is or is not reliant on the fees received from the particular audit client. We believe that including the detailed disclosures in paragraph 65 in its entirety encroaches to the confidentiality of fees between the auditor and its clients. This may also have unintended consequences of instances where audit client may be encouraged to price-hunt and for audit practitioners to be influenced by other auditors' report disclosures when preparing their proposals and estimates.

34. Do you believe the auditor's report is an appropriate mechanism to disclose whether an entity has been classified as a PIE or not? *

Refer to question 15 in section F of the Consultation Paper.

	Yes	Maybe	No	No particular view
Disclosure of whether an entity has been classified as a PIE or not in the auditor's report. Refer to section F.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

35. In relation to question 34 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We have concerns regarding the proposal for firms to disclose if they treated an audited entity as a PIE. We encourage the IRBA to carefully consider the implications of introducing a requirement for such disclosure. The value of the disclosure will have to be evaluated from the perspective of the users as recipients of the disclosure. We have heard concerns being expressed about the users' ability to understand the implications of PIE vs. non-PIE classification. And warned about the risk of the perception of different 'quality level' of audit being provided to PIEs, undermining non-PIE audits. This could widen the audit expectation gap as the rationale and meaning behind such disclosure is unlikely to be immediately clear to users. Therefore, IRBA will have to proceed with caution and coordinate closely with IRBA on whether a disclosure is indeed useful and if so, decide which is the best way to approach this in order to avoid misinterpretation and any unintended consequences.

36. Do you believe that when prior period financial statements that are misstated have not been amended and an auditor's report has not been reissued, but the corresponding figures have been properly restated or appropriate disclosures have been made in the current period financial statements, the matter should in all cases be described in the auditor's report? *

Refer to question 16 in section G of the Consultation Paper.

Yes	Maybe	No	No particular view
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	Yes	Maybe	No	No particular view
<p>Description in the auditor's report when prior period financial statements that are misstated have not been amended and an auditor's report has not been reissued, but the corresponding figures have been properly restated or appropriate disclosures have been made in the current period financial statements. Refer to section G.</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

37. In relation to question 36 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We believe that the disclosures relating to prior year misstatements would be addressed mainly by the accounting framework as it is likely that it may result in prior period errors which are already disclosed in the financial statements and are still audited accordingly in the current form of the audit report. Where necessary the emphasis paragraph is already being successfully used to draw the attention of the users to the relevant disclosures in the financial statements. Where such disclosure is not adequate, it is common knowledge that this would be considered by the auditor as a basis for modifying their audit opinion. It is therefore seemingly a duplication and an effort that has no effect or enhancement to the current status quo.

38. Where such disclosure (refer to question 36) is made in the auditor's report, whether mandated or not, do you believe that tailored descriptions of the audit procedures performed, and key observations made by the auditor regarding prior year material misstatements, would be useful in enhancing the understanding of how the auditor addressed the matter? *

Refer to question 17 in section G of the Consultation Paper.

Very useful Useful Somewhat useful Not useful No particular view

Tailored descriptions of the audit procedures performed, and key observations made by the auditor regarding prior year material misstatements. Refer to section G.

39. In relation to question 38 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We do not believe this disclosure should be made by the auditor in the first place as explained in answer to question 37 above.

40. Do you believe the disclosure of the threshold of unadjusted misstatements in the auditor's report would be useful in further enhancing transparency by auditors? *

Refer to question 18 in section H of the Consultation Paper.

Very useful Useful Somewhat useful Not useful No particular view

Do you believe the disclosure of the threshold of unadjusted misstatements in the auditor's report would be useful in further enhancing transparency by auditors? Refer to section H.

41. In relation to question 40 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We believe that by disclosing the performance materiality, the auditor would have provided adequate indication of the extent to which the auditor would consider misstatements to be adjusted before their audit opinion is modified. Additionally, we believe that the unadjusted misstatements are already reported to those charged with governance and the auditor is comfortable not to modify their audit opinion due to the aggregate of these misstatements being below the final materiality. We therefore do not see the benefit of the disclosure of such to the users of the audit report. We view this to be confidential elements of the audit that should not be divulged. We also believe that this is the auditor's judgement that they should document in the audit file and not divulge in the audit report in the same way that the individual results of the audit tests are not included in the audit report.

42. In relation to the matters described in sections A, B, C, G and H in the Consultation Paper, if applicable, would you please indicate for which types of entities these disclosures should be made? Your response should be in the format set out below (tick where appropriate and provide your reasons, including benefits and drawbacks, in the comment box). *

Refer to question 19 in section I of the Consultation Paper.

	All entities	PIEs only	Listed entities only	Others (Please explain in question 43 below)	Disclosure should not be made at all (Please explain in question 43)
Extending the disclosures of the Audit Scope. Refer to section A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Materiality. Refer to section A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Performance Materiality. Refer to section A.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	All entities	PIEs only	Listed entities only	Others (Please explain in question 43 below)	Disclosure should not be made at all (Please explain in question 43)
Enhancing the disclosure of the audit effort related to Irregularities, including fraud. Refer to section B.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the disclosure of the audit effort related to Going Concern. Refer to section C.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Auditor's report disclosures arising from Prior Year Misstatements. Refer to section G.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Disclosure of the reporting threshold unadjusted misstatements. Refer to section H.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

43. In relation to question 42 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We believe that these two aspects are part of the audit process and are guided by the firm or practitioner's audit methodology which is an application of the auditing standards. We do not perceive that there will be reasonable value to be derived by the users of the financial statements and the audit report from the above disclosures. We believe that by disclosing the performance materiality, the auditor would have provided adequate indication of the extent to which the auditor would consider misstatements to be adjusted before their audit opinion is modified. We also believe that the disclosures relating to prior year misstatements would be addressed mainly by the accounting framework as it is likely that it may result in prior period errors which are already disclosed in the financial statements and are still audited accordingly in the current form of the audit report. Where necessary the emphasis

paragraph is already being successfully used to draw the attention of the users to the relevant disclosures in the financial statements.

44. Other than those proposals discussed in sections A to I in the Consultation Paper, are there more matters that can be disclosed by auditors in the auditor's report for an audit of financial statements? *

Refer to question 20 in section J of the Consultation Paper.

	Yes	Maybe	No	No particular view
More matters that can be disclosed by auditors in the auditor's report.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

45. In relation to question 44 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

We believe that the audit report should be enhanced to the extent that it derives benefits to the users of the report and the financial statements. It should contain the relevant information to enhance the user's understanding of the audit report and the key processes. It should however not be overly extended such that important matters are diluted by other non-important aspects. Consideration should also be taken in that already, the auditor is subject to regulatory oversight and is bound by the ISAs and other codes of professional conduct. It is therefore automatic that certain matters are adhered to if the auditor complies with the ISAs and the firm-wide quality control standards.

46. Should there be prescribed standards or a rule that will mandate additional disclosures in the auditor's report? *

Refer to question 21 in section J of the Consultation Paper.

	Yes	Maybe	No	No particular view
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	Yes	Maybe	No	No particular view
Prescribed standards or a rule that will mandate additional disclosures in the auditor's report.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

47. In relation to question 46 above, please provide your reasons and where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder, as well as any suggestions you may have.

Max 4 000 characters.

In the absence of standards or rules, there will be vast inconsistencies between practitioners and this will confuse the public as to the expectations they should have of an audit report. Users of the audit reports will begin to assume that the varying detail and format of audit reports do reflect a varying level of audit quality by different audit practitioners. We therefore strongly support that IRBA exercise its standard-setting role and do issue pronouncements to guide the uniform application of the enhanced audit reporting as envisaged in the discussion paper and the applicable inputs of the stakeholders.

48. Is there a need to develop a structure or framework within which to accommodate currently envisaged but also future changes to auditor's report contents? *

Refer to question 22 in section J of the Consultation Paper.

	Yes	Maybe	No	No particular view
A need to develop a structure or framework within which to accommodate currently envisaged but also future changes to auditor's report contents.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

49. In relation to question 48 above, please provide your reasons. Where applicable, indicate what the benefits and drawbacks of such disclosures would be to you as a stakeholder and explain what the elements of such a framework would be. Also provide any suggestions you may have.

Max 4 000 characters.

We believe that the structure of an audit report should be standardised in order to ensure that users of the audit report have a consistent experience when indulging with the auditors' reports. We therefore support the proposed structure that IRBA shared during the webinar as it demonstrated a logical flow of the audit report that is easy to follow by a knowledgeable user of the audit report.