



Tasmanian
Audit Office

**Senior Management and Members of
Audit Committees
Information Session**

19 May 2022

Agenda

Time	Presenter	Topic
1:00 – 1:05	Rod Whitehead	Introduction
1:05 – 1:25	Rod Whitehead	Failures in governance and internal control
1:25 – 1:35	David Bond	Audit findings
1:35 – 1:45	Stephen Morrison	Tasmanian Audit Office approach to internal controls
1:45 – 2:00	Rod Whitehead	Audit focus areas
2:00 – 2:15	Jeff Tongs	Financial reporting changes for 30 June 2022
2:15 – 2:45	Afternoon tea	
2:45 – 3:25	WLF	Essential elements of good internal control
3:25 – 4:10	Rod Whitehead (facilitator)	Panel discussion – responding to COVID-19 – impacts on internal control
4:10 – 4:25	Janine McGuinness	Overview of COVID-19 performance audits and reviews
4:25 – 4:30	Rod Whitehead	Close



Tasmanian
Audit Office

Failures in governance and internal control systems

Rod Whitehead
Tasmanian Audit Office

Recent failures in governance

- In 2019, Kenneth Hayne delivered the Final Report of the *Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry*.
- In March 2021, Tony Pagone and Lynelle Briggs delivered the *Final Report of the Royal Commission into Aged Care Quality and Safety*.
- Also in 2021, the *NSW Casino Inquiry report* was delivered.
- Three separate inquiries in three quite different industries. But there is one thing they all have in common - startling failures of corporate governance.

Financial Services Royal Commission

- Commissioner Hayne noted types of risk associated with misconduct are compliance, conduct, regulatory and operational risks – i.e. non-financial risks
- Boards did not receive the right information that would have enabled them to either identify emerging non-financial risks or oversee and challenge management effectively.
- Such risks are more difficult to measure than most types of financial risk.
- Recommendations focused on comprehensive assessments of governance arrangements and compliance with existing rules and governance practices.

Aged Care Royal Commission

- Aged Care Royal Commission cited “*deficiencies in the governance and leadership*”⁴ of some aged care providers as well as a lack of structures in place to “*ensure that governing bodies are properly informed of care deficiencies and risks.*”⁵
- These governance factors ultimately contributed to a substandard quality and safety of care.
- Recommendations related to legislative and system changes to uplift the governance standard of aged care providers.
- In this industry, as in others, where boards and governance arrangements fail to prevent issues, legislative requirements become tighter and more prescriptive.

NSW Casino Inquiry

- The NSW Casino Inquiry Commissioner found *“processes that exposed its directors to conflicts of interest”, “lack of robust Junket approval processes”* and *“lack of proper oversight and monitoring of risks to money laundering”*.
- Commissioner found Crown was “not suitable” to operate the Barangaroo casino in Sydney.
- Recommendations largely focus on strengthening its corporate culture and governance and included enforceable undertakings from the Board.

Key governance lessons

- It is often not until conduct-related outcomes of poor governance come to light in a very public and reputationally damaging manner that the importance of strong corporate governance is realised.
- Indeed, much of what went wrong may even have been prevented with stronger corporate governance practices and robust, informed decision-making.
- Areas for improvement - accountability, risk management, improved and corporate culture.
- Reflected in ASIC's corporate governance priorities for the year ahead.

Observations from Australasian audit offices

- Business continuity
- Information technology
- Cyber security
- Conflicts of interest
- Masterfile management
- Shared service (outsource) arrangements

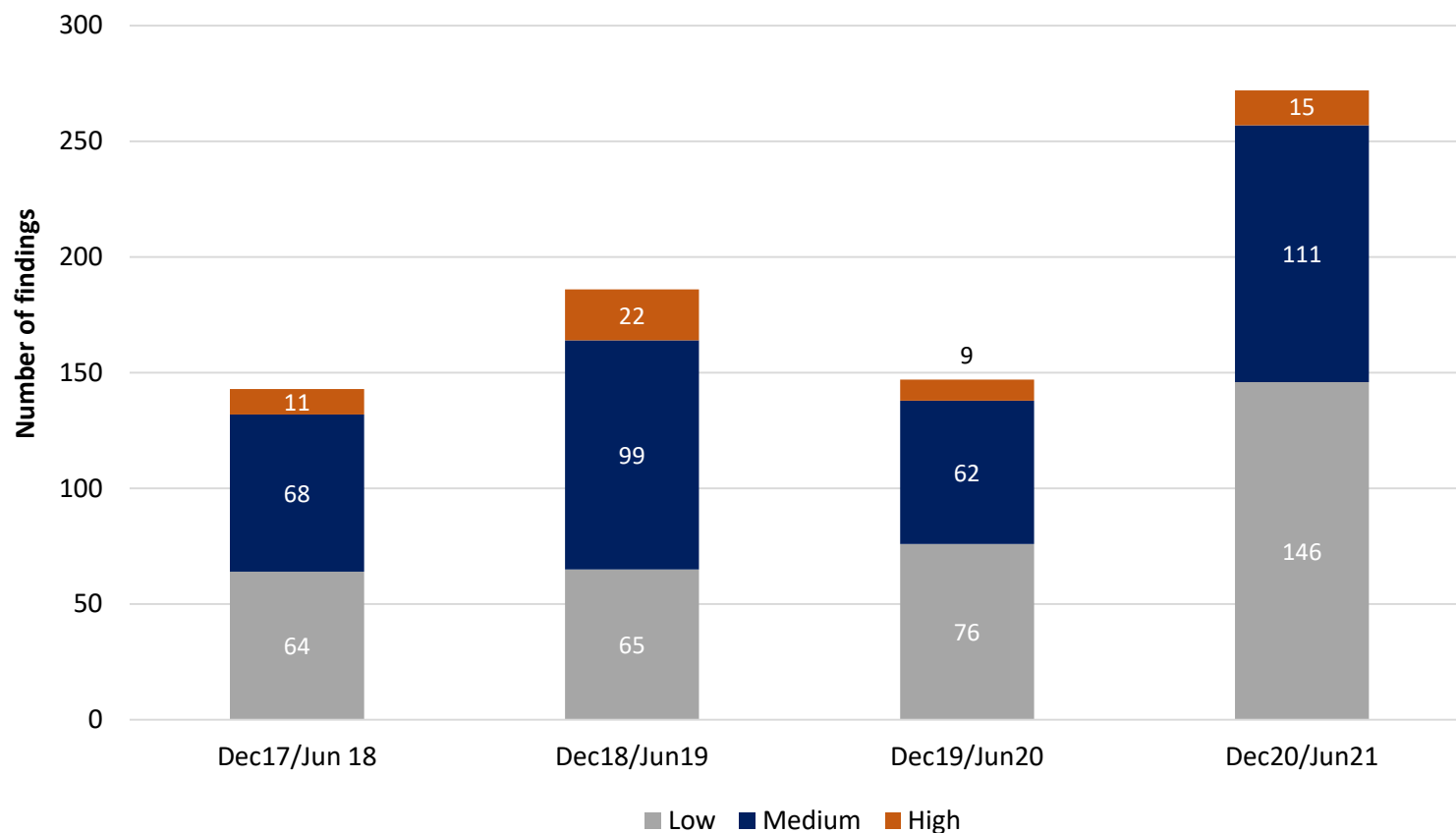


Tasmanian
Audit Office

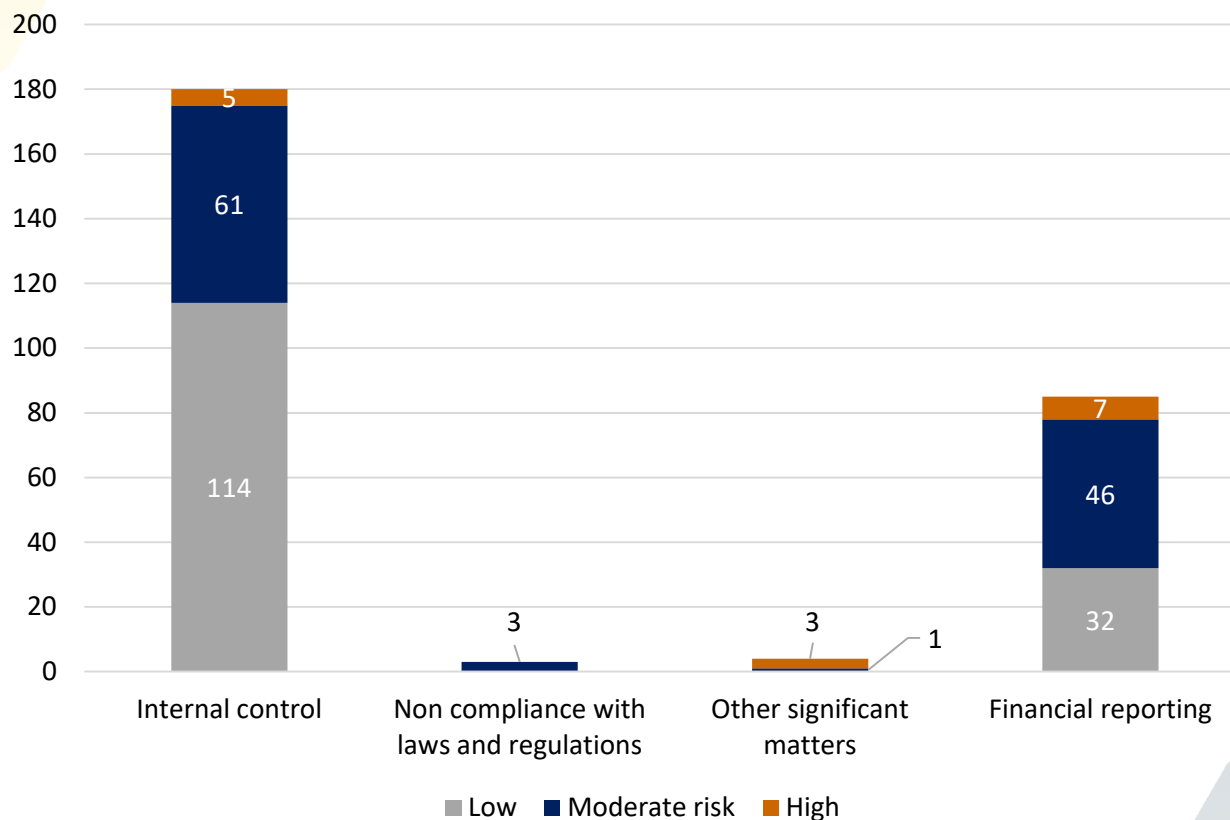
Audit findings

David Bond
Tasmanian Audit Office

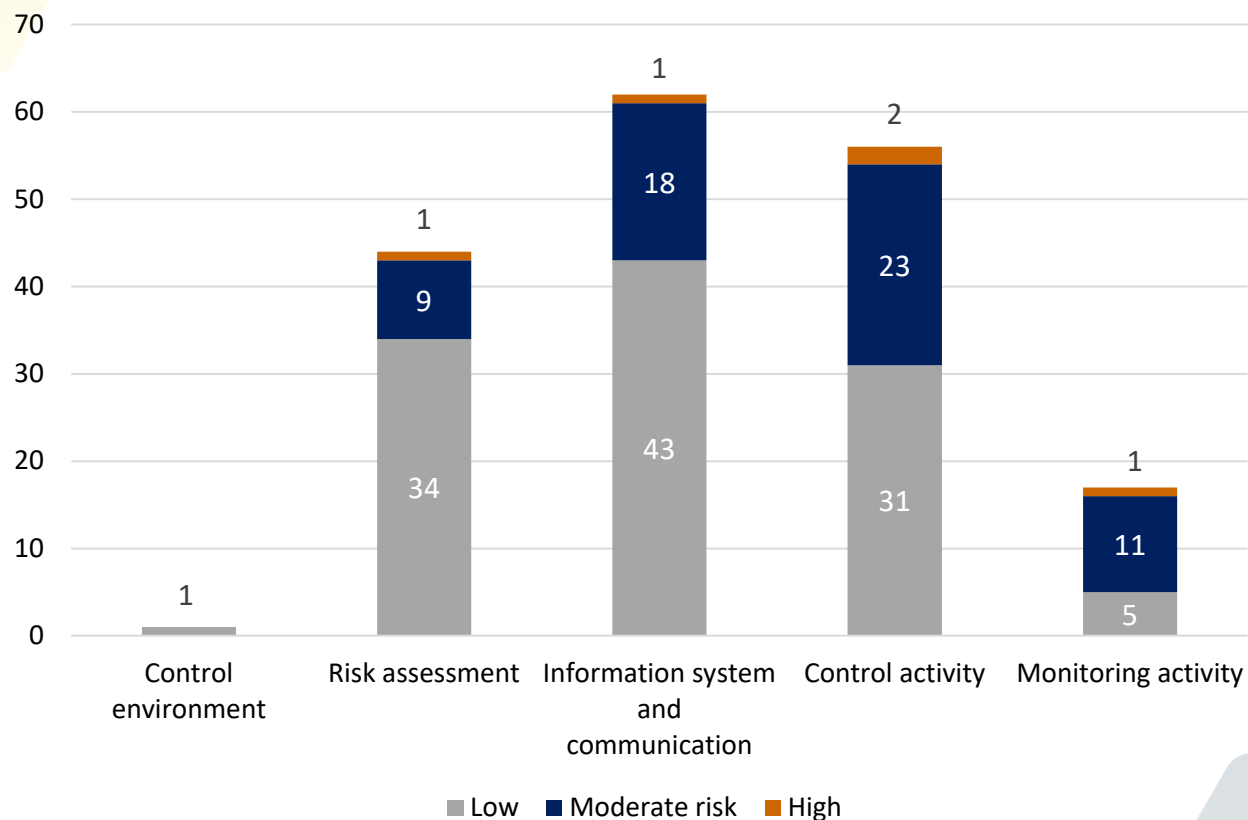
Comparison of audit findings by risk rating



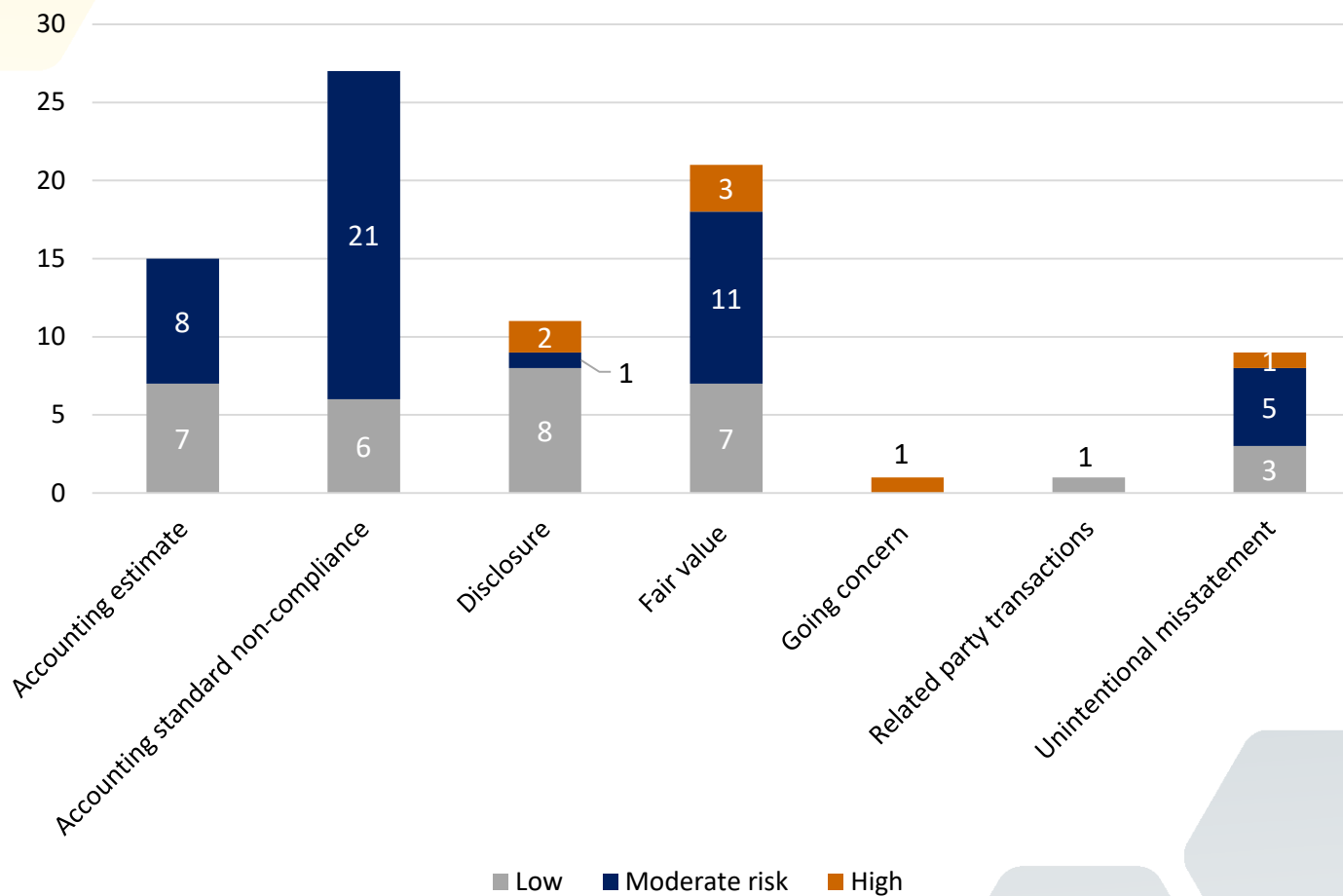
Classification of audit findings



Classification of audit findings



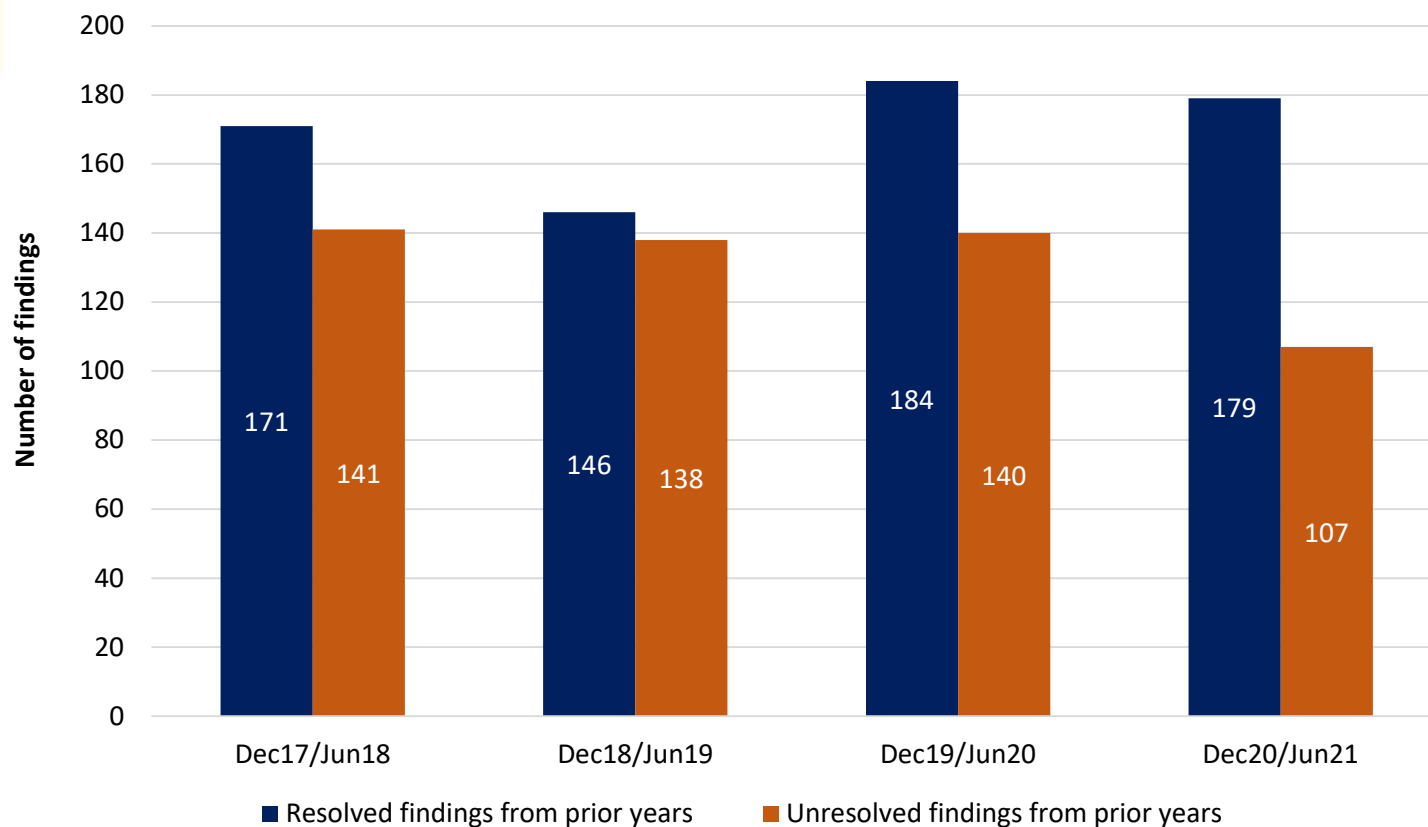
Classification of audit findings



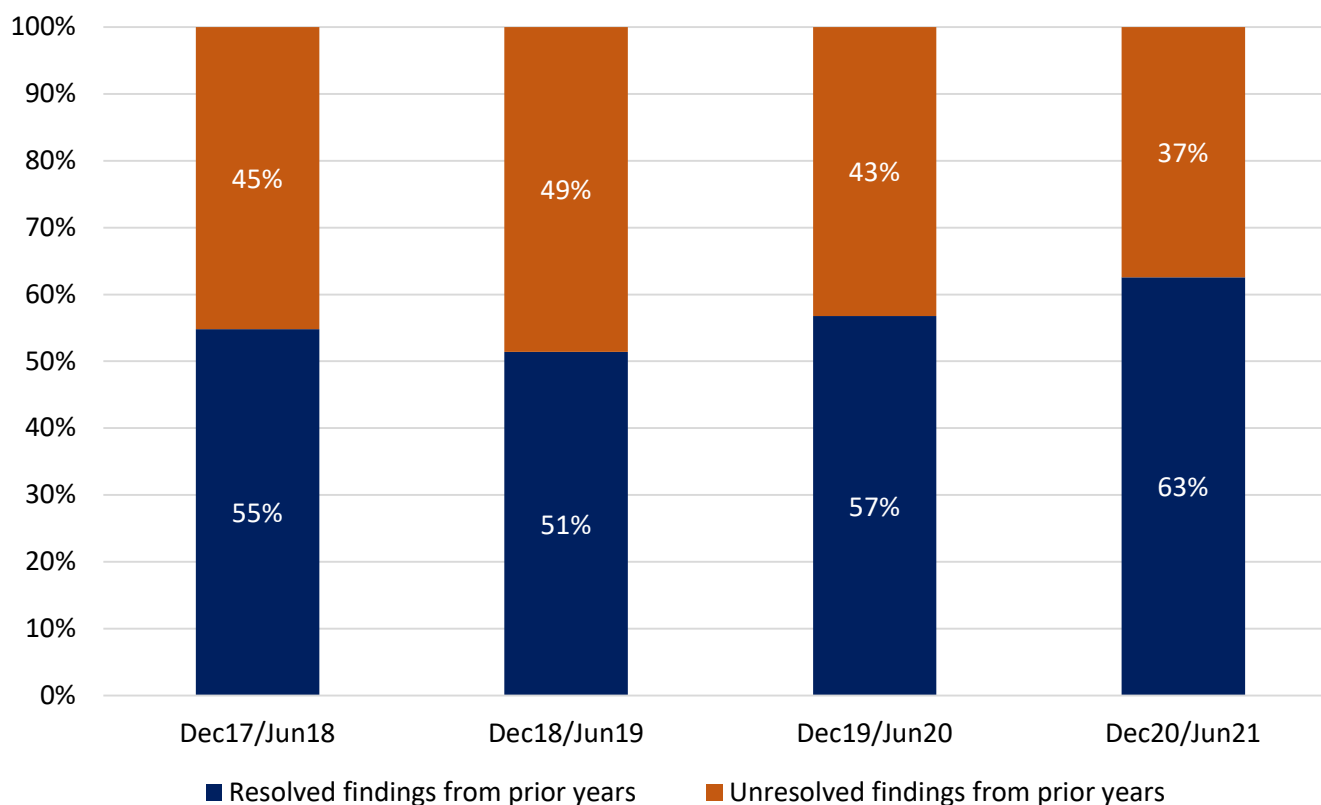
Audit findings by sector and risk rating

2021	High Risk	Moderate Risk	Low Risk	Total
General Government	3	26	48	77
Government Business	1	20	20	41
Local Government	3	47	63	113
Other	8	18	15	41
Total	15	111	146	272

Prior years' audit findings



Resolution of prior years' audit findings





Tasmanian
Audit Office

Tasmanian Audit Office approach to internal controls

Stephen Morrison
Tasmanian Audit Office

High risk areas – control approach

- Presumption that management will have controls in place for high risk areas
- Audit reliance on key controls (focus area in 2022)
- Key assertions at risk (e.g. completeness, accuracy, existence, valuation, presentation and disclosure)
- Design and Implementation of key controls
- Operating effectiveness of key controls
- Reporting of control deficiencies/areas for improvement
- Impact on audit approach

Internal control focus areas 2022

General IT Controls (examples)

- Governance
- Change management
- Access management
- Service organisations (IaaS, PaaS, SaaS)
- Disaster recovery/backups

Payroll (examples)

- Valid employees
- Correct rates
- Masterfile changes
- Leave balances/approvals
- Payroll reconciliations

Internal control focus areas 2022

Property, Plant and Equipment (examples)

- Independent review of asset/WIP reconciliations
- Management review and approval of valuations or indices applied to assets
- Application controls and the calculation of indices/depreciation rates applied to assets
- Managements review of remaining useful lives of assets
- Management assessment of impairment indicators
- Controls around commissioning of assets of a timely basis



Tasmanian
Audit Office

Audit focus areas

Rod Whitehead
Tasmanian Audit Office

Audit focus on responsibilities relating to financial reporting obligations

Areas subject to audit focus include:

1. consideration by those charged with governance (TCWG) and management of the risks relevant to financial reporting objectives
2. extent to which the design and implementation of appropriate controls and processes are adequately documented
3. reliance on information produced by accounting and other experts
4. accounting position papers.

Business risks relevant to financial reporting objectives

- Australian Auditing Standard 315 *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment* - consider process for identifying business risks relevant to financial reporting objectives.
- If no such a process exists \Rightarrow significant deficiency in internal control.
- Is an enterprise risk assessment sufficient to meet the requirement?
- Does it specifically address business risks relevant to financial reporting objectives?

Process for identifying business risks relevant to financial reporting objectives



Committee of Sponsoring Organizations of the Treadway Commission (COSO) developed a COSO Framework for evaluating internal controls.

For the purposes of the Australian Auditing Standards, the system of internal control comprises the same five inter-related components

What could go wrong?

- Control environment:
 - Inadequate governance structures
 - Poor commitment to integrity and ethical values
 - Unclear assignment of authority and responsibility
 - Inability to attract, develop and retain competent individuals
 - Limited governance over information technology and communication systems/changes

What could go wrong?

- Information system and communication:
 - IT applications – working around controls that initiate, process, record and report transactions or information
 - IT infrastructure – limited oversight of network, operating systems, and databases and their related hardware and software
 - IT processes – poor controls over access, change management, IT operations
 - Breakdowns in initiating, recording, processing and correcting (if necessary) transactions

What could go wrong?

- Information system and communication:
 - Limited capture, processing and disclosure of other events and conditions (other than transactions) in the financial report
 - Deficient/missing accounting records
 - Unclear financial reporting process to prepare the financial statements
 - Inadequate resources relevant to the above

What could go wrong?

- Control activities:
 - Absence of authorisations and approvals
 - Limited review of reconciliations
 - Over-reliance on manual verifications
 - Poor physical controls
 - Inadequate safeguarding of assets
 - Inadequate segregation of duties
 - Overriding of IT controls - completeness checks, validity checks, input controls

What could go wrong?

- Monitoring activities:
 - Limited processes to monitor the effectiveness of controls, identification and remediation of control deficiencies
 - No, or ineffective, internal audit function
 - Limited processes to test the effectiveness of IT controls, identification and remediation of IT control deficiencies

What could go wrong?

- Financial reporting considerations:
 - Going concern
 - Fair value
 - Estimates
 - Key judgements
 - Related party transactions
 - Accounting standards
 - Disclosures
 - Use of experts
 - Unintentional misstatement
 - Intentional misstatement
 - Asset misappropriation
 - Fraud
 - Non-compliance – laws, etc.

Documentation of key controls

ASIC guidance¹:

- Entities must have appropriate processes and records to support information in the financial report rather than rely on the independent auditor.
- How well are key internal controls understood?
- How well are internal controls documented?

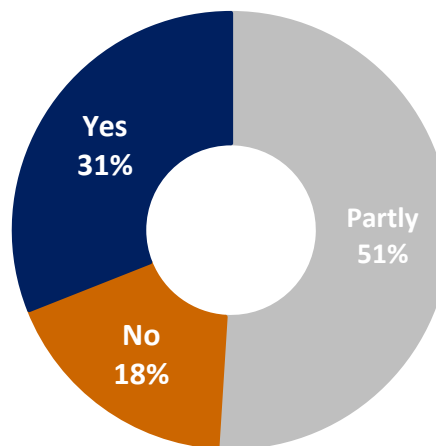
1 ASIC information sheet (INFO 183) Directors and financial reporting, <https://asic.gov.au/regulatory-resources/financial-reporting-and-audit/directors-and-financial-reporting/>

Documentation of key controls

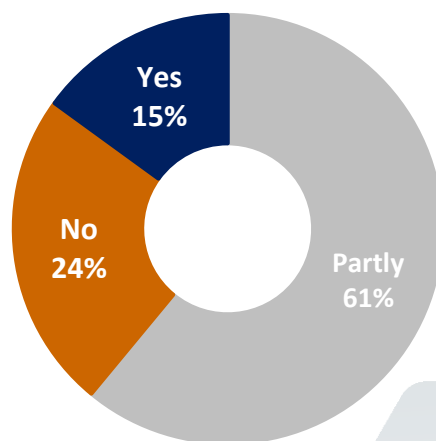
- KPMG Controls Transformation and Automation Survey across 300 organisations, March 2021

Are you in control? Business outcomes focused controls transformation

<https://newsroom.kpmg.com.au/wp-content/uploads/2021/08/Controls-Transformation.pdf>



Only a third of respondents felt that it was clear who is responsible for setting the standards for controls and designing controls within their organisations



Nearly a quarter of respondents said the controls were not formally documented with over 60 percent saying that only some controls were documented (e.g. financial)

Reliance on the work of experts

- Management's expert - an individual or organisation possessing expertise in a field other than accounting or auditing, whose work in that field is used by the entity to assist the entity in preparing the financial report.
- Management should document their:
 - consideration of the competence, capabilities and objectivity of the expert
 - understanding of the work of that expert
 - evaluation of the appropriateness of the expert's work for use in preparing the financial statements.
- Audit committees should evaluate the management's assessment.



Accounting position papers

- Should form part of financial statement/management process
- Types and examples:
 - Changes in accounting policy
 - New standards
 - Annual assessments of useful lives and other estimates
 - Consideration of reports from experts (eg. Valuations)
 - Consideration of impairment and expected credit losses
 - Other matters of significance effecting the accounting or disclosures in the financial statements



Tasmanian
Audit Office

Financial reporting changes for 30 June 2022

Jeff Tongs

Tasmanian Audit Office

Cloud Computing /Software-as-a-Service (SaaS)

IFRIC Agenda Decision - Configuration or Customisation Costs in a Cloud Computing Arrangement

- Rejected the view that a SaaS contract created a separate intangible asset, or a lease, as there was no control over software code
- Rejected the view that the SaaS contract for Configuration or Customisation represented an intangible asset (*despite that an intangible asset is defined as arising from contractual or other legal rights*)
- Costs related to getting these services ready for use **cannot be capitalised** as an intangible asset
- Expense upfront or over the contract for service period (depending upon “**distinct services**” test)

Cloud Computing /Software-as-a-Service

Distinct Service or Not a Distinct Service? Apply AASB 15?

If the configuration/customisation service is:

- a distinct service from the right to receive access to the supplier's software, the costs are expensed upfront when performed.
- not a distinct service from the right access to the supplier's software, the costs are recognised as expenses as/when the supplier provides access over the contract term. This usually means recognising a prepaid asset upfront, which unwinds over the contract term.
- completed by a third-party supplier, recognise the costs as an expense when the service is performed.

Cloud Computing /Software-as-a-Service (SaaS)

Issues to consider:

- What costs have been capitalised for what projects?
- What assets controlled by the entity do the costs represent?
 - Is it computer code? *“Show me the code”*
- Who provided the services? - SaaS/cloud computing company, third party, internal costs, contract breakdown?
 - **Know your contract – know your costs**
 - **Different costs could be expensed upfront or over time**
(prepayment or intangible if software)

Transition:

- Change in accounting policy, not via a standard or interpretation
- Not an error – change is based on ‘new information’
- Retrospective application applies

AABS 1060: General Purpose Financial Statements – Simplified Disclosures for For-Profit and Not-for-Profit Tier 2 Entities

- AASB 2019-1 *Amendments to Australian Accounting Standards – References to the Conceptual Framework*
- “**Reporting Entity**” concept introduced by IASB. “An entity that is required, or chooses, to prepare general purpose financial statements.”
- Conflicted with Australian concept of a “reporting entity” and “non-reporting entity” based upon “dependent users”. If not changed, Australian entities would be non-compliant with IFRS.
- Non-reporting entity and special purpose financial statements removed (AASB 2020-2) for for-profit entities.

AABS 1060: *General Purpose Financial Statements – Simplified Disclosures for For-Profit and Not-for-Profit Tier 2 Entities*

- **Conceptual Framework (CF)**
 - Mandatory application for **for-profit private sector entities**.
 - **For-profit public sector** entities can elect to apply if IFRS compliance is necessary
 - **Not for use by NFP private and public sector entities**
- AASB 1060 introduces the ‘Simplified Disclosures’ framework for Tier 2 entities - disclosures now combined into a single standard
- Replaces the previous ‘Reduced Disclosure Requirements’ (RDR) framework. - “shaded” disclosure paragraphs now redundant
- DOES NOT APPLY to Government and Statutory Entities who apply their own Act - Tier 1 (full) GPFR

Lease Considerations

Centralised management of major office accommodation leases is facilitated by Finance-General for Agencies (Substantive Substitution rights)

- What about office fit outs? Separate arrangement? Useful life?
- Other Leases? Changes? (moving, modifications, extensions?)

Concessionary Leases

- Temporary exemptions still allows Not-for-Profit lessees to elect to measure ROU assets at 'cost' (AASB 16 in para Aus 25.1).
- ROU assets can be treated as a separate class of asset, despite a similar nature and use.
- What's next in public sector NFP lessees?

Other Reporting Considerations

Equity Contributions \$135m in 2020-21

- 1038 *Contributions by Owners Made to Wholly-Owned Public Sector Entities*
 - Government designation determines – Equity or Income
- TI Guidance: FC-16 *Contributions to Government Businesses*
It provides criteria that the contribution must:
 - gives rise to a financial interest in the net assets
 - Be an equity instrument - can be sold, transferred or redeemed.
- If criteria not meet - recognise as grant funding
- Ultimately designation by Government determines treatment

Other Reporting Considerations



Asset Valuation, Revaluation model – sufficient regularity

- Are valuations planned?
 - VG: 10 Municipalities in 2022, valuation is date 1 July 2021
 - Infrastructure?
- If not, what's the approach?
 - Indexing? (What basis?)
 - VG Adjustment factors? (*28 Feb 22 Land range: up to 5.00!*)
- Disclosure requirements all met and correct?
 - Policy, Effective date, Independent valuer or internal, Valuation technique explained, Hierarchy (level 1,2 or 3)....?

Other Reporting Considerations

- Climate Related Risks and Financial Statements
 - Risk related to reported amounts
 - Climate risks in key assumptions in developing estimates
- Impact of COVID-19 on Financial Reporting
 - Disclosure of significant impacts
 - Are previously disclosed impacts still valid?



Remember – Inclusion of key estimates, judgements and assumptions about the future are a requirement of AASB 101, and that includes comparative information if relevant to understanding the statements.

(AASB 101.122, 125 & 38)

New Accounting Standards



- 2023/24 *AASB 2021-2 Amendments to Australian Accounting Standards – Disclosure of Accounting Policies and Definition of Accounting Estimates*
- 2023/24 *AASB 2020-6 Amendments to Australian Accounting Standards – Classification of Liabilities as Current or Non-current – Deferral of Effective Date (for AASB 2020-1)*

References



- **Software as a Service – IFRIC Interpretation**
<https://www.ifrs.org/content/dam/ifrs/supporting-implementation/agenda-decisions/2021/configuration-or-customisation-costs-in-a-cloud-computing-arrangement-mar-21.pdf>
- **Climate-related and Other Emerging Risks Disclosures**
https://www.aasb.gov.au/admin/file/content102/c3/AASB_AUASB_Joint_Bulletin_Finished.pdf
- **Impact of COVID-19 on Financial Reporting**
<https://www.audit.tas.gov.au/client-reference-information/>
https://www.aasb.gov.au/admin/file/content102/c3/AASB19009_COVID19_FA.pdf
- **Guidance Paper - accounting for assets valued using current replacement cost**
<https://www.audit.tas.gov.au/wp-content/uploads/Accounting-for-assets-valued-using-current-replacement-cost.pdf>
- **Valuation Adjustment Factors - 28 February 2022**
<https://nre.tas.gov.au/land-tasmania/office-of-the-valuer-general/property-valuation-adjustment-factors>
- **Guidance Paper – 30 June 2022 financial statement submission**
[Guidance-paper-30-June-2022-financial-statement-submission.pdf \(audit.tas.gov.au\)](#)



Tasmanian
Audit Office

Essential elements of internal control

Maryellen Salter & Alison Merridew

WLF Accounting and Advisory

Essential Elements of Good Internal Control



Maryellen Salter
Partner
WLF Accounting and Advisory
Chair, Tasmanian Chapter of the Institute
of Internal Auditors - Australia



Alison Merridew
Audit Consultant
WLF Accounting and Advisory

What will we cover.....

- 1. What is risk?**
- 2. What is a control?**
- 3. Confirmation of controls**
- 4. Sources of Assurance**
- 5. Role of internal controls**
- 6. Assurance activities**
- 7. Case Studies**
- 8. Summary**



Risk = the effect of uncertainty on objectives

- Inherently linked to strategy
- **Not** inherently 'bad' - uncertainty can give rise to both **threats** and **opportunities**
- Understand and monitor your context
- Change strategy ⇔ change risks ⇔ change strategy



The risk landscape – external environment

What 5 risks will pose a critical threat to your sector in the next two years?



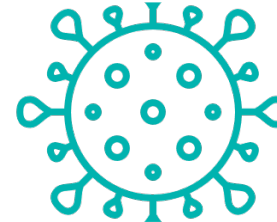
**Cybersecurity
failure**



**Extreme weather
events**



**Climate action
failure**



**Infectious
diseases**



**Debt crises in
large economies**

Source: WEF Executive Opinion Survey 2021 – Australia

Control = is any action taken by management to enhance the likelihood that objectives will be achieved

Directive – to cause or encourage

Preventative – to deter

Detective – to detect and correct

Reactive – action to minimise impact or maximise opportunity



Control = Why do you do that?

What
control?

I've always
done it

I was told
to

It's in my
procedures
manual

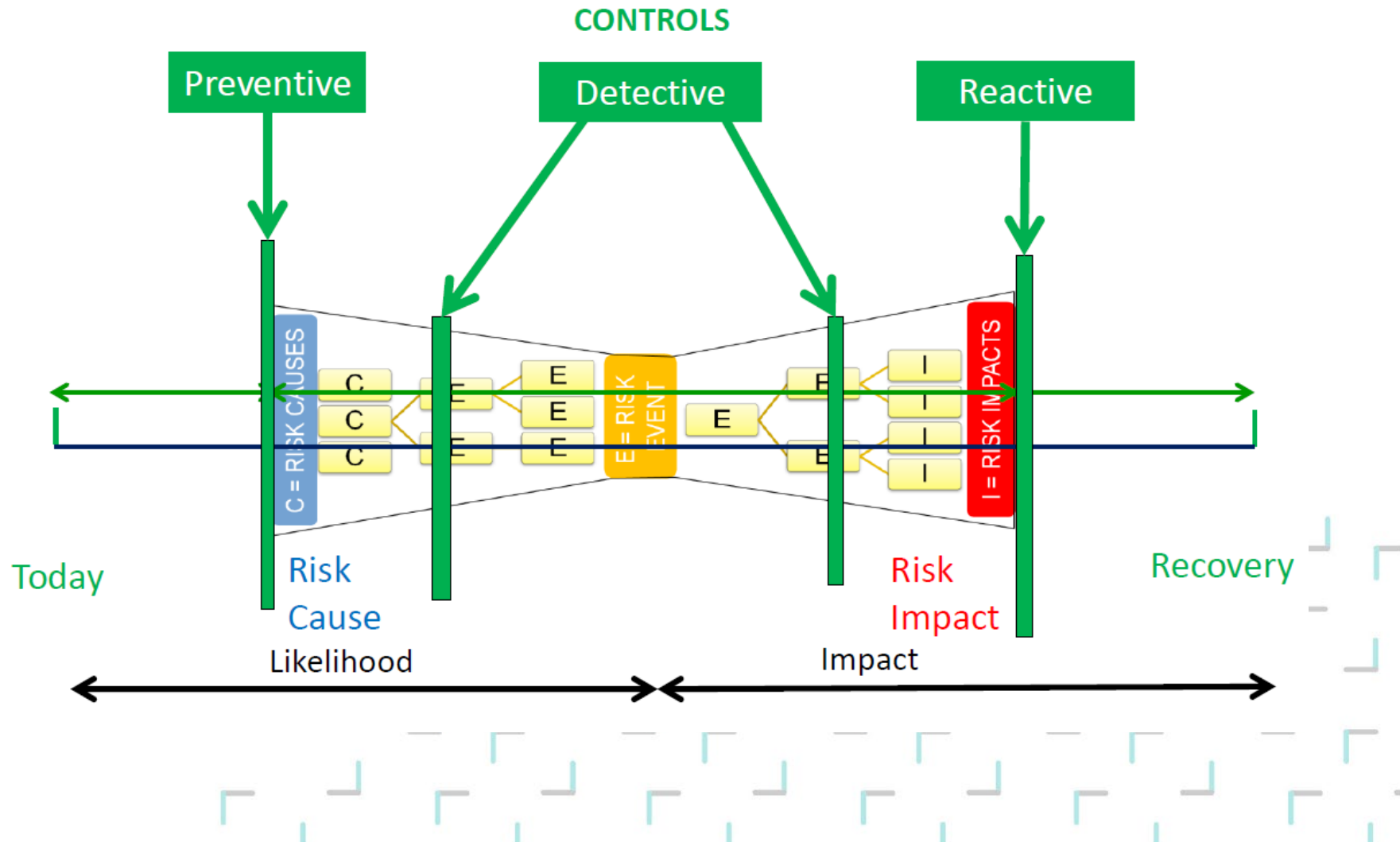
So I don't
get into
trouble

How controls modify risk

1. Controls modify some characteristics of risk
 - Likelihood
 - Impact
2. Most controls either modify likelihood or impact (rarely both)

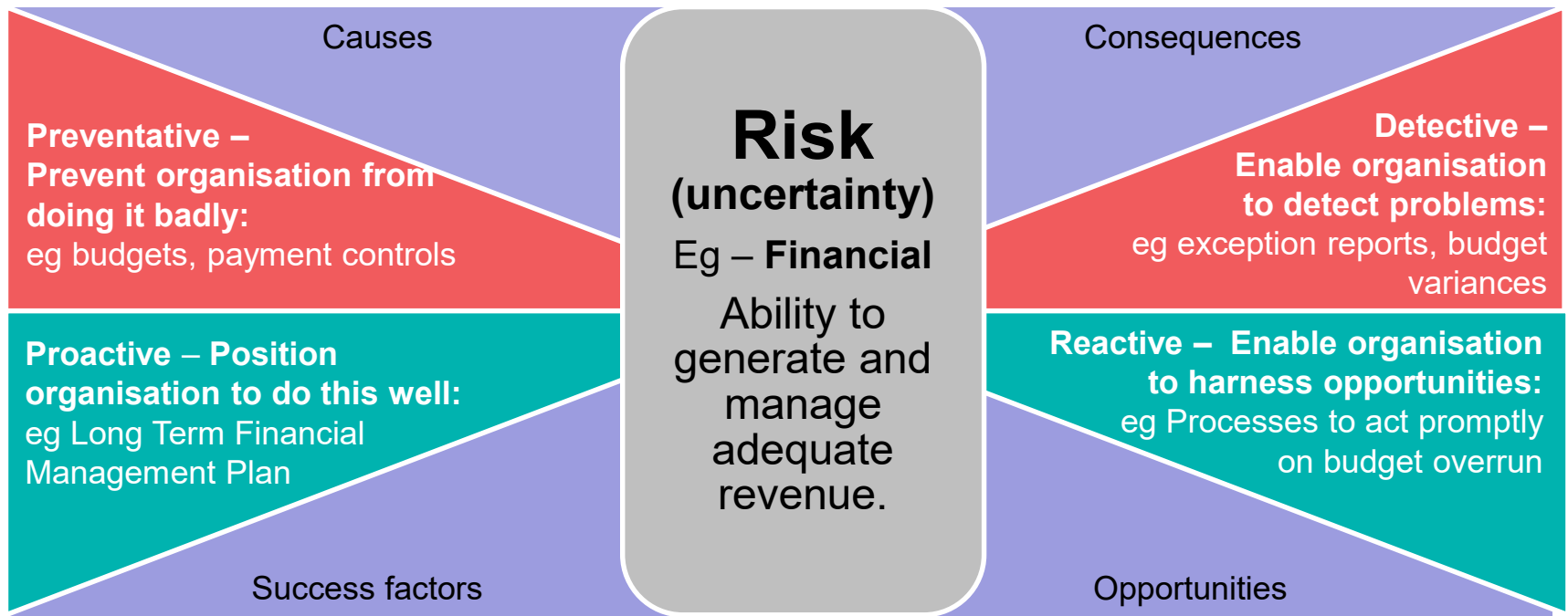


A complete picture of risk



Risk management strategies (controls)

Risk = the effect of uncertainty on objectives



Monitoring control effectiveness

A control's effectiveness in mitigating a risk (s) is made up of three elements:

- **The objectives of the control**
- **The design effectiveness**
- **The operating effectiveness**



Audit of the Control Environment

Are controls linked to risks, processes and outcomes?

Ownership of controls

Understanding of control objectives

Mix of controls

Culture

1. Quality of control testing

How seriously is control testing and control effectiveness taken?

Reporting

Compliance with controls

**Compliance
encompasses
adherence to policies,
plans, procedures,
laws, regulations,
contracts or other
requirements**

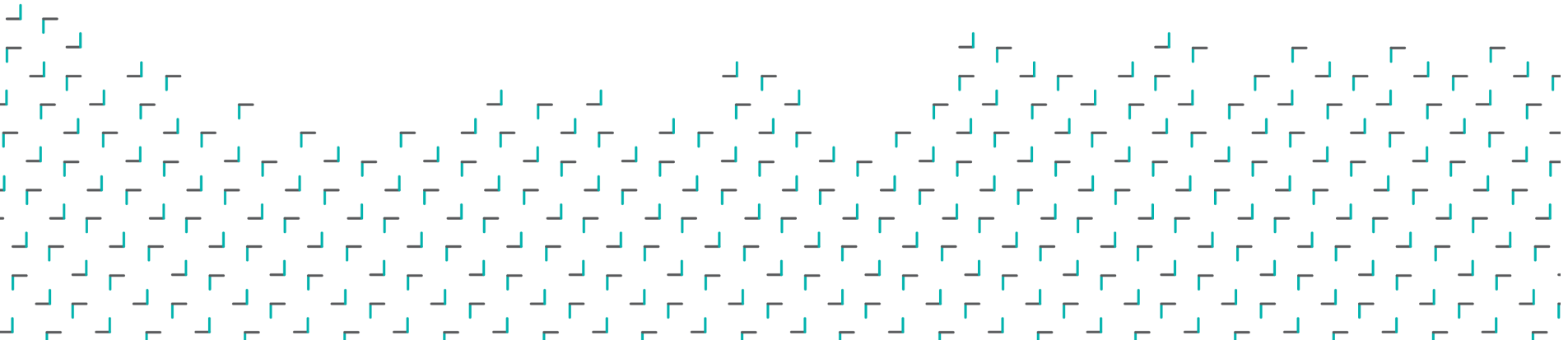
**What questions do
Directors need to
ask?**

Assurance Activities

Assurance is a process that provides a level of confidence that objectives will be achieved within an acceptable level of risk.



Case Studies



Global fraud trends – ACFE report 2020

Top 3 control weaknesses

Lack of
internal
controls

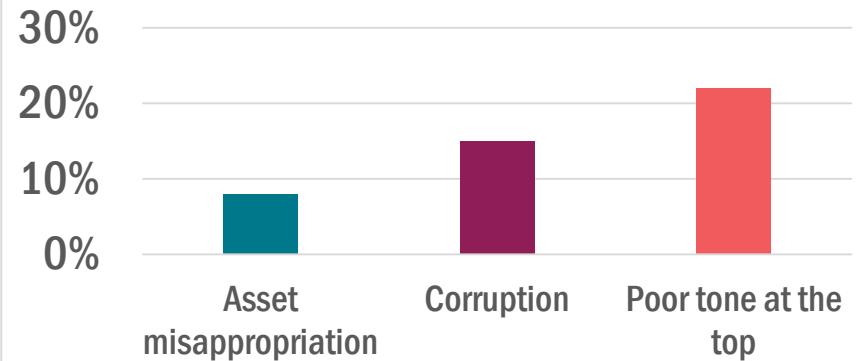
Lack of
management
review

Override of
existing
internal
controls



9% of fraudsters made
no attempt
to conceal the fraud

Primary risk factor in financial statement frauds



Source: Association of Certified Fraud Examiners, *Report to the Nations – 2020 Global Study on Occupational Fraud & Abuse*

Supplier Master file changes – good practice

Segregation of
duties across
P2P

Verbal
verification

Regular clean
ups of
creditors
ledger

Exception
Reporting /
oversight
control

Policies and
procedures

1. Phishing
and fraud
awareness
training

Regular
controls
testing

Ordering and
receipting
authorisations



WHS – conduct and workplace culture

\$8 billion annual cost for construction industry's cultural issues

The productivity cost of employees consistently working overtime was \$708 million; the cost of mental ill-health was \$643 million and the cost of higher incidence of male construction worker suicides compared to other industries was \$533 million.

‘A dire situation that is unprecedented’: Senior Alfred doctor quits, warning of mass burnout

Review finds 1 in 3 staff in federal parliament experience sexual harassment

Bullying, sexual harassment and racism rife at Rio Tinto, workplace review finds

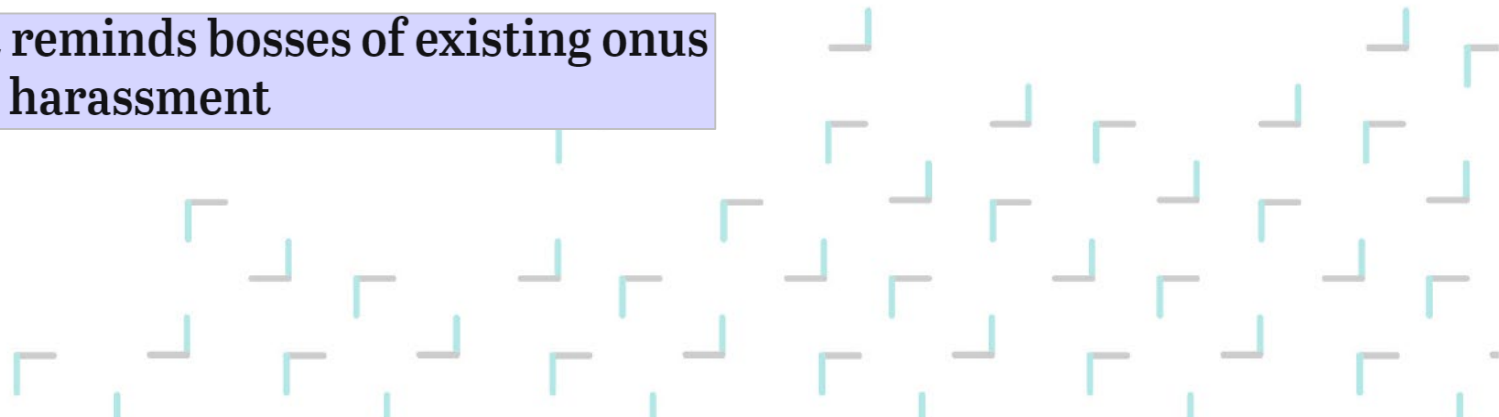
Government reminds bosses of existing onus to stamp out harassment



Work-related psychological health and safety



Preventing workplace sexual harassment



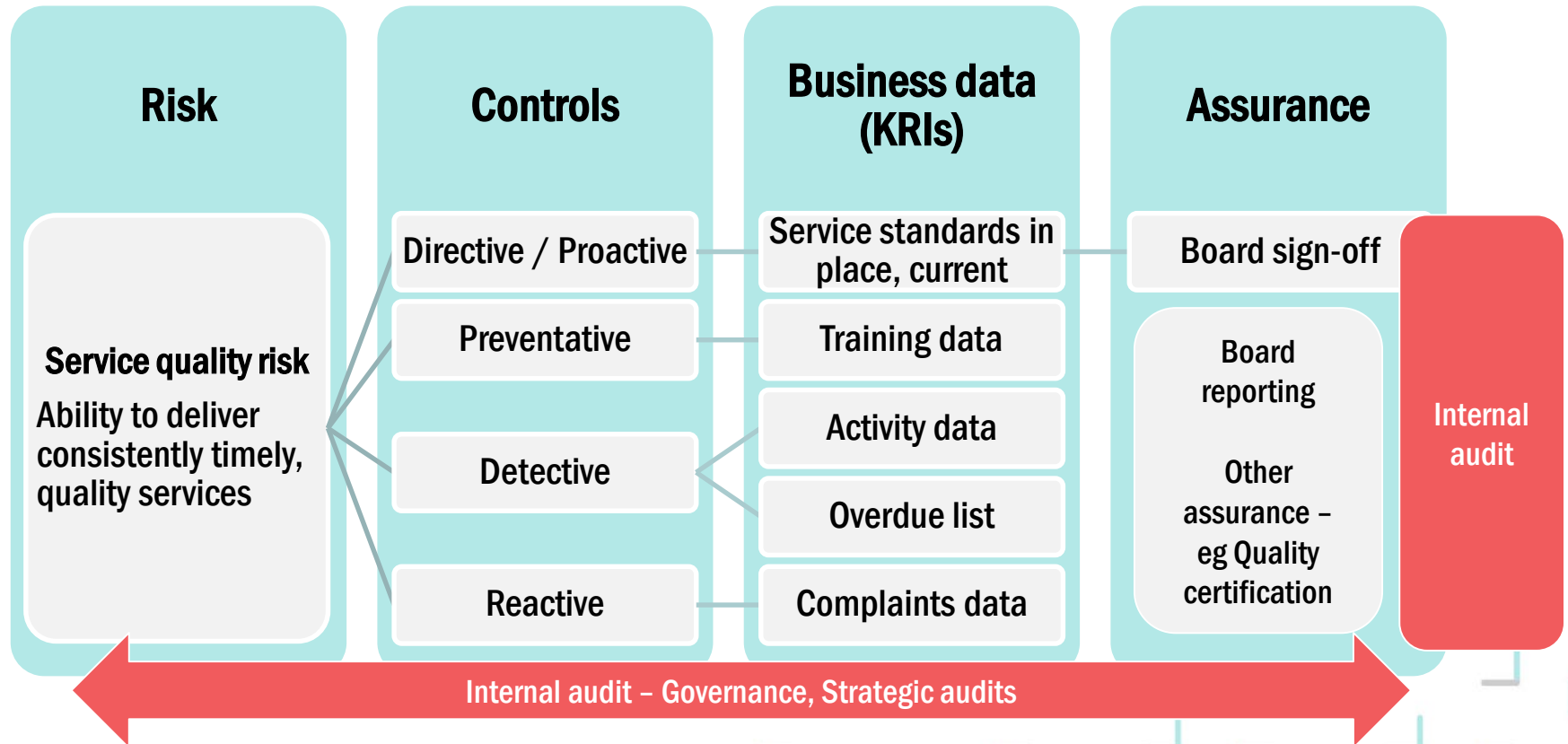
WHS – conduct and workplace culture



“Prevention is paramount”, *Company Director*, 1 March 2022

<https://aicd.companydirectors.com.au/membership/company-director-magazine/2022-back-editions/march/sally-bruce>

How can I sleep at night? – sources of assurance



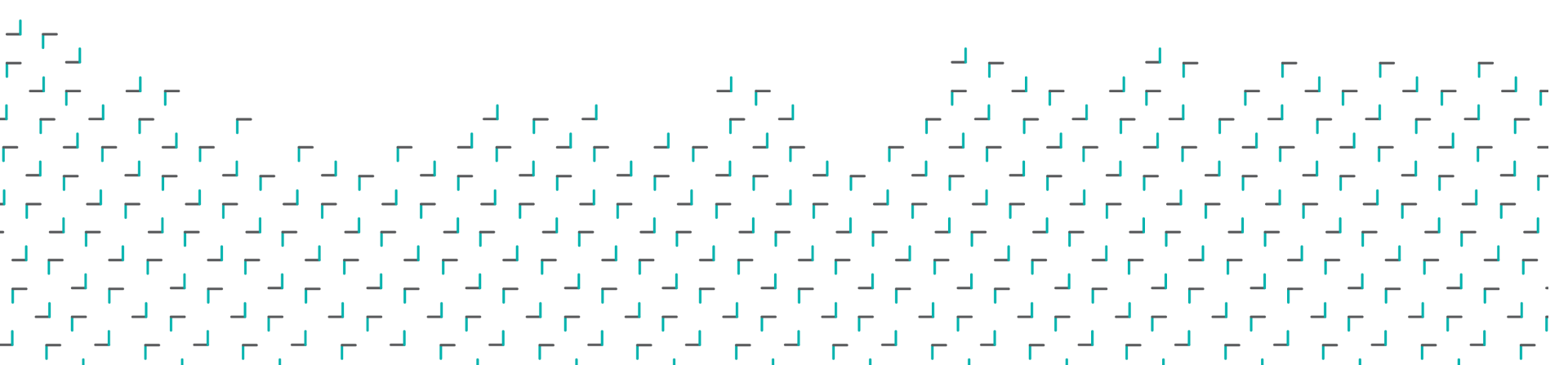
WHS governance

- Different from 'compliance' audit of individual controls
- Focus on:
 - **Processes** for WHS risk identification at whole-of-business level
 - **Strategic risk management:** relationship between risks and control framework
 - Clarity of roles / responsibilities
 - Effectiveness of reporting and monitoring, feedback loops

Questions?

Maryellen.Salter@wlf.com.au Alison.Merridew@wlf.com.au

Ph 03 6223 6155





Tasmanian
Audit Office

Responding to COVID-19 – impacts on internal control

Panel discussion facilitated by Rod Whitehead
Tasmanian Audit Office

Panel members



Gary Arnold



Katie Cooper



Frank Barta

Building resilience and maintaining effective internal control

As organisations continue to respond to and recover from the effects of COVID-19, it continues to be important to consider how any changes to people, policy, process, and/or technology may have impacted the design of internal controls or the way they are typically operated. Now more than ever it is critical to maintain robust internal controls as we embed new ways of working.

Deloitte, Third Party Assurance Insights and Benchmarking, 8th edition, May 2021

Building resilience and maintaining effective internal control

Internal control framework components



Relevance and impact on other framework components



Building resilience and maintaining effective internal control

1. Describe some of the factors that led to changes, or improvements, in internal control as a consequence of the COVID pandemic.

Building resilience and maintaining effective internal control

2. Surveys suggest responses to COVID have speeded the adoption of digital technologies or approaches by several years – with many of these changes embedded in the way organisations now operate.

How has your organisation responded to the increased need for digital services or digital interaction during the COVID pandemic?

Building resilience and maintaining effective internal control

3. The COVID pandemic led to supply chain disruption and tested the reliability of third party arrangements (sourcing or outsourcing).

Did your organisation experience any third party or supply difficulties and how did you respond to these difficulties?

Building resilience and maintaining effective internal control

4. What ongoing challenges do organisations face in maintaining effective internal controls?



Tasmanian
Audit Office

Overview of COVID-19 performance audits and reviews

Janine McGuinness
Tasmanian Audit Office

Impact of the pandemic on our annual performance audit plan of work

- During preparation of the 2020-21 Annual Plan of Work, the Parliamentary Standing Committee of Public Accounts suggested the Auditor-General examine aspects of the Government's response to COVID-19
- Suspended our normal performance audit programme of work
- Concerns from key departments on the burden we might place on them and our messaging
- Work undertaken remotely and with a new team
- Mixture of reasonable and limited assurance activity

Our Covid-19 plan of work

- Support Measures:
 - Review of expenditure in 2019-20
 - Small Business Hardship Grant Program
 - Payroll Tax Waiver
 - Community Support Fund
- Pandemic response and mobilisation
- Allocation, distribution and replenishment of PPE
- Response to social impacts
- Response to Social Impacts: mental health and digital inclusion

Preparedness and initial response

Key findings

- Government acted quickly to ensure governance and oversight for its response
- While initial plans were not fully developed they were quickly adapted and largely effective

Lessons

- There was a lack of preparedness with no pandemic scenario testing, PPE stock levels or plans specifically developed for a pandemic
- While governance for the response was quickly set up and agile it was over complicated

Resourcing the pandemic response

Key findings

- Departments and other stakeholders were agile and reacted well to changing circumstances
- While there was some 'burn out' for staff, resourcing largely met needs
- Despite the small size of the State sector there was adequate capability

Lessons

- Public Health were unable to cope in the early stages of the response and their role was quickly changed
- More tailored and targeted support for some staff was needed

Resourcing the pandemic response

Key findings

- Those most at risk and vulnerable were identified and resources allocated
- Across the public sector the demand for PPE was largely met

Lessons

- Some of the ways in which organisations worked more effectively/efficiently during the pandemic are starting to be lost

Support and stimulus measures

Key findings

- Effective contract management approach ensured there were enough hotel quarantine rooms to meet demand
- Stimulus measures provided real time support for people and businesses and processes ensured equity

Lessons

- Having five agencies involved in quarantine resulted in some inefficiencies
- A lack of investment in grant management software prior to the pandemic impacted on the efficiency of grant program delivery

Support and stimulus measures

Key findings

- Use of existing systems and processes for allocating grants and funding reduced the risk of fraud

Lessons

- Some of the system-based controls in the grant management software used were underutilised
- Existing local providers/networks were not always utilised effectively

Communication

Key findings

- Communication to the public at a State level was clear

Lessons

- Communication with the regions and local providers of services could have been better



Tasmanian
Audit Office

Closing comments

Rod Whitehead

Tasmanian Audit Office