



MAPPING TABLE

ED 05/21 APES 320 *Quality Management for Firms that provide Non-Assurance Services* (September 2021) compared with APES 320 *Quality Control for Firms* (September 2019)

Prepared by the Technical Staff of APESB

Note to Stakeholders

This Mapping Table is a supplement to, and not part of, APES 320. It has been prepared by Technical Staff of APESB to assist users of APES 320 navigate to the corresponding provisions in the extant APES 320.

The Mapping Table sets out the provision numbers in the proposed revised APES 320 and links it to the relevant reference number in the extant APES 320. Comments are included where necessary to explain the nature of the changes.

Proposed APES 320 ED (September 2021)	Extant APES 320 (September 2019)	High level summary of changes (excluding minor editorials and changes to paragraph references within paragraphs resulting from new numbering system in the proposed APES 320 ED)
Note that paragraphs are presented in the order of the proposed APES 320 ED (September 2021)		
APES 320 Quality Management for Firms that provide Non-Assurance Services		
1. Scope and Application	1. Scope and Application	No change
1.1	1.1	Change to new name <i>Quality Management for Firms that provide Non-Assurance Services</i> for the Standard and amended system of quality control to System of Quality Management and Reasonable Assurance to reasonable confidence. Removed reference to Relevant Ethical Requirements to focus on compliance with Professional Standards.
1.2	1.2	Change to new name for the Standard, that APES 320 has been reissued and that Firms are required to incorporate appropriate amendments to their systems by 1 January 2023 to establish a System of Quality Management.
1.3	1.3	Change of system of quality control to System of Quality Management and noting that the standard includes paragraphs with considerations specific to smaller Firms on how this Standard is scalable.
1.4	1.4	No change
1.5	1.5	No change
1.6	1.6	No change
1.7	1.7	No change
1.8	1.8	No change
1.9	1.9	No change
1.10	1.10	Paragraph amended to highlight that: - Firms that provide non-assurance services are required to comply with APES 320 to their non-assurance practices and Engagements; and - Assurance Practices within Firms are required to comply with APES 210 <i>Conformity with Auditing and Assurance Standards</i> which includes the quality management standards issued by the AUASB being: ASQM 1 – <i>Quality Management for Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance Engagements or Related Services Engagements</i> (ASQM 1); ASQM 2 – <i>Engagement Quality Reviews</i> (ASQM 2); and ASA 220 <i>Quality Management for an Audit of a Financial Report and Other Historical Financial Information</i> (ASA 220). - Referring to Appendix 1 flow chart illustrating the quality management standards that apply and Appendix 2 for a high-level comparison of APES 320's elements to ASQM 1's components.
-	1.11	Removed paragraph that referred to ASA 220 as more relevant to Assurance Practices and is outside the scope of reissued APES 320.
1.11	1.12	No change
2. Definitions	2. Definitions	No change
Assurance Engagement	AUST 2.1 (a)	Definition amended to align to the definition in <i>Amendments to Part 4B of APES 110 Code of Ethics for Professional Accountants (including Independence Standards)</i> issued in September 2020.
Assurance Practice	AUST 2.1 (b)	Added agreed-upon procedures Engagements and footnote reference to ASRS 4400 <i>Agreed-Upon Procedures Engagements</i> for a description of such engagements which are covered by ASQM 1 and not within the scope of APES 320.
AUASB	-	New definition added from the Code for use of defined term in Section 1 <i>Scope and Application</i> and definition of Assurance Engagement.

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Client	AUST 2.1 (c)	No change
Code	AUST 2.1 (d)	No change
-	2. (a)	Definition of Date of Report removed as longer used within the Standard.
Engagement	AUST 2.1 (e)	No change
Engagement Documentation	2. (b)	No change
Engagement Partner	AUST 2.1 (f)	Removed reference to public sector audit organisation & Auditor-General delegations.
-	2. (c)	Definition of Engagement Quality Control Review removed as no longer used within the Standard.
-	2. (d)	Definition of Engagement Quality Control Reviewer removed as no longer used within the Standard.
Engagement Team	2. (e)	Definition of Engagement Team amended to be consistent with ASQM 1, to be Partners and Staff and any other individuals performing procedures on the Engagement, excluding an External Expert. Note added under definition that this includes other individuals from Network Firms or a Service Provider.
External Expert	-	Added definition from the Code that is professionals other than those who have accounting or audit expertise that assist the Member in obtaining sufficient appropriate evidence.
Firm	2. (f)	No change
Independence	AUST 2.1 (g)	No change
Inspection	2. (g)	Change from quality control policies and procedures to quality management policies and procedures.
-	AUST 2.1 (h)	Definition of Key Audit Partner removed as no longer used within the Standard.
-	2. (h)	Definition of Listed Entity removed as no longer used within the Standard.
Member	AUST 2.1 (i)	No change
Member in Business	-	Definition added from the Code due to inclusion of the footnote 4 to paragraph 4.16 referring to Members in Business requirements under Section 260 <i>Responding to Non-Compliance with Laws and Regulations</i> of the Code.
Member in Public Practice	AUST 2.1 (j)	No change
Monitoring	2. (i)	Amended references to system of quality control to System of Quality Management and Reasonable Assurance to reasonable confidence.
Network	2. (j)	Amended reference to quality control to quality management.
Network Firm	2. (k)	No change
Partner	2. (l)	No change
Personnel	2. (m)	No change
Professional Activity	AUST 2.1 (k)	No change
Professional Bodies	AUST 2.1 (l)	No change
Professional Services	AUST 2.1 (m)	No change
Professional Standards	AUST 2.1 (n)	No change
Public Document	-	Definition added from APES 345 <i>Reporting on Prospective Financial Information prepared in connection with a Public Document</i> and APES 350 <i>Participation by Members in Public Practice in Due Diligence Committees in connection with a Public Document</i> due to this term being used in guidance in paragraph 4.48 of criteria for determining which Engagements are high-risk.
-	2. (n)	Definition of Reasonable Assurance removed as no longer used within the Standard which now uses reasonable confidence instead.

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-	2. (o)	Definition of Relevant Ethical Requirements removed as no longer used within the Standard which now refers to Professional Standards instead.
Service Provider	-	New definition aligned to ASQM 1 in relation to external resources used in the System of Quality Management or the performance of Engagements.
Staff	2. (p)	No change
-	2. (q)	Definition of Suitably Qualified External Person removed as no longer used within the Standard and Service Provider now used instead.
System(s) of Quality Management	-	New definition modelled on ASQM 1, however, aligned to the requirement in paragraph 3.1 of reissued APES 320.
Those Charged with Governance	-	New definition aligned to the Code.
3. Firm's responsibilities for a System of Quality Management	Objective	Added section number and renamed heading
3.1	3	Amended system of quality control to System of Quality Management for non- assurance services and Reasonable Assurance to reasonable confidence.
3.2	4	Amended system of quality control to System of Quality Management and reference to objective in paragraph 3 to requirement in paragraph 3.1.
3.3	-	New paragraph highlighting that the public interest is served by the consistent performance of quality Engagements which is based on elements of paragraph 15 of ASQM 1 with amendments from: - 'design, implementation and operation of the system of quality management' to 'establishing and maintaining the System of Quality Management'; - AUASB standards to Professional Standards; and - professional scepticism to inquiring mind, professional judgement and the reasonable and informed third party test.
3.4	-	New paragraph including reference to APES 325 <i>Risk Management for Firms</i> (APES 325) and that policies and procedures developed in accordance with APES 320 should be embedded within the risk management framework required under APES 325 which will facilitate compliance with both standards.
-	6	Removed the requirement for Personnel responsible for establishing and maintaining the system of quality control to understand the entire text of the standard as this is implied in other requirements including paragraph 3.13.
The System of Quality Management	Elements of a system quality control	Amended subheading
3.5	10	Amended system of quality control to System of Quality Management and the elements as follows: - Leadership responsibility for quality within the Firm amended to Governance and Leadership; - Relevant Ethical Requirements amended to Professional Standards; - Human resources amended to Resources; - New element Information and Communication added; and - Monitoring amended to Monitoring and remediation.
3.6	11	No change
3.7	5	No change

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3.8	7 & 9	Paragraph combines paragraphs 7 and 9 of extant APES 320 to note the requirements are designed to enable a Firm to implement a System of Quality Management and to achieve the requirement in paragraph 3.1 and the Firm is to consider its nature and circumstances and comply with all requirements (unless not relevant) and consider whether additional policies and procedures are required.
3.9	8	Added list of paragraphs not applicable to sole practitioner with no Staff (with cross references to paragraphs 4.4, 4.9, 4.28 and 4.38) and removed cross reference to paragraph relating to Assurance Practices which is outside the scope of reissued APES 320.
3.10	12	Amended references to quality control to quality management and system of quality control to System of Quality Management.
3.11	13	No change
Allocation of responsibilities within the Firm		Subsection added
3.12	AUST 5.1	Amended quality control to quality management and Suitably Qualified External Person to Service Providers.
3.13	14	First sentence of paragraph 14 of extant APES 320 has been relocated to paragraph 4.1. The remainder of this paragraph has been amended from references to system of quality control to System of Quality Management and added Firm's managing Partner (or equivalent) as an individual who could assume ultimate responsibility for the System of Quality Management. Paragraph also amended to reflect the Firm is to document this in the policies and procedures.
3.14	17	Added 'managing partners' for consistency with paragraph 3.13. References to quality control amended to quality management and incorporated aspects of paragraphs 21 and 22 of ASQM 1 in respect of appropriate knowledge, sufficient time, understanding assigned roles, being accountable and having a direct line of communication with the person with ultimate responsibility for the System of Quality Management.
3.15	18	Amended references to system of quality control to System of Quality Management and quality control to quality management and paragraph enhanced to incorporate new aspects of paragraph 3.14.
Network Firms		Subsection added
3.16	-	New paragraph incorporating aspects of paragraph 48 of ASQM 1 requiring Firms to take responsibility for the System of Quality Management irrespective of whether the Firm complies with Network requirements.
Documentation of the System of Quality Management	Documentation of the system of quality control	Amended subheading
3.17	124	Amended system of quality control to System of Quality Management and made explicit that documentation evidencing the operation of each element of the System of Quality Management is required rather than policies and procedures requiring this documentation to be established.
3.18	125 & 127	Paragraph consolidates paragraphs 125 and 127 of extant APES 320, amended reference to system of quality control to System of Quality Management and removed reference to Independence confirmations.
4. Elements of the System of Quality Management	Elements of a system of quality control	Added section number and amended heading
Governance and Leadership	Leadership responsibilities for quality within a Firm	Amended subheading
4.1	14	Consists of first sentence of paragraph 14 of extant APES 320 which remains unchanged.

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4.2	15	Amended reference to quality control policies to quality management policies and Partner and Staff to Personnel and to refer to compliance with the requirements of System of Quality Management.
4.3	16	Amended reference to quality control to quality management.
Professional standards	Relevant Ethical Requirements	Amended subheading
4.4	19	Amended references to Reasonable Assurance to reasonable confidence and comply with Relevant Ethical Requirements to comply with Professional Standards.
4.5	20	Removed 'which include' in second sentence.
4.6	21	Amended reference to the Code more broadly rather than Parts 3, 4A and 4B of the Code in extant APES 320.
4.7	22	Amended the leadership of the Firm to the governance and leadership of the Firm.
-	23	Paragraph removed as it refers to Relevant Ethical Requirements and relates to Assurance Practice that is outside the scope of reissued APES 320.
Independence	Independence	
4.8	-	New paragraph added to provide context of when Independence requirements may be applicable including non-assurance services provided to assurance clients requiring consideration of Part 4A <i>Independence for Audit and Review Engagements</i> or Part 4B <i>Independence for Assurance Engagements Other than Audit or Review Engagements</i> of the Code and other Professional Standards with Independence requirements.
4.9	24	Amended references to Reasonable Assurance to reasonable confidence and Relevant Ethical Requirements to Professional Standards.
-	25-37	Paragraphs removed as they relate to Assurance Practices and are outside the scope of reissued APES 320.
Acceptance and Continuance of Client relationships and specific Engagements	Acceptance and Continuance of Client relationships and specific Engagements	
4.10	38	Amended references to Reasonable Assurance to reasonable confidence and Relevant Ethical Requirements to Professional Standards.
4.11	39	Amended reference to Engagement Quality Control Review to appropriate reviewer and Partner and Staff to Personnel and removed 'profiles'. Changed cross reference to paragraph 4.48 and dot points to alpha list.
4.12	40	Amended to use defined term Those Charged with Governance.
4.13	41	Amended references to professional accountancy services to Professional Services, Relevant Ethical Requirements to Professional Standards and bankers to financial institutions. Removed 'the following' and added ethical letters and other sources of information on clients including the internet and industry forums.
4.14	42	No change
4.15	43	No change
4.16	44	Addition of subparagraph 4.16(a) that policies and procedures are to include consideration of compliance with NOCLAR provisions in the Code (with new footnote 4 referring Sections 260 and 360 <i>Responding to Non-Compliance with Laws and Regulations</i> of the Code).
4.17	45	Amended to use defined term Those Charged with Governance.
-	46	Paragraph removed as it relates to Assurance Practices and is outside the scope of reissued APES 320.
Resources	Human Resources	Amended subheading

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4.18	-	New paragraph that the Firm's size and circumstances and nature and complexity of Engagements will influence the resources employed and policies and procedures adopted should consider Human, Technology and Intellectual Resources and Service Providers.
4.19	47	Requirement amended to emphasise the Firm's policies and procedures established are to provide reasonable confidence it has sufficient and appropriate resources (not just human resources) for the System of Quality Management and Engagements. Amended reference to Reasonable Assurance to reasonable confidence.
Human resources	-	Subheading added
4.20	48	No change
4.21	49	Removed 'the following'.
4.22	50	Removed first sentence from extant paragraph.
4.23	51	Amended reference to Suitably Qualified External Person to Service Provider.
4.24	52	No change
4.25	53	No change
<u>Assignment of Engagement Teams</u>	Assignment of Engagement Teams	
4.26	54	Amended to use defined term Those Charged with Governance and added new requirement (c) that the Engagement Partner has the capacity to be sufficiently and appropriately involved throughout the Engagement partially from paragraph 31(a) of ASQM 1 and extant requirement (c) moved to (d).
4.27	55	No change
4.28	56	Simplified the requirement to make it explicit that the policies and procedures require assignment of individuals to the Engagement Team (extant APES 320 refers to Personnel) with necessary competence and capabilities to ensure the requirements of the System of Quality Management are met.
4.29	57	Amended reference to quality control to quality management and dot points amended to alpha list.
Technology Resources	-	Subsection added.
4.30	-	New application material setting out technological resources relevant to the System of Quality Management and this Standard. Simplified from paragraph A99 of ASQM 1.
4.31	-	New application material for matters for Firms to consider in obtaining, developing, implementing and maintaining technological resources including IT applications based on paragraph A100 of ASQM 1.
Intellectual Resources	-	Subsection added.
4.32	-	New application material in relation to examples of intellectual resources based on paragraph A102 of ASQM 1.
4.33	-	New application material in relation to specific policies and procedures that Firms may establish relating to the use of intellectual and technological resources based on paragraphs A103 and A104 of ASQM 1.
Service Providers	-	Subsection added.
4.34	-	New application material in relation to Firms remaining responsible for the System of Quality Management when using Service Providers and examples of resources from Service Providers based on paragraph A105 of ASQM 1 adjusted for relevance to reissued APES 320 including reference to External Experts.
4.35	-	New application material with reference to the guidance in APES GN 30 <i>Outsources Services</i> including on the outsourcing agreement, performance management and monitoring relevant to outsourced services and Service Providers even it not an outsourced service.

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4.36	-	New application material in relation to matters for Firms to consider when establishing policies and procedures for determining whether resources from a Service Provider are appropriate for use in the System of Quality Management. Based on paragraphs A106 and A107 of ASQM 1 and adjusted for relevance to reissued APES 320.
Engagement Performance	Engagement Performance	
4.37	58	Uses first sentence of paragraph 58 of extant APES 320, which is simplified to refer to the System of Quality Management and amended reference to Reasonable Assurance to reasonable confidence.
4.38	58 & 63	Uses second sentence and alpha points of paragraph 58 combined with paragraph 63 of extant APES 320 and includes specific policies and procedures on Engagement Teams understanding and fulfilling responsibilities (based on paragraph 31(a) of ASQM 1) and to have an inquiring mind, exercise professional judgement and use the reasonable and informed third party test.
4.39	59	Changed reference to Staff to Personnel and added that where applicable policies and procedures to include appropriate oversight over External Experts.
4.40	60	No change
4.41	61	Removed 'the following' and dot points amended to alpha list.
4.42	62	No change
Consultation	Consultation	
4.43	64	Amended reference to Reasonable Assurance to reasonable confidence, added high-risk Engagements to matters requiring appropriate consultation and removed subparagraph 64(c) from extant APES 320 as it relates to Assurance Practices and is outside the scope of reissued APES 320.
4.44	65	No change
4.45	66	No change
4.46	67	Added that effective consultation includes having a process to resolve differences of opinion.
4.47	68	Amended reference from quality control to quality management and dot points changed to alpha list.
<u>High-Risk Engagements</u>		Subsection added
4.48	70 & 71	New application material (based on paragraphs 70 and 71 of extant APES 320) that Firms may establish policies and procedures for high-risk Engagements in relation to appropriate consultation to consist of an appropriate reviewer for Engagements meeting the criteria listed and the appointment and eligibility requirements for, and responsibilities of, the appropriate reviewer. Added complexity and the size of the client and number of stakeholders relying on the Engagement report to criteria for high-risk Engagements.
-	69 & 72-92	Paragraphs removed as they relate to Assurance Practices and Engagement Quality Control Reviews and are outside the scope of reissued APES 320.
Engagement Documentation	Engagement Documentation	
4.49	93, 96 & 101	Combined paragraphs 93, 96 and 101 of extant APES 320 to require policies and procedures in relation to Engagement Documentation including: - completing the Engagement File on a timely basis; - maintaining the confidentiality, safe custody, integrity, accessibility and retrievability of Engagement Documentation; and - retention of Engagement Documentation.
<u>Completion of the assembly of final Engagement files</u>	<i>Completion of the assembly of final Engagement files</i>	Moved heading to after the requirement in paragraph 4.49.

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4.50	94	Added guidance that acceptance of electronic signatures, where permitted under laws and regulations, may assist completing Engagement files on a timely basis. Last sentence relating to audits removed as it relates to Assurance Practices and is outside the scope of reissued APES 320.
4.51	95	Removed 'information' after subject matter and last sentence about audits removed which relate to Assurance Practices and is outside the scope of reissued APES 320.
<u>Confidentiality, safe custody, integrity, accessibility and retrievability of Engagement Documentation</u>	<i>Confidentiality, safe custody, integrity, accessibility and retrievability of Engagement Documentation</i>	
4.52	97	Amended references to Relevant Ethical Requirements to Professional Standards and legal duty to legal or professional right or duty.
4.53	98	Amended dot points to alpha list.
4.54	99	No change
4.55	100	Amended dot points to alpha list.
<u>Retention of Engagement Documentation</u>	<i>Retention of Engagement Documentation</i>	
4.56	102	No change
-	103	Paragraph removed as it is relevant to Assurance Practices and is outside the scope of reissued APES 320.
4.57	104	Amended reference to quality control to quality management and dot points changed to alpha list.
<u>Ownership of Engagement Documentation</u>	<i>Ownership of Engagement Documentation</i>	
4.58	105	Removed reference to Assurance Engagements and added that Engagement Documentation does not include the original source documentation provided by clients to provide greater clarity to Firms.
Information and Communication	-	New subsection added
4.59	-	New requirement paragraph (based on initial part of paragraph 33 of ASQM 1) that policies and procedures are established that address obtaining, generating and using information about the System of Quality Management and communicating that information within the Firm and to external parties on a timely basis.
4.60	-	New paragraph added that the procedures of retrieving the information may be enforced through IT applications or embedded into Firm's other policies and procedures (based on paragraph A111 of ASQM 1).
4.61	-	New paragraph that smaller firms may not need rigorous policies and procedures in relation to information and communication (based on paragraph A111 of ASQM 1).
4.62	-	New application material in relation to recognising and reinforcing the responsibility to exchange information within the Firm and provides examples of communication among the Firm, Personnel and Engagement Teams, based on paragraph A112 of ASQM 1.
<u>Communication with External Parties</u>	-	New subsection
4.63	-	New application material in relation to the Firm communicating information within a Network or to or from a Service Provider that supports the System of Quality Management. Based on paragraph A113 of ASQM 1 and 'establishing and maintaining' used instead of 'the design, implementation and operation of'.

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4.64	-	New application material in relation to examples of when law, regulation or Professional Standards may require the Firm to communicate information to external parties. Based on paragraph A114 of ASQM 1 except used more specific reference to Section 360 <i>Responding to Non-Compliance with Laws and Regulations</i> of the Code and removed reference to transparency reports which relate to Assurance Practices and is outside of the scope of reissued APES 320. Also includes application material in relation to examples of when Firm's may be precluded from communicating information externally, based on paragraph A115 of ASQM 1 except added specific reference to Subsection 114 <i>Confidentiality</i> of the Code.
Monitoring and remediation	Monitoring	Renamed subheading
<u>Monitoring a Firm's quality management policies and procedures</u>	<i>Monitoring a Firm's quality control policies and procedures</i>	Renamed subheading
4.65	106	Amended references to Reasonable Assurance to reasonable confidence and system of quality control to System of Quality Management and removed reference to Engagement Quality Control Review. Also removed the requirement on the person assigned responsibility for monitoring (covered by proposed paragraph 3.14) and changed to use the defined term Inspection to make it clear what the inspection involves.
4.66	107	Amended references to quality control to quality management, system of quality control to System of Quality Management and changed dot points to alpha list.
4.67	108	Amended references to quality control to quality management and system of quality control to System of Quality Management. Removed analysis of confirmation of compliance with policies and procedures on Independence as it relates to Assurance Practices only and is outside of the scope of reissued APES 320.
4.68	AUST 109	Removed boxed part of paragraph related to Assurance Practices and is outside of the scope of reissued APES 320.
-	110-118	Paragraphs removed as they relate to Assurance Practices and are outside the scope of reissued APES 320.
4.69	128	Amended reference to system of quality control to System of Quality Management.
4.70	126	Amended references to system of quality control to System of Quality Management and quality control to quality management.
<u>Complaints and allegations</u>	Complaints allegations	
4.71	119 & 129	Consolidated paragraphs 119 and 129 of extant APES 320 and amended references to Reasonable Assurance to reasonable confidence and system of quality control to System of Quality Management.
4.72	120	Simplified the wording the paragraph but the substance remains the same. Added reference to and footnote 8 on whistleblowing.
-	121	Removed paragraph as it relates to Assurance Practices and is outside of the scope of reissued APES 320.
4.73	123	Simplified the wording the paragraph but the substance remains the same. Amended reference to Suitably Qualified External Person to Service Providers.
<u>Remediation</u>		Subheading added
4.74	122	Amended requirement to undertake appropriate remedial actions in respect of Monitoring or complaints and allegations that indicate there are deficiencies in the System of Quality Management.
4.75	115	Application material of list of appropriate remedial actions derived from paragraph 115 in extant APES 320 and paragraph 45 of ASQM 1 about other appropriate actions and legal advice. Also added to advise the client of inappropriate reports.
5 Transitional Provisions	Effective Date	Added section number and renamed heading

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5.1	130	Amended to reflect the transition from APES 320 issued in September 2019 to incorporate amendments to their systems by 1 January 2023 to establish Systems of Quality Management.
Conformity with International Pronouncements	Conformity with International Pronouncements	
APES 320 and ISQC1/ISQM 1	APES 320 and ISQC 1	Subheading amended.
Appendix 1 - Application of quality management standards by Firms	Appendix 1 Application requirements for Firms	Subheading amended.
		Amended flow chart to reflect paragraph 1.10 of reissued APES 320 that the non-assurance practice and Engagements of firms are required to comply with APES 320 and Assurance Practices within Firms are to comply with ASQM 1 and 2 and ASA 220.
Appendix 2 - Comparison of APES 320 elements to ASQM 1 components		Appendix Added
		Demonstrates the high level alignment between proposed APES 320 elements and ASQM 1 components with paragraph references for each standard to assist firms that perform both non-assurance and assurance Engagements.
	Appendix 2 Summary of revisions to the previous APES 320 (Issued in December 2015)	Appendix Removed
		As proposed APES 320 is being reissued rather than revised, summarising revisions in this table is unnecessary. This mapping table provides stakeholders with sufficient information to navigate changes from extant APES 320.