

## What's changed

### Update - May 2021 (Irregularities)

We are pleased to issue updates to your Mercia Pension Schemes Manual (dated 05/21). The principal changes in this update relate to the reporting on irregularities including fraud.

#### Reporting on irregularities, including fraud

Following the ICAEW publication of 'How to report on irregularities, including fraud, in the auditor's report - Guide for auditors reporting for the first time' in April 2021 and the comment that 'how the auditor developed their explanation, and the areas considered, would be expected to be documented in the audit file', we have added a new A29 Reporting on irregularities, including fraud in the auditor's report in the Audit Methodology and also an additional test on A21 for the R1 to confirm their approval.

#### Contact us

We are always pleased to receive feedback on our manuals, including any improvements that you would like to see incorporated. Please contact me if you have any comments to make.

Jenny Faulkner (Head of Publications - Assurance and Financial Reporting)

May 2021

The following changes have been made:

Updated area	Main reason for update
Audit reports [P_C on or after 15 Dec 19] - All	- Updated to reflect the ICAEW 'Audit guide: how to report on irregularities, including fraud' published in April. The footnotes have been added to give clarity over what is mandatory and what is expected of auditors.
<b>Completion [P_C on or after 15 Dec 19]</b> - A21 Responsible Individual review and conclusion - A29 Reporting on irregularities, including fraud in the auditors' report	- New test added to confirm the RIs approval of the 'Reporting irregularities, including fraud' wording in the audit report. - New form added to reflect the ICAEW 'Audit guide: how to report on irregularities, including fraud' published in April which states 'How the auditor developed their explanation, and the areas considered, would be expected to be documented in the audit file'. This expectation goes beyond ISA 700 and we have added a new form to aid documentation for firms.

### Update - May 2021 (Data analytics)

We are pleased to issue an update to your Mercia Pension Schemes Manual (dated 05/21). The principal changes in this update relate to the inclusion of guidance and related forms in respect of the use of audit data analytics (ADA).

#### Use of audit data analytics

A number of changes have been throughout the manual to encourage teams to consider the use of audit data analytics (ADA) on audit engagements. These changes principally focus on the use of ADA as part of the risk assessment, selection of high risk transactions for testing and stratification of populations to assist with sampling, although teams are encouraged to consider its use in other areas, with revisions to planning forms providing prompts for you to record its planned use. Given the audit quality and efficiency gains which can be provided by the use of ADA, a new planning form (B20) has been added for teams to appraise its use on engagements and record why ADA was or was not considered appropriate to use. Where the use of ADA is intended, a number of other revisions have been made throughout the manual to help you record and reflect on the results from its use.

Please see below for a detailed list of all changes made as part of this update.

#### Contact us

We are always pleased to receive feedback on our manuals, including any improvements that you would like to see incorporated. Please contact me if you have any comments to make.

Jenny Faulkner (Head of Publications - Assurance and Financial Reporting)

May 2021

#### May 2021 detailed list of changes

The following changes have been made:

Updated area	Main reason for update
<b>Audit data analytics update</b>	
<b>Current file documents (both P_C on or after 15 December 2019 and P_C before 15 December 2019)</b>	
<b>Completion</b>	
A45 - Audit data analytics and other technology update and evaluation	- New form added to provide an update and evaluation of the use of ADA and if relevant, other technology.
A52-1 - Communication with management checklist	- Test 3 updated to include salient findings from the use of ADA and / or other technology.
<b>Planning</b>	
B11 - Planning memorandum (and freeform version)	- Updated risk assessment procedures to include a new test 5 on consideration of the use of audit data analytics (ADA) and confirming the appropriateness of its use (B20) A new footnote has also been added to refer to additional guidance material included in the Audit Procedures Manual.
B11 - Audit Freeform Planning memorandum	- References to the B20 for planning the use of ADA and a new footnote 31 added which confirms that B20 must be completed to appraise the use (or rationale for the lack of use) of audit data analytics.
B12 - Acceptance of appointment or reappointment	- New footnote added for consideration of audit data analytics as a non-audit service.
B20 - Audit data analytics assessment	- New form added to appraise the use (or rationale for the lack of use) of audit data analytics and to plan the approach.
B21-1 - Communication with management	- Updated nature of assignment to refer to audit data analytics and other technology when communicating the scope of the engagement and the general approach.
B22 - Preliminary analytical review	- Updated objective to include the utilisation of audit data analytics (ADA) for the preliminary analytical review. Additional guidance added at the top of the form and confirmation that the B20 must be completed to confirm the appropriateness of the use of ADA.
B23 - Audit team discussion	- Approach to the assignment updated to incorporate the use of audit data analytics (ADA) and other technology. A new footnote added in relation to which area(s) are assigned to which team members to confirm that where there are specialists supporting the engagement for ADA / other technology they should also be included in the team briefing.
B33 - Audit plan - Trial balance (use of audit data analytics)	- New form added for when using ADA to identify journals / significant unusual transactions for testing.
<b>Audit programme</b>	
K Other areas audit programme	- New test on journals for confirming the appropriateness of using ADA where relevant.
<b>Other minor updates</b>	
A42 - Going concern update and evaluation (P_C on or after 15 December 2019)	- Updated to make a small correction for a missing word.
B11 freeform planning memorandum	- Updated to make a small correction for a missing word.
PF1-8 - Accounting estimates (P_C on or after 15 December 2019)	- Updated to make a small correction for a missing word.
The Cold file review checklist within the Guidance section	- The Cold file review checklist has been updated to incorporate the changes to methodology made in relation to accounting estimates, going concern and subsequent events.

### March 2021

We are pleased to issue updates to your Pension Schemes Manual (dated 03/21). The principal technical changes in these updates relate to the Ethical Standard 2019:

#### Ethical Standard 2019

The B12 and B13 have been updated for the Ethical Standard 2019 which is largely effective for engagements with periods commencing on or after 15 March 2020.

#### Other changes

A number of other minor updates to wording have also been made including updating the language used in example letters and reports for gender neutrality and for changes relating to Brexit.

We have also updated the manual include a new section 'Supplementary forms' which are not mandatory but maybe used on assignments. These include COVID-19, Brexit and a Change of Financial Reporting Framework Impact assessment and risk analysis. These have previously been provided outside of the manual but with the new method of delivery are now included as supplementary material.

In addition, it was noted that in the previous publication, the Example Audit Reports 1 to 3 indicated that the name of the Senior Statutory Auditor was required, which is incorrect. These audit reports have been updated in respect of this error.

#### What's changed in the sector? Guidance from PRAG

##### Pension Scheme Financial Statements and Going Concern

Following the issue of revised ISA (UK) 570, PRAG has updated its guidance in relation to Pension Scheme Financial Statements and Going Concern. The new guidance is dated December 2020 and highlights the main changes made to ISA (UK) 570 and how these will impact audits of pension schemes.

##### Pension SORP addendum: Revised investment disclosure requirements in pension scheme Annual Reports

Since the SORP was published in May 2018, there have been a number of amendments to the investment disclosure requirements for pension schemes affecting the information to be included in the annual report. PRAG issued an addendum in February 2021 which outlines these changes.

Please see below for a detailed list of all changes made as part of this update.

#### Contact us

We are always pleased to receive feedback on our manuals, including any improvements that you would like to see incorporated. Please contact me if you have any comments to make.

Jenny Faulkner (Head of Publications - Assurance and Financial Reporting)

March 2021

#### March 2021 detailed list of changes

Updated area	Main reason for change
<b>Guidance</b>	
Contents	- Contents page updated for the changes made in this update.
Guidance notes	- Updated the FRC Ethical Standard section.
	- Updated the going concern section.
	- Updated the Appendix 1 which outlines what is required in an Annual Report.
	- Other minor typographical and formatting updates.
What's changed	- A copy of this guidance has been added to the manual.
<b>Example letters</b>	
All	- Updated language for gender neutrality.
Engagement - terms of business	- Updated 10.6.5 and 10.6.9 to reflect Brexit and 16.2 for best practice amendments.
<b>Example reports</b>	
<b>[P_C on or after 15 December 2019]</b>	
Unqualified audit report	- Updated in accordance with the PRAG revised guidance on going concern.
Unqualified audit report for a non-statutory report	
<b>Both versions</b>	
Unqualified audit report	- Amended for errors made in respect of the signatories box in the previous release.
Unqualified audit statement about contributions	
Unqualified audit report for a non-statutory report	
Report to trustees	- Updated language for gender neutrality.
<b>Accounts disclosure checklists</b>	
A32 Pension Schemes Annual Report Checklist (Periods ending on or after 1 October 2019)	- Minor updates made in respect of the Pension SORP addendum issued by PRAG.
<b>Current file documents (Planning [P_C on or after 15 December 2019])</b>	
B12 Acceptance of appointment or reappointment and	
B13 Compliance with the Ethical Standard	- Updated for FRC's Ethical Standard 2019.
B31 Going concern risk assessment (B33/R2 Audit plan - Going concern	- Updated in accordance with the PRAG revised guidance on going concern.
<b>Current file documents (Completion [P_C on or after 15 December 2019])</b>	
A31 Completion checklist	- Updated for FRC's Ethical Standard 2019.
A42 Going concern update and evaluation	- Updated in accordance with the PRAG revised guidance on going concern.
<b>Current file documents (Audit programmes [P_C on or after 15 December 2019])</b>	
R Audit programme	- Updated in accordance with the PRAG revised guidance on going concern.
<b>Supplementary forms</b>	
	- New section added with the inclusion of non-mandatory supplementary forms, including on COVID-19, Brexit and Changes to Financial Reporting Framework.

**January 2021**

The A31 has been reinstated after a number of tests on accounting estimates had inadvertently been excluded.

## December 2020 - Changes made in relation to the update in methodology and financial reporting

### What's changed?

We are pleased to issue this update to your Pension Scheme Manual (dated December 2020). The principal technical changes in this update relate to:

#### Changes to Auditing Standards

##### ISA (UK) 540 (Revised December 2018) – Auditing Accounting Estimates and Related Disclosures

In December 2018 the FRC issued a [revised ISA \(UK\) 540](#) on Accounting Estimates, to reflect changes made by the IAASB to this standard. The new standard takes effect for audits of financial statements for periods beginning on or after 15 December 2019, although early adoption is permitted. Several other minor consequential amendments were made to other ISAs (UK) early in 2020.

The revised standard is a complete overhaul of the previous version and introduces several key changes to the approach that must be followed when auditing all types of accounting estimate and the associated financial statement disclosures. These changes will strengthen the audit of what can be a difficult area. The revised standard emphasises the need for professional scepticism at all times when assessing the methods, significant assumptions and data used by management when determining accounting estimates to be included in the financial statements, as well as the associated financial statement disclosures.

In order to reflect the requirements of the revised standard the audit methodology now places greater emphasis on the documentation of our understanding of accounting estimates and the risks they present at the planning stage and there is a revision to the workflow of key accounting estimates.

##### ISA (UK) 570 (Revised September 2019) – Going Concern

In September 2019, the FRC issued a [revised version of ISA \(UK\) 570](#) on Going Concern, which is effective for audits of financial statements commencing on or after 15 December 2019, although early adoption is permitted. These revisions are in response to a number of recent audit failures regarding going concern, with the requirements of the new standard being much more prescriptive. Accordingly, a number of changes have been made throughout the manual to reflect these requirements, most notably the creation of a going concern work programme within fieldwork.

#### Other changes

In addition to the going concern work programme within fieldwork, we have also added a subsequent events programme to fieldwork to give the same level of prominence.

Other changes to your Pension Scheme Manual have been made for ISA amendments that are effective for audits of financial statements commencing on or after 15 December 2019.

See below for a full list of changes to the Pension Scheme Manual.

#### Financial Reporting Changes

##### Changes to the Occupational and Personal Pension Scheme (Disclosure of Information) Regulations 2013

Changes have been made to these regulations that require additional disclosure the investment report section of a scheme's annual report concerning the statement of investment principles and a new engagement policy implementation statement. The changes apply in two stages for periods ending on or after 1 October 2019 and then periods ending on or after 1 October 2020.

Further related changes affect information that must be published on a website.

The model accounts and disclosure checklists have been updated for these changes with those changes that apply for periods ending 1 October 2020 identified separately.

#### What's changed in the sector? Guidance from PRAG

##### Pension scheme reports and financial statements, and related matters in the context of the COVID-19 pandemic

A guide was published by the ICAEW, ICAS and PRAG in May 2020 to support pension scheme auditors navigate the additional challenges they are likely to experience as a consequence of the COVID-19 pandemic in meeting their responsibilities towards the scheme's annual report, including the audited financial statements. The guide includes many signposts to other sources of guidance.

##### Cybercrime Protection Guidance

An updated version of the 2018 guidance to help trustees of pension schemes protect their schemes from cybercrime was published in October 2020. The guidance has been put together by PRAG's Cybercrime and Fraud Working Party and updates the previous guidance to reflect the considerable developments and increase in cybercrime since then.

#### What's next?

The changes made to the Ethical Standard 2019 will be pushed through the Pension Scheme Manual in early 2021 to be ready for predominately periods commencing on or after 15 March 2020.

#### Contact us

We are always pleased to receive feedback on our manuals, including any improvements that you would like to see incorporated. Please contact me on [jenny.faulkner@mercia-group.com](mailto:jenny.faulkner@mercia-group.com) if you have any comments to make.

Jenny Faulkner

#### December 2020 detailed changes

A small number of minor formatting amendments have been made to ensure consistency across the Mercia product range. In addition the following changes have been made:

Updated area	
<b>Guidance</b>	
Contents and guidance notes	- Updated for the changes made in this update.
Accessing the manual within Getting started for new manual users	- Updated for the new method of delivery.
Update 12/20 - What's changed	- Updated for the changes made in this update.
<b>Example letters</b>	
Letter of representation	- Amended to include the going concern management representation requirements as set out in ISA (UK) 570 (Revised September 2019). - Updated to reflect revised wording of the representation required from management for accounting estimates as set out in ISA (UK) 540 (Revised December 2018).
<b>Example reports</b>	
New tree structure added to separate out Example reports [For periods commencing on or after 15 December 2019] and [For periods commencing before 15 December 2019]	- N/A
Unqualified audit report	- Updated to reflect the requirement in ISA (UK) 570 (Revised September 2019) to give positive conclusions regarding going concern and ISA (UK) 700 (Revised November 2019) to add a placeholder to explain the extent the audit was capable of detecting irregularities, including fraud.
Non-statutory unqualified audit report	- Updated to reflect the requirement in ISA (UK) 570 (Revised September 2019) to give positive conclusions regarding going concern and ISA (UK) 700 (Revised November 2019) to add a placeholder to explain the extent the audit was capable of detecting irregularities, including fraud.
<b>Example accounts</b>	
Defined benefit scheme accounts - periods ending on or after 1 October 2019	- Disclosures in respect of the statement of investment principles added to the investment section of the annual report. Disclosures that apply for periods ending on or after 1 October 2020 are identified separately. See Appendix II for further guidance.
Defined contribution scheme accounts - periods ending on or after 1 October 2019	- Disclosures in respect of the statement of investment principles added to the investment section of the annual report. Disclosures that apply for periods ending on or after 1 October 2020 are identified separately. See Appendix II for further guidance.
Hybrid scheme accounts - periods ending on or after 1 October 2019	- Disclosures in respect of the statement of investment principles added to the investment section of the annual report. Disclosures that apply for periods ending on or after 1 October 2020 are identified separately. See Appendix II for further guidance.
For all scheme accounts - periods commencing before 1 January 2019	- These accounts have been withdrawn as they are no longer applicable.
<b>Disclosure checklists</b>	
SORP 2018	- This checklist updates the previous checklist 1A that applied for periods commencing on or after 1 January 2019 and supersedes the checklist for periods commencing before 1 January 2019. - Updated to reflect the requirement in ISA (UK) 700 (Revised November 2019) to explain the extent the audit was capable of detecting irregularities, including fraud. - Updated for FRC's Amendments to FRS 102 - COVID-19-related rent concessions, Amendments to FRS 102 – Interest rate benchmark reform and Amendments to FRS 102 - Multi-employer defined benefit plans.  - Updated for additional disclosures in respect of the statement of investment principles that are required in the investment section of the annual report. Disclosures that apply for periods ending on or after 1 October 2020 are identified separately. See Appendix II for further guidance.
SORP 2015	- This has been withdrawn as is no longer applicable.

## Current file documents

New tree structure added to separate out the following areas [For periods commencing on or after 15 December 2019] and [For periods commencing before 15 December 2019]:

- Completion (Individual entity);
- Completion (Group);
- Planning (Individual entity);
- Planning (freeform) (Individual entity);
- Planning (Group);
- Audit programmes;
- Current file indexes

- N/A

### Current file index

- A21-1 - Responsible Individual review and conclusion
- A22 - Overall Review of the Financial Statements
- A25 - Audit Summary/Memorandum
- A31 - Audit completion checklist

- Updated for the changes made in this update.

- New document B30X added.

- Amended to reflect going concern and subsequent events which now form part of the field work programme.

- Additional test 15 added in relation to ISA(UK) 540 (Revised December 2018).

- Amended to reflect the updated work paper references regarding going concern.

- Amended to reflect the updated requirements of ISA(UK) 540 (Revised December 2018) in respect of accounting estimates.

- Updated referencing to reflect ISA(UK) 600 (Revised November 2019).

- Updated to remove references to the freeform memorandum planning approach for group engagements.

- Updated referencing to reflect ISA(UK) 600 (Revised November 2019).

A41 - Subsequent events update and evaluation

- Amended to remove some core ISA(UK) 560 requirements which are now set out in the S work programme within field work. Updated conclusions to allow space to document key judgements made.

A42 - Going concern update and evaluation

- Amended to remove some core ISA(UK) 570 (Revised September 2019) requirements which are now set out in the R work programme within field work. Additional areas added to ensure that key documentation requirements are dealt within in relation to stand back requirements and key judgements made.

A44 - Accounting estimates update and evaluation

- A new completion form to document the global conclusions on accounting estimates and to demonstrate compliance with ISA(UK) 540.

- Amended to include the going concern management representation requirements as set out in ISA(UK) 570 (Revised September 2019).

A51 - Written representation checklist

- Wording updated to bring into line with the requirements of ISA(UK) 540 (Revised December 2018) in respect of accounting estimates.

A52-1 - Communication with management checklist

- Amended to include the required communications with management regarding going concern as set out in ISA(UK) 570 (Revised September 2019).

- The need to discuss accounting estimates with management to comply with ISA(UK) 540 (Revised December 2018) has been added.

- Updated referencing to reflect ISA(UK) 600 (Revised November 2019).

A52-2 - Communication with those charged with governance checklist

- Amended to include the required communications with those charged with governance regarding going concern as set out in ISA(UK) 570 (Revised September 2019).

- Updated referencing to reflect ISA(UK) 600 (Revised November 2019).

B11 - Planning checklist

- Added the requirement to consider accounting estimates as part of the risk assessment procedures, including reference to new document B30.

B11 - Planning checklist (freeform memorandum approach)

- Added the requirement to consider accounting estimates as part of the risk assessment procedures.

- Added a requirement to discuss with management the contents of the other information to be presented alongside the financial statements and the timing of their issuance as required by ISA(UK) 720.

- Amended to reflect the requirements of ISA(UK) 570 (Revised September 2019) and ISA(UK) 540 (Revised December 2018) and related footnotes included.

B11 - Freeform planning memorandum

- Amended to highlight that subsequent events are now addressed in the S programme at fieldwork.

- A number of minor amendments made to reflect best practice and consistency with other areas of the manual.

B13 - Compliance with the Ethical Standard

- Amended internal references to reflect changes made elsewhere in the manual.

B21-1 - Agenda for communication with management

- Amended to include the required communications with management regarding going concern as set out in ISA(UK) 570 (Revised September 2019).

- Amended to better highlight the need to discuss with management the contents of the other information to be presented alongside the financial statements and the timing of their issuance as required by ISA(UK) 720.

- Updated referencing to reflect ISA(UK) 600 (Revised November 2019).

B21-2 - Agenda for communication with those charged with governance

- Added accounting estimates to the list of matters to be discussed as part of understanding the entity and its environment in accordance with the requirement to do so in ISA(UK) 540 (Revised December 2018).

- Amended to include the required communications with those charged with governance regarding going concern as set out in ISA(UK) 570 (Revised September 2019).

- Updated referencing to reflect ISA(UK) 600 (Revised November 2019).

B22 - Preliminary analytical review

- Amended opening narrative to highlight that changes in the method of determining accounting estimates may help to identify audit risks.

B23 - Audit team discussion

- Added accounting estimates as a matter to be discussed as part of the audit approach.

- Amended to align audit team discussion prompts regarding going concern to ISA(UK) 570 (Revised September 2019).

- New planning checklist designed to ensure compliance with the requirements of ISA(UK) 540 (Revised December 2018). A copy of this should be completed for each identified key accounting estimate.

- Amended to reflect the requirements of ISA(UK) 570 (Revised September 2019).

B30X - Key accounting estimates summary

- Amended to include new forms within the checklist, including PF1-10 and B30X

B31 - Going concern risk assessment

- Amended to reflect accounting estimates, going concern and subsequent events now being part of the field work programmes.

B32 - Risk assessment

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

B33/ Q2 / R2 / S2 - Audit plan

- Amended F section 'Tests of detail' at the top of the page to note that where there are key accounting estimates, the Q programme also needs to be completed.

D - Related parties programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to better reflect ISA(UK) 540 (Revised December 2018)'s requirements when testing accounting estimates such as valuation and impairment and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

- Inserted tests on impairment of investments.

F - Investments and related income programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to add estimation uncertainty to be considered as part of presentation and disclosure and highlighted that debtor impairment and derivatives are accounting estimates and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

H - Contributions receivable and related debtors programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to remove obsolete reference to Practice Note 16 'Bank confirmations'. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

I - Bank and cash programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended C section 'Non-audit services' to add preparation of the Analysis of Changes in Net Debt to presentation.

J - Benefits and other payments and related creditors programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to highlight that provisions are an accounting estimate and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

K - Other audit areas programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to highlight that provisions are an accounting estimate and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

L - Capital and reserves programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' at the top of the page to note that where there are key accounting estimates, the Q programme also needs to be completed.

Q - Accounting estimates programme

- New programme created to give more prominence to certain requirements of ISA(UK) 570 (Revised September 2019) within field work. A copy of the programme should be completed for each identified key accounting estimate. As such we have included 5 versions of the programme (QA- QE) to tie in with 5 versions of the B30.

- New programme created to give more prominence to certain requirements of ISA(UK) 570 (Revised September 2019) within field work.

R - Going concern programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to highlight that derivatives are accounting estimates and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

S - Subsequent events programme

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to highlight that provisions are an accounting estimate and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' to highlight that provisions are an accounting estimate and to include testing of related disclosures. The top of the page notes that where there are key accounting estimates, the Q programme also needs to be completed.

- Amended B section 'Tests of control' of work programme to highlight the need to consider controls relevant to the making of accounting estimates.

- Amended F section 'Tests of detail' at the top of the page to note that where there are key accounting estimates, the Q programme also needs to be completed.

## Permanent file documents

New tree structure added to separate out Permanent file documents [For periods commencing on or after 15 December 2019] and [For periods commencing before 15 December 2019]

### Permanent file indexes

- PF1-1 - The entity and its environment
- PF1-3 - Laws and regulations
- PF1-8 - Accounting estimates
- PF1-10 - Going concern
- PF2-1 - Systems overview

- N/A

- Updated for the changes made in this update.

- Amended to reflect the requirements of ISA(UK) 570 (Revised September 2019) and ISA(UK) 540 (Revised December 2018).

- Amended to add whether there are any indications of non-compliance with laws and regulations in accordance with the requirements of ISA(UK) 250 Section A (Revised November 2019).

- Amended form to provide an overview of management's approach for determining accounting estimates and to highlight expected key accounting estimates, with cross reference to supporting documentation for each identified key accounting estimate at B30X

- New form to ensure that the requirements of ISA(UK) 570 in relation to understanding the entity and its environment including internal control specifically in relation to going concern are addressed.

- Amended to reflect the need to obtain an understanding of the entity's processes regarding accounting estimates, going concern and subsequent events (where these are not covered elsewhere).

PF2-2 - Internal control overview

- Amended to reflect the requirements of ISA(UK) 570 (Revised September 2019), and ISA(540) (Revised December 2018) making it clear that documentation of the entity's risk assessment process includes consideration of going concern and accounting estimates.

PF2-3 - Internal control summary

- Amended to reflect the need to obtain an understanding of the entity's internal controls regarding accounting estimates, going concern and subsequent events.

PF3-1 - Risk analysis

- Question added to consider whether there are accounting measurements subject to a high degree of subjectivity in accordance with the requirements of ISA (UK) 540 (Revised December 2018).  
- Question added to consider whether there are any indications of non-compliance with laws and regulations in accordance with the requirements of ISA (UK) 250 Section A (Revised November 2019).

## Appendix I - Auditing changes

### ISA (UK) 540 (Revised December 2018) – Auditing Accounting Estimates and Related Disclosures

In December 2018 the FRC issued a [revised ISA\(UK\) 540](#) on Accounting Estimates, to reflect changes made by the IAASB to this standard.

The new standard takes effect for audits of financial statements for periods beginning on or after 15 December 2019, although early adoption is permitted. A number of other minor consequential amendments were made to other ISAs (UK) early in 2020.

The new version of the ISA includes:

- A requirement to obtain an understanding of the entity and its environment, including an entity's internal control, to provide an appropriate basis for the identification and assessment of risks of material misstatement of accounting estimates at both the financial statements and assertion level. It should be noted that this standard was developed internationally alongside a new version of ISA(UK) 315, however, the application of these sister standards is non-coterminous, with the ISA (UK) 315 revisions not coming into effect for audits of financial statements for periods beginning on or after 15 December 2021, although early adoption is permitted. The revised ISA(UK) 540 will still work alongside the extant ISA(UK) 315, however it does include a number of concepts that are in common with the new version that are not yet in effect.
- Requirements for risk assessment at the assertion level, with the new standard explicitly requiring separate assessment of inherent risk and control risk. It also introduces the concept of the "spectrum of risk" which is part of a theme of looking at the overall position with regard to inherent risk and making a clear-sighted assessment of actual risk levels for each engagement. Control risk is based upon the likely effectiveness of the control procedures implemented by management to address the assessed inherent risks. If there is no plan to test the operating effectiveness of controls the assessment of control risk should be high.
- When assessing inherent risk, the degree of estimation uncertainty, the effect of complexity, subjectivity and other inherent risk factors on the selection and application by management of the methods, assumptions and data used in making the estimate and on the selection of point estimates and related disclosures will need to be considered.
- Other considerations relating to obtaining and documenting audit evidence around:
  - the events up to the date of the audit report;
  - testing how management made the estimate;
  - testing controls (where appropriate);
  - management's disclosures in relation to estimation uncertainty; and
  - developing an auditor's point estimate or range (requiring that the range only includes amounts supported by sufficient appropriate audit evidence).
- The updated objective requires audit procedures to address whether both the accounting estimates AND related disclosures are reasonable (rather than simply adequate, as is currently the case for the latter) in the context of the financial reporting framework.
- Reinforced the application of professional scepticism. Enhancements include using wording to drive questioning or challenging management where appropriate; more focus on identifying indicators of possible management bias; requiring further audit procedures to be designed and performed in a manner that is not biased towards obtaining audit evidence that may be corroborative or towards excluding audit evidence that may be contradictory, and an enhanced retrospective review and an overall evaluation based on procedures performed.
- A new requirement to remind auditors of their responsibilities to communicate certain matters to those charged with governance and to consider the matters to communicate regarding accounting estimates, considering the reasons given to the risks of material misstatement.
- Enhanced documentation requirements, particularly around:
  - understanding the entity;
  - the link between audit risks and audit procedures;
  - the response if management procedures are inadequate;
  - indicators of possible management bias and implications for the audit; and
  - significant judgements made when assessing whether or not estimates and disclosures are reasonable.

The revised standard is applicable to all estimates. It has been designed to be scalable, recognising that some estimates may not require significant judgments and the processes for making them may not be complex.

Alongside the revised ISA(UK) 540, confirming and consequential amendments have also been made to the following standards:

- ISA(UK) 200 Overall objectives of the independent auditor and the conduct of an audit in accordance with International Standards on Auditing (UK)
- ISA(UK) 230 Audit documentation
- ISA(UK) 240 The auditor's responsibilities relating to fraud in an audit of financial statements
- ISA(UK) 260 Communication with those charged with governance
- ISA(UK) 500 Audit evidence
- ISA(UK) 580 Written representations
- ISA(UK) 700 Forming an opinion and reporting on financial statements

Most of these changes are minor and have little impact. The most significant change is the inclusion for the first time of guidance for auditors within ISA(UK) 500 on the use of external information sources which are often used by auditors when assessing the estimates and judgements made by management when determining accounting estimates to be reflected in the financial statements.

The publication of a revised version of ISA(UK) 540 Auditing Accounting Estimates and Related Disclosures has provided the opportunity to revisit the approach adopted by the Mercia audit methodology in addressing this complex area. In doing so we have not just ensured that the methodology demonstrates compliance with the requirements of the revised standard but have also overhauled the entire approach to documenting the work performed in respect of accounting estimates, from planning through to completion. The inclusion of new and revised forms at each key stage of the process will facilitate an efficient audit approach that concentrates on those key accounting estimates that represent a heightened risk of material misstatement in the financial statements and better enable the auditor to demonstrate that all aspects of ISA(UK) 540's requirements have been complied with.

#### The risk assessment

The initial phase of the planning of an audit engagement is to complete a risk assessment. As with previous versions of the Audit Manual this will include completion of form PF1 The Entity and its Environment and it is here, as part of the documentation of the financial reporting framework that the entity is subject to, that knowledge of the accounting estimates relevant to the entity is first recorded.

The majority of entities that are subject to audit will have one or more accounting estimates in their financial statements, and for those entities it will be necessary to complete form PF1-8 Accounting Estimates in support of the overall consideration of the entity and its environment.

Compared to the previous version of the Audit Manual form PF1-8 has been significantly updated. The purposes of this form are the following:

- To document issues relevant to understanding the entity's approach to determining accounting estimates at an entity level. This includes how management identifies the need to reflect accounting estimates in its reporting, regulatory issues and how the entity's system of internal control demonstrates oversight and governance of the process, identifies areas of risk, implements general control procedures and utilises management experts.
- To record all the accounting estimates that have been identified as being relevant to the entity's financial reporting, whether or not management have reflected them in the draft financial statements presented for audit. This would include any accounting estimates that the auditor would expect to be relevant to the entity's reporting based on their understanding of the entity and the applicable financial reporting framework but may have been overlooked by the entity's management.

In recording the accounting estimates relevant to the entity, it is necessary to record whether from an audit perspective it is considered to be a key accounting estimate or not. A key accounting estimate is one with an increased possibility of there being material misstatements in the financial statements due to estimation uncertainty or the complexity, subjectivity or other inherent risk factors involved in its determination.

For those accounting estimates that are not considered to be key accounting estimates documentation of this is required on form PF1-8, including the reason why in the professional judgement of the auditor this is the case. It may be that the accounting estimate concerned does not have a material impact on the financial statements due to its magnitude, or that the method used for its determination is such that the assumptions and data utilised carry no risk of significant estimation uncertainty, such that the possibility of a material misstatement in the financial statements is considered to be remote. Such accounting estimates will not need to be considered further in planning the audit engagement.

Additional consideration is required for each key accounting estimate that has been identified. In order to better document the risk assessment of those key accounting estimates that do present a risk of possible material misstatement in the financial statements form B30X Key Accounting Estimates Summary has been introduced, and a separate copy of this form should be completed in respect of each key accounting estimate (eg. the X is replaced with a letter, therefore if there are three key accounting estimates, then there will be a B30A, B30B and a B30C).

This form records the auditor's understanding of specific issues related to that key accounting estimate. This includes issues such as those related to the entity and its environment, such as any specific requirements of the applicable financial reporting framework, and the entity's internal controls and other related procedures. This will set out the method utilised by the entity to determine the accounting estimate, the underlying assumptions involved, and data incorporated into the calculation, and ultimately how management select the point estimate for recognition in the financial statements. The use of any management experts will be noted. Crucially the form also records how management address the level of estimation uncertainty inherent in the accounting estimate.

Form B30X also provides an opportunity for the auditor to record their review of the outcome of previous accounting estimates made in prior years and their accuracy, useful in helping to identify the risk of material misstatement in the current period.

Having identified all of the issues related to each key accounting estimate, form B30X also records the auditor's assessments of inherent risk and control risk, which in order to comply with the requirements of the revised version of ISA (UK) 540 are required to be considered separately.

The revised standard requires inherent risk to be assessed on a spectrum, which under the Mercia methodology results in an assessment that falls between 1 (being very low) and 5 (being very high). In arriving at this determination there is an opportunity to note the degree to which the accounting estimate is affected by the following:

- Estimation uncertainty;
- The complexity, subjectivity and other inherent risk factors arising from the selection and application of the method, assumptions and data used to determine the accounting estimate; and
- The complexity, subjectivity and other inherent risk factors arising from the selection of management's point estimate and related disclosure.

The auditor's understanding of these three key issues will inform the inherent risk assessment. Clearly an accounting estimate that is simple to determine and carries little estimation uncertainty would result in a conclusion of their being minimal inherent risk and would be assessed at the lower end of the spectrum. Conversely an accounting estimate that exhibits considerable estimation uncertainty and requires complex modelling to determine would be assessed as being at the higher end of the spectrum.

The control risk assessment is based upon whether the auditor considers the control procedures implemented by management will be effective and will be assessed on a scale from low to high, similar to other risk assessments within the Mercia audit methodology. If there is no plan to test the operating effectiveness of controls (see below) the assessment of control risk should be high.

If there are any risks which are considered to be significant risks, they also reflected on form B32 Risk Assessment.

Lastly form B30 requires the auditor to consider whether testing of controls should be planned, where management implement control procedures in relation to the key accounting estimate.

The approach to the key accounting estimate then needs to be planned and this is recorded on B33 / Q2 Audit Plan or an alternative freeform memorandum. The planned approach must meet ISA (UK) 540's requirement to take the form of one or more of the following:

- Obtaining evidence from events occurring up to the date of the auditor's report;
- Testing how management made the accounting estimate; or
- Developing an auditor's point estimate or range.

Whichever of the above approaches is followed, the audit procedures performed should be designed to ensure that auditors can conclude on the following issues:

- whether management has appropriately applied the requirements of the applicable financial reporting framework;
- whether the methods used to determine the accounting estimate are appropriate and have been consistently applied;
- that any changes in accounting estimates are appropriate; and
- that disclosure related to the accounting estimate included in the financial statements is reasonable.

Each individual key accounting estimate should have its own planned approach and there are duplications of the planned approach tables within the B33 / Q2 in order to facilitate this (ie. if there are three key accounting estimates, then there will be a B30A, B30B and a B30C and three corresponding planned approaches on the B33/Q2 – that this does not require three versions of the B33/Q2 as there are duplications of the tables within the form).

For each key accounting estimates documented at B30X, we consider where management implement control procedures, whether testing of controls should be planned. Where it is deemed suitable to test controls in relation to key accounting estimates, either because we aim to rely on those controls, or where substantive procedures alone cannot provide sufficient appropriate audit evidence at the assertion level, we perform the controls testing as part of the related individual audit area programme. For example, if the impairment of a particular class of fixed assets is a key accounting estimate and we plan to test controls then we would use the Fixed asset audit programme, B tests of controls to record our controls audit. This would also be documented on the audit plan for Fixed assets and feed through to the Fixed asset audit programme (E).

#### *Audit fieldwork*

An entity may have several key accounting estimates, and it is likely that the procedures to be performed in respect of each will differ considerably. For example, you would not expect to adopt the same approach for testing an impairment provision and the valuation of investment property. Regardless of the nature of each individual key accounting estimate, the procedures being performed must comply with the approach required by ISA (UK) 540.

To help the auditor ensure that the standard is being complied with a new Q Audit programme for Accounting Estimates has been developed, a copy of which should be completed for each key accounting estimate being tested. This sets out the specific requirements of the standard for each of the three permitted audit approaches, allowing the auditor to demonstrate that they have been complied with.

There are certain requirements of the standard that will apply regardless of the approach being followed, such as whether the requirements of the applicable financial reporting framework have been complied with and that the disclosures in the financial statements are appropriate and to consider whether there has been management bias. There are separate sections of the Q audit programme which deal with these requirements.

Having ensured that the key accounting estimate has been tested in accordance with the requirements of ISA (UK) 540 the form requires the auditor to conclude on whether they have obtained sufficient appropriate audit evidence on which to be able to form a conclusion in respect of that key accounting estimate. The documentation surrounding this area is critical to show compliance with the standard.

#### *Audit completion*

The updated ISA (UK) 540 includes a 'stand-back' requirement that involves performing an overall evaluation of accounting estimates based on the audit procedures that have been performed. This is performed at an individual key accounting estimate level on the Q audit programme, but it is also considered globally at the completion stage. To help demonstrate compliance with this requirement a new form has been added to the completion section, form A44 Accounting Estimates Update and Evaluation.

Using the experience gained from having completed the detailed audit work this form is used to consider whether the original risk assessment determined during the audit planning stage remains appropriate, and if not whether any additional procedures should be completed.

The overview process is used to determine whether management's approach to assessing accounting estimates is reasonable or not. It helps the auditor to identify possible instances of management bias, for example where assumptions made or point estimates selected in the context of an individual accounting estimate may appear reasonable but collectively demonstrates a pattern that best fits management's objectives for the company's reporting rather than a more objective, reasonable approach.

The overview is also used to ensure that the accounting estimates have been made in accordance with the applicable financial reporting framework, including any related disclosure requirements. This may include disclosures beyond that required by the framework when considered necessary to ensure that the financial statements show a true and fair view.

Building on the conclusions reached on the individual Q audit programmes completed for each individual key accounting estimates, the overview also provides an opportunity to document whether sufficient appropriate audit evidence has been obtained in respect of accounting estimates. This should take account of all audit evidence obtained, whether it corroborates the entries in the financial statements or is contradictory. As part of the audit evidence required the overview form is used in conjunction with form A51 Written Representations to consider whether what, if any, representations need to be obtained from management or those charged with governance in respect of accounting estimates.

Working alongside form A52-1 Communication with Management Checklist the overview form is also used to detail any matters that need to be reported, including any qualitative aspects of the entity's reporting practices or significant deficiencies in internal control.

Lastly the overview form provides an opportunity for the auditor to conclude on whether, in their opinion, accounting estimates collectively are reasonable and whether sufficient appropriate audit evidence has been obtained and to document any significant judgements made in relation to this conclusion. The impact on the audit opinion is also documented.

#### **ISA (UK) 570 (Revised September 2019) – Going Concern**

In September 2019, the Financial Reporting Council (FRC) issued a revised version of ISA (UK) 570 Going Concern which becomes effective for audits of financial statements for periods commencing on or after 15 December 2019. Early adoption is permitted. This revised ISA (UK) has been extensively amended in light of the well-publicised criticisms of the auditing profession. ISA (UK) 570 (Revised September 2019) increases the work which auditors are required to undertake when auditing the going concern status of an entity. A summary of the amendments is as follows:

- Responsibilities of the auditor – the standard has been revised to clarify that as well as obtaining sufficient appropriate audit evidence to conclude on the appropriateness of management's use of the going concern basis of accounting, the auditor also needs to obtain sufficient appropriate audit evidence to conclude on whether or not a material uncertainty regarding going concern exists, this requirement being more explicit than in the previous standard.
- Definitions – the revised standard now also includes the following definitions to be applied when using ISA (UK):
  - Management bias – A lack of neutrality by management in the preparation of information.
  - Material uncertainty related to going concern – An uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the entity's ability to continue as a going concern, where the magnitude of its potential impact and likelihood of occurrence is such that appropriate disclosure of the nature and implications of the uncertainty is necessary for, the fair presentation of the financial statements.
- Enhanced risk assessment procedures – The risk assessment procedures in the revised standard have been significantly expanded, drawing a clear link to the requirements of ISA (UK) 315, including a requirement to understand the following areas in relation to going concern in order to meet the objectives of the standard:
  - the entity and its environment;
  - the applicable financial reporting framework; and
  - the entity's system of internal control.
- Further, should the auditor identify events or conditions which may cast significant doubt on the entity's ability to continue as a going concern which management has not previously identified or disclosed to the auditor, the standard now requires the auditor to:
  - request management to perform additional procedures to understand the effect of the events or conditions on management's going concern assessment;
  - inquire as to why management's going concern assessment failed to identify or disclose the events or conditions; and
  - perform additional audit procedures relating to the newly identified events or conditions.
- Requirements when evaluating management's assessment – While the broad requirement to evaluate management's going concern assessment is unchanged, the new standard gives much more prescriptive requirements for the auditor when doing this, including:
  - evaluating the method used by management in assessing the entity's ability to continue as a going concern;
  - evaluating the relevance and reliability of the underlying data used to make the assessment;
  - evaluating the assumptions on which management's assessment is based;
  - evaluating management's plans for future actions in respect of going concern.
- The new standard also gives an explicit requirement that management's assessment needs to cover at least 12 months from the date of approving the financial statements and where this is not done, the auditor shall request management to extend its assessment to cover this period.
- Evaluating the sufficiency and appropriateness of audit evidence and consider all relevant audit evidence obtained, whether corroborative or contradictory.
- Reporting – The revised standard uses the words 'appropriate' and 'appropriateness' in terms of the disclosures made in the financial statements relating to going concern rather than 'adequate' and 'adequacy'. In the audit report, should the auditor conclude the going concern basis is appropriate and no material uncertainty exists, a positive conclusion regarding going concern is now required under 'Conclusions related to going concern' or other appropriate heading.
- Documentation - The revised standard now also includes some specific documentation requirements which need to be recorded on the audit file (drawing on the requirements of ISA (UK) 230 which would be relevant to this standard) as follows:
  - Key elements of the auditor's understanding of the entity and its environment, including the entity's internal control related to going concern;
  - Indicators of possible management bias related to going concern, if any, and the auditor's evaluation of the implications for the audit.
  - Significant judgments relating to the auditor's determination of:
    - Whether or not a material uncertainty related to going concern exists;
    - The appropriateness of management's use of the going concern basis of accounting in the preparation of the financial statements; and
    - The appropriateness of management's disclosures in the financial statements.

In light of the changes above several updates have been made throughout the Audit Manual to reflect these requirements within the methodology. Firstly, permanent file forms have been updated to reflect the specific requirements within the updated ISA to ensure the requirements regarding going concern are reflecting in the understanding of the entity and its control environment. There is a new PF1-10 which specifically looks at understanding the entity's environment in relation to going concern.

The PF1-10 firstly identifies the events or conditions regarding the going concern status by reviewing the information of PF1 relating to the following areas:

#### Entity's business model, objectives, strategies and related business risks

Through understanding the above, auditors will obtain information that is relevant in identifying events or conditions that may cast significant doubt on the entity's ability to continue as a going concern and whether a material uncertainty related to going concern exists, for example;

- developments in the environment where the entity operates (eg. a potential related business risk might be increased costs, loss of market share);
- new products and services (eg. leading to increased product liability);
- expansion of the business (eg. demand has not been accurately estimated); and
- current and prospective financing requirements (eg. current financing requirements may be approaching maturity without realistic prospects of renewal or repayment).

*The nature of the entity, including its operations, the types of investments or disposals the entity is making and plans to make, and how the entity is structured and financed*

Through understanding the above, auditors will obtain information that is relevant in identifying events or conditions that may cast significant doubt on the entity's ability to continue as a going concern and whether a material uncertainty related to going concern exists (eg.

- whether the entity has a complex structure or large in size;
- whether the entity has any financial obligations / undertakings / guarantees, with lenders / suppliers / group entities and the terms of those facilities.

*Requirements of the applicable financial reporting framework relating to going concern, and the related disclosures that we expect to be included in the entity's financial statements*  
*The entity's risk assessment process relating to going concern*

After identifying events or conditions regarding the going concern status, consideration of the entity's risk assessment process is required:

- the risk assessment process identifies relevant business risks and assesses their significance; including likelihood and impact;
- the information system identifies and captures events or conditions, that individually or collectively may threaten the entity's ability to continue as a going concern;
- the methods, assumptions and data used in assessing its going concern status are identified by management. This may include how they determine the relevance and accuracy of the method, how they determine that assumptions are relevant and complete and the nature and source of the method, data and assumptions;
- management prepares disclosures relating to going concern for its financial statements;
- the nature and extent of oversight and governance over management's assessment process. Auditors' will assess whether those charged with governance have the skills and knowledge to understanding how characteristics of the method used by management to assess the entity's ability to continue as a going concern and as to whether the assessment fulfils the requirements of the financial reporting framework. This final element is also covered on the B21-1 and B21-2.

The understanding reflected in these forms then leads to an updated B31 risk assessment. This revised form guides users to consider if any events or conditions that, individually or collectively, may cast significant doubt on the entity's ability to continue as a going concern would give rise to a material uncertainty regarding going concern. The form then prompts auditors to obtain a copy of management's initial going concern assessment and document the understanding of how this was made. Auditors are then required to evaluate if the period assessed covers at least 12 months from the expected date of approving the financial statements and where it does not, this should be discussed with the client, noting the key points from the discussed and considering the impact this has on your risk assessment. Auditors inquire with the client of their knowledge of events or conditions beyond the period initially assessed and the potential significance of these on their assessment of the entity's ability to continue as a going concern and then, considering management's assessment as whole, evaluate if their assessment considers all the events or conditions that may cast significant doubt on the entity's ability to continue as a going concern.

An important aspect is that auditors evaluate whether factors, events or conditions that may cast significant doubt on the entity's ability to continue as a going concern give rise to a risk of management bias.

When reflecting on this risk assessment process auditors ensure they have updated and reviewing relevant permanent file documents. If through their risk assessment process, additional factors, events or conditions that cast significant doubt over the entity's ability to continue as a going concern have been identified by the auditor, auditors must inquire as to why management failed to identify or disclose those factors, events or conditions. An overall conclusion should then be summarised as to whether events or conditions [have / have not] been identified that may individually or collectively, cast significant doubt on the entity's ability to continue as a going concern and there is a [low / medium / high] risk that a material uncertainty related to going concern exists; and a [low / medium / high] risk that management's use of the going concern basis of accounting in the preparation of the financial statements is inappropriate. Any specific risks noted should be added to B32 and B33 / R2. The audit approach should be planned on B33 / R2 and the R audit programme tailored accordingly.

Given the increased emphasis on the auditors work around going concern, a dedicated audit programme has been created to give a greater focus on the work needed during core field work. This takes a number of the procedures that were previously performed when completing A42 along with a number of mandatory procedures now required in the revised version of ISA (UK) 570 and is set out in Section R of the work programmes. For consistency, the same change has been made for work required over subsequent events, with certain procedures which were previously set out in A41 now being included in Section S of the work programme. Given the nature of these areas, these sections only contact 'General and Mandatory' procedures, given the other work programmes seen in other areas are not considered applicable.

While the majority of work required over going concern (and subsequent events) has been moved into field work per the changes set out above, A41 & A42 have been retained for a final update and evaluation prior to finalising the engagement. The documentation of significant judgements made and the impact on the audit opinion should be reflected here and are also documented on the Audit Summary Memorandum at A25.

The example reports included within the manual have also been updated to reflect the reporting requirements set out in the revised version of ISA (UK) 570. In addition the a standard opinion, which reflects a positive conclusion regarding there not being a material uncertainty relating to going concern and that management's use of the going concern basis of accounting in preparing the financial statements is appropriate, there is now also a template which reflects a material uncertainty relating to going concern.

#### Other recent changes to ISAs (UK)

Alongside the recent update to the FRC Ethical Standard in December 2019, the FRC issued a number of relatively minor revisions to the following ISAs (UK) that take effect for accounting periods commencing on or after 15 December 2019:

- ISQC (UK) 1 Quality control for firms that perform audits and reviews of financial statements, and other assurance and related services engagements
- ISA (UK) 220 Quality control for an audit of financial statements
- ISA (UK) 250A Consideration of laws and regulations in an audit of financial statements
- ISA (UK) 250B The auditor's statutory right and duty to report to regulators of public interest entities and regulators of other entities in the financial sector
- ISA (UK) 260 Communication with those charged with governance
- ISA (UK) 600 Special considerations – audits of group financial statements (including the work of component auditors)
- ISA (UK) 620 Using the work of an auditor's expert
- ISA (UK) 700 Forming an opinion and reporting on financial statements
- ISA (UK) 701 Communicating key matters in the independent auditor's report
- ISA (UK) 720 The auditor's responsibilities relating to other information

As can be seen from the list above, the changes affect a broad selection of the ISAs, although the main changes focus on four principal areas.

#### Laws and regulations

There are requirements for greater consideration of whether there are any indications of non-compliance with the legal and regulatory framework in which the audited entity operates. Additional work will be required as part of the auditor's risk assessment, and the updated ISA (UK) 250A includes improved guidance on circumstances which may indicate that such non-compliance has taken place.

The changes also emphasise the importance of qualitative factors when considering whether non-compliance is material and may require disclosure in the financial statements. PF1-3 and the related guidance in the Audit Procedures Manual has been updated for this.

#### Groups

As an area that has been repeatedly found to be poorly addressed in practice, it is perhaps no surprise that the guidance has been improved to clarify the level of work that the revised ISA (UK) 600 expects when considering the work performed by component auditors.

The whole standard has been rearranged to put together all the elements relating to component auditors and, although there was already published guidance on this, in a FRC Staff Guidance Note, moving sections of the standard into the body of ISA (UK) 600 gives this extra prominence and emphasises how important it is to get this right. There is also guidance included for how the group auditor should respond if it is unable to gain access to the component auditor's working papers, and clarity about where responsibility lies for setting performance materiality and for the ultimate audit opinion. The Mercia audit methodology already included the guidance from the FRC Staff Guidance Note and so there is no change to the methodology although cross references to the new paragraphs included in the standard are included in both the Audit Manual and the Audit Procedures Manual.

#### Reporting

Possibly the biggest impact outside of the ISA 540 and ISA 570 changes for the majority of auditors will be the introduction of what is intended to be a bespoke paragraph in each audit report. It is required to explain to what extent the audit was considered capable of detecting irregularities, including fraud. The FRC's own impact assessment noted that it was expected that this additional requirement would take an additional one manager hour per engagement, though in reality this will undoubtedly vary considerably from one engagement to the next.

The example reports included within the manual have also been updated to reflect the reporting requirements set out in the revised version of ISA (UK) 700. This includes a section for you to set out the extent the audit was considered capable of detecting irregularities, including fraud. We have included guidance within the Audit Procedures Manual to help guide auditors as to what could be included in this section.



## Appendix II - Financial reporting changes

### Changes to the Occupational and Personal Pension Scheme (Disclosure of Information) Regulations 2013

There have been two sets of changes to the Disclosure of Information Regulations 2013 concerning a scheme's statement of investment principles (SIP) that follow in quick succession; however, it should be noted that schemes with fewer than 100 members are not required to prepare a SIP.

- Changes made by the Pension Protection Fund (Pensionable Service) and Occupational Pension Schemes (Investment and Disclosure) (Amendment and Modification) Regulations 2018. Changes under these regulations are referred to below as the 2018 changes.
- Changes made by the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019. Changes under these regulations are referred to below as the 2019 changes.

The changes below focus on what must be published on the scheme website or included in the annual report rather than the changes to the content of the SIP. Very broadly the changes to the SIP content are intended to encourage adoption of a more long-term focus in investment strategies, not only considering social and environmental issues, but also being transparent about how they invest and approach their engagement as shareholders.

#### The 2018 changes

- By 1 October 2019, Trustees of defined contribution schemes with 100 or more members are required to state a policy in relation to the stewardship of their scheme's investments in their default investment strategy and publish their SIP on a publicly available website and inform scheme members of its availability in their annual benefit statement.
- By 1 October 2020, Trustees of defined contribution schemes will be required to produce an implementation report setting out how they acted on the principles set out in the SIP and publish that implementation report online in the same way as the SIP and inform members of its availability in their annual benefit statement.

#### The 2019 changes

**By 1 October 2019.** Trustees of all schemes should ensure the SIP includes policies on financially material considerations, non-financial matters and, where the scheme has 100 or more members, stewardship and ensure these matters are covered in the scheme's investment report section of the annual report for scheme years ending on or after 1 October 2019.

**By 1 October 2020.** Trustees of all schemes should update the SIP to include a policy in relation to the arrangements with asset managers and update the stewardship policy with the expanded range of engagement activities and ensure these matters are covered in the scheme's investment report section of the annual report for scheme years ending on or after 1 October 2020. The statement is known as an engagement policy implementation statement.

**By 1 October 2020.** Trustees of defined benefit schemes are required to publish their SIP online.

**By 1 October 2021.** Trustees of defined benefit schemes must produce and publish, on a publicly available, free to access website, their annual report on voting and engagement.

## December 2020 - Changes made in relation to the new method of delivery

Set out below is a list of all of the documents that have been revised in this update, along with a brief explanation of how they have changed.

Pages to be changed	Main reason for change
<b>All</b>	
All	<ul style="list-style-type: none"> <li>- The creator tool has been withdrawn, so areas of the Pensions Manual required are selected from the webpage instead. Users are able to 'customise' a pack of documentation for the clients on the website and then download and save the documentation in order to complete.</li> <li>- The overall document hierarchy has been amended to be more intuitive. 'Permanent File Documents' is now the final section of this manual (also see comments below for how specific sections have been re-ordered).</li> </ul>
<b>Guidance</b>	
All	<ul style="list-style-type: none"> <li>- Section renamed to 'Guidance' from 'Section A - Guidance notes'.</li> </ul>
Contents	<ul style="list-style-type: none"> <li>- Contents page updated to reflect the new format and method of delivery.</li> </ul>
Guidance notes	<ul style="list-style-type: none"> <li>- Chapter referencing has been updated to reflect the new method of delivery.</li> <li>- A number of other minor amendments to reflect best practice and standardise guidance notes across the Mercia product range.</li> </ul>
Getting started for new manual users	<ul style="list-style-type: none"> <li>- A revised set of guidance notes has been included to reflect the updated method of product delivery.</li> </ul>
What's changed	<ul style="list-style-type: none"> <li>- A copy of this document.</li> </ul>
<b>Example Letters</b>	
All	<ul style="list-style-type: none"> <li>- Section renamed to 'Example Letters' from 'Section B - Example letters'.</li> </ul>
Engagement - covering letter	<ul style="list-style-type: none"> <li>- A number of amendments to reflect best practice and standardise engagement letters across the Mercia product range.</li> </ul>
Engagement - schedules of professional services	<ul style="list-style-type: none"> <li>- A number of amendments to reflect best practice and standardise engagement letters across the Mercia product range.</li> </ul>
Engagement - terms of business	<ul style="list-style-type: none"> <li>- A number of amendments to reflect best practice and standardise engagement letters across the Mercia product range.</li> </ul>
<b>Example Reports</b>	
All	<ul style="list-style-type: none"> <li>- Section renamed to 'Example Reports' from 'Section C - Example reports'.</li> </ul>
<b>Example Accounts</b>	
All	<ul style="list-style-type: none"> <li>- Section renamed to 'Example Accounts' from 'Section D - Example accounts'.</li> </ul>
<b>Accounts Disclosure Checklists</b>	
All	<ul style="list-style-type: none"> <li>- Section renamed to 'Accounts Disclosure Checklists' from 'Section E - Accounts disclosure checklists'.</li> <li>- The references given to the disclosure checklists have been amended to reflect the new system of product delivery. Titles have also been updated in some cases for clearer descriptions.</li> <li>- All guidance is now shaded grey and in small italics to aid users in completing these documents.</li> <li>- The "Section N/A" column has been removed, instead users select "N/A" from the column options situated against the section headings, where needed, to reflect the section does not apply. In addition, the heading "Compliance" above the column options has been removed.</li> </ul>
<b>Current File Documents</b>	
All	<ul style="list-style-type: none"> <li>- Section renamed to 'Current File Documents' from 'Section G - Current file documents'.</li> <li>- The hierarchy of the content in this section has been amended to be more intuitive, with sections now being presented in the order they would appear in an audit file (i.e. Completion, then Planning, then Audit programmes).</li> <li>- For consistency across the Mercia product range, specific references in the main body of forms to 'ISA(UK)' have been replaced with 'ISA', with guidance notes at the top of the form being added to make it clear these refer to ISAs (UK).</li> </ul>
All completion documents	<ul style="list-style-type: none"> <li>- For consistency of presentation, under all subheadings within a completion form, procedure numbering now reverts back to 1 (for example within A21-1 procedures 13-15 are now 1-3 under the heading 'Approval and signature').</li> </ul>
A21-1 - Responsible Individual review and conclusion	<ul style="list-style-type: none"> <li>- Procedures 1-13 now sit under a heading 'Audit finalisation'.</li> <li>- The heading 'Confirmation of signing / completion' has been replaced with 'Approval and signature'.</li> <li>- Conclusions now have explicit options to 'tick as appropriate', rather than being a strike through 'delete as appropriate'.</li> <li>- 'Reappointment considerations' have been separated into their own section under 'Conclusions and Audit Opinion'.</li> </ul>
A21-2 - Engagement quality control review checklist	<ul style="list-style-type: none"> <li>- Column headings 'Comments' and 'Initials' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> <li>- The procedures on this form have been re-ordered, to be better grouped for the objectives they achieve, with 8 &amp; 9 now being under the heading 'Integrity, objectivity and independence', 1, 3, 4 &amp; 5 now being under a heading 'Matters arising during the assignment' and 6, 2, 7 &amp; 10 now being under the heading 'Final review and reporting'.</li> </ul>
A21-3 - Consultation / ethics review	<ul style="list-style-type: none"> <li>- For improved styling, guidance notes for the relevant section have been re-formatted.</li> <li>- Within the 'Review points' section, the column headings 'Sch Ref', 'Clearance' and 'Initials/Date' have been consolidated under the heading 'Schedule reference and details of clearance, with initials and date'.</li> </ul>
A22 - Overall review of the financial statements	<ul style="list-style-type: none"> <li>- Column headings 'Comments' and 'Initials' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
A25 - Audit summary memorandum	<ul style="list-style-type: none"> <li>- For improved styling guidance notes for the relevant section have been re-formatted.</li> <li>- The column heading 'Clearance' has been renamed 'Justification for clearance', to encourage more appropriate responses.</li> </ul>
A27 - Summary of misstatements	<ul style="list-style-type: none"> <li>- For improved styling the materiality section has been re-formatted, with the conclusion section now having options to 'tick as appropriate', rather than being a strike through 'delete as appropriate'.</li> </ul>
A31 - Audit completion checklist	<ul style="list-style-type: none"> <li>- For clarity, confirmation that ISA references refer to ISAs (UK) is now in the guidance notes at the top of the form.</li> <li>- The column headings 'Yes, No or N/A' and 'Comments' have been consolidated under the heading 'Yes/No (add comments as needed)' to better reflect the expected responses.</li> <li>- Footnote explaining point 7 is relevant for accounting periods beginning on or after 15 December 2017 has been removed given all year ends now being audited will be beyond this date.</li> <li>- Column headings 'Comments' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)' to encourage more complete responses.</li> </ul>
A41 - Subsequent events checklist	<ul style="list-style-type: none"> <li>- Column headings 'Comments' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)' to encourage more complete responses.</li> </ul>

Pages to be changed	Main reason for change
	<ul style="list-style-type: none"> <li>- For clarity the conclusion section now cross references to A42 for going concern considerations.</li> </ul>
A43 - Whistle blowing - Reporting to The Pensions Regulator	<ul style="list-style-type: none"> <li>- For clarity the section for updates prior to signing is now headed 'Update to the audit report date'.</li> <li>- The column headings 'Yes / No' and 'Comments' have been consolidated under the heading 'Yes/No (add comments as needed)' to better reflect the expected responses.</li> </ul>
A51 - Written representations checklist	<ul style="list-style-type: none"> <li>- The 'Comments' column has been renamed 'Notes (refer to other schedules where applicable)' to encourage more complete commentary.</li> <li>- For clarity, confirmation that ISA references refer to ISA's (UK) is now in the guidance notes at the top of the form.</li> <li>- For clarity, the section for updates in respect of additional procedures performed up to the date of signing has been separated from the 'Conclusions' section and is now under the heading 'Update to the audit report date'.</li> </ul>
A52-1 - Communication with management checklist	<ul style="list-style-type: none"> <li>- Guidance notes to indicate that any communication with those charged with governance, where different from management, should be recorded on B21-2 has been moved to the top of the form for clarity.</li> <li>- Column headings 'Sch Ref' and 'Comments' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
A52-1 - Communication with those charged with governance checklist	<ul style="list-style-type: none"> <li>- The 'Comments' column has been renamed 'Notes (refer to other schedules where applicable)' to encourage more complete commentary.</li> <li>- Column headings 'Sch Ref' and 'Comments' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
All planning documents	<ul style="list-style-type: none"> <li>- For consistency of presentation, under all subheadings within a completion form, procedure numbering now reverts back to 1. (for example within B12 procedure 2-3 are now procedure 1-2 under the heading 'Long association with the audit engagement').</li> </ul>
B11 - Planning checklist	<ul style="list-style-type: none"> <li>- Column headings 'Notes' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
B13 - Compliance with the Ethical Standard	<ul style="list-style-type: none"> <li>- 'N/A' has been removed from the response column given questions should generally only require a 'Yes' or 'No' answer, although a prompt has been added to 'add comments as needed' for where enhanced explanation is required.</li> <li>- Prompts to 'tick as applicable' have been added where the form gives multiple options for the response.</li> <li>- The Acceptance of appointment or reappointment form has been consolidated under one reference 'B13-1'.</li> <li>- A 'Consultation and communications' section has been added to separate any communications with the firm's ethics partner and the client from the final conclusion.</li> <li>- The conclusion section has been renamed 'Responsible Individual judgement and conclusion' and now includes space for RI judgement to be recorded, with the final conclusion now being a tick options rather than a strike through to make the choice clearer.</li> </ul>
B14 - Preliminary engagement quality control review	<ul style="list-style-type: none"> <li>- The columns 'Comments' and 'Initials' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> <li>- The conclusion section has been renamed 'EQC reviewer conclusion' for clarity.</li> </ul>
B21-1 - Communication with management	<ul style="list-style-type: none"> <li>- The title of the form has been shortened to 'Communication with management'.</li> <li>- Guidance notes to indicate that any communication with those charged with governance, where different from management, should be recorded on B21-2 has been moved to the top of the form for clarity.</li> <li>- The heading 'Discussions must, as a minimum, include the areas noted below' has been replaced with 'Record of the communication', with additional guidance notes added for recording the discussion.</li> <li>- Column headings 'Response / matters arising' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
B21-2 - Agenda for communication with those charged with governance	<ul style="list-style-type: none"> <li>- The title of the form has been shortened to 'Communication with those charged with governance'.</li> <li>- The heading 'Discussions must, as a minimum, include the areas noted below' has been replaced with 'Record the communication', with additional guidance notes added for recording the discussion.</li> <li>- Column headings 'Response / matters arising' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
B23 - Audit team discussion	<ul style="list-style-type: none"> <li>- Guidance notes regarding capturing the discussion(s) have been moved to the top of the form for clarity and the summary of points to discuss is now under the heading 'Matters to discuss'.</li> </ul>
B32 - Risk assessment	<ul style="list-style-type: none"> <li>- For clarity the strike-through options for risk levels in the conclusions have been replaced with tick boxes.</li> </ul>
B33 - Audit plan - All	<ul style="list-style-type: none"> <li>- For clarity, the guidance notes have been moved to the top of the forms.</li> <li>- The options to select the audit programmes required now sit above the area to record more detailed comments.</li> </ul>
B41 - Materiality	<ul style="list-style-type: none"> <li>- Guidance notes have been moved to the top of the form for clarity.</li> <li>- The table has been reformatted for clarity, with 'Basis for determining materiality' section being merged into the 'Materiality for the financial statements as a whole' section and the 'Amount below which misstatements are clearly trivial' and 'Audit areas requiring other levels of materiality' not being under a heading of 'Trivial threshold and other levels of materiality'.</li> <li>- The area to update for final materiality has been given more prominence in its own section at the end of the form.</li> </ul>
B11 - Planning checklist – Freeform memorandum approach	<ul style="list-style-type: none"> <li>- Across all areas, column headings 'Notes' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
B11 - Audit planning memorandum	<ul style="list-style-type: none"> <li>- For ease of use, this form is now contains more tick box options, rather than having to tailor and lock the form prior to printing.</li> <li>- Other minor amendments have been made to reflect best practice guidance and ensure consistency across the Mercia product range.</li> </ul>
Audit programmes - all	<ul style="list-style-type: none"> <li>- The structure and referencing of work programmes has been amended to reflect the new method of delivery and best practice.</li> <li>- Across all the work programmes, the heading 'Sch ref / Work done' has been replaced with 'Notes (refer to other schedules where applicable)'.</li> <li>- E1 – This section is now titled 'E Test of detail (blank programme)'.</li> <li>- E2 – This section is now titled 'F Test of detail (tailorable programme)'.</li> </ul>
Current file indexes - sections D to K	<ul style="list-style-type: none"> <li>- The sign-off's on these forms have been updated from 'Signed by' to 'Prepared by' to be consistent with other sign-offs within the manual.</li> </ul>

**Permanent File Documents**

Pages to be changed	Main reason for change
All	<ul style="list-style-type: none"> <li>- Section has been renamed to 'Permanent File Documents' from 'Section F - Permanent file'.</li> <li>- Across all the permanent file forms, column headings 'Notes' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
New and existing client customer due diligence forms	<ul style="list-style-type: none"> <li>- The client customer due diligence forms have been removed from the manual, as these should be completed in line with the guidance and procedures in the firm's Anti-Money Laundering compliance manual. The new client checklist is still included within this manual, however.</li> </ul>
PF1-1 - The entity and its environment	<ul style="list-style-type: none"> <li>- Given it is one form, PF1-1 and PF1-2 have been merged, with PF1-2 now being an omitted reference.</li> </ul>
PF1-3 - Laws and regulations	<ul style="list-style-type: none"> <li>- This form has been reformatted to give space for commentary under the items to consider, rather than to the right, as this provides more space for documentation.</li> </ul>
PF1-4 - Related parties	<ul style="list-style-type: none"> <li>- To emphasise the requirements when recording related parties the guidance 'You should include all known related parties, regardless of whether or not there are any likely transactions.' has been moved from an end note to be part of the core content on the form.</li> </ul>
PF1-6 - Using a service organisation	<ul style="list-style-type: none"> <li>- This form has been reformatted to give space for commentary under the items to consider, rather than to the right, as this provides more space for documentation.</li> </ul>
PF1-7 - Using the work of an expert	<ul style="list-style-type: none"> <li>- This form has been reformatted to give space for commentary under the items to consider, rather than to the right, as this provides more space for documentation.</li> </ul>
PF1-8 - Accounting estimates	<ul style="list-style-type: none"> <li>- The 'Planned approach' section of this form has been reformatted to give space for commentary under the items to consider, rather than to the right, as this provides more space for documentation.</li> </ul>
PF2-2 - Internal control overview	<ul style="list-style-type: none"> <li>- For clarity, the items to consider have now been listed as bullet points, rather than a single body of text.</li> </ul>
PF2-4 - Using the work of and communication with internal auditors	<ul style="list-style-type: none"> <li>- Across all areas, column headings 'Notes' and 'Sch Ref' have been consolidated under the heading 'Notes (refer to other schedules where applicable)'.</li> </ul>
PF3-1 - Risk analysis	<ul style="list-style-type: none"> <li>- The 'YN' column has been removed, to encourage more qualitative discussion of risk factors, with the 'Comments / other factors' column being replaced with 'Notes (refer to other schedules where applicable)'. The guidance notes have been updated and moved to the top of the page to also reflect this.</li> </ul>
PF3-2 - Fraud risk analysis	<ul style="list-style-type: none"> <li>- The 'YN' column has been removed, to encourage more qualitative discussion of risk factors, with the 'Comments / other factors' column being replaced with 'Notes (refer to other schedules where applicable)'. The guidance notes have been updated and moved to the top of the page to also reflect this.</li> </ul>

