



HELLENIC REPUBLIC

Professional Standards for Audit Work of the National Transparency Authority

Version 1.0
September 2020



NATIONAL TRANSPARENCY AUTHORITY

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Preamble

The following Professional Standards for the Auditing Work of the National Transparency Authority (hereinafter, Auditing Standards) were issued under the provisions of article 86 par. 2 of Law 4622/2019 (Government Gazette A' 133/07.08.2019) and constitute the working standards of the Inspectors-Auditors of the National Transparency Authority.

On the National Transparency Authority

The National Transparency Authority (hereinafter, the Authority) was established by Law 4622/2019 (A' 133). Articles 82-103 and 118-119 define the institutional framework of its operation. The Authority took over all the competences of five public auditing bodies (the Office of the Inspector General of Public Administration, the College of Inspectors-Auditors of Public Administration, the College of Inspectors of Health and Welfare Services, the College of Inspectors of Public Works, the College of Inspectors-Auditors of Transport), as well as the General Secretariat for the Fight against Corruption, which were abolished under the above law.

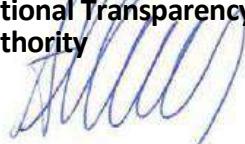
The Law 4622/2019 establishes for the first time in Greece a single and independent Authority, which has the required guarantees of independence and impartiality, in accordance with good international practices and the requirements of international law.

On the Professional Standards for the Audit Work of the SAI

The Authority's Auditing Standards provide the framework for the design and implementation of its audit activity. They are based on the auditing standards adopted by internationally recognised bodies, such as the International Organisation of Supreme Audit Institutions (INTOSAI) and the International Institute of Internal Auditors (IIA Global) and incorporate the knowledge and experience gained in the application of these standards to public audit bodies of European Union countries, to the extent that they meet the requirements and characteristics of the Greek public sector.

The objective is to provide general guidance to the Authority's Inspectors-Auditors, who are required to use their professional judgement and adapt the auditing standards to the requirements and specific characteristics of each audit assignment.

**The Governor of the
National Transparency
Authority**



Angelos Binis

Introduction

The National Transparency Authority (NTA) is responsible for conducting independent and objective audits designed to add value and improve the operations of public bodies. The audit activity of the Authority focuses on supporting the agencies in achieving its objective by adopting a systematic and professional approach to assessing and improving the effectiveness of governance processes, risk management mechanisms and internal control procedures/processes of public bodies.

Effective audit contributes to improving the governance of public bodies and to achieving their strategic and operational objectives. It can also help public bodies to identify risks and opportunities early and respond accordingly.

An audit mission can also provide assurance that the resources allocated to public policies are being used rationally, on the one hand, and provide evidence or conclusions on whether a particular public policy action has achieved the intended results.

The performance of the Authority's audit missions reinforces the role and credibility of the Inspector-Auditor and provides guarantees of professionalism, independence and objectivity. The following standards are based on: (a) the International Standards for the Professional Practice of Internal Auditing, which are part of the International Professional Practices Framework (IPPF) of the Global Institute of Internal Auditors, IIA) and b) the International Standards on Auditing of the International Organisation of Supreme Audit Institutions (INTOSAI), which have been adapted to the mission and responsibilities of the Authority, as reflected in Law 4622/2019 and the other provisions governing the organisation and operation of the Authority.

The objectives of the Professional Standards for the Audit Work of the Authority are:

- establish basic principles for planning and conducting audit missions and writing audit reports,
- set the framework for the delivery of value-added audit services to public bodies, improving their operations and results,
- form the basis for assessing the quality and impact of audit missions.

Professional Standards of Organisation

1. Purpose, Jurisdiction and Responsibility

10/1 The purpose and jurisdiction of the Inspections and Audits Unit (hereinafter referred to as the Inspections and Audits Unit) are defined in the Audit Operation Regulation (hereinafter referred to as the Audit Operation Regulation), which must be in line with the current regulatory framework based on Articles 82-103 of Law 4622/2019 and the Code of Professional Ethics of the Authority's Inspectors-Auditors.

11/1 The Governor of the Authority should ensure the regular review of both the Audit Function Rules and the Code of Conduct.

12/1 The nature and scope of the control activities undertaken by the M.E.U. shall be specified in the C.I.L.

12/2 The nature and scope of the consultancy services provided by the M.E.E. must be specified in the C.E.L.

2. Independence and Objectivity

20/1 Inspectors-Auditors must be independent and objective in the performance of their work.

21/1 Independence is the freedom from conditions that threaten the ability of the Auditor-Inspectors to perform their duties impartially.

21/2 Threats to independence need to be addressed at the level of the Inspector-Auditor, at the level of contracting, but also at the operational and organisational level.

22/1 Objectivity is the impartial mentality that allows the Inspectors-Auditors to carry out their work as they believe and not to compromise on its quality. Objectivity requires that inspectors-auditors do not subordinate their judgement on audit matters to other persons.

22/2 Threats to objectivity need to be addressed at the level of the Inspector-Auditor, at the level of project assignment, but also at the operational and organisational level.

23/1 The audit function must be free from any interference in determining the scope of the audit work, in performing the work and in communicating the results.

23/2 The Head of the audit team should communicate such an intervention to the Administrator and the Head of the PMU and discuss any implications.

24/1 Inspectors-Auditors must have an impartial, unbiased attitude and avoid any conflict of interest.

24/2 A conflict of interest is a situation in which the Inspector-Auditor, who enjoys the confidence of the Authority, has a conflicting, competing, professional or personal interest. Such competing interests may make it difficult for him to perform his duties impartially.

24/3 A conflict of interest situation may give the impression of improper practices, which may undermine confidence in the Inspector-Auditor and in the audit function of the Authority.

24/4 A conflict of interest situation may impair the ability of an Inspector-Auditor to perform his/her duties and responsibilities objectively.

25/1 If the independence or objectivity of an Inspector-Auditor is impaired, whether actual or apparent, the details of the impairment must be disclosed to the parties involved.

25/2 Impediments to organisational independence or objectivity may include, but are not limited to: individual conflicts of interest, restrictions on the scope of the audit, restrictions on access to records, human resources and intangible or tangible assets of the organisation.

26/1 Inspectors-Auditors must refrain from auditing or evaluating the public body in which their position is located.

3. Professional Competence and Due Diligence

30/1 Audit missions must be carried out with professional competence and due professional diligence.

31/1 The M.E.U. must collectively possess or acquire the knowledge, skills and other competencies required to fulfil its obligations.

31/2 Inspector-Auditors must have the knowledge, skills and other competencies required to perform their individual duties.

31/3 Inspectors-Auditors should have sufficient knowledge to be able to assess the risks of corruption and how they are managed by the auditee. They are not, however, expected to have

all Inspector-Auditors have the expertise of a professional whose primary responsibility is to detect and investigate corruption.

31/4 Inspector-Auditors should have sufficient knowledge of the key risks and controls of information systems, as well as the available audit technology practices, to perform the work assigned to them. However, not everyone can be expected to have the expertise of an auditor whose primary responsibility is to audit information systems.

32/1 Inspector-Auditors should exercise the diligence and skills of a reasonably prudent and competent auditor. Due professional diligence does not imply infallibility.

32/2 Inspectors-Auditors must exercise due professional diligence taking into account the following:

- the extent of the work required to achieve the objectives of the audit mission,
- the relative complexity, substance or importance of the matters to which the audit task relates,
- the adequacy and effectiveness of the audited entity's governance, risk management and control processes,
- the likelihood of significant errors, fraud or non-compliance in the operation of the auditee.

32/3 In exercising due professional diligence, Inspector-Auditors should consider the possibility of using audit technology practices and other data analysis techniques.

4. Continuous Professional Development

40/1 Inspectors-Auditors should improve their knowledge, skills and other competencies through continuous professional development.

5. Quality Assurance and Quality Improvement Programme

50/1 The Head of the PMO shall develop and maintain a Quality Assurance and Quality Improvement Programme covering all aspects of the audit work.

50/2 The Quality Assurance and Quality Improvement Programme is designed to enable that assessment of the degree of compliance of the audit function with the Auditing Standards, as well as the assessment of whether the Inspector-Auditors apply the Code of Ethics.

50/3 The Programme also assesses the efficiency and effectiveness of the audit function and identifies areas for improvement.

50/4 The Governor of the Authority shall oversee the Quality Assurance and Quality Improvement Programme.

Professional Operating Standards

6. Management of the Inspections and Controls Unit (IACU)

60/1 The Head of the PMU must perform his/her duties effectively to ensure that the PMU can achieve its strategic and operational objectives.

60/2 The M.E.U. is effectively managed when:

- achieves the purpose and objectives stated in the law, the C.E.L. and the annual audit action plan,

- Each Auditor-Inspector complies with the Code of Ethics and Professional Standards.

7. Planning of the Audit Mission Programme

70/1 The Governor of the Authority in cooperation with the Head of the PMU should prepare an Audit Mission Plan based on a risk analysis, with the aim of setting priorities for audit activity in line with the Authority's objectives.

70/2 The Sectors of the MEA contribute to the development of the audit action plan based on a risk analysis of the agencies and policy areas of government work under their responsibility. To this end, the Heads of the Sectors shall consult with the Head of the PSC.

70/3 The audit action plan is adapted to changes in the Authority's audit environment, activities, risks, operations and programmes of the auditees.

8. Resource Management

80/1 The Head of the PMU must ensure that audit resources are appropriate, adequate and effectively used to implement the Audit Mission Programme.

81/1 The term "competent" refers to the combination of knowledge, skills and other competencies necessary for the performance of the Audit Mission Programme.

82/1 The term "sufficient" refers to the amount of resources necessary to complete the Programme. The resources are used "effective" when used optimally to achieve the approved Audit Mission Programme.

9. Control Policies and Procedures

90/1 The management of the NTA should establish policies and procedures to guide the implementation of the audit work.

10. Nature of Audit Work

100/1 The work of the PSC should contribute to improving the public governance systems, risk management process and internal control mechanisms of auditees by adopting a systematic, disciplined and risk-based approach.

101/1 The value and credibility of audit is enhanced when Inspectors-Auditors act in accordance with the principles of economy, efficiency and effectiveness.

11. Public Governance

110/1 The work of the M.E.E. should include missions to assess and make appropriate recommendations for improving the auditee's governance systems and procedures in relation to the following:

- making strategic and operational decisions,
- the operation of the risk management process,
- overseeing the internal control mechanisms/nodes,
- promoting integrity and transparency within the organisation,
- ensuring accountability and effective review and evaluation of the organisation's performance,
- the suitability and effectiveness of the organisation's information systems for the achievement of its strategic and operational objectives.

12. Risk Management

120/1 The work of the NPM should include missions to assess the effectiveness and improve the risk management process at the level of each public entity.

120/2 The Inspector-Auditor judges the effectiveness of risk management procedures by assessing whether:

- the strategic and operational objectives of the organisation support and align with its mission,
- major risks are identified and assessed,
- the risk mitigation measures are appropriate and commensurate with the acceptable risk tolerance limits of the operator.

120/3 The audit should assess the entity's exposure to risks related to its governance processes, business operations and information systems with respect to the following:

- achieving the strategic and operational objectives of the organisation,
- the reliability and integrity of financial and operational reporting,
- the effectiveness and efficiency of the functions and procedures for the protection and rational use of the institution's assets,
- compliance of the organisation's operations with laws, regulations, circulars, policies, procedures and contracts.

120/4 The audit should assess the likelihood of corruption risk and the effectiveness of mechanisms to address threats to integrity and transparency.

13. Internal Audit System

130/1 The audit should assess the design and implementation of the individual components of the entities' internal control system, evaluating their effectiveness and efficiency and promoting their improvement.

130/2 The audit should assess the adequacy and effectiveness of the internal control mechanisms and internal controls in addressing risks to the entity's governance systems and processes, business operations and information systems with respect to the following points:

- achieving the strategic and operational objectives of the organisation,
- the reliability and integrity of financial and operational reporting,
- the effectiveness and efficiency of the functions and procedures for the protection and rational use of the institution's assets,
- compliance of the organisation's operations with laws, regulations, circulars, policies, procedures and contracts.

14. Control mission planning

140/1 Inspectors-auditors should develop and thoroughly document the planning of each audit mission, which should include the objectives, scope, timing, criteria and allocation of resources.

15. Design criteria

150/1 In the process of planning audit missions, the Inspectors-Auditors must take into account:

- the mission and objectives of the audited entities, their policies and procedures, and the means by which the performance of the entity and the achievement of its objectives are monitored,
- the risks that threaten the objectives, resources and activities, and the mechanisms to mitigate the potential impact of the occurrence of these risks,
- the adequacy and effectiveness of the governance systems and processes, the risk management framework and the internal control mechanisms/directories.

151/1 The outcome of the planning of an audit mission will be recorded in an audit memorandum, which will describe, as a minimum, the objectives, scope, timing, criteria, and methodologies of the audit.

16. Objectives of the audit

160/1 For each control mission, its objectives should be defined.

160/2 Inspectors-Auditors should carry out a preliminary analysis of the risks associated with the audited entity. The objectives of the audit work should reflect the results of this analysis.

161/1 It is necessary to have adequate criteria for assessing the systems and processes for governance and risk management, as well as the internal control mechanisms/nodules in place. The control criteria are formulated on the basis of:

- internal parameters, such as the policies and procedures of the organisation,
- external factors, such as the legislative and institutional framework,
- good practices used by other public bodies.

17. Control dispatch range

170/1 Inspectors-Auditors shall ensure that the scope of the audit work is adequate and appropriate to achieve its objective.

18. Allocation of resources for the audit mission

180/1 The Head of the PMU in cooperation with the Heads of Audit Fields should determine the appropriate and sufficient resources required to achieve the objectives of the audit mission based on an assessment of the nature and complexity of each project, time constraints and available resources.

180/2 The term "*qualified*" refers to the combination of knowledge, skills and other competencies required to perform the audit.

180/3 The term "*adequate*" refers to the amount of resources needed to achieve the completion of the audit with due professional diligence.

19. Audit Mission Work Programme

190/1 Inspector-Auditors shall develop and document a detailed work programme, which is appropriate for achieving the objectives of the audit assignment.

190/2 The audit work programme should include the procedures for the identification, analysis, evaluation and recording of data and information during the audit mission.

191/1 The programme shall be approved by the relevant Head of Division prior to its implementation, and any amendments shall be approved in good time.

20. Carrying out an audit mission

200/1 Inspectors-auditors shall identify, analyse, evaluate, record and document sufficient information to achieve the objectives of the audit.

21. Information collection

210/1 Inspectors-auditors shall collect sufficient, reliable, relevant and useful information to achieve the objectives of the audit.

210/2 "Sufficient information" is factual, satisfactory and convincing information which, if used by a reasonable person, would lead to the same conclusions as the auditor.

210/3 "Reliable" is the best possible information that can be identified through the use of appropriate project techniques.

210/4 "Relevant information" supports the observations and recommendations resulting from the audit and is relevant to its objectives.

22. Analysis and Evaluation

220/1 Audit conclusions and results should be based on appropriate analyses and evaluations.

23. Documentation

230/1 Inspectors-auditors shall document the conclusions and results of their audit through adequate, reliable, appropriate and useful information.

231/1 Inspector-Auditors should control access to audit records.

231/2 Inspectors-Auditors should obtain the approval of management and/or legal advisers before allowing third parties other than the Authority access to such records, where appropriate, subject to applicable law.

231/3 Inspectors-Auditors shall keep the records of the audit, irrespective of the means of storage of each record, in accordance with the instructions of the Authority and the applicable provisions.

24. Supervision of audit missions

240/1 Audit missions must be properly supervised to ensure that the objectives are achieved, quality is assured and the Authority's human resources are developed.

240/2 The degree of supervision required depends on the professional competence and experience of the Inspector-Auditors, but also on the complexity of the audit.

240/3 The Head of the responsible Sector has overall responsibility for the supervision of the audit mission.

240/4 The relevant documentation of the supervision of all individual stages of an audit mission shall be recorded and retained.

25. Communication of results through the Audit Reports

250/1 The Authority should communicate the results of inspection missions to the parties concerned in an appropriate manner.

250/2 A senior official of the Authority is responsible for reviewing and approving the final notification of a project and for deciding to whom and how it will be notified.

250/3 Unless a different treatment is required by legal, institutional or regulatory requirements, the competent official of the Authority, before disclosing the results to third parties other than the entity, must:

- assess the potential risk to the Authority from the disclosure of the results,
- consult with management and/or legal advisors, as appropriate,
- control the disclosure of results by limiting their use in compliance with the applicable provisions and internal rules of the Authority.

26. Mandatory elements of Audit Reports

260/1 Audit reports shall include the objectives, scope and results of the audit.

260/2 The audit report should include the conclusions as well as practicable suggestions/recommendations for improvement.

260/3 Inspectors-Auditors are recommended to include evidence of the auditee's satisfactory performance in the audit report.

260/4 When communicating the results of an audit to third parties other than the Authority, the communication shall include restrictions on the disposal and use of the results in accordance with the applicable provisions.

27. Quality of Audit Reports

270/1 The audit report should be accurate, objective, clear, comprehensive, constructive, complete and timely.

271/1 The "accurate audit report" is free of errors and distortions and faithfully reflects the facts.

271/2 The "objective audit report" is fair, unbiased and impartial, and is the result of a fair and balanced assessment of all relevant facts and circumstances.

271/3 The "*clear audit report*" is easy to understand and logical, avoiding unnecessary technical language and providing all important and relevant information.

271/4 The "*comprehensive audit report*" is accurate and avoids unnecessary explanations, excessive details, redundancies and long-windedness.

271/5 The '*constructive audit report*' is useful for the auditee/concerned party and the auditee and leads to improvements where necessary.

271/6 The "*full audit report*" shall not omit any element that is material to its addressees and shall include all significant and relevant

information and observations to support its conclusions and recommendations/proposals.

271/7 The '*timely audit report*' is completed within a reasonable time after the audit, depending on the significance of the issue, allowing the auditee to take appropriate action.

28. Errors and Omissions

280/1 If an audit report contains a material error or omission, the information should be correctly repeated to the parties to whom it was originally communicated.

29. Monitoring progress in the implementation of recommendations

290/1 The Authority shall establish and maintain a system to monitor the implementation of the recommendations and recommendations of the audit reports/findings/results.

290/2 The I AC shall establish an effective monitoring and oversight process to ensure that the management of the audited entity takes the necessary actions to implement the recommendations of the audit report or has adequately justified the reason for not doing so.



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