White Paper

Reporting on the Status of Audit Recommendations

UPDATED 2020
## Background

### Purpose

The Chief Audit Executive (CAE) is required to establish a follow-up process (see Note 1) to monitor and ensure that management actions have been effectively implemented to address audit recommendations or that senior management has accepted the risk of not taking action. An effective follow-up process - coupled with meaningful analysis of the information - facilitates periodic reporting to the audit committee and chief executive on the status of audit recommendations.

See Exhibit 5 for an explanation of Acronyms and Terms used in this White Paper.

### Background

In terms of professional auditing standards, internal auditors are required to communicate the results of their engagements (standard 2400), and the CAE is required to establish and maintain a system to monitor the disposition of results communicated to management (standard 2500).

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### Note 1:

Follow-up is a process by which internal auditors evaluate the adequacy, effectiveness and timeliness of actions taken by management on reported observations and recommendations, including those by external auditors and others. This process also includes determining whether senior management and/or the board have assumed the risk of not taking corrective action on reported observations.¹

Internal audit charters typically include requirements to assist the audit committee to discharge its responsibilities and for the CAE to report to each meeting of the audit committee on the implementation status of agreed internal and external audit recommendations.

Likewise, audit committee charters typically include responsibilities to monitor management’s implementation of internal audit recommendations and provide advice to the chief executive on action taken on significant issues raised in relevant external audit reports and better practice guides.

A prudential enquiry into the Commonwealth Bank in 2018 recommended the Executive Committee and Board improve their processes for monitoring issues raised by internal audit and others, and end any organisational tolerance for untimely or ineffective resolution.

CAEs utilise a range of mechanisms for monitoring the implementation of audit recommendations depending on the size of the internal audit function, the extent of the internal audit program, and the number of recommendations being tracked. These range from basic approaches that log and track recommendations using Excel or simple databases, through to more sophisticated integrated audit software solutions which have client interfaces and / or email functions.

This White Paper is intended to provide the basis for CAEs to establish arrangements for the reporting on the status of audit recommendations that satisfies the contemporary needs and expectations of audit committees. The approach complements themes based reporting which is the subject of a separate IIA–Australia White Paper (see Note 2).

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### Note 2:

Themes-based reporting is a value-adding approach that helps CAEs to determine, consolidate and report high-level insights to the audit committee, chief executive and other key stakeholders through the grouping of internal audit outcomes into related higher-level topic areas or themes.²
Past practice saw CAEs delivering to the audit committee a long and detailed list of audit recommendations together with the current status. The listing was often in sequential order, with little attention given to prioritising high risk and/or long overdue (or ‘at risk’) recommendations. The absence of meaningful analysis meant that the real story was buried in a mass of data.

Delivering a list of audit recommendations does little to assist the audit committee to discharge its responsibilities in respect to open recommendations. Exhibit 2 illustrates the difference between two contrasting reporting styles.

**Exhibit 2 – Overview of Reporting Styles for Follow-up of Audit Recommendations**

<table>
<thead>
<tr>
<th>Report style</th>
<th>Content</th>
<th>Approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short covering paper; essentially a list of all audit recommendations that tells the story in a clear and unambiguous manner.</td>
<td>Obtain updates from management and update the recommendations database. Print list of all audit recommendations with their status, or all open recommendations with their status.</td>
<td>Discern the ‘story’ of how well recommendations are being addressed by management and prepare appropriate narrative.</td>
</tr>
<tr>
<td>List of recommendations with status.</td>
<td>Obtain updates from management and update the recommendations database. Download and analyse the data for trends and prepare relevant graphs.</td>
<td>- Opinion on management’s overall level of commitment to addressing agreed audit recommendations. - Commenting on at risk recommendations, including their original and revised targeted completion dates and comments on action in train. - Trends (3 to 5 years) of actions opened, closed, overdue, and total number of actions currently open. - Trends and / graphs on recommendations being raised applied against different business risk categories (see Exhibit 3). - Graphs illustrating through different lenses overdue recommendations, for instance: - Risk ratings (high, medium, and low). - Ageing of periods overdue. - Business areas. - List of open recommendations (in full or part) as an attachment.</td>
</tr>
<tr>
<td>Low. Meets the basic requirements of the audit committee.</td>
<td>List of open recommendations (in full or part) as an attachment.</td>
<td>- List of open recommendations (in full or part) as an attachment.</td>
</tr>
<tr>
<td>High. In addition to meeting the basic requirements of the audit committee, this reporting type helps to provide risk-based and objective assurance, advice and insights.</td>
<td>- Opinion on management’s overall level of commitment to addressing agreed audit recommendations. - Commenting on at risk recommendations, including their original and revised targeted completion dates and comments on action in train. - Trends (3 to 5 years) of actions opened, closed, overdue, and total number of actions currently open. - Trends and / graphs on recommendations being raised applied against different business risk categories (see Exhibit 3). - Graphs illustrating through different lenses overdue recommendations, for instance: - Risk ratings (high, medium, and low). - Ageing of periods overdue. - Business areas. - List of open recommendations (in full or part) as an attachment.</td>
<td></td>
</tr>
</tbody>
</table>

Note: This table is intended as a simplified overview, recognising that variations can and do occur.
Reporting on the Status of Audit Recommendations

For large and medium sized internal audit functions, the grouping and analysing of recommendations by, say, business risk categories (see Exhibit 3) can provide powerful insights on areas of the business risk profile that require closer scrutiny by management.

Exhibit 3 – Example of Business Risk Categories

<table>
<thead>
<tr>
<th>BR1</th>
<th>BR2</th>
<th>BR3</th>
<th>BR4</th>
<th>BR5</th>
<th>BR6</th>
<th>BR7</th>
<th>BR8</th>
<th>BR9</th>
<th>BR10</th>
<th>BR11</th>
<th>BR12</th>
<th>BR13</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inability to withstand unanticipated events such as natural disasters</td>
<td>Interruption to continuity of operations</td>
<td>Unnecessary costs</td>
<td>Revenue not maximised</td>
<td>Internal and external information unreliable and / or irrelevant</td>
<td>Inefficient use of resources</td>
<td>Inability to take advantage of opportunities</td>
<td>Non-compliance with laws and regulations</td>
<td>Failure to develop people</td>
<td>Loss of reputation/credibility</td>
<td>Quality of service or product not at acceptable standard</td>
<td>Assets not safeguarded</td>
<td>Lack of safety, of employees or customers or the environment</td>
</tr>
</tbody>
</table>

Analysing and reporting on business risk categories - as part of the arrangements for reporting on the status of audit recommendations - is a contemporary approach that complements themes-based reporting.

The integrity of reporting on audit recommendations relies on the processes for capturing details of recommendations into the database when they are initially raised (see blue tabs in Exhibit 4) and ongoing capture of updates received periodically from management (see yellow tabs in Exhibit 4).

Exhibit 4 – Example of Information Commonly Held in a Recommendations Database

<table>
<thead>
<tr>
<th>Task</th>
<th>Assign</th>
<th>Risk</th>
<th>Target</th>
<th>Change</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shows the name of the audit report and date issued (and audit reference number if used)</td>
<td>Indicates the responsible business unit</td>
<td>Shows risk rating and / or priority of the recommendation (eg high, medium low)</td>
<td>Identifies dates of key milestones (where relevant) for complex and / or technology solutions</td>
<td>Provides comments from management on reason/s for change/s to target dates</td>
<td>Indicates current status of recommendations (eg complete, in progress, deferred, identified)</td>
</tr>
<tr>
<td>Summarises (or provides full narrative) of the recommendation and unique number</td>
<td>Identifies the person primarily responsible for implementation</td>
<td>Identifies the risk category (if used - see Exhibit 3)</td>
<td></td>
<td></td>
<td>Flags any ‘at risk’ recommendations</td>
</tr>
<tr>
<td>Flags recommendations where management or board assumed risk of not taking corrective action</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Exhibit 5 - Acronyms and Terms

<table>
<thead>
<tr>
<th>Descriptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ageing of periods overdue</td>
</tr>
<tr>
<td>At risk’ recommendations</td>
</tr>
<tr>
<td>Business area</td>
</tr>
<tr>
<td>Business risk category</td>
</tr>
<tr>
<td>Formal follow-up options</td>
</tr>
<tr>
<td>Open recommendations</td>
</tr>
<tr>
<td>Overdue recommendations</td>
</tr>
<tr>
<td>Recommendations database</td>
</tr>
</tbody>
</table>
Reporting on the Status of Audit Recommendations

Five Action Steps

Establishing meaningful and valued reporting on the status of audit recommendations can be achieved where the CAE implements the following action steps.

1. Internal audit establishes a database to log audit recommendations and monitor progress. This may be in a table or spreadsheet format, or as part of an automated audit management system. The database is updated periodically with information received from management on steps taken to implement agreed management action plans in response to audit recommendations (see point 2 below).

2. Internal audit periodically requests updates from management to monitor progress on implementation of management action plans. This is often done quarterly to facilitate reporting to the audit committee.

3. The CAE or delegate undertakes appropriate analysis of the status of all audit recommendations, including:
   - Identifying ‘at risk’ recommendations such as higher risk and overdue recommendations and their targeted completion dates.
   - Analysing trends (3 to 5 years) of actions opened, closed, overdue, and total number of actions currently open.
   - Producing graphs illustrating overdue recommendations by:
     - Risk ratings (high, medium, and low).
     - Ageing of periods overdue.
     - Business area.

4. Internal audit undertakes periodic independent follow-up of higher priority recommendations and obtains evidence that management’s action plans have been implemented as intended. The CAE recommends to the audit committee the closure of completed audit recommendations that have been independently validated. Follow-up can be conducted through:
   - Another audit of the same audit topic.
   - Follow-up of all high risk audit recommendations across all internal audit engagements.
   - Follow-up of audit recommendations across several audits.
   - Follow-up of audit recommendations by business area.

5. The CAE produces a report to the audit committee on the status of audit recommendations, covering insights on the analysis covered in points 3 and 4 above.

[The above Action Steps modified from the publication Internal Audit in Australia, IIA—Australia, July 2016]

Note 3:
The most valuable audit recommendations are typically derived from well-planned audits that are executed by capable audit professionals that apply the ABCs of auditing—by being attuned, balanced and credible. It is important for CAEs and their delegates to maintain effective stakeholder engagement strategies that help to ensure audit recommendations reflect the key business drivers and strategies, and are developed in the context of wider organisational changes and policy directives. This White Paper and the ‘five action steps’ above pick up on the time that recommendations have been raised, agreed and reported; it assumes that appropriate steps were taken beforehand to ensure the recommendations are appropriate, practical and of value. This approach can also be applied to situations where the CAE is required to monitor other recommendations (such as recommendations from the external auditor and other scrutineers).

Conclusion

Summary and Options

Under professional auditing standards CAEs are required to follow-up reported observations and recommendations to evaluate the adequacy, effectiveness and timeliness of actions taken by management. This requirement is also typically part of contemporary internal audit charters.

There is a shift in the way that open recommendations are reported to the audit committee. Whilst providing a list of all audit recommendations might have satisfied the needs of the audit committee in the past, audit committees are nowadays increasingly deriving greater value from a report on open recommendations that contains meaningful analysis that tells the whole story through an opinion, commentary, trends, and graphs.

Conclusion

The mission of professional internal auditing is to enhance and protect organisational value by providing risk-based and objective assurance, advice and insights. And CAEs are expected to assist the audit committee to discharge its responsibilities.
There is reduced value provided by internal audit to stakeholders if management fails to implement audit recommendations that are intended to improve the business.

Meaningful reporting to the audit committee and chief executive on the status of audit recommendations and associated follow-ups is an important assurance safeguard. Importantly, it also provides information that an audit committee and/or chief executive officer can use to hold management accountable for implementing audit recommendations.

Bibliography

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References

1 International Professional Practices Framework (IPPF), Excerpt from Practice Advisory 2500.A1-1

2 White Paper - Themes-based Reporting, IIA–Australia, January 2020, p3

3 IIA–Australia Journal, March 2012, The ABC of a professional audit practice – delivering what the audit committee really needs, pp15-22

4 Prudential Enquiry into the Commonwealth Bank of Australia, APRA, April 2018, p43
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Purpose of White Papers

A White Paper is an authoritative report or guide that informs readers concisely about a complex issue and presents the issuing body’s philosophy on the matter. It is meant to help readers understand an issue, solve a problem, or make a decision.

Author’s Biography

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Bruce has been a member of the IIA since 1984 and was an IIA-Australia Board Director from 2012 to 2018. He spent nearly 30 years within the financial services sector, which included extensive internal auditing responsibilities in Australia, United States and United Kingdom spanning commercial banking, merchant banking and central banking. He ultimately held CAE roles at the State Rail Authority of NSW, Integral Energy Australia, and the Australian Taxation Office. He is currently a company director and audit committee chairman and independent member.

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