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INTRODUCTION

We are pleased to present our annual report for 2017. As in previous years, this report aims to provide transparency over our work and includes:

• An overview of the activities of ICAS Audit Monitoring during 2017; and
• Key messages and detailed findings arising from monitoring visits.

We hope that you find it useful in considering how effectively your firm is complying with regulatory requirements. We encourage you to share the report with your colleagues, and also to utilise the key messages when conducting your own Audit Compliance Review process.

If you have any comments or questions, please contact us on auditandpracticemonitoring@icas.com.
A challenging regulatory landscape

We recognise, first and foremost, that it has been a tough year for firms, mainly due to the challenges arising from changes in the economic and regulatory landscape. There are significant regulatory changes which have taken effect, including: new UK GAAP; new SORPs for specialist entities; as well as various non-audit changes, such as the new money laundering regulations.

Whilst we will focus our report only on direct audit regulatory changes, we recognise that the overall impact of all these changes has been to put significant pressure on workload, fees and recoverability for many firms.

These changes have also inevitably had a knock-on impact on audit quality, increasing the number of firms - half of our firms as explained in “2017 Monitoring Results” - on follow up after their audit monitoring visit.

Looking to the future

The downturn in audit quality was fully anticipated, given the learning curve with new UK GAAP and the new SORPs. This is not dissimilar to trends experienced following other regulatory changes such as ISA implementation. We think this will be a short-term issue only, and that things should start to improve once all of these regulatory changes have bedded in.

The key is to try and stay on top of changes. We hope you find this report useful in keeping up to date with some of the main challenges we find.
Background: Developmental Regulation

We aim to deliver Developmental Regulation. This means that our Audit Monitoring regime is designed to both:

- support the work of ICAS audit registered firms; and
- uphold standards and provide reassurance to the public over audit quality.

Our primary aim is to work with, and to support, firms to make any improvements required.

As explained previously, the regulatory landscape has become increasingly challenging, meaning we require to act as a robust regulator, when required.

The regulatory framework

Following the implementation of the EU Audit Regulation & Directive, ICAS is now accountable to two audit Competent Authorities, the Financial Reporting Council (“FRC”) in the UK and The Irish Auditing and Accounting Supervisory Authority (“IAASA”) in Ireland, both of which have increased powers.

UK

Under the EU Audit Regulation & UK legislation, the Financial Reporting Council (FRC) holds all statutory powers in relation to audit regulation.

The FRC delegates to ICAS, as an audit RSB, the responsibility for monitoring all firms audit licensed with ICAS, except for firms auditing PIEs (“Public Interest Entities”).

ICAS audit registered firms that audit PIEs are monitored by the Audit Quality Review team of the FRC. The FRC, however, delegates to ICAS the review of non-PIE audits. This means that PIE audit firms are reviewed by both the FRC and ICAS.
All of the monitoring work we do is governed by the aforementioned legislation and a delegation agreement with the FRC. The FRC, with its increased powers since 17 June 2016, is increasing its oversight role.

Ireland

ICAS audit registered firms are authorised to conduct audits of both UK and Irish entities. We are therefore also required to meet the requirements of Irish legislation and we are regulated by the Irish Auditing & Accounting Supervisory Authority ("IAASA").

Whilst the statutory powers are different in Ireland, and the legislation is due to change again shortly, the overall effect of the EU Regulation & Directive is similar, in that IAASA have also increased its regulatory oversight. Similarly, IAASA have an Audit Inspection Unit responsible for PIE audit firms.

Impact of changes

This increased audit oversight is aimed at improving audit quality, but has also inevitably resulted in increased regulatory requirements.

The FRC intends to accompany ICAS on a number of monitoring visits during 2018.

What we review

Audit Monitoring conducts the monitoring of all ICAS audit registered firms. Visits are selected on a risk basis and all firms are, in the main, visited at least once every six years.

Risk indicators include: the type and size of the audit portfolio; changes within the practice; and the previous visit history. This risk-based approach determines the time and frequency of visits. Firms with previous visit issues will have their time until the next visit shortened.

How we review

Our visit process is:

The size of firms registered with ICAS to conduct audit work varies and the monitoring visit approach is tailored to reflect the nature and client base of each firm.

For more information about Audit Monitoring, and the role of the Authorisation Committee, please search for “audit monitoring” at icas.com.
Who we review

The number of ICAS audit registered firms and approved Responsible Individuals (RIs), has reduced slightly year-on-year. This continues to be due to the increase in the audit threshold, and the increased regulatory framework.
2017 MONITORING RESULTS

In 2017 we conducted 44 Audit Monitoring visits (2016: 40, 2015: 38), covering our full range of firms. The table below shows the size of the firms we visited in 2017.

As can be seen, there was an increase in the number of smaller firms this year.

**Firms visited**

<table>
<thead>
<tr>
<th></th>
<th>2017 visits</th>
<th>2016 visits</th>
<th>2015 visits</th>
</tr>
</thead>
<tbody>
<tr>
<td>sole practitioners</td>
<td>15</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>2-3 partners</td>
<td>21</td>
<td>19</td>
<td>12</td>
</tr>
<tr>
<td>4+ partners</td>
<td>8</td>
<td>9</td>
<td>15</td>
</tr>
<tr>
<td>firms with major audits</td>
<td>2</td>
<td>2</td>
<td>1</td>
</tr>
</tbody>
</table>

**Visit outcomes**

<table>
<thead>
<tr>
<th></th>
<th>2017 visits</th>
<th>2016 visits</th>
</tr>
</thead>
<tbody>
<tr>
<td>No follow up</td>
<td>5 (11%)</td>
<td>2 (5.5%)</td>
</tr>
<tr>
<td>Isolated issues</td>
<td>14 (32%)</td>
<td>11 (31%)</td>
</tr>
<tr>
<td>Systemic issues</td>
<td>22 (50%)</td>
<td>21 (58%)</td>
</tr>
<tr>
<td>Serious issues</td>
<td>3 (7%)</td>
<td>2 (5.5%)</td>
</tr>
</tbody>
</table>

It is difficult to make comparisons year-on-year as:

- different firms are visited each year; and
- the regulatory landscape has been changing significantly.

All isolated, systemic issues and serious issues resulted in the Authorisation Committee requiring the firm to submit evidence of follow-up action. There has been a small downturn in compliance and the number of firms on follow up have increased, but this was anticipated due to the impact of UK GAAP changes.

It is, however, pleasing that 82% of firms receiving a full-scope visit during 2017 (89% in 2016) had no systemic/serious audit quality issues.
The main issues resulting in firms being considered, “isolated”, “systemic” or “serious”, and requiring follow-up, are explained in the next section “Key Themes”.

**Last visit result for all audit firms**

The graph below shows the last visit for all our current audit firms – these visits were all conducted within the last six-year period.

This indicates that 88% of all our current audit firms visited had no systemic/serious audit quality issues at their last monitoring visit.

**Audit file standards**

All Recognised Supervisory Bodies in the UK use a common method of assessing audit quality on individual files reviewed. In 2017, 80 audit files were reviewed in full (and 21 in overview) (2016 -113; 2015-96; 2014-110; 2013-112 files) across the visits conducted. The smaller number of files reviewed in 2017 reflects the smaller size of the firms visited this year.

There has been some reduction in file standards seen during 2017, primarily due to the regulatory landscape as explained in Key Themes. Appendix One provides more detailed analysis of our findings.
Follow-up

The firms requiring a greater level of action to enhance quality are those falling into the more “systemic” and “serious” groups (18% during 2017 (11% in 2016)).

Such firms would be required to provide a greater level of evidence to demonstrate improvement, and this ranges from submitting external hot file reviews, cold file reviews and CPD records, through to the more serious cases, where other regulatory interventions may be required.

Developmental regulation means that as well as the range of follow up measures above, ICAS provides a range of audit support (see our “ICAS Support” section) and includes our mandatory audit course and Audit News. Firms are also encouraged to engage with external compliance reviewers, such as our Practice Review Service, to make the necessary improvements.

The aim of this combination of follow-up action and support is to encourage firms to improve audit quality quickly, but ICAS can withdraw audit registration if progress cannot be made within the timescales set by the Committee.

Of the 58 firms subject to follow-up at their last visit, many have now successfully showed improvement and cleared the visit process.
**KEY THEMES**

**Firms requiring follow-up**

**Serious issues**

Whilst the number of firms with serious monitoring findings continues to be low (at 5 visits), it is double that of previous years. The main underlying issues identified on these visits are noted below:

- **Personal circumstances:** Difficult personal circumstances or ill-health can have a significant impact on firms. Whilst these circumstances are, sadly, unavoidable and the Committee will take these circumstances into account, firms are advised to seek support as early as possible. Our Practice Team are on hand to help (contact details are at the end of this report).

- **Ethics:** Whilst integrity and ethics issues are not common-place and are often due to a lack of consideration of the requirements, rather than a deliberate action, they are viewed very seriously by the Committee. There have been a small number of serious issues referred to the Investigation Committee for disciplinary action this year. This is also consistent with our findings on Practice Monitoring visits.

- **Gaps in experience:** Firms are reminded that we now desktop monitor firms with no audit clients (“zero audit firms”). We then conduct more in depth monitoring as soon as we are aware that a previously inactive RI or firm has picked up audit clients. A period of inactivity can lead to a gap in audit competence, resulting in poor quality audit files. It is important that if you wish to stay audit registered, without any audit clients, that you ensure that competence is maintained via audit-specific CPD.

**Systemic issues**

Most of the firms following into the category of “systemic issues” had very firm-specific compliance issues, mainly due to the way that audit procedures were implemented in the firm which then had a firm-wide impact such as:

- over-reliance on the accounts preparation process;
- specialist audit procedures not utilised in full; and
- inadequate approach to FRS 102 audit work.
Isolated issues
This is by far the biggest category of firms requiring follow-up action. The increase in the number of firms who previously would have had a “clean bill of health”, but are now on follow-up, are due to mainly to the changing regulatory landscape as explained below.

Moving on now to the recurring technical issues identified on visits:

UK GAAP Issues
As expected, the implementation of UK GAAP has had a significant impact on financial statement compliance and audit quality:

- Financial statement issues. 57% of firms were found to have financial statement non-compliance. Whilst in most firms, issues are limited to missed accounting policy disclosures, a number of firms had more widespread issues such as the adoption of the wrong accounting framework. The main disclosure issues are highlighted below.

- ISA 315 and 330 issues: a number of firms have failed to demonstrate the impact of the transition to FRS 102 in their audit planning, as explained further in Appendix 1.

- ISA 230 Documentation: there has been increased documentation issues raised in relation to the audit implications of transition and the accounting treatment, and audit of, a number of balances affected by FRS 102, as explained in Appendix 1; and

- ISA 500 Evidence: a less marked, but still noticeable, increase in evidence issues in areas such as “other creditors” and related parties (ISA 550), primarily due to a lack of audit work in relation to financing transactions.

This has had a major impact on the number of firms that would ordinarily have achieved a “clean bill of health” but are now on follow-up following their audit monitoring visit.

FRS 102 Disclosure Issues (expressed as % of firms visited)

<table>
<thead>
<tr>
<th>Issue</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Insufficient financial instruments policy / note to the accounts</td>
<td>20%</td>
</tr>
<tr>
<td>No accounting policy for employment benefits including holiday pay</td>
<td>15%</td>
</tr>
<tr>
<td>No accounting policy for provision for liabilities</td>
<td>10%</td>
</tr>
<tr>
<td>No accounting policy for judgements/estimates</td>
<td>8%</td>
</tr>
<tr>
<td>No accounting policy cash/cash equivalents</td>
<td>6%</td>
</tr>
<tr>
<td>No mention of residual values or need for review in fixed asset policy</td>
<td>5%</td>
</tr>
<tr>
<td>Financial instruments policy not disclosed</td>
<td>5%</td>
</tr>
<tr>
<td>Turnover policy note not disclosing all classes of revenue</td>
<td>4%</td>
</tr>
</tbody>
</table>

As can be seen from the above, the most common disclosure issues identified were not in relation to accounting treatment, but in relation to inadequate accounting policy notes. Other FRS 102 issues were noted on files but not in sufficient frequency to warrant mention here.

Five of our firms visited had more marked FRS 102 issues, including financial statements adopting the wrong accounting framework, which has resulted in the Committee requesting evidence of specific follow up action. However, given the general low incidence of these more serious issues, they are not included in the above table.
Charity audits

Given the extent of changes in charity accounting - from the 2005 SORP, to the FRSSE SORP to FRS 102 SORP, it is no surprise that monitoring findings have been raised in relation to SORP implementation.

Again, a number of firms who would otherwise have achieved a “clean bill of health” were placed on follow up due to isolated specialist areas.

There were a small number of serious cases reviewed where the wrong accounting framework was adopted, resulting in significant disclosure issues. One case was also reviewed where the wrong scrutiny requirements were adopted (i.e. an audit of a charity was omitted).

The most common FRS 102 SORP disclosure issues are noted below (the most common FRSSE SORP issues are included, for completeness, in Appendix One but are now superceded by implementation of the FRS 102 SORP).

**FRS 102 SORP Issues (expressed as % of firms visited)**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Key Management Personnel disclosure</td>
<td>20%</td>
</tr>
<tr>
<td>Insufficient policy for apportionment of costs and estimation techniques</td>
<td>25%</td>
</tr>
<tr>
<td>Insufficient policy re financial instruments</td>
<td>15%</td>
</tr>
<tr>
<td>Recommended going concern disclosure omitted</td>
<td>20%</td>
</tr>
<tr>
<td>Expenditure policy not specific re each expenditure heading</td>
<td>10%</td>
</tr>
<tr>
<td>Income policy not in line with SORP</td>
<td>20%</td>
</tr>
</tbody>
</table>

FRS 102 SORP accounts were only seen in the latter visits of 2017, therefore the levels of non-compliance with FRS 102 SORP are actually much worse than the above graph indicates. This is a key area requiring attention by firms in 2018.

**OSCR Key Messages**

We now liaise closely with OSCR and there are several key themes coming out of their reviews:

- **Reporting Matters of Material Significance:** Unsurprisingly, in light of recent press coverage on charity misconduct, this is a key area of concern for OSCR. It is particularly concerned that a number of charities which it has investigated recently, where serious issues have arisen, have had no prior reports made by charity’s Auditor/Independent Examiner. OSCR is concerned that there appears to be a misunderstanding as to the implications of reporting and highlights that the best reporting it sees is where the Auditor/Independent Examiner is working with the charity to make improvements i.e. that the charity is benefiting from the adviser’s experience and that the reporting is not viewed only as negative whistleblowing. Your attention is drawn to joint guidance issued on charity reporting, issued in November 2017. There are also a number of technical articles on this on icas.com.
• Groups: OSCR is particularly concerned about charities which are part of a group structure which includes trading entities. It is clear that a number of charities have grown significantly since their original set up and that the charity may not have obtained current advice on the most appropriate governance and structure of the group. This has resulted in different issues being identified, including:
  o Loans between charities and trading subsidiaries on non-commercial terms: meaning that essentially charity resources are being used for non-charitable purposes;
  o Gift-aid claimed on trading activities;
  o Rates rebates claimed on trading activities;
  o Lack of oversight by the trustees over the full activities of the group.

• Audit exemption: similar to our findings, OSCR is concerned that a number of firms are missing audit requirements. This has mainly arisen due to:
  o Firms not checking the governing document (e.g. trust deed) of the charity to check accounts & scrutiny requirements; and
  o Failing to check asset values as well as income limits.

Ineffective compliance reviews

Whilst there have been no significant changes in relation to ISQC1, the input of our regulator has resulted in a change to the way we do things.

ICAS used to only follow up on Audit Compliance Review (“ACR”) weaknesses if the underlying audit files also contained audit quality issues. The FRC views the ACR process as fundamental regardless of the standard of files and expects RSBs to follow up on repeat compliance review failings, regardless of the quality of audit work.

Whilst this does not affect many firms, given the ACR and audit file results often go hand in hand, this has potentially impacted a small number of firms.

The key issues in relation to ineffective compliance reviews are:

[Bar chart showing the percentage of each issue from 2015 to 2017]
We take a developmental approach to regulation, and we have a number of initiatives to assist our audit registered firms in complying with the ISAs and Audit Regulations.

**Mandatory audit quality course: Keeping Audit on the Right Track**

Our mandatory audit quality course has continually been re-developed and updated to reflect comments received and continues to be well-received. Whilst we continue to run our mandatory course in the central belt and Aberdeen we also deliver the course in a range of different venues each year. The key dates for 2018 are:

- **Ayr:** Thursday 19 April
- **Inverness:** Wednesday 9 May
- **Edinburgh:** Wednesday 16 May
- **Midlands:** Wednesday 6 June
- **Aberdeen:** Thursday 14 June
- **Glasgow:** Wednesday 26 September

We have also delivered bespoke versions of this course to a number of audit firms, onsite at their firm’s premises, which have been well-attended and have proved successful, allowing for a more discursive training session. We are happy to take enquiries from firms who wish to discuss this approach, although we note that this will only be considered when cost effective for both parties.

Firms are reminded of the mandatory course attendance requirements:

- Each Audit Compliance Partner will be required to attend at least once in the three-year period from 1 January 2016 to 31 December 2018 - this is the last year so ACPs should already be making their arrangements to attend a 2018 course if they haven’t attended in this cycle so far. Reminders will also be issued.
- Each RI will be required to attend at least once in the five-year period from 1 January 2016 to 31 December 2020.
- Each newly approved RI will be required to attend the course within 12 months of being approved.
- Previously inactive RIs (i.e. approved RIs who are not signing audit reports), who have recommenced the role, will be required to attend the course within 12 months of becoming active.

**Helpsheets**

We have published a number of helpsheets covering specialist and regulated audit engagements, as these can often give rise to areas of non-compliance. The helpsheets cover:

- Charities registered in Scotland;
- Charities registered in England and Wales;
- Pension schemes;
- Registered social landlords;
- Entities registered with the Financial Conduct Authority;
- Credit unions; and
- Registered societies.

They are free to all members of ICAS and can be downloaded from icas.com by first logging in and searching on "regulatory helpsheets". In addition to the sector specific helpsheets, we have one aimed at providing guidance to Audit Compliance Partners.
Audit News

We publish Audit News on a quarterly basis, which covers current topics and issues noted at monitoring visits. It is also the way we notify firms of any changes to the Audit Regulations. This is available on-line but for each publication we produce a printer-friendly pdf. Audit News, including past publications, can be accessed by first logging into icas.com then searching on “Audit News”.

Revised International Education Standard 8 (IES 8)

We have published a web-page dedicated to providing guidance on the education standard which came into force on 1 July 2016 and is applicable to all RIs. The web-page can be accessed by first logging onto icas.com and searching on IES 8.

Republic of Ireland Technical Support (www.icas.com/regulation/ireland)

ICAS has set up a new RoI website area to cover the main requirements for the accounting and auditing of Irish companies, including:

- Audit Regulations and Auditing Standards applicable in Ireland;
- Guidance on financial reporting requirements in Ireland; and
- Information on the Irish Auditing and Accounting Supervisory Body (IAASA).

CA Practice digital magazine

CA Practice digital magazine brings the latest essential information, news and views for those in public practice. Issued on the third Thursday of each month CA Practice has been designed to alert you to important issues and inform you of the ICAS practice team’s activities and important course dates.

Previous articles have included:

- AML developments;
- Making Tax Digital updates;
- GDPR;
- Practice development ;
- Technical Bulletin roundup.

The current issue can be accessed at capractice.icas.com.


Bridge the GAAP: Events

In early 2017, the Audit & Practice Monitoring team ran a number of UK GAAP events aimed at updating firms on new UK GAAP issues identified on monitoring visits, which were recorded as videos and podcasts, and can be found by searching on “FRS 102 videos” at icas.com.
Changes to our monitoring approach

- There will be some important developments to ICAS Audit Monitoring visits in 2018.
- The approach will include a more detailed request for information in advance of the visit.
- This will help to enhance the focus of the onsite stage of the monitoring process.

Previously, firms were asked to submit their audit client information one month before the visit, including details of: client turnover; audit fee; and confirmation of any qualified and/or modified audit reports.

Now, firms will be asked to submit copies of the following information two weeks before the visit:

- The firm’s audit client information;
- Recent Audit Compliance Reviews (ACRs);
- Confirmation of the audit procedures used by the firm, including procedures used on specialist audits (if different) and disclosure checklists;
- CPD/training records for all audit Responsible Individuals (RIs);
- A list of audit staff, noting qualifications and job titles (including subcontractors or consultants used in audit work); and
- The firm’s most recent PII documentation.

The firm will also be required to complete and return an audit client analysis checklist (covering client details such as largest audit fee, specialist clients etc); and an independence issues checklist (covering identified ethical threats and implemented safeguards).

These developments will enable the ICAS reviewer to more effectively plan the visit approach and will minimise the number of background questions asked of firms at the outset of the onsite stage.
APPENDIX ONE: DETAILED VISIT FINDINGS

This Appendix provides further detail on the level of compliance noted on visits and where the most common ISA findings were identified during file reviews conducted by ICAS Audit Monitoring (AM) in 2017.

Six-year visit history

The table below shows the monitoring visit outcomes in the last five years.

<table>
<thead>
<tr>
<th>Audit Monitoring visit outcomes</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>No follow up</td>
<td>18 (45%)</td>
<td>24 (58%)</td>
<td>23 (59%)</td>
<td>28 (73%)</td>
<td>21 (58%)</td>
<td>22 (50%)</td>
</tr>
<tr>
<td>Isolated issues - firm to submit evidence of action</td>
<td>9 (22%)</td>
<td>6 (15%)</td>
<td>11 (28%)</td>
<td>3 (8%)</td>
<td>11 (31%)</td>
<td>14 (32%)</td>
</tr>
<tr>
<td>More systemic issues - firm to submit evidence of action</td>
<td>8 (20%)</td>
<td>6 (15%)</td>
<td>3 (8%)</td>
<td>4 (11%)</td>
<td>2 (5.5%)</td>
<td>3 (7%)</td>
</tr>
<tr>
<td>Serious issues - follow up/other regulatory actions</td>
<td>5 (13%)</td>
<td>5 (12%)</td>
<td>2 (5%)</td>
<td>3 (8%)</td>
<td>2 (5.5%)</td>
<td>5 (11%)</td>
</tr>
<tr>
<td>Total full visits</td>
<td>40</td>
<td>41</td>
<td>39</td>
<td>38</td>
<td>36</td>
<td>44</td>
</tr>
<tr>
<td>Restricted reviews</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Total visits</td>
<td>40</td>
<td>41</td>
<td>39</td>
<td>38</td>
<td>40</td>
<td>44</td>
</tr>
</tbody>
</table>

There has been a downturn in compliance results as explained earlier in our report. The visits above include firms which are now ceased audit registration. Looking at the visit outcomes of all current 183 "live" audit firms:

<table>
<thead>
<tr>
<th>Visit outcomes</th>
<th>Number of live firms</th>
</tr>
</thead>
<tbody>
<tr>
<td>No follow-up</td>
<td>113</td>
</tr>
<tr>
<td>Isolated issues</td>
<td>38</td>
</tr>
<tr>
<td>More systemic issues</td>
<td>12</td>
</tr>
<tr>
<td>Serious issues</td>
<td>8</td>
</tr>
<tr>
<td>Total visited full-scope</td>
<td>171</td>
</tr>
<tr>
<td>Zero audit firms (restricted scope)</td>
<td>3</td>
</tr>
<tr>
<td>New firms</td>
<td>9</td>
</tr>
<tr>
<td>Total live firms</td>
<td>183</td>
</tr>
</tbody>
</table>
It is pleasing to note that a number of areas have improved from last year, being:

- ISA 240 Fraud;
- ISA 320 Materiality; and
- ISA 210 Engagement letters.

The previous issues with the compliance with these ISAs was raised on the 2016 report, which is still available at icas.com.

There were also recurring issues with ISA 250A and 550, but as these often go hand in hand with deficiencies at completion, these have been included in the “completion” section below.

Identifying and assessing risks

Not surprisingly, given they are the most complex areas of the planning, the two areas still requiring more attention from firms are understanding the entity and risks and responding to those risks (ISAs 315 and 330).

Most firms now document a good understanding of their client, along with detailed systems notes. Our most frequent issue relates to identifying and assessing risks, and in particular significant risks.

Too frequently on monitoring visits we can often identify risks, from our stepping back and looking at the audit “cold”, which have not been considered on the audit and, in some cases, we find that the planning is still a tick box exercise, rather than a proper analysis of the risks presenting on the audit.

In relation to response to risks, the main increase in this issue has been in relation to a lack of documented response to the audit implications of the transition to new UK GAAP (i.e. FRS 102, FRS 102 1A) and the relevant new FRS 102 SORP.

Sufficient time and focus should be spent on identifying audit risks and the audit approach. A failure to do so, results in an increased likelihood of audit evidence gaps.
Fieldwork

Recording

As in previous years, recording omissions is the most prevalent finding on all monitoring visits - 75% of firms visited (compared to 71% in 2016 and 87% in 2015). We encourage all RIs and audit teams to conduct a robust self-review and ask the question that underpins ISA 230: "could an experienced auditor reperform this work and draw the same conclusions based on what has been recorded?"

Evidence

Some marked improvements are noted compared to the evidence issues noted last year. Evidence issues were identified on 52% of monitoring visits (compared to 66% in 2016, and 63% in 2015). Audit evidence issues (i.e. where there is not sufficient audit evidence to support the audit opinion) significantly impact the monitoring outcomes of monitoring visits and are viewed seriously by the Committee.

Improvements have been seen across all areas, with the exception of other creditors. The increase in evidence issues in this area is due to the number of FRS 102 evidence issues noted in relation to holiday pay accruals and the accounting treatment of financial instruments.

Audit evidence issues (expressed as % of firms reviewed)

Albeit the incidence of issues has reduced, the most recurring area of concern is the lack of effective audit work over the profit and loss account. There are number of key causes:

- Reliance on analytical review which is not substantive in nature;
- Samples not covering the full profit and loss account area;
- Sample sizes too small (e.g. inappropriate reliance on analytical review or controls testing to reduce sample sizes); and
- Wrong direction of testing.

A number of these areas were covered in detail in our 2016 monitoring report which is still available on icas.com.
Completion

Completion issues (expressed as % of firms visited)

Completion is generally conducted well and there has been an improvement on last year. The most common issues continue to be:

- **Related parties (ISA 550):** the planning stage often fails to identify all related parties or the risk of fraud in this area, and there is a lack of audit work on the completeness assertion.
- **Laws and regulations (ISA 250A):** a lack of identification of key laws and regulations at planning and a lack of audit work in this area, to support the conclusion that there are no issues.
- **Two-way communication (ISA 260):** the most common findings is a lack of evidence of two-way communication with those charged with governance at planning and/or completion.

**Financial statement disclosures**

As expected, there has been a downturn in financial statement compliance (57% of firms visited in 2017 compared to 47% in 2016) in part, due to teething issues with the implementation of FRS 102. This has been covered in depth earlier in this report.

The most common audit report issue on monitoring visits is the omission of “Statutory auditor/s” after the firm name on audit reports.

Whilst the FRSSE SORP is now superseded the main issues identified on monitoring visits are noted below:
Compliance issues (expressed as % of firms visited)

![Chart showing compliance issues]

Again, the most common issues raised related to the accounting policy notes.

Further information on UK GAAP implementation for non-audit clients is included in the Practice Monitoring report, including a detailed section on charity reporting.

Other audit regulation issues

Of a more firm-wide (ISQC1) nature, the incidence of other regulatory issues are noted below:

![Bar chart showing compliance issues]

The most common firm-wide issue is the lack of an effective compliance review process which has been covered in the Key Themes section of this report.
APPENDIX TWO: OTHER USEFUL LINKS AND CONTACTS

We hope you find this report useful, and if you have any comments or questions please contact us at auditandpracticemonitoring@icas.com

Within ICAS there are a number of contacts which may be useful:

- Technical queries: for auditing, accounting, law or audit ethics queries please contact accountingandauditing@icas.com
- Money Laundering confidential helpline: if you have any potential money laundering issues, please contact our confidential helpline on 0131 347 0271.
- The ICAS Practice Support Service provides support to ICAS firms. It offers a variety of services on all aspects of practice, which can be tailored to meet the needs of your firm. The Practice Review Service provides review services, including Audit Compliance Review and Cold File Review services in order to help firms with their audit compliance.

For more information on any of these services, contact 0131 347 0249 or email practicesupport@icas.com.