



Quality Control System in Office of the CAG Bangladesh

Issued under the authority of
Comptroller and Auditor General of Bangladesh



Quality Control System in OCAAG Bangladesh

Foreword

Introduction of Quality Control System (QCS) in the Office of the Comptroller and Auditor General (OCAAG) is an important step towards ensuring high quality audit work. Commitment of OCAAG Bangladesh to quality is a continuing process and it has been reflected in various guidelines and manuals. This is for the first time that the Quality Control System is being launched in the organisation.

The Quality Control System is based on the principles and requirements of International Standards of Supreme Audit Institutions (ISSAI) 140, which in turn is based on the key principles in the International Standard on Quality Control 1 (ISQC-1) published by International Federation of Accountants (IFAC). In designing the control system, guidance, where appropriate, has been taken from International Standards on Auditing (ISA) 220 published by International Auditing and Assurance Standards Board (IAASB).

The QCS in OCAAG thus reflect the best of the global practices relating to quality in audit work.

The Quality Control System, the Code of Ethics and the Government Auditing Standards are being promulgated together. They provide us with a framework which is consistent with the best global practices. The auditing standards make firm commitment to maintaining quality in audit work and the QCS delineates concrete steps to achieve the quality.

I thank my officers and staff whose commitment to quality is well established and manifest in their work. OCAAG is a knowledge based organisation and standards such as QCS provide us with the opportunity to keep up with the developments in the global auditing practices both in public and private sector.

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Mohammad Muslim Chowdhury
Comptroller and Auditor General of Bangladesh
Dhaka, Bangladesh.

Issued under the authority of Comptroller and Auditor General of Bangladesh



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Preface

The Quality Control System in OCAAG Bangladesh is based on the principles and requirements of International Standards of Supreme Audit Institutions (ISSAI) 140, which is based on the key principles in the International Standard on Quality Control 1 (ISQC-1) published by International Federation of Accountants (IFAC). While designing the system, appropriate guidance has been taken from International Standards on Auditing (ISA) 220 published by International Auditing and Assurance Standards Board (IAASB).

It is considered as integral part of Government Auditing Standards of Bangladesh.

The narration is gender neutral. Words and expressions denoting masculine gender include feminine gender also.



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Introduction

1.01 Comptroller and Auditor General (CAG) of Bangladesh is the Supreme Audit Institution (SAI) of Bangladesh. He derives his mandate from the Constitution of Bangladesh. His mission is to provide independent assurance to citizens, parliament and other stakeholders on optimal management of public resources for ensuring good governance and improved public service delivery through quality audit.

1.02 Quality control is an ongoing activity for any Supreme Audit Institution and OCAG Bangladesh is no exception. The Quality Control System is designed keeping in mind that quality is essential in every aspect of the work performed by the office and particularly in the audit work. The quality of work performed by OCAG is a key to its reputation and credibility and its ability to fulfil its mission and mandate.

1.03 The Quality Control System in OCAG Bangladesh is based on the principles and requirements of International Standards of Supreme Audit Institutions (ISSAI) 140, which in turn is based on the key principles in the International Standard on Quality Control 1 (ISQC-1) published by International Federation of Accountants (IFAC). In designing the system, guidance, where appropriate, has been taken from International Standards on Auditing (ISA) 220 published by International Auditing and Assurance Standards Board (IAASB).

1.04 The objective of the system of quality control in OCAG Bangladesh is to provide it with reasonable assurance that:

- a) The officers and staff comply with professional standards and applicable legal and regulatory requirements; and
- b) Reports issued by OCAG are appropriate in the circumstances.



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Elements of Quality Control

2.01 The following are the elements of the Quality Control System in OCAG Bangladesh:

- a) Leadership responsibilities for quality within the organisation;
- b) Relevant ethical requirements;
- c) Acceptance and continuance of audit engagement;
- d) Human Resources;
- e) Engagement performance;
- f) Monitoring.

Leadership Responsibilities

3.01 Constitution of Bangladesh entrusts Comptroller and Auditor General of Bangladesh with the overall responsibility of audit of public accounts of Bangladesh. Article 128(4) of the Constitution further states that the Comptroller and Auditor General shall not be subject to the direction and control of any other person or authority in discharging his audit functions.

3.02 It is recognised that Comptroller and Auditor General of Bangladesh takes overall responsibility of quality of all work performed by OCAG.

3.03 Comptroller and Auditor General of Bangladesh is assisted by Deputy CAGs, Director Generals of audit directorates and other officers and staff working under him. The audit engagements are carried out by the directorates.

3.04 While CAG is overall responsible for the quality of work done in his office, in the interests of better control of quality, the heads of the directorates shall be in charge of quality control in respect of audit work in their own directorates. Deputy CAG (Senior) shall assist CAG in maintaining high quality in all work in OCAG.



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Ethical Requirements and Responsibilities

4.01 Government Auditing Standards of Bangladesh establish the principles of ethics, which are:

- (a) Public interest
- (b) Integrity
- (c) Independence and Objectivity
- (d) Competence
- (e) Confidentiality and Transparency and
- (f) Professional behaviour.

4.02 Throughout the audit engagement, the Director General shall remain alert through observation and making such inquiries as deemed necessary, for evidence of non-compliance with relevant ethical requirements by members of the engagement team.

4.03 Appropriate action shall be taken without delay if evidence comes to notice to indicate that a member of the engagement team has not complied with the ethical requirement.

4.04 All senior officers who are in leadership position shall serve as an example of ethical behaviour.

4.05 OCAg shall ensure that any party contracted to carry out work on its behalf shall abide by the ethical principles.

Acceptance and Continuation of Audit Engagements

5.01 All audit engagements are undertaken by OCAg in accordance with the mandate of CAG under the Constitution and Act. OCAg does not have a firm-client relationship with any of the audited organizations. However, to ensure quality in audit work and mitigate the risks to quality of work done, several factors need to be kept in mind while undertaking and planning an audit engagement and during performance of the engagement.

5.02 The Heads of the directorates shall perform the role and function of “engagement partner” in terms of ISQC-1 and ISA 220. They shall remain responsible for planning of audit engagements, performance of audit engagements and the inspection and other audit



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reports that will be generated in the directorate. [Engagement partner has been defined in ISAs as “the partner or other person in the firm who is responsible for the audit engagement and its performance, and for the auditor’s report that is issued on behalf of the firm, and who, where required, has the appropriate authority from a professional, legal or regulatory body.”]

5.03 In the context of OCAg, no separate authority from a professional, legal or regulatory body is required.

5.04 The engagement team in the context of audit activities in OCAg would mean the audit team(s) and section in directorate who are entrusted with the responsibility of any particular audit engagement. All audit teams known as “inspection party”, “audit party” “special audit party” etc. would come under the meaning of engagement team. The officers and staff in the directorates who deal with these teams and vet their reports for issue to the responsible party shall also come under the meaning of engagement team. The Director General may distribute responsibilities between the “Field” team and the “Headquarters”¹ team according to convenience in case of individual audit engagements.

5.05 No engagement team shall function without a team leader in the field. In addition, senior officers of the directorate shall ensure close supervision of the work of the engagement team. The team leaders and other members may be required to submit such documents/ reports/ returns as may be prescribed to measure the quality of the work done by them.

5.06 The directorates and the teams, while considering quality of their work shall keep in mind the following four elements of quality.

- a) Quality is performing work that complies with Government Auditing Standards of Bangladesh and other relevant professional standards and applicable legal and regulatory requirements;
- b) Quality is complying with the quality control policies and procedures of OCAg;

¹“Headquarters” in this context would denote the responsibility centre in the audit directorate.



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c) Quality is issuing auditor's report or communication that are appropriate in the circumstances; and

d) Quality is the engagement team's ability to raise concerns without fear of reprisals.

5.07 Quality is the concern of all. OCAg shall encourage establishment of "Quality Circles"- small groups of officers and staff who would periodically meet and disseminate the quality issues.

5.08 It shall be recognised by all officers and staff of OCAg that there is an overriding requirement to achieve quality in all of its work and political, economic or other consideration shall not compromise the quality of work performed.

5.09 Director General Financial Management Academy shall ensure that there is at least one session on quality issues, policies and procedures in every training programme related to audit.

5.10 All directorates shall prepare their audit plan keeping in view three factors. These are (i) the directorate is competent to perform the work and has the capabilities, time and resources; (ii) while performing the audit engagement, all relevant ethical requirements can be complied with; and (iii) the directorate has considered the integrity of the audited organization and has considered the risks to quality that may arise. This may also include any significant matter that might have arisen during the previous audit engagements.

5.11 It is recognised that OCAg has a statutory responsibility to audit any organization under its audit jurisdiction and hence it shall not be possible to reject any audit engagement on grounds that risks to quality of the engagement cannot be minimised to an acceptable level. However such engagements shall require intense supervision and should be reported appropriately.

5.12 Every directorate in its audit planning shall prioritise audited entities for undertaking audit. The planning cycle of OCAg shall consist of two stages (i) an annual plan indicating the subject matters and audited organisations and (ii) a half-yearly plan indicating audited organizations and audit engagement teams. These plans should be prepared well in advance.



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5.13 The plans must take into account the resources available to every directorate. Deviations from the plans except due to abnormal and unanticipated circumstances shall indicate inadequate planning affecting quality of audit work in that directorate.

5.14 It should also be acknowledged that such routine audit engagements which are more in the nature of compliance audit, tend to achieve limited results when seen as individual audit engagement but collectively are important from the point of view of overall transparency and good governance. Such audits keep a check on remote and inaccessible entities which tend to go out of any control mechanism. The Director General of the directorate shall be the authority to decide which engagement can be considered as routine and which as important.

5.15 With respect to the important units, the nature of the risks and effective steps to mitigate them should form part of the documented plan and while undertaking the audit engagement, special care shall be taken to mitigate the identified risks.

5.16 Some of the risks that can arise specifically to the quality of audit can be:

- a) The audited organization can be a very specialised scientific or technical organization and auditors may not have adequate knowledge of the subject matter, even though the audit may be of financial nature.
- b) The audited organization, in any previous audit had failed to cooperate fully with the engagement team.
- c) The subject matter information may be maintained on digital platform and to conduct audit, the engagement team would require IT expertise.
- d) The subject matter information that is essential to conduct audit engagement may be in arrears. This normally may apply to arrears in financial information.



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e) In many field formations, the subject matter information may be dispersed over many geographical locations. This may happen in case of public works and other types of projects.

f) The subject matter may be dispersed geographically. While procurement order is placed centrally, the supplies are made over a large number of units. Procurement audit in any specific unit may provide an incomplete picture.

5.17 While planning audit engagement, the concerned directorate shall document the risk management procedures to mitigate the risks of carrying out the work. The response to the risks may include:

- a) carefully scoping the work to be performed;
- b) assigning more senior/ experienced/ adequately skilled staff than would ordinarily be the case; and
- c) doing a more in depth engagement quality control review of the work before a report is issued.

5.19 When the integrity of the audited organization is in doubt or evidence comes to light during the performance of the audit engagement, OCAG shall immediately consider at an appropriate level and address the risks arising from the capability of the members of the engagement teams, the level of resources and any ethical issue that might arise in the audited organisation. In such situations, a separate report highlighting the issues relating to integrity may also be issued to the higher than normal authorities in addition to the audit report. It may also be considered to send copies of the normal audit report to the concerned authorities to whom otherwise; such reports would not have been endorsed.

5.19 In rarest of the rare cases OCAG might decide to refer a matter that has come to the notice of the engagement team to appropriate investigating agencies. The normal course of action in such situations would be to write to the head of the department to which the audited entity belongs, to initiate suitable action. Such actions would be undertaken after carefully examining the available evidence and the decision should be taken at an appropriate level.



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Human Resources

6.01 The greatest asset of OCAAG is its officers and staff. It is a knowledge based organisation and combination of knowledge, training and experience is the mainstay of audit. Similarly, the mainstay of quality in the work of OCAAG is its human resources.

6.02 It shall be the endeavour of the office that responsibility is clearly assigned for all work carried out by OCAAG.

6.03 Training shall continue to be one of the most important activities of the office. Financial Management Academy under CAG shall continue to be the focal point for all training activities of the office. In addition, officers and staff are encouraged to achieve professional degrees and diplomas in such subjects, which will improve their professional effectiveness and contribute to their professional development.

6.04 If any expert is contracted to facilitate audit work on behalf of OCAAG, it shall be ensured that such personnel shall abide by the ethical and quality requirements expected from the officers and staff of OCAAG.

6.05 Quality and ethical principles shall be key drivers of performance assessments of personnel and any parties contracted to carry out work for OCAAG.

Assignment of the Engagement Teams

6.06 All engagement teams shall be formed keeping in mind the knowledge and skills required in the engagement and the distribution of responsibilities of performing specific audit procedures among the members of the team.

6.07 While considering the appropriate competence and capabilities expected of the engagement team as a whole, the following aspects may be taken into consideration:

- a) Team members should have practical experience of engagements of similar nature and complexity. Such practical experience can be gained through training or participation.



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- b) All team members should have adequate understanding of professional standards and applicable legal or regulatory requirements, particularly in case of special audits or audits of complex nature.
- c) The team members should collectively possess relevant expertise including expertise in information technology and areas of audit and accounting.
- d) The team members should possess the ability to apply professional judgement.
- e) All members of the team should be aware of the requirement of quality control policies of OCAg.

Engagement Performance

7.01 There are three most important aspects as far as engagement performance is concerned. These are : (i) Direction (ii) Supervision and (iii) Review. The Director General of the concerned directorate shall remain in charge of all three aspects.

Direction and Supervision

7.02 Direction of the engagement team involves informing the members of the team of matters such as:

- a) Responsibilities of each member of the team including the need to comply with the relevant ethical requirements and to plan and perform the audit with professional scepticism;
- b) The objective of the work performed;
- c) The nature of the entity's activities and objectives and risk related issues;
- d) Problems that may arise;
- e) Detailed approach to the performance of the engagement including aspects of materiality; and
- f) The quality of the communications that are issued during the audit engagement.



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7.03 Supervision will include matters such as:

- a) Watching the progress of the audit engagement and whether any problem has arisen during the performance of the engagement.
- b) Whether the team members have addressed all significant matters that might have come to their notice during the performance of the engagement.
- c) Whether any issue that has come to the notice of the engagement team which may require escalation at a higher level.

7.04 Even though the Director General shall be responsible for overall supervision, more intense supervision including physical visits should be undertaken to the extent possible by Director or Deputy Director level officers in the directorate.

7.05 During such visits, the concerned Director or Deputy Director should also try to meet the head of the audited entity and discuss any issues that might have arisen during the audit.

7.06 While in case of routine audits, to save time and resources, such briefings or intense supervision may not be necessary in respect of each and every audit engagement, it must be ensured that in case of important and special audits, the team members must meet before starting the engagement and overall response to the direction issues should be documented.

Review responsibilities

7.07 The fundamental principle that should guide the review of the audit engagement is that the work of a less experienced team member should be reviewed by more experienced superior officer. There should also be an overall review of the work done by the team collectively. It is expected that the quality of the work done is appropriately reflected in the audit report of the engagement proposed to be issued to the audited organisation.



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7.08 A review should include consideration of the following:

- a) The work has been performed in accordance with the professional standards and applicable legal and regulatory requirements;
- b) Significant matters have been examined during the performance of the engagement;
- c) The evidence obtained is sufficient and appropriate to support the report;
- d) The objectives of the engagement procedures have been achieved.

7.09 In case of compliance audit, the team may propose a 'Nil' report. Normally, such a situation should not arise as the auditor's report should indicate clearly the areas that have been examined and the findings relating to these areas. In case of such proposed 'Nil' reports, particular review should be conducted to find out the areas that have been examined, the audit communications that have been issued and the overall performance of the engagement team. Great care and caution should be exercised before issue of a 'Nil' report.

7.10 The review consideration shall also include audit issues that are considered unfit for inclusion in the auditor's report.

7.11 The inspection report that is issued after each audit engagement shall be considered as auditor's report for the purpose of review.

7.12 The officer who in the directorate finally authorises the issue of auditor's report (inspection report) shall be responsible for overall engagement quality control review before issue of the report.

Monitoring

8.01 Monitoring shall involve ongoing consideration and evaluation of the system of quality control in OCAAG. This will include periodic inspection of a selection of completed engagements in respect of financial, performance and compliance audit to provide reasonable assurance that the system of quality control is operating effectively.



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8.02 A deficiency in the quality control system of OCAG shall not necessarily indicate that a particular audit engagement was not performed in accordance with professional standards and applicable legal and regulatory requirements or that the reports issued by OCAG were inappropriate.

8.03 Every year a few directorates shall be chosen by rotation by CAG and a review of the quality control system shall be conducted by another officer of the rank not less than DG who was not associated with the work of the directorate at any time during the period under review. The results of the review shall be brought to the notice of CAG. This exercise shall be in the nature of internal peer review.

8.04 Deputy CAG (Senior) shall have the responsibility to monitor the operation of the quality control system.

8.05 Where appropriate and resources permitting, OCAG shall consider engaging another SAI to carry out an independent review of the overall system of quality control. This will be in the nature of external peer review. Such external peer review shall be conducted at least once in five years.