



Representatives of the Australian Accounting Profession

CPA Australia Ltd, The Institute of Chartered Accountants in Australia & the National Institute of Accountants



Competency Requirements

For Auditors of Self-Managed Superannuation Funds

February 2008



The Australian Professional Accounting Bodies Joint Standing Committee

The major professional accounting bodies in Australia established the Joint Standing Committee to speak with a united voice to government bodies, standard setters and regulators on non-competitive matters affecting the profession. The bodies forming the Joint Standing Committee are:



CPA Australia Ltd is Australia's largest professional organisation and the world's sixth largest accounting body. We have 117,000 members, including 25,000 who work in 97 countries outside Australia, and we have a significant and growing international presence through which to service them. Our office network, which spans the globe from London to Auckland, includes two offices in mainland China in Beijing and in Shanghai. This year we are expanding into Vietnam, where we will have offices in Hanoi and Ho Ch Minh City. We also have several mutual recognition agreements with other professional bodies in Asia and the United States.

Our internationally respected CPA Program has been established for more than 20 years, with a major factor in its success being its anticipation of, and response to, emerging business needs. This year we're introducing a new segment, International Business. In 2007, there were close on 46,000 segment enrolments, a record number.

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**The Institute of
Chartered Accountants
in Australia**

The Institute of Chartered Accountants in Australia (the Institute) is the professional body representing Chartered Accountants in Australia. Our reach extends to more than 55,000 of today's and tomorrow's business leaders, representing some 44,000 Chartered Accountants and 11,000 of Australia's best accounting graduates who are currently enrolled in our world-class post-graduate program.

Our members work in diverse roles across commerce and industry, academia, government, and public practice throughout Australia and in 107 countries around the world. We aim to lead the profession by delivering visionary thought leadership projects, setting the benchmark for the highest ethical, professional and educational standards and enhancing and promoting the Chartered Accountant brand. We also represent the interests of members to government, industry, academia and the general public by actively engaging our membership and local and international bodies on public policy, government legislation and regulatory issues.

The Institute can leverage advantages for its members as a founding member of the Global Accounting Alliance (GAA), an international accounting coalition formed by the world's premier accounting bodies. The GAA has a membership of 700,000 and promotes quality professional services to share information and collaborate on international accounting issues. The Institute is constituted by Royal Charter and was established in 1928. For further information about the Institute visit charteredaccountants.com.au



The National Institute of Accountants provides guidance and insight into long-term future planning for its 20,000 members and students in Australia and in more than 50 countries around the world, as well as quality education and career progression pathways for its members and for graduates throughout Australia.

NIA members must meet prescribed standards of education, training and experience while at the same time displaying a high standard of professional ethics. The NIA delivers the expert representation as well as the crucial technical tools and business support members require to excel in their chosen field.

The NIA also provides members with an ongoing program of professional development and education as well as a host of social and business networking opportunities and online discussion forums.

NIA members benefit from the organisation's strong alliances and leadership reaching to the international and national business sectors, State and Federal Governments in Australia as well as the public and private sectors.

Through these networks the NIA provides 'thought leadership' in addressing issues affecting the accounting profession. As a full member of the International Federation of Accountants (IFAC) the NIA is well positioned in its work with national and international standard setters to ensure members are fully represented and fully informed.

For further information about the NIA visit www.nia.org.au

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Introduction

Competency refers to the knowledge and skills drawn on in performing tasks in particular work contexts. A competency requirement describes the specific tasks required to competently perform a particular function in such work contexts by reference to performance criteria, environmental factors and individual skills and knowledge entailed by the performance of the tasks.

The quality review programs of CPA Australia Ltd, the Institute of Chartered Accountants in Australia, the National Institute of Accountants (NIA) and the Australian Taxation Office (ATO) have found there is a large variance in the competency of auditors of Self Managed Superannuation Funds (SMSFs), resulting in audit work performed being of variable quality, particularly in the area of audit documentation. This document sets out the minimum requirements to be followed by accountants undertaking the audits of SMSFs.

Competency is evaluated by assessing whether a person has acquired the necessary knowledge and skills to perform an audit of an SMSF. The auditor must be able to demonstrate to a quality control reviewer or an assessor, as well as the ATO, that they are able to competently perform the SMSF audit. Such an assessment will form a part of the quality review process.

Auditors will need to display their ability to complete the tasks of planning, evidence gathering, evidence evaluation and decision making in each of the five key areas, in the context of an audit of an SMSF.

Application

This document sets out the minimum competency requirements for auditors of SMSFs. These are mandatory for members of the three professional accounting bodies who sign audit reports for SMSFs. Further, the member must hold a public practice certificate of the professional accounting body of which they are a member.

The competency requirement is operative for financial reporting periods commencing on or after 1 July 2008, although earlier adoption is encouraged.

Background

The Superannuation Industry (Supervision) Act 1993 and the Superannuation Industry (Supervision) Regulations 1994 (SIS) permit the audits of Self Managed Superannuation Funds to be carried out by any of the following:

- A member of CPA Australia Ltd (CPA Australia)
- A member of the Institute of Chartered Accountants in Australia (Institute)
- A member of the National Institute of Accountants (NIA)
- A Registered Company Auditor
- A Member or fellow of the Association of Taxation and Management Accountants (ATMA)
- A Fellow of National Tax Agents and Accountants Association (NTAA)
- The Auditor General of the Commonwealth, a state or territory.

Auditors of Self Managed Superannuation Funds need to have, and be able to demonstrate, competencies in a number of key areas:

1. Client acceptance and retention
2. Audit planning
3. Controls evaluation and testing
4. Substantive testing
5. Forming an opinion.

In order to address these areas adequately the auditor must be familiar with the requirements of Australian Auditing Standards (ASAs), and SIS.

Practitioners must also be familiar with, and abide by, the requirements of the pronouncements of the Accounting Professional and Ethical Standards Board (APESB) – such as APES 110 ‘Code of Ethics for Professional Accountants’ and the quality control obligations imposed on firms by APES 320 ‘Quality Control for Firms’. The requirements of the latter standard with regard to assurance engagements are particularly important. Further, APES 410 ‘Conformity with Auditing and Assurance Standards’ imposes the obligation to utilise the ASAs in the conduct of all Australian audit engagements.

Audit working papers are a key element of any audit and are required by the auditing standards – specifically ASA 230 ‘Audit Documentation’, paragraph 11 of which contains the following requirement:

The auditor shall prepare the audit documentation so as to enable an experienced auditor, having no previous connection with the audit, to understand:

- (a) The nature, timing, and extent of the audit procedures performed to comply with Auditing Standards and applicable legal and regulatory requirements*
- (b) The results of the audit procedures and the audit evidence obtained*
- (c) Significant matters arising during the audit and the conclusions reached thereon.*

Audit working papers will also assist in being able to demonstrate competency in the areas mentioned above, as well as engagement quality control, supervision and review, and in the conduct of the audit generally.

Quality control procedures at both the firm level and at the engagement level are an overarching requirement to the conduct of the engagement to the highest standards.

The balance of this paper deals with the five key audit areas and the knowledge and skills required for a competent auditor of an SMSF. The competencies are based on those required for registered company auditors, tailored for application to the audits of SMSFs.

The competencies described in this paper are intended as the minimum required for members of the three professional accounting bodies – the Institute, CPA Australia and the NIA.

Tasks and sub-tasks

The tasks and sub-tasks set out below are intended to be the minimum competencies auditors of SMSFs require. They are not intended to be a substitute for a proper audit program, nor for the need for each auditor of an SMSF to be familiar with the requirements of the Auditing Standards, ethical standards and SIS.

1. Client acceptance and retention

Task	Description
1.1 – Planning	Identify the criteria for client acceptance / retention decision on a potential / existing audit engagement.
1.2 – Evidence gathering	<p>Gather evidence related to the client acceptance / retention decision.</p> <p>Gather information about the fund to ensure that the auditor is able to make an objective assessment regarding auditor independence, and also assess whether the auditor has the knowledge and skill to undertake the required audit.</p> <p>This information will include:</p> <ul style="list-style-type: none"> • Details of fund trustees – used to assess auditor independence matters and compliance with the definition of an SMSF • Details of fund investments – used to determine whether there are complex issues related to types of investments and SIS compliance which the auditor may not have the skills and experience to adequately audit.
1.3 – Evidence evaluation	<p>Evaluate the evidence related to the client acceptance / retention decision.</p> <p>Evaluate the information and document any difficulties which may be encountered in the audit and their potential resolution.</p> <p>This information will include:</p> <ul style="list-style-type: none"> • Any identified independence issues and how they may be mitigated • The steps the auditor has taken to ensure they have the skills to address complex issues which may exist.
1.4 – Decision making	<p>Decide whether to accept or reject a particular audit engagement.</p> <p>Make an objective decision regarding the appropriateness of accepting an appointment giving appropriate regard to any independence matters, potential risks, and the auditor's skills and knowledge.</p>

Knowledge requirements

The auditor must display knowledge of:

- Ethical requirements (especially independence)
- Financial audit requirements
- Terms of audit engagements
- SIS compliance (for a basic audit assessment process this may be obtained from the document addressing the roles and responsibilities of the approved auditor issued by the ATO).

The concept of professional independence is fundamental to compliance with the principles of integrity and objectivity, which are consistent with objective and impartial judgement. Auditors of SMSFs are required to be independent of their clients both in appearance and in fact. Where an auditor is unable to satisfy the independence requirements in respect of an audit the audit should be declined. Auditors need also to be mindful of independence issues arising during the conduct of the audit. If the latter arises care needs to be taken to either implement appropriate safeguards, or ultimately resign from the engagement if no safeguards are appropriate.

The auditor will need to be particularly aware of the advocacy threat created where he or she has provided advice in connection with a transaction, and decline the audit where independence is impaired, or perceived to be impaired.

2. Audit planning

Task	Description
2.1 – Planning	Identify the audit objectives and any risks to be addressed during the audit. It is possible to utilise standard audit programs for many aspects of routine (non-complex) audits. The audit plan for the compliance aspects of the plan should at a minimum address each compliance section of the audit report.
2.2 – Evidence gathering	Gather evidence relevant to the development of the audit plan. This evidence includes the trust deed, the fund's investment strategy, financial statements and minutes and other relevant supporting documents.
2.3 – Evidence evaluation	The gathered documents must be reviewed to identify any potential high risk audit areas and the detailed documentation which will be required in connection with the performance of the audit.
2.4 – Decision making	Determine an appropriate materiality level. Decide on the preferred audit approach, based on the knowledge gained and the risks identified. Decide on the preferred audit approach to be undertaken in respect of SIS compliance. Document the audit plan.

Knowledge requirements

The auditor may consider generic audit plans available commercially.

The auditor must display knowledge of the requirements of auditing standards addressing audit planning, including:

- Understanding the entity and its environment and assessing the risks of material misstatement
- Consideration of fraud in an audit of financial statements
- Materiality
- Procedures in response to assessed risks.

The auditor must display knowledge of the requirements of SIS.

The plan must be tailored to suit the audit being undertaken.

3. Controls evaluation and testing

In the audits of many SMSFs it is common for the auditor not to be able to place reliance on controls. Consequently a substantive audit is undertaken in most cases. However, auditing standards require a documented assessment of the control environment prior to making the decision as to the audit approach to be adopted.

Task	Description
3.1 – Planning	Understand internal control procedures in sufficient detail to be able to determine whether it may be appropriate to plan to rely on internal controls.
3.2 – Evidence gathering	Gather evidence relevant to determining the effectiveness of operation of any control procedures on which reliance is planned. This evidence includes the trust deed, financial statements and minutes and other relevant supporting documents.
3.3 – Evidence evaluation	Evaluate the evidence gathered.
3.4 – Decision making	Decide whether planned reliance on internal control procedures is appropriate.

The auditor should document the controls in place over banking and investment transactions. The controls should demonstrate how the assets are protected by trustees.

Knowledge requirements

The auditor must display knowledge of:

- The requirements of auditing standards regarding an understanding of the controls environment
- The requirements of SIS in relation to controls
- The importance of controls, particularly over banking and investment transactions.

4. Substantive testing

Task	Description
4.1 – Planning	Identify the nature, timing and extent of audit procedures necessary to gather evidence in support of the financial statement assertions for material account balances and classes of transactions. Identify the nature, timing and extent of audit procedures necessary to gather evidence in support of the funds compliance with the relevant sections of the SIS Act and regulations.
4.2 – Evidence gathering	Financial audit – gather evidence in support of the financial statement assertions for material account balances and classes of transactions. Compliance audit – gather evidence to test the fund's compliance with SIS requirements.
4.3 – Evidence evaluation	Document the results of the testing and conclude on the findings. Conclusions must be supported by appropriate audit documentation.
4.4 – Decision making	Consider whether sufficient appropriate audit evidence has been gathered in order to support the opinion. Determine the further evidence required and the implications for the audit plan.

Knowledge requirements

Understand the concepts of:

- Financial statement assertions
- Audit evidence
- Audit sampling
- Audit documentation
- SIS compliance.

The auditor must create and retain audit working papers sufficient to enable a peer who has had no previous involvement with the audit to gain an understanding of the work performed and the opinion reached.

The auditor may consider generic material available commercially such as CPA Australia's *Sample Audit Programs for small entities*, the Institute's *Audit of Self Managed Superannuation Funds Information Kit*, and the NIA's *SMSF Approved Auditors Guide* as well as ATO guidance material.

5. Forming an opinion

Task	Description
5.1 – Planning	Financial audit – identify the nature, timing and extent of audit procedures necessary to forming an opinion on the financial statements. Compliance audit – identify the nature, timing and extent of audit procedures necessary to forming an opinion on the fund's compliance with SIS requirements.
5.2 – Evidence gathering	Prepare a summary of the audit findings relating to the financial statements, as well as audit findings relating to compliance matters.
5.3 – Evidence evaluation	Form an opinion on the financial statements, as well as on compliance with the SIS provisions, using the information gathered during the audit.
5.4 – Decision making	Determine the appropriate form of audit report on the financial statements. Determine the appropriate form of audit report on compliance matters, and if any matters require reporting to the trustees or notification to the ATO.

Knowledge requirements

Understand the requirements of SIS and the scope of the ATO reporting requirements:

- Mandated reporting requirements
- Voluntary reporting obligations.

Auditors must document and be able to demonstrate the procedures adopted in order to be able to form an opinion on the financial statements and on compliance matters.

Appendices

Appendix 1 – Professional standards

A member undertaking an SMSF audit must meet the following requirements:

- Hold a practicing certificate issued by the professional accounting body of which they are a member – the Institute of Chartered Accountants in Australia, CPA Australia Ltd or the National Institute of Accountants
- Have appropriate Professional Indemnity Cover
- Continuing Professional Development as set out in appendix 2
- Ensure that those who undertake work on their behalf have appropriate knowledge and experience, and are properly supervised in the conduct of the audit.

Appendix 2 – Minimum continuing professional development standard

Initial requirement – all members must complete, or have previously completed, a course in the audit of SMSFs that complies with the regulations relating to training and development of their professional accounting body, prior to commencing in the area of SMSF audits.

Ongoing requirements – all members who audit SMSFs must complete at least 30 hours of relevant professional development activity in each rolling three-year period, comprising the following as a minimum for each category, with the balance made up from any of these categories as necessary:

- 8 hours of superannuation training – which need not deal only with the audits of SMSFs
- 8 hours of financial statement or compliance audit training
- 4 hours of financial accounting training.

A maximum of one third of the minimum 30 hours required may be unstructured.

The ongoing training in financial / compliance auditing and financial accounting training will not necessarily need to focus specifically on audits of SMSFs. A combination of courses will meet the required obligations.

In addition to formal education auditors are expected to monitor the relevant SMSF information updates provided by their associations and the regulator to improve / maintain their current knowledge (for example the SMSF newsletter issued by the ATO).

Appendix 3 –Standards of particular importance

Auditing standards

All the auditing standards are important and must be applied as required in the conduct of the audit of an SMSF. However, because of the nature of SMSFs, some standards are likely to be applied or referred to more frequently than others. Some of these are:

1. ASA 210 – Terms of Audit Engagements – requires the auditor to issue an engagement letter setting out the terms of the engagement. The engagement letter may cover a period greater than one year. However the standard sets out when this is inappropriate
2. ASA 220 – Quality Control for Audits of Historical Financial Information – requires quality control procedures that are applicable to the individual audit engagement
3. ASA 230 – Audit Documentation – requires the auditor to prepare work papers which support the audit conclusion. This includes work programs which address financial and compliance sections of the audit as well as work papers which address the findings of the audit, including how the financial statement assertions have been addressed
4. ASA 240 – The Auditor’s Responsibility to Consider Fraud in an Audit of a Financial Report – requires the auditor to specifically address the risk of material misstatements in the financial report due to fraud
5. ASA 260 – Communication of Audit Matters with Those Charged with Governance – requires the auditor to communicate audit matters of governance matters with those charged with governance. This will take place via the management letter in the majority of cases
6. ASA 300 – Planning an Audit of a Financial Report – requires the auditor to plan the audit in order to perform the engagement effectively
7. ASA 315 – Understanding the Entity and its Environment and Assessing the Risks of Material Misstatement – requires the auditor to obtain an understanding of the entity and its environment, including its internal control, sufficient to identify and assess the risks of material misstatement of the financial report whether due to fraud or error, and sufficient to design and perform further audit procedures
8. ASA 320 – Materiality and Audit Adjustments – requires the auditor to consider materiality and its relationship with audit risk
9. ASA 330 – The Auditor’s Procedures in Response to Assessed Risks – requires the auditor to reduce audit risk to an acceptably low level by determining overall responses to assessed risks and designing and performing further audit procedures to respond to risks at the assertion level
10. ASA 500 – Audit Evidence – requires the auditor to obtain sufficient appropriate audit evidence to be able to draw reasonable conclusions on which to base their opinion
11. ASA 505 – External Confirmations – requires the auditor to determine whether the use of external confirmations is necessary to obtain sufficient appropriate audit evidence
12. ASA 520 – Analytical Procedures – requires the auditor to apply analytical procedures as risk assessment procedures
13. ASA 530 – Audit Sampling and Other Means of Testing – requires the auditor to determine appropriate means for selecting items for testing so as to gather sufficient appropriate audit evidence to meet the objectives of the audit procedures
14. ASA 545 – Auditing Fair Value Measurements and Disclosures – requires the auditor to obtain sufficient appropriate audit evidence that fair value measurements and disclosures are in accordance with the entity’s financial reporting framework
15. ASA 550 – Related Parties – requires the auditor to obtain evidence regarding the identification and disclosure of related party transactions, and consider the effect on the financial report
16. ASA 560 – Subsequent Events – requires the auditor to consider the effect of subsequent events on the financial report and on the auditor’s report
17. ASA 580 – Management Representations – requires the auditor to seek management representations in relation to the preparation of the accounts, internal controls and compliance matters such as record retention
18. ASA 600 – Using the Work of Another Auditor – where the fund invests via a wrap account the auditor should consider the information provided over the provider’s controls. This involves the reliance on the work of another auditor
19. AUS 522 – Audit Evidence Implications of Externally Managed Assets of Superannuation, Provident or Similar Funds.

Accounting Professional and Ethical Standards

Auditors of SMSFs who are members of the three professional accounting bodies need to comply with the standards issued by the Accounting Professional and Ethical Standards Board, which are currently:

- APES 110 – Code of Ethics for Professional Accountants. While all sections of the Code are important, Section 290 ‘Independence – Assurance Engagements’ is particularly significant
- APES 205 – Conformity with Accounting Standards
- APES 220 – Taxation Services
- APES 305 – Terms of Engagement
- APES 320 – Quality Control for Firms
- APES 410 – Conformity with Auditing and Assurance Standards.

Appendix 4 – Knowledge requirements

In order to audit SMSFs an auditor needs to meet some key knowledge requirements:

Financial Statements

Accounting

- An understanding of the AASB accounting standards applicable to the valuation of assets, tax effect accounting and disclosure of financial information
- Skills to prepare journals to correct misstatements.

These skills are developed when obtaining an accounting degree and obtaining the professional qualification. Where it is has been a number of years since obtaining the qualification the auditor should consider undertaking a refresher in the topic.

Auditing

- An understanding of the auditing standards as outlined in appendix 3.

These skills are developed when obtaining an accounting degree and obtaining the professional qualification. The auditor should ensure that their knowledge and skills are current.

Compliance

Auditors must have an understanding of the Superannuation Industry (Supervision) Act and Regulations to the extent that this is applicable to SMSFs.

This includes requirements relating to

- Contributions
- Benefits
- Investments
 - In-house assets
 - Loans
 - Borrowings
 - Investment restrictions
- Record keeping
- Sole Purpose
- Trustees
 - Structure
 - Residency
- Reporting.

These requirements have changed significantly in 2007 and the auditor should consider undertaking a refresher in the topic.

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