



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU

Archwilydd Cyffredinol Cymru
Auditor General for Wales

Transparency Statement – Wales Audit Office and the Auditor General for Wales

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We welcome correspondence and telephone calls in Welsh and English. Corresponding in Welsh will not lead to delay. Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

Mae'r ddogfen hon hefyd ar gael yn Gymraeg. This document is also available in Welsh.

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Introduction

The Statement forms part of a suite of documents, which when taken together, provide similar information to that which private-sector audit firms are required to publish in their 'transparency reports'. We are not subject to these transparency reporting requirements but are committed to the principle of transparency in all that we do.

The first section of this Statement – About the Wales Audit Office/Auditor General – provides references to where we already publish information about our governance and financial arrangements (information which private-sector firms are required to include in their 'transparency reports' as it is not provided elsewhere).

We are committed to achieving high standards of audit quality in all our work in order to provide members of the public with assurance that our work can be relied upon and that the messages we provide are robust and evidence-based. The remaining parts of the Statement are designed to explain at a high level the arrangements we have in place to achieve these objectives.

About the Wales Audit Office and the Auditor General

Information about the Wales Audit Office and the Auditor General is set out in a range of public documents available on [our website](#). These include our:

- Estimates of income and expenditure
- Annual Plans
- Interim Reports
- Annual Report and Accounts
- Code of Practice Governing the Relationship between the Auditor General for Wales and the Wales Audit Office
- Auditor General for Wales Code of Audit Practice 2018

Information about our governance and financial arrangements is available within these documents as illustrated in the following table.

Legal Structure	Governance Arrangements	Financial Information	Remuneration of WAO Board and Senior Management
The Code of Practice Governing the Relationship between the Auditor General for Wales and the Wales Audit Office summarises the statutory roles of the Auditor General and the Wales Audit Office and the relationship between them.	A summary of the governance structure of the Wales Audit Office is set out in the Governance Statement published in our Annual Report and Accounts.	Information about the income and expenditure of the Wales Audit Office is detailed in our Estimates and Annual Report and Accounts.	Information about the remuneration, and the remuneration bases of Wales Audit Office Board Members and Senior Management, is set out in our annual Remuneration Report published in our Annual Report and Accounts.

Quality control framework

Our quality control system has been designed to comply with the quality control standards of the Financial Reporting Council.

Our Management Committee is of the view that this quality framework is operating effectively and that the arrangements are continuing to develop as set out in this report.

Tone at the top

The Assistant Auditor General is responsible to the Auditor General for the quality of all our audit work, including that performed by Wales Audit Office staff and external contractors. He ensures that audit quality is at the forefront of what we do through:

- setting personal standards for audit quality and leading by example;
- embedding audit quality into our strategies, culture, values, code of conduct and audit methodologies;
- promoting the importance of audit quality through our performance appraisal system;
- providing regular, open and clear messages to staff about the importance of audit quality; and
- establishing clear lines of responsibility for audit quality.

Our culture is one committed to continuous improvement and to supporting our staff to achieve that improvement, through learning and development and our performance management arrangements.

Audit methodology and tools

An important component of achieving audit quality is establishing standardised approaches to carrying out our work. We have developed consistent methodologies for all our work, as follows:

- the Performance Audit Delivery Manual provides a framework for carrying out all our performance audit work;
- the Financial Audit Delivery Manual provides a framework for carrying out all our accounts opinion work; and
- a suite of certification instructions provides guidance on undertaking grants certification work.

All our audit methodologies emphasise the importance of audit quality and the role of all members of staff in achieving expected levels of audit quality.

These methodologies are designed to establish a baseline for applying consistent judgements and procedures to all our audit work and are supported by documentation and record management systems, which again promote audit consistency and quality.

We continue to develop and use a range of other computerised tools in undertaking our work to allow us to effectively interrogate large volumes of complex data and to present our findings in more visually accessible formats.

While standardisation in audit approaches serves to enhance audit quality, it cannot replace the need for effective auditor scepticism and judgement. Through our learning and development programmes we continue to promote these skills while also updating our audit methodologies to embed best practices and to take account of new professional developments.

Similarly, private firms also use standardised methodologies and tools.

All our auditors, including private firms, are supported by dedicated technical functions which provide expert guidance and advice on a range of technical and professional issues.

Auditor independence

One key characteristic of auditors is the requirement that we be independent from those whom we audit. This includes not just the delivery of audit work but the independence of appointments as well. This independence supports our exercise of professional scepticism and enables us to objectively arrive at conclusions without being affected by influences that could compromise our professional judgement.

The Auditor General is the statutory external auditor of most of the Welsh public sector. The office is independent of government and appointments are made by the Queen on nomination of the National Assembly for Wales. Auditors General are appointed for a fixed eight-year period and may only be relieved of office by the Queen in very limited circumstances. The Auditor General's remuneration is a direct charge on the Welsh Consolidated Fund, which serves to preserve the independence of the office.

We have published a Code of Audit Practice and a Code of Conduct which reinforce the importance of the independence and objectivity to our work.

All of our staff are required to make an annual declaration of independence in which they identify any connections with the bodies we audit that might impair their independence. Where any such impediments are identified, appropriate action is taken to mitigate potential conflicts of interest to an acceptable level. Such action can include preventing staff from working on certain audits or restricting the scope of involvement an individual may have with a particular audit.

A separate Code of Conduct is in place for Board members who are required to declare any interests they may have in any issue and may be required to withdraw from meetings where that issue is being considered.

In addition to the statutory work that the Auditor General is required to undertake, he may from time to time undertake some non-statutory work. We have established policies and procedures to ensure that such work is only undertaken where we have the capacity and capability to do that work and where accepting such an appointment would not impair the statutory independence of the Auditor General.

Private firms undertaking work on behalf of the Auditor General are required to have similar arrangements in place to monitor and manage any potential threats to independence to the audits that they undertake. We have procedures in place to monitor the effectiveness of those arrangements.

The Auditor General has also issued a Rotation Policy which governs how long senior members of staff can be involved with the direction of any particular audit. The policy seeks to achieve a balance between the mostly non-discretionary nature of the Auditor General's work, the relatively small size of the WAO and the requirements of ethical standards.

Training is provided to staff on a regular basis to raise awareness of our independence policies and procedures

Continuing professional education of auditors

We continue to invest heavily in staff learning and development to enhance the professional skills and knowledge of our staff. All staff are provided with a typical allowance of 10 days per annum to support their professional learning and development.

Our annual learning and development programmes contain two main elements:

- mandatory programmes: these are designed to ensure that all staff receive training in new and key technical and core skill areas relevant to their particular roles; and
- 'on-demand' learning: this is identified from performance development reviews by individuals with their line managers, and is designed to support the personal development of individuals.

Our personal development processes have been accredited as appropriate CPD systems for our staff by the Institute of Chartered Accountants in England and Wales (ICAEW), the Association of Certified Chartered Accountants (ACCA) and the Association of Accounting Technicians (AAT).

The effectiveness of our investment in professional development is subject to ongoing review and assessment. In particular, periodic assessments are undertaken between individuals and their line managers of the effectiveness of the learning and how it has been applied in practice.

We also operate a post-project learning approach to all major projects (including audits) which seeks to reinforce our aim of being a learning and sharing organisation that strives continually to improve. This post-project learning process focuses on considering what we can learn from the way the project was delivered and promotes consideration of:

- what worked well;
- what could have been improved;
- how did it feel;
- evidence of impact; and
- lessons for the future.

Private firms also attend our mandatory training programmes, to ensure consistency amongst all those undertaking work for the Auditor General

Monitoring

We have established quality monitoring arrangements across both financial audit and performance audit to ensure that we are achieving the standards of audit quality we expect in all our work. These are outlined below.

Financial audit

A policy of rotational review has been adopted in financial audit – accounts opinion and grants certification – and in-house audits are selected for review in accordance with the following principles:

- each engagement lead is normally reviewed at least every two years (although this tends to be annual in practice); and
- each audit manager is normally reviewed at least every three years.

We also aim to achieve representative coverage of the bodies we audit taking account of audit sectors, body size and complexity.

A number of these reviews are undertaken by counterparts from the other UK audit agencies, such as the Northern Ireland Audit Office and Audit Scotland.

The Practice has also enhanced its arrangements by using the Quality Assurance Department (QAD) of the ICAEW to independently review quality arrangements across the Practice. The WAO does not place any restriction on QAD's choice of audits for review, how those reviews are undertaken nor on how QAD reports back its findings to the WAO. We publish an annual summary of the QAD's independent findings on [Openness and Transparency](#) page of our website. We entered into a new contract in 2016, which will run until November 2020. This contract provides for quality review services plus training for in-house quality reviewers and expert guidance on developing our audit methodology.

Performance audit

We use a range of different approaches within performance audit to assess whether our work has complied with the standards we have laid out in our quality framework. These include:

- ex-post reviews of a sample of performance audit products that are selected for review in accordance with the following principles:
 - each engagement lead is normally reviewed every year; and
 - each audit manager is normally reviewed at least every three years.
- peer reviews of a sample of national reports;
- feedback on national reports and annual programmes of performance audit work from stakeholder surveys;
- an assessment of the quality of our written outputs from an analysis of performance audit editing and screening activity;
- an analysis of delivery to time and budget; and

- performance group learning and development activities.

In order to carry out the peer reviews highlighted above, we have established reciprocal arrangements with the National Audit Office, Audit Scotland and the Northern Ireland Audit Office to review a sample of our national reports each year.

Private sector firms

We also contract with private-sector audit firms to deliver some financial and performance audit work on behalf of the Auditor General. These firms are contractually required to establish their own quality control frameworks to ensure that their work is undertaken to appropriate quality standards. We carry out quality assurance reviews of the audit work carried out by the firms on behalf of the Auditor General and have appropriate remedies in place should those standards not be achieved.

Whole-of-firm arrangements

The Assistant Auditor General is also responsible for monitoring whether appropriate support arrangements (including in relation to independence arrangements) are in place across the Wales Audit Office as a whole to realise the standards of audit quality we expect to achieve. To this end he works in collaboration with the Director of Corporate Services who is responsible for advising the Auditor General and the Board on the quality control framework which has been established within the Wales Audit Office and the Director of Finance who has responsibility for HR (including our recruitment and appraisals processes).

Reporting

The outcomes of this review work are reported to the director committees for each practice and are shared with all members of staff to support our aspiration of continuous improvement.

Monitoring and reporting on audit quality

One of the key performance indicators we measure in line with our Annual Plan is:

- the proportion of audits that are delivered in accordance with required quality standards.

This indicator includes both work undertaken by the two in-house practices (performance and financial audit) and work undertaken by private-sector firms.

We set a target for this indicator of achieving 100% compliance for the audits assessed as part of the quality monitoring work described above.

We publicly report our performance against this target in our Annual Report.

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