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Response

Yes

Are you commenting as an individual or as an official representative of an organization?
(Choose one.)

Response

As an official representative of an organization

Response

Organization name	ecoDa
Your title related to the organization	Director General

Please provide your name and contact information. Providing this information is optional. All information will be kept confidential and used only to contact you regarding the feedback you provided, if needed.

Response

Given name/first name	Beatrice
Family name/last name	Richez-Baum
Email address	contact@ecoda.eu
Phone number (including international prefix)	

Please select the region where the organization is headquartered.

Response

Europe

Please select the country, dependency, or area of special sovereignty where the organization is headquartered. If the location is not listed, choose "other" at the end of the list and input the information.

Response

Belgium

To what extent do you agree or disagree with the structure of the proposed Global Internal Audit Standards being organized by Domains, Principles, Standards, and Considerations for Implementation and Considerations for Evidence of Conformance?

Response

Agree

Please provide any additional comments or recommended changes for the structure of the proposed Global Internal Audit Standards.

Response

General comments : -The standards are too detailed and over prescriptive, should be made simpler, principle-based and more concise (too wordy and a lot of repeat, which blur the message); -They are not ambitious enough in view of ESG and technology challenges (in particular digitalization, artificial intelligence, cyber). The text is fairly generic and would not allow a CAE to adjust to current challenges (including professional skepticism in the context of ESG specific areas, internal control over sustainability reporting, ESG gap analysis as a topic, etc); -The specificities of internal audit, being inside the company but objective, are not exploited towards 1) a hard look at efficiencies 2) a greater leverage of the inside knowledge of the sector (and value chain) and 3) a greater cooperation with teams and added value to the organization (whilst maintaining its objectivity) to foster a better culture (in all dimensions); -Alternative structures for IA are not discussed sufficiently (outsourcing, SMEs, building an IA function from zero, etc); -Relationships with the board and audit committee (AC), as discussed, seem to miss the point as to how governance actually works : board / AC are not compliance activities, and provide oversight (not detailed checks). Board responsibility is to set the right policies but the board does not go into any detail; -IA cannot shoulder all the responsibility of good governance but should ensure that other actors are performing their roles responsibly (we agree with a topical standard regarding governance assessment); -The standard should embark on artificial intelligence. The standards should discuss how and on what conditions internal audit can leverage artificial intelligence for execution of engagements as well as in assistance to management of internal audit and reporting, and include audits over artificial intelligence components as (or as part of) a topical standard. The use of artificial intelligence to assist internal audit could be addressed in a topical standard (which could be more easily refreshed considering the evolutive nature of the topic), which should also underline that auditors in any case should maintain their professional judgment and critical thinking skills to interpret (re-interpret) AI-generated insights and make informed decisions based on the results; -There should be more emphasis on continuous training. Overall opinion: The structure is improved compared to current standards. The draft is too long and should be shortened to be more effective in implementation (avoid repeats). Internal audit functions in the context of SMEs should be discussed more extensively.

Introduction to the Global Internal Audit Standards

To what extent do you agree or disagree with the proposed content for this element?

Response

Agree

Introduction to the Global Internal Audit Standards

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

Glossary

To what extent do you agree or disagree with the proposed content for this element?

Response

Agree

Glossary

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

- The glossary should be put at the end of the document for clarity rather than in the middle; - Some of the definitions should be reviewed for clarity, and aligned to other well known audit frameworks (re. external audit). Some concepts have been deleted or are not included (re. certain concepts widely used in the COSO framework used by many companies). Words which are used in the generally acceptance should not be defined. Some definitions are not useful (re. Condition). More specifically : - Effect : the definition is not clear when compared to the definition for Impact; - Professional skepticism : definition is too narrow (not only regarding reliability of information), and should be modeled with reference to the literature for external audit for consistency; - Independence : should be discussed in relation to objectivity. Internal auditors being employed by the company can never be considered independent, however under appropriate conditions (direct accountability to the board) they can be objective.

Domain I. Purpose of Internal Auditing

To what extent do you agree or disagree with the proposed content for this element?

Response

Agree

Domain I. Purpose of Internal Auditing

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

- IA also strengthens an organization's culture of risk and, internal control and accountability;
- "Ability to serve the public interest" can be misread and would not be applicable to private entities; -The word "independently" in "independently positioned under the board" should be changed so as not to create confusion. Internal auditors being employed by the company can never be considered independent, however under appropriate conditions (direct accountability to the board) they can be objective. The sentence should be changed to "the Internal audit function is reporting to, and directly accountable to the board". As a general comment, the word "independent" should be avoided in the proposed framework and replaced with "objective".

Domain II. Ethics and Professionalism

To what extent do you agree or disagree with the proposed content for this element?

Response

Agree

Domain II. Ethics and Professionalism

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

-Specific considerations should be provided regarding outsourcing of the IA function (and conditions for using outsourcing effectively and with integrity); -Specific considerations should be provided to whistleblowing (WB) : situation of an internal auditor regarding the use of whistleblowing procedures (including protection), management by IA of the WB hotline (we favor a best practice where the WB should be either outsourced or managed independently to avoid creating a conflict of interest in case an internal auditor has to use the WB hotline).

Domain II. Ethics and Professionalism

From the list below, choose all areas for which you would like to provide feedback for this element.

Response

Standard 1.3 Legal and Professional Behavior, Standard 2.1 Individual Objectivity, Standard 2.2 Safeguarding Objectivity, Standard 3.1 Competency, Standard 4.3 Professional Skepticism

Standard 1.3 Legal and Professional Behavior

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 1.3 Legal and Professional Behavior

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 1.3 Legal and Professional Behavior

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-Discreditable behaviors should include accepting a mission for which the internal auditor does not have the required competencies (re. cyber, ESG, artificial intelligence, data privacy), as well as conflicts of interest; -Evidence of conformance should include documentation of competence. Competences should be clearly assessed.

Standard 1.3 Legal and Professional Behavior

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 1.3 Legal and Professional Behavior

Why do you disagree with the proposed considerations for implementation and evidence of conformance for this standard? (Choose all that apply.)

Response

Incomplete

Standard 1.3 Legal and Professional Behavior

Please provide any additional comments or recommended changes for the proposed considerations for implementation and evidence of conformance for this standard.

Response

Standard 2.1 Individual Objectivity

To what extent do you agree or disagree with the proposed requirements for this standard?

Response

Disagree

Standard 2.1 Individual Objectivity

Why do you disagree with the proposed requirements for this standard? (Choose all that apply.)

Response

Inaccurate

Standard 2.1 Individual Objectivity

Please provide any additional comments or recommended changes for the proposed requirements for this standard.

Response

-Self-review bias : the concept of self review is not appropriate in the context of an audit. A review should always be conducted by a different person. A self-assessment (of one's own work) is a judgment and not a review.

Standard 2.1 Individual Objectivity

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 2.1 Individual Objectivity

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Inaccurate

Standard 2.1 Individual Objectivity

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 2.2 Safeguarding Objectivity

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 2.2 Safeguarding Objectivity

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Lack of perceived benefit compared to cost

Standard 2.2 Safeguarding Objectivity

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-Re. Activities to be avoided may include fraternizing outside of work with the organization's employees, management, third party suppliers and vendors : this sentence might unduly restrict internal auditors to socialize with other employees of the company, which can prevent them from accessing useful information by gaining the trust internally. Concept of extensive socialization, or familiarity, might be more appropriate.

Standard 2.2 Safeguarding Objectivity

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Disagree

Standard 2.2 Safeguarding Objectivity

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Inappropriate

Standard 2.2 Safeguarding Objectivity

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 3.1 Competency

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 3.1 Competency

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 3.1 Competency

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-The list of knowledge, skills and abilities is too narrow in light of the challenges facing internal auditors currently. Knowledge should include certain specialized areas (where needed), in particular regarding artificial intelligence (as an example). Internal auditors should also be trained in cybersecurity / data protection as well as ESG, which are transversal topics (the IIA should develop some accreditation model as part of this, identifying the required minimum knowledge / proficiency in these matters for all internal auditors); -Intercultural skills should be added to the list; -Regarding the considerations for implementation and evidence of conformance, the use of internal experts to support the IA team should be discussed (conditions for not losing objectivity, etc). This is important in the context of specialized areas and in particular with respect to ESG, artificial intelligence and cyber.

Standard 3.1 Competency

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 3.1 Competency

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 3.1 Competency

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 4.3 Professional Skepticism

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 4.3 Professional Skepticism

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 4.3 Professional Skepticism

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-“Seek additional evidence etc” should be supplemented with “in an unbiased manner”; -A point regarding “Not presuming of the integrity or honesty of other parties” should be added; - Regarding the considerations for implementation and evidence of conformance, the point “additionally, CAE should set expectations regarding the amount of time appropriate to invest in seeking evidence within the engagement’s time constraint” should be specifically marked for discussion with governance (in a closed session between Internal audit and audit committee/board), as there is a potential to reduce the depth of the audit / investigation in a manner detrimental to the end result.

Standard 4.3 Professional Skepticism

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Disagree

Standard 4.3 Professional Skepticism

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 4.3 Professional Skepticism

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Domain III. Governing the Internal Audit Function

To what extent do you agree or disagree with the proposed content for this element.

Response

Agree

Domain III. Governing the Internal Audit Function

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

-The responsibility of the board is to ensure that there is an effective / adequate internal audit function, either mandatory or voluntary (and in the absence of an internal audit function, boards should always assess the need for an internal audit function). However the board does not retain the responsibility to ensure that the internal audit function conforms with the standards. Conformance with the standard is part of the quality assessment performed on the internal audit function, by way of self assessment or external assessment. The role of the board is to ensure that such assessments are undertaken on a periodic basis, as mutually agreed in the IA charter. The responsibility to conform to the standards is for the CAE. - Conditions for outsourcing of the IA function should be discussed to a greater extent, and in particular regarding internal resources dedicated to take responsibility for the outsourcing process and review of audit results, in line with previous guidance from the IIA (re. "oversight and responsibility for the internal audit activity cannot be outsourced and an in-house liaison, preferably an executive or senior management-level employee should be assigned responsibility for 'management' of the internal audit activity. Consideration of the independence of the assigned in-house liaison must be evaluated if this individual has other (non-internal audit) responsibilities. The role of the board or equivalent governing body also is important in the oversight process and the level of active oversight should be considered.")

Domain III. Governing the Internal Audit Function

From the list below, choose all areas for which you would like to provide feedback for this element.

Response

Principle 6 Authorized by the Board, Standard 6.1 Internal Audit Mandate, Standard 6.2 Board Support, Principle 7 Positioned Independently, Standard 7.2 Chief Audit Executive Roles, Responsibilities, and Qualifications, Standard 7.3 Safeguarding Independence, Standard 8.1 Board Interaction, Standard 8.4 External Quality Assessment

Principle 6 Authorized by the Board

To what extent do you agree or disagree with the proposed content for this element?

Response

Disagree

Principle 6 Authorized by the Board

Why do you disagree with the proposed content for this element? (Choose all that apply.)

Response

Inaccurate

Principle 6 Authorized by the Board

Please provide any additional comments or recommended changes for this element.

Response

Except when regulatorily required, the board does not establish and approve the IA function. This is the responsibility of the CEO / senior executives (delegated to CAE), however IA report to the board (hence the board provides oversight, support the authority, role and responsibilities).

Standard 6.1 Internal Audit Mandate

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 6.1 Internal Audit Mandate

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Inaccurate

Standard 6.1 Internal Audit Mandate

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-The AI function's authority, role and responsibilities are not contingent on the changes in the organization (and certainly not on the change of CAE), but rather on the need for assurance (regulatory evolution such as ESG for example) as deemed necessary by management and the board. The scope of the annual IA plan is contingent on the evolution of the scope of the organization (re. acquisition), nature of activity (re. new business), changes in business model (re. new channels, ways of operating), changes in the risks (re. interdependence, emerging risks/technologies/trends, horizons, etc). -Information to be provided to the board regarding the internal audit mandate does not include the standards. It is not the role of the board to check that the internal audit mandate conforms to the standards, although the board should inquire about conformance. (as well as quality control and external assessment). -To review whether the mandate is appropriate, the CAE should discuss the nature and configuration of the risks with respect to the strategy, business model and the structure and characteristics of the organization. The mutual understanding of the roles and responsibilities (which is shared by construction) is independent from the determination of the scope and types of internal audit services. -There is no joint responsibility between the board and IA -In Consideration for implementation, all the information considered points to a very formal view of IA, not a view of IA at the service of a company and as a provider of assurance to the board, in the specific circumstances of the company. The board does not have a role where it should "recognize and promote organizational acceptance" of the IA function. Organizational acceptance will stem from the added value of IA in the company, as recognized by the other functions, and the CAE should work to embed added value of IA per se. The board will leverage the added value of IA and assurance capabilities for its information with respect to the various topics under its remit (and among others, strategy execution, risks and internal control). The internal audit mandate and charter should be periodically reviewed, as necessary, and at least annually. -As structured, the considerations for implementation give way to a lot of repeats. -Structuring the oversight over and relationship with other assurance providers (broader than the independent financial auditor) should be discussed in a separate section and part of the discussions should encompass how management and the board would like the CAE to work in this area (also dependent on circumstances). -The CAE will provide a draft charter – the text under "joint practices" seems to indicate that the board will develop the IA charter based on sampled documents. A lot of the text is a repeat, and breaks down the process into very specific (and unnecessary) details (too granular). -The Evidence of conformance section points to a check-the-box mentality, as opposed to a healthy functioning and coordination between the CAE, management and the board -Internal audit function as a whole or some internal audit engagements could be outsourced by an entity. The former is more frequently preferred by small and medium-sized entities whereas the latter is chosen especially when the in-house team do not possess necessary skill sets or have the resources, including time. In these cases, ensuring effective communication and consistency in the quality of the engagement performance becomes an important concern for those charged with governing the entity. In this respect, the IIA should consider adding specific considerations to this domain of the standard for cases where the internal audit function is partly or fully outsourced

Standard 6.1 Internal Audit Mandate

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 6.1 Internal Audit Mandate

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Inaccurate

Standard 6.1 Internal Audit Mandate

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 6.2 Board Support

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 6.2 Board Support

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Inaccurate

Standard 6.2 Board Support

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-Although we agree that the board must support IA, the primary responsibility and action means rest with management. Same with full access; -The items under “demonstration” tend to be overly formalistic, and forget the most important measure regarding whether IA is duly considered within an organization, which is whether its recommendations are duly considered and implemented timely and effectively by management; -In Considerations for implementation, the number of closed sessions should be left to a joint CAE / board (/AC) determination. “At least” should be reduced to 2 sessions instead of 4, with informal meetings occurring on a more frequent basis in between board sessions. These meetings are not a “demonstration of support” (a check-the-box / umbrella mentality) but rather are required for directors to exercise the proper oversight on management and the activity, at a more detailed level than just the board meetings; -The board is not in a situation to “evaluate whether any access, scope or resources limitations etc” and does not have the information to do so. This information will be provided to the board by the CAE; -In case of scope limitations or restriction of access, the discussion to be held with senior management is not a “demonstration of support”, but a condition for the audit to be effective, as part of management’s responsibility over internal control; -See comments above regarding repeats from the structure of the Considerations section; -More specifically in this section, the wording seems to imply that positioning difficulties for the CAE are inherent to the function. In companies where the CAE is a qualified and respected professional, there are no positioning difficulties and the CAE is not requiring the board to “demonstrate support”, he/she owns it.

Standard 6.2 Board Support

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 6.2 Board Support

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Inaccurate,not appropriate

Standard 6.2 Board Support

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Principle 7 Positioned Independently

To what extent do you agree or disagree with the proposed content for this element?

Response

Disagree

Principle 7 Positioned Independently

Why do you disagree with the proposed content for this element? (Choose all that apply.)

Response

Inaccurate

Principle 7 Positioned Independently

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

-There is no such thing as an IA positioned independently as its employees are paid by the company. Correct wording should be "objectivity"; -The board is not responsible for the "independence" (/objectivity) of the IA function. Objectivity in the way IA should be carried out is the responsibility of the CAE in managing the IA execution. The board must establish clear reporting lines for IA (direct functional reporting to the board, with administrative management by HR, and operational functional reporting to the CEO) and create the conditions for objectivity; -Considerations for implementation contain a lot of redundancy with other sections and could be trimmed down to render the framework more concise; - Sentences such as "it is usually ideal" should be reworded in terms of best practices; - Evidence of conformance are mostly designed as check-the-box exercise and do not discuss how objectivity is fostered and achieved in the execution of IA.

Standard 7.2 Chief Audit Executive Roles, Responsibilities, and Qualifications

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 7.2 Chief Audit Executive Roles, Responsibilities, and Qualifications

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 7.2 Chief Audit Executive Roles, Responsibilities, and Qualifications

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-The standards do not address the situation at SMEs where often IA consist of one person; - The standards should provide principles / organizational guidelines where the CAE has more than one role (risk officer, internal control), rather than just identifying possible situations; - Considerations for implementation should discuss experience regarding IT (and notably cyber, data privacy) and ESG.

Standard 7.2 Chief Audit Executive Roles, Responsibilities, and Qualifications

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Neutral (neither agree, not disagree)

Standard 7.2 Chief Audit Executive Roles, Responsibilities, and Qualifications

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 7.3 Safeguarding Independence

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 7.3 Safeguarding Independence

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Inaccurate

Standard 7.3 Safeguarding Independence

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-All wording for independence should be changed to objectivity (see comment above); -The board must discuss the situation impairing objectivity and the safeguards put in place to ensure objectivity. The wording "the board must protect" is not appropriate, and it is not a function of the board to ensure that "the safeguards to manage the risk of objectivity impairment are designed adequately and operating effectively". There seems to be a misunderstanding of the role of governance and of the board. The responsibility lies with management (which must ensure an objective IA function), and the board must inquire as to objectivity and safeguarding measures; -Considerations for implementation merely provide a list of situations without best practices / guidelines for each situation; -Also, the board has no audit role and will not be in a situation to "verify" that the safeguards are operating effectively, other than by asking questions. The wording (like other wordings mentioned above) is creating a burden on the board which will transform the relationship into a highly formal one, which will be detrimental to the added value of internal audit.

Standard 7.3 Safeguarding Independence

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 7.3 Safeguarding Independence

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Inaccurate,Incomplete

Standard 7.3 Safeguarding Independence

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 8.1 Board Interaction

To what extent do you agree or disagree with the proposed requirements for this standard?

Response

Disagree

Standard 8.1 Board Interaction

Why do you disagree with the proposed requirements for this standard? (Choose all that apply.)

Response

Incomplete

Standard 8.1 Board Interaction

Please provide any additional comments or recommended changes for the proposed requirements for this standard.

Response

The board must set expectations of communication regarding frequency but also nature, content (appropriately designed to convey information in a meaningful way to the reader, including infographics, etc), channels and extent of communications

Standard 8.1 Board Interaction

To what extent do you agree or disagree with the proposed considerations for implementation and evidence of conformance for this standard?

Response

Strongly disagree

Standard 8.1 Board Interaction

Why do you disagree with the proposed considerations for implementation and evidence of conformance for this standard? (Choose all that apply.)

Response

Incomplete

Standard 8.1 Board Interaction

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 8.4 External Quality Assessment

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 8.4 External Quality Assessment

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

too broad

Standard 8.4 External Quality Assessment

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

10 years between external quality assessments seems too far apart

Standard 8.4 External Quality Assessment

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Strongly disagree

Standard 8.4 External Quality Assessment

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Too broad, inappropriate

Standard 8.4 External Quality Assessment

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Domain IV. Managing the Internal Audit Function

To what extent do you agree or disagree with the proposed content for this element?

Response

Agree

Domain IV. Managing the Internal Audit Function

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

Domain IV. Managing the Internal Audit Function

From the list below, choose all areas for which you would like to provide feedback for this element.

Response

Standard 9.5 Internal Audit Plan, Standard 9.6 Coordination and Reliance, Standard 10.2 Human Resource Management, Principle 11 Communicates Effectively

Standard 9.5 Internal Audit Plan

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 9.5 Internal Audit Plan

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 9.5 Internal Audit Plan

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

-Both the Board and Audit Committee should approve the annual audit plan. The plan for internal audits revisions and work should be approved by the Audit Committee and there should be a dialogue related to high-risk areas / vulnerable areas to focus on and possible amendments of the plans to reflect the AC/BOD priorities. This description of the procedure could be clearer; -Chief audit executive and internal auditors to proactively communicate with external auditors and other assurance service providers while setting up the internal audit strategy and plan.

Standard 9.5 Internal Audit Plan

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Disagree

Standard 9.5 Internal Audit Plan

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 9.5 Internal Audit Plan

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 9.6 Coordination and Reliance

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 9.6 Coordination and Reliance

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 9.6 Coordination and Reliance

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

“the chief audit executive must coordinate with internal and external providers of assurance services and consider relying upon their work” : internal providers of assurance services should be reworded as “other internal providers of assurance services”. Also, the standards should take into account other operational assurance providers or regulatory audits (currently, “external” seems to point readily to external financial auditors).

Standard 9.6 Coordination and Reliance

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Disagree

Standard 9.6 Coordination and Reliance

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 9.6 Coordination and Reliance

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Standard 10.2 Human Resource Management

To what extent do you agree or disagree with the proposed **requirements** for this standard?

Response

Disagree

Standard 10.2 Human Resource Management

Why do you disagree with the proposed **requirements** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 10.2 Human Resource Management

Please provide any additional comments or recommended changes for the proposed **requirements** for this standard.

Response

HR should also emphasize upskilling (ESG, IT/cyber/artificial intelligence) and integrating new competencies, as well as an in depth industry knowledge and background for analysis of risks related to the specific industry and value chain.

Standard 10.2 Human Resource Management

To what extent do you agree or disagree with the proposed **considerations for implementation and evidence of conformance** for this standard?

Response

Disagree

Standard 10.2 Human Resource Management

Why do you disagree with the proposed **considerations for implementation and evidence of conformance** for this standard? (Choose all that apply.)

Response

Incomplete

Standard 10.2 Human Resource Management

Please provide any additional comments or recommended changes for the proposed **considerations for implementation and evidence of conformance** for this standard.

Response

Principle 11 Communicates Effectively

To what extent do you agree or disagree with the proposed content for this element?

Response

Disagree

Principle 11 Communicates Effectively

Why do you disagree with the proposed content for this element? (Choose all that apply.)

Response

Incomplete

Principle 11 Communicates Effectively

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

-The standards should foster the role of IA to build a risk and control culture within companies; -The use of data visualization tools, infographics and other techniques when executing the IA assignments and reporting to the board should be strongly suggested (as is any means that could increase efficiency and effectiveness).

Domain V. Performing Internal Audit Services

To what extent do you agree or disagree with the proposed content for this element?

Response

Agree

Domain V. Performing Internal Audit Services

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

Domain V. Performing Internal Audit Services

From the list below, choose all areas for which you would like to provide feedback for this element.

Response

None

Do you support the inclusion of Topical Requirements in the IPPF?

Response

No

Topical Requirements

Please provide any additional comments or recommended changes for the proposed content for this element.

Response

Topical requirements should be addressed separately to provide a methodology / roadmap for IA with different level of assurance . Addressing separately will enable a more detailed approach.

Do you support providing Topical Requirements for these topics?

Response

Yes

Please list any additional topics you would like to be considered for development of Topical Requirements (optional).

Response

-Cyber should include data privacy; -IT governance should include artificial intelligence; -Data governance should be addressed separately (it includes all types of data, and goes from origination to archiving); -Reputational audit (incl. social media use); -Sustainability should include robustness of due diligence carried out on ESG topics (including human rights, environmental impacts, etc).

<https://www.theiia.org/en/standards/Standards-Public-Comment/>