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INSIGHTS

AUDIT & ASSURANCE

ISA 230 audit documentation in Cambodia

What a Cambodian audit file must document under ISA 230, the 60-day assembly window, the 10-year retention under the Law on Accounting and Auditing, and how to handle subsequent changes.



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WHAT DOES ISA 230 REQUIRE IN A CAMBODIAN AUDIT FILE?

ISA 230 requires the auditor to prepare audit documentation that is sufficient to enable an experienced auditor, having no previous connection with the audit, to understand the nature, timing and extent of the procedures performed, the results, the significant matters, the judgements and the conclusions. The file is assembled on a timely basis; ISA 230 sets a 60-day window after the date of the auditor's report for the assembly of the final file. In Cambodia, the Law on Accounting and Auditing requires accounting records and audit evidence to be retained for ten years, which is longer than the ISA 230 minimum; the auditor should apply the longer period.

IN SHORT

- The test is whether an experienced auditor with no prior connection can understand the work, the evidence and the conclusions.
- Document the nature, timing and extent of procedures, the results, the significant matters, the judgements and the conclusions.
- Assemble the final file within 60 days after the date of the auditor's report.
- Retain the file for at least the longer of ISA 230's minimum and the 10 years required by the Law on Accounting and Auditing.
- After assembly, additions are allowed with a documented reason, who made them and when; do not delete or overwrite evidence.

Purpose and sufficiency

Audit documentation is the record of the audit procedures performed, the relevant audit evidence obtained, and the conclusions reached. It serves as evidence of the auditor's basis for the report, the performance of the work, the review and supervision, and the significant matters and judgements.

The sufficiency test is whether an experienced auditor, having no previous connection with the audit, can understand the nature, timing and extent of the procedures, the results, the evidence obtained, the significant matters, the judgements and the conclusions. The file does not need to contain every document; it needs to explain the work and support the conclusion.

The form and content depend on the risk, the complexity, the significance of the matter and the size of the engagement. A high-risk estimate needs more documentation than a low-risk routine test; a complex group needs more than a small single-entity audit.

What to document

The file should identify the engagement, the financial statements, the period and the framework. It should document the audit plan, the risk assessment, the responses, the sample selections, the evidence obtained, the significant matters and the conclusions. The evidence should include the identifying characteristics of the items tested and the source.

For significant matters, the file should record the issue, the alternatives considered, the judgement and the conclusion, and the reasons. A consultation with a specialist or another partner should be documented, including the response and how it was addressed.

The file should show who performed the work, who reviewed it and when. A sign-off with no review evidence does not demonstrate supervision. The review should cover the significant judgements, the financial statement disclosures and the audit report.

DOCUMENTATION OF A SIGNIFICANT MATTER

Element	What to record	Example
Issue	The question or risk	Impairment of a plantation
Evidence	The procedures and results	Valuation report, cash-flow model, sensitivity
Judgement	The alternatives and the choice	Discount rate and yield assumptions
Conclusion	The conclusion and the basis	No impairment / impairment recognised
Review	Who reviewed and when	Engagement partner sign-off

Assembly and retention

ISA 230 requires the auditor to assemble the final audit file on a timely basis. The standard sets a period of no more than 60 days after the date of the auditor's report for the assembly of the final file. After the assembly, the auditor does not delete or discard documentation before the end of the retention period.

The retention period is at least five years from the date of the auditor's report under ISA 230, or longer if local law requires. In Cambodia, the Law on Accounting and Auditing requires accounting records and audit evidence to be retained for ten years. The auditor should apply the ten-year period, and the entity should keep its own records for the same period.

The documentation is the auditor's property. It is confidential, but it may be made available to the entity or to a regulator in accordance with the law and the engagement terms. The auditor should not disclose it without the appropriate authority.

Changes after assembly

If the auditor needs to add documentation after the final file is assembled, the addition should be documented with the reason, the date and the person who made it. The auditor should not delete or overwrite the original documentation. The addition should not obscure the original evidence or the conclusion.

A change to the audit report or the financial statements after the assembly is a separate event. The auditor should document the reason, the work performed, the review and the effect on the report. A subsequent discovery of a fact that existed at the report date may require a revised report or other action.

The file should show the chronology. A note added months later without a date or explanation is difficult to defend in an inspection or a legal dispute.

> ⚠ **If it is not documented, it is hard to defend**
>
> The audit file is the evidence of the work. A conclusion that cannot be traced to procedures, evidence and a review is a finding, even if the work was actually performed.

Electronic files

Most Cambodian audit files are electronic. The same requirements apply: access controls, backup, version control, a clear index, and a record of who prepared and reviewed each section. The file should be readable and retrievable for the retention period.

A cloud audit platform can help with the assembly and the review, but it does not replace the auditor's judgement about sufficiency. The auditor should confirm the platform's backup, export and retention terms, and keep an export at the end of the engagement if the platform is changed.

The file may be bilingual. The auditor should ensure that the key documents, the review notes and the conclusions are understandable to the reviewer and the regulator.

Cambodian practice

A Cambodian audit file often includes Khmer and English documents, paper originals and electronic working papers. The index should identify the documents, the source, the period and the preparer. The review should cover the bilingual financial statements and the Khmer/Riel filing.

The 10-year retention applies to the accounting records and the audit evidence. The auditor should align the client's retention with the file retention and confirm the storage and access arrangements at the end of the engagement.

For a group audit, the group auditor should document the instructions to component auditors, the component work reviewed, the consolidation adjustments and the group conclusion. The component files should be retained and accessible for the group file.

- Index, engagement letter and audit plan.
- Risk assessment, responses and sample selections.
- Significant matters, judgements and consultations.
- Review sign-offs and the audit report.
- Assembly date, retention period and access controls.

Key facts

How this article is checked

Figures were verified against the sources listed below in November 2026 and are re-checked each January or when the rule changes. Written by Liv Bonito, Co-founder & Managing Director. General information, not advice on your situation: for that, talk to a partner.

QUESTIONS

Questions people ask

How long must a Cambodian auditor keep the audit file?

The Law on Accounting and Auditing requires accounting records and audit evidence to be retained for ten years. ISA 230 requires at least five years from the date of the auditor's report, or longer if local law requires. Apply the ten-year period.

Can the audit file be changed after it is assembled?

Yes, but additions must be documented with the reason, the date and the person who made them. The auditor should not delete or overwrite the original documentation or obscure the original conclusion.

Who owns the audit file?

The auditor. It is confidential and may be made available to the entity or a regulator in accordance with the law and the engagement terms. The auditor should not disclose it without authority.

Does an electronic file meet ISA 230?

Yes, if it is complete, accessible, retrievable and protected for the retention period. The auditor should confirm the backup, version control, access controls and export arrangements.

SOURCES

Where the rules come from

01 ISA 230 Audit Documentation — IAASB / KICPAA

02 ISA 220 Quality Management for an Audit of Financial Statements and ISQM 1 — IAASB / KICPAA

03 Law on Accounting and Auditing (Royal Kram NS/RKM/0416/006, 11 April 2016), Arts. 20, 23 and 26 (10-year retention) — Kingdom of Cambodia

04 CISA / CISQM standards applied in Cambodia — Kampuchea Institute of Certified Public Accountants and Auditors (KICPAA)