COMMENT TRACKING – ISSAI 150

ANNEXURE A – ECA, PROPOSED EDITORIAL CHANGES

Para , etc. ref	Comments/suggestions
ISSAI 150	
INTRODUCTION	
1, 41	I suggest combining paragraph 1 with the first two sentences of paragraph 41 to begin the introduction of the ISSAI, as follows: '1. The ability of a Supreme Audit Institution (SAI) to fulfil its mandate and carry out high quality and effective audits depends, to a large extent, on the competency of its staff. (See INTOSAI-P 1 and the Lima Declaration). The competency requirements of auditors, as well as how to manage, develop and assess them, is and always has been of fundamental importance to SAIs.' ISSAI 150 sets out the principles that a SAI should follow in this respect, to which '
2, 4	I suggest combining paragraph 2 and 4 for the second paragraph of the introduction: '2. Auditing standards give structure to the execution of a SAI's mandate and work, but they can only be implemented by staff with the right competencies. Including a pronouncement on auditor competence in the INTOSAI Framework of Professional Pronouncements (IFPP) underlines the fact that the need for competent auditors is an integral part of a SAI's professionalism, credibility and relevance.'
3, 8	I suggest combining and simplifying paragraphs 3 and 8 as follows: '3. It is important that the leadership of the SAI assigns sufficient importance to setting up and maintaining a sound framework for auditor competence for it to succeed. This framework should be integrated into the SAI's culture, strategies, policies and procedures. The SAI leadership should also encourage individual auditors to commit to and take responsibility for their own development in the context of life-long learning.'
5, 41, 6	I suggest combining the essence of paragraphs 5, 6 and 41 as a last paragraph for the introduction: '5. ISSAI 150 is intended to be used in conjunction other ISSAIs and with due consideration of SAIs' mandates, enabling legislation, structure, size and other considerations. This follows ISSAI 100, which recognises that a SAI may choose to adopt the ISSAIs as the authoritative standards that will determine the execution of its work or use the ISSAIs as a basis to develop own standards or to adopt consistent national standards. Given the inherent evolutionary nature of the process of competency development, SAIs should be able to adhere to the principles on auditor competence with relative ease, and move towards closer alignment in the longer term. In this respect, this ISSAI follows the slogan of "global profession, local solution", often associated with INTOSAI's capacity development initiatives.'
SCOPE	
1, 42	I suggest that ISSAI 150 actually sets out the principles rather than formalises them. For the first paragraph of the scope, I suggest combining paragraphs 1 and 42, as follows: '6. The purpose of ISSAI 150 – *Auditor Competence* is to set out the principles that a SAI should follow in developing auditor competence. Guidelines to support implementation of this ISSAI can be found in the GUID 7500 – 7900 series.'
7	I suggest slight re-wording:

	'7. ISSAI 150 addresses how to develop, manage and assess the competency requirements of auditors in the areas of financial auditing, performance auditing and compliance auditing, while also recognising the unique considerations of SAIs with jurisdictional responsibilities.'
11, 12, 13	I suggest making these points about links with other standards in the scope section, simplified as follows: '8. The IFPP includes many pronouncements which refer to the concept of auditor competence. ISSAI 150 serves as a single anchor point to bring together all such references. It does this both at the level of the organisation and at engagement level, dealing with both audit team and individual competence. It should be used in conjunction with statements on in the fundamental principles of public sector auditing (ISSAI 100), quality control for SAIs (ISSAI 140), auditing principles (ISSAI 200 and beyond) and auditing standards (ISSAI 2000 and beyond).
OVERVIEW	

10	I suggest replacing paragraph 10 with an overview of the ISSAI:
	'10. ISSAI 150 sets out the principles underpinning a SAI's responsibilities towards auditor competence and provides application guidance for developing, managing and assessing the competency requirements of auditors. These principles relate to the way in which a SAI should:
	   1. Determine competencies for auditors within its organisational strategy;
	   2. Put in place processes to ensure the appropriate competence for auditors;
	   3. Develop pathways for initial and continuing professional development of auditors; and
	   4. Set up and implement an assessment of auditor competencies.
	The GUID 7500-7900 series provides guidance to support these principles.'

ELEMENTS OF AUDITOR COMPETENCE	
14, 15, 16	Since this text appears in the GUIDs, consider some simpler drafting and restructuring: '14. There are three elements underpinning the development of auditor competence by SAIs. The extent to which each SAI gives effect to each element depends on the SAI's enabling legislation, mandate, strategy, resource availability, size, etc. 15. *Competence* is the measurable or observable knowledge, skills and personal attributes critical to successful job performance, where: a)Knowledge is the theoretical or practical understanding of a topic; b)Skills are the proficiencies developed through learning or experience; and c)Personal attributes are the qualities, characteristics and traits of a person. 16. A *competency framework or profile* is as a conceptual model (or a job description) that details and defines the ideal competencies required or expected of an individual auditor for a specific task, and for a specific position in an organisation. Competency frameworks are not static but rather dynamic in nature. They seek to define the competencies needed to drive success and high performance and will change depending on the circumstances. 17.A *pathway for professional development* is a formalised, structured development programme chosen by a SAI aimed at developing and maintaining competent, professional auditors in the SAI.