



Independence of Supreme Audit Institutions: Classic Challenges of Government Auditing

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Abstract

Independence of Supreme Audit Institutions is a must for each SAI's function. As many of SAIs in developing countries still have no real independence from executive power and/or other entities; therefore, International Organisation of Supreme Audit Institutions (INTOSAI) need to find some international standards to promote and protect SAIs' independence such as Mexico Declaration, Lima Declaration, ISSAI 300, ISSAI 100/36, ISSAI 200/40 and ISSAI GOV 9140 respectively. Every INTOSAI standard emphasizes on both legal standards and political commitments in order to ensure that SAIs' functions will not be undermined by an arbitrary power of government and SAIs' report will be correct and reliable for the public.

Keywords: *Supreme audit institutions (SAIs), International organisation of supreme Audit institutions (INTOSAI), Independence, Government audit, International standards of supreme audit institutions (ISSAI), Lima declaration*

1. Introduction

Government income and expenditure are quite necessary for governing the country and needs to be spent wisely. Therefore, Supreme Audit Institutions (SAIs) in each nation are responsible to scrutinize the government income and expenditures in order to ensure that public funds will be utilized for the benefit of the people. For this reason, SAIs in every country must be responsible for auditing government income and expenditures. Their legal mandate, auditing-reporting and follow-up in relationship with the government policies, are vary in accordance with the situation in each state. In this regard, SAIs must play the watchdog's role over the management of public funds and must report their findings to the stakeholders, such as parliament, relevant public agencies, media and people. The quality and credibility of their reports are very important. In many countries, SAIs audit all public sector entities but sometimes may be not the case due to their limited budget, human resource and scope of their responsibility. It should be noted also that other countries may establish a separate auditing function: specialized organization may be setup differently, from the routine work of government auditing, to audit government business enterprises and other autonomous or politically sensitive public organizations.

SAIs' role in fighting against corruption is increasingly relevant. Audits are measures to control and solve the problem of waste and abuse of public funds. Consequently, auditing measures will reinforce the legal, financial, and institutional framework in each country to prevent, control and solve the problem of corruption. Furthermore, they may help people to know the government behavior in terms of spending money of which is tax collected from the people. Thus, they can establish a predictable framework of government behavior by reducing arbitrariness in the application of rules and laws.

The purpose of this research paper aims to help people to understand the role and nature of SAIs, particularly in the context of public expenditure management and financial accountability diagnostics, and with respect to reviews the weakness of SAIs when they have no freedom and their independence was threaten by the government in some particular case of some countries.

At present, there are 3 basic auditing models namely: *La Cour des Compte* of French model, the Westminster, and the Board systems:

Firstly, in the Napoleonic "*la Cours des Comptes*" system or French Audit Court model, the SAI has both judicial and administrative authority; it is an integral part of the judiciary, makes legal judgements on compliance with laws and regulations, and exercises a budget control function to assure that public funds are well spent. The French Audit Court model is independent of both the legislative and executive branches



of government. It audits the accounts of every government body. In addition, It has compulsory jurisdiction not only to audit the government income and expenditures but also to examine and decide the case of misused public funds. The Court may issue rulings imposing fines for delays in producing accounts or may require the repayment of wrongfully paid or unpaid sums by the accountant in question. The Latin countries of Europe, Turkey and most South American and Francophone African countries use this model.

Secondly, in many Commonwealth countries, the government auditing system is known as Westminster system, The Office of the Auditor General (AG) is an independent body that provides audit reports to Parliament. This office, comprised of professional auditors, submits periodic reports to Parliament on the financial statements and operations of government entities but with less emphasis on legal compliance. The auditors in this system are not civil servants although their terms and conditions of employment are normally similar to civil service peers. The Auditor General usually report annually to Parliament. For example, in UK, Public Account Committee (PAC) will have power to scrutinize the government auditing system by inviting ministers, permanent secretaries or other ministry officials to the committee for questioning and issue a report of their findings. In this regard, the government is to required to report back to the parliament within two to six months based on PAC recommendations. In contrast to the *Cours des Comptes*, the Auditor General has no judicial function but, when warranted, his findings may be passed to relevant legal authorities for further action.

Thirdly, the Board model, generally accepted in Asia, is similar to the Westminster model as it helps Parliament exercise its oversight role. Thailand, Indonesia, Japan, and Korea, for example, have a Board system composed of an Audit Commission, the decision-making body, and the General Executive Bureau, which is the executive organ. The President of the Board is the *de facto* Auditor General. The Board of Audit is a constitutional organization independent of the executive. Its primary mandate is to analyze the expenditures and revenues of the State and report its findings to Parliament.

Generally speaking, there are three basic types of audits: attest or financial auditing, compliance auditing, and performance or value-for-money auditing. In financial auditing, the auditor attests to the accuracy and fairness of an organization's financial statements. Normally these statements are backed by evidence to support the amounts disclosed, while in compliance auditing, the auditor verifies that government income and expenditures have been authorized and utilized for approved purposes and finally in performance auditing, the auditor verifies as well that government budget was utilized economically, efficiently and effectively or not, and confirms whether taxpayers receive value for their tax revenues.

Audits play a key role in implementing the so-called budget cycle. As a public document, it requires public disclosure, evaluation, and auditing. Here SAIs play a key role. On the basis of the report issued by the Auditor General or the Court, a public accounting is issued describing how the budget has been implemented and managed and need to report the auditing reports to the Parliament for oversight function.

In this regard, government auditing system in every auditing model needs to be scrutinized by the SAI of each country according to the Lima Declaration on the Guidelines on Auditing Precepts or so-called "Lima Declaration", which has been recognized in the history of International Organisation of Supreme Audit Institutions (INTOSAI) as its Magna Carta, or in other word, "Constitution of INTOSAI". That's why Article 9 of Lima Declaration states that the activities of the government, its administrative authorities, and other subordinate institutions are subject to audits performed by the SAI. Even though Article 5.2 of Lima Declaration does confirm that state institutions cannot be absolutely independent because they are part of state as a whole, Article 5.1 of Lima Declaration stipulates clearly that they are independent of the audited entity and protected against outside influences. In brief, it should be noted that the success of each SAI is dependent on their independence from the government and/or other entities when they perform their auditing functions. Several factors according to the basic principles of Lima Declaration such as organizational independence, functional dependence, and financial independence of SAI have been identified as pre-requisites to SAIs' success:



2. Objectives

This research paper aims to emphasize the importance of SAI independence in government auditing system today and to analyze its legal basic guarantee as indicated as one of the basic principles of Lima Declaration of 1977 in order to find out an appropriate legal guarantees for the functioning of SAI and ensuring that the independence and effectiveness of government auditing system will be respected in the constitution of each country and its implementing legislation.

In this regard, it is necessary to analyze SAI independence from the text and context of Lima Declaration and other related documents of INTOSAI. In addition, the best practices of SAI independence will be examined as well in order to have a better auditing system for each SAI in each country.

Consequently, the analysis of this paper will be examined in the framework of the independence principle of SAIs, best practices of SAIs and legal environment problems of SAIs as follows;

2.1 Independence Principle of SAIs

Auditing mandates should be independent. Before legislation is drafted, governments and SAIs need to define auditing per se, establishing the independence and setting out the reporting responsibilities of auditors, the scope of audits, and the entities to be audited.

Independence is a fundamental feature of all advanced countries' SAIs. Independence of SAI and its auditors must be clearly recognized and guaranteed by laws and regulations of the relevant state. In this regard, the personal independence, based upon appointment and secure tenure, of the Auditing General (sometime a Chair or President of SAI) or Court of Audit members, has to be clearly established in legislation and acknowledged in tradition. The Auditor General's autonomy is essential, given the need to report directly to Parliament without interference from other government branches. The SAI's and its leader's independence are quite necessary for its effectiveness. It must be completely sovereign to determine what to be audited and how to conduct the audits in question. The SAI leader also needs legal and traditional status to ensure that senior government bureaucrats will make information available and respond appropriately to recommendations. Independence can be strengthened by setting out the role of the Auditor General in the constitution of the country as Thailand, India, Indonesia, Japan and some other countries have done.

In the French model, for example, the *Cours des Comptes'* autonomy is guaranteed by its status as a Court, the security of tenure of its magistrate members, and by its right to design its own program of activities.

Another dimension of independence is the freedom to determine the scope of audits scope. Auditees should not have any influence on the audit. Likewise, the substance of the audit report should be the sole decision of the SAI. While discussion and negotiation are integral parts of the process, it is the audit office's responsibility to decide the reports' final contents.

SAIs require adequate funding, equipment and facilities. In the developing world where these are often inadequate, there is some potential for increased efficiencies, but it is unlikely that these alone would generate sufficient savings to provide competitive salaries and modern technology. Governments need to appreciate the costs and the high rates of return of audits, and undertake to provide commensurate levels of funding.

SAI staff must be adequately paid and trained. Effective SAIs provide competitive pay and benefits, and subscribe to the principle of continuous staff development. To ensure high-quality work, they need well-qualified, adequately remunerated staff who are encouraged to improve continuously especially their subject-matter expertise. For example, auditors could enhance their skills in fraud detection and information technology through a combination of training, education, and experience.

The number of authorized personnel should be determined independently from government control; e.g., in the Board model, the Board of Audit controls the number of personnel in the General Executive Bureau.

Although responsible for commenting on the economy, efficiency, and effectiveness of government operations, few SAIs engage in self-evaluations. Most do not track resources that are consumed by audits or overall operating costs. Budgets are rarely produced for performance audit projects and



administration, or for training and methodology development. This is especially true in developing countries.

To help maintain credibility, SAIs should be managed in a manner such that a performance audit of their own operations would result in a favorable report.

International exchange of ideas, knowledge, and experience is an effective means of raising the quality of audits, harmonizing standards, sharing best practices and generally helping SAIs to fulfil their mandates. To this end, international congresses and training seminars, regional and inter-regional conferences, and international publications have promoted the evolution and development of the auditing function. Increasingly, SAIs need to liaise closely with enforcement officials of government agencies to ensure that they share skills and insights and become more adept at uncovering corruption. Furthermore, it is of prime importance to develop a uniform terminology of government audits, based on comparative law.

Adherence to International Auditing Standards; the adherence by the SAI to appropriate professional auditing standards (for example, those promulgated by the International Organization of Supreme Audit Institutions (INTOSAI) or international professional accountancy bodies) is an important aspect of ensuring the quality of audit work.

2.2 Independence Principle as a Founding Principle of Government Audit

2.2.1 Independence of SAIs and its members under Lima Declaration (ISSAI Level 1)

According to the Lima Declaration, all SAIs must be independent from any kind of intervention. The SAIs and their auditors must have freedom to do their auditing function without interference from the executive power or other entities. In this regard, it should be noted that:

- (1) Lima Declaration's main purpose is to call for independent government auditing. A Supreme Audit Institution which cannot live up to this demand does not come up to standard.
- (2) Rule of law and democracy are essential premises for really independent government auditing and are the pillars on which the Declaration of Lima is founded.
- (3) In brief, the declaration point out basics for audits and audit institutions, which are necessary for achieving independent and objective results.

At present, there are 3 types of independent SAIs' namely: 1) Independence of Supreme Audit Institutions, 2) Independences of the members and officials of Supreme Audit Institutions and 3) Financial Independence of Supreme Audit Institutions. This means that SAIs' function can be implemented effectively and efficiently only if the said 3 principles are fulfilled by law and practices in each state concerned.

1) Independence of Supreme Audit Institutions

Indeed, Section 5 of Lima Declaration stipulates in 3 mains dimensions as follow that:

1. Supreme Audit Institutions can accomplish their tasks objectively and effectively only if they are independent of the audited entity and are protected against outside influence.
2. Although state institutions cannot be absolutely independent because they are part of the state as a whole, Supreme Audit Institutions shall have the functional and organizational independence required to accomplish their tasks.
3. The establishment of Supreme Audit Institutions and the necessary degree of their independence shall be laid down in the Constitution; details may be set out in legislation. In particular, adequate legal protection by a supreme court against any interference with a Supreme Audit Institution's independence and audit mandate shall be guaranteed.

2) Independence of SAI's Members and Officials

In the meantime, Section 6 of Lima Declaration disposes about the Independence of the members and officials of Supreme Audit Institutions in different aspects as indicated below:

1. The independence of Supreme Audit Institutions is inseparably linked to the independence of its members.
2. The independence of the members shall be guaranteed by the Constitution. In particular, the procedures for removal from office also shall be embodied in the Constitution and may not impair the independence of the members.



3. In their professional careers, audit staff of Supreme Audit Institutions must not be influenced by the audited organizations and must not be dependent on such organizations.

3) Financial Independence of Supreme Audit Institutions

It should be understood that financial independence of SAIs is also important for the credibility of SAIs. If SAIs have not enough budget and lack of financial support from the Parliament, it might be a big obstruction for SAIs to do their functions, thus it is quite necessary that SAIs must have 3 basic needs as follow:

1. Supreme Audit Institutions shall be provided with the financial means to enable them to accomplish their tasks.
2. If required, Supreme Audit Institutions shall be entitled to apply directly for the necessary financial means to the public body deciding on the national budget.
3. Supreme Audit Institutions shall be entitled to use the funds allotted to them under a separate budget heading as they see fit.

2.2.2 What does SAI independence stand for?

Lima and Mexico Declaration on SAI Independence (ISSAI 10), as a prerequisite for the functioning of SAI, recognize the following.....

1. Legal Status of SAI shall be guaranteed: The existence of an appropriate and effective constitutional/statutory/legal framework and the de facto application provisions of this framework are fundamental pathways for SAIs to deliver value and benefits to society and make a difference in the lives of citizens.
2. Heads of SAI and Members must be protected: The independence of SAI heads and members of collegial institutions, including security of tenure and legal immunity in the normal discharge of their duties must be protected by law.
3. Operation must have full discretion: A sufficiently broad mandate and full discretion, in the discharge of SAI functions, is a must.
4. Access to Information must be granted promptly and unconditionally: Unrestricted access to information is quite necessary.
5. Reporting Audit Results must be protected effectively: The rights and obligation to report on their work must be recognized.
6. Content and Timing of Audit Reports must not be interfered by any influence: The freedom to decide the content and timing of audit reports and to publish and disseminate them without any influence.
7. Effective Follow-Up System needs to be implemented by the SAI: The existence of effective follow-up mechanisms on SAI recommendations are SAIs' routine works and must be effective and conform with the relevant ISSAIs.
8. Autonomy Resources must be sufficient and effective: Financial and managerial/administrative autonomy and the availability of appropriate human, material and monetary resources are necessary and must be recognized by law.

Finally, it should be noted that Lima Declaration specifies that SAI independence shall be specified in the Constitution.

2.2.3 ISSAI 11 – Guidelines and Good Practices Related to SAI Independence.

The guideline serves as a source of good practices to share means of increasing and improving SAIs' independence in 2 key examples as shown below:

1. The examples given in the guideline follow the structure of ISSAI 10.
2. An Appendix to ISSAI 11 refers to the results of case studies used to test SAI adherence to the draft Mexico declaration on SAI independence and to provide examples of safeguards to be put in place to meet independence application provisions. For example, where the head of the SAI has a minister's status, the SAI adopts specific organizational behavior to gain more independence from the Executive. The SAI



distances itself from the Executive, by not attending all cabinet meetings or events—only attending when it needs to accomplish its audit work.

2.2.4 UNGA RES 66/209 and 69/228 stipulate importance of independence SAIs.

1. The UN Resolution 66/209 recognizes that SAIs can accomplish their tasks objectively and effectively only if they are independent of the audited entity and protected against outside influence.

2. The UN Resolution 69/228 encourages the Member States:

To apply, in a manner consistent with their national institution structures, the principle of independence of SAIs as set out in the Declarations of Lima and Mexico, and:

To give due consideration to the independence and capacity building of SAIs as well as of the improvement of public accounting systems in the context of the Post 2015 Development Agenda.

2.2.5 The SAI's Constitutional Position as an Important Legal Basis for SAI Independence in Practice.

The Mexico Declaration laid down the legal basis for SAI independence as follows:

1. The head or members of the SAI should be appointed by a process that ensures their independence from the executive (principle 2).

2. The SAI should be free from direction or interference from the parliament and the executive in selection of audit issues (principle 3).

3. The SAI submits its report to the parliament (or other equivalent body), as well as the audited entity, and has mechanisms to monitor and issue follow-up reports (principle 7).

4. The executive should not control or direct the SAI's access to resources; rather, the parliament is responsible for ensuring that the SAI has the proper resources to fulfill its mandate and the SAI should have direct access to the parliament if the resources provided are insufficient (principle 8).

2.2.6 The Limits of Independence Principle in Practice.

Referring to the conference paper of World Bank Group and the Pacific Association of Supreme Audit Institutions dated 23-25 November 2016, many SAIs in the Pacific region were originally established as government agencies to audit and report on government accounts. Under this model, the SAI Head is legally independent, but the SAI as an organization is an instrument of the executive government. The SAI's staff are civil servants (as in the Marshall Islands example), and the budget is determined in the same way as for other executive government agencies. Thus, public sector auditing in the modern era bears little resemblance to that approach.

2.2.7 The Best Practices need to be adopted effectively as follow:

1. The SAI must be independent and should be anchored in the constitution and/or legislation. (ISSAI 1/section 3, para2)

2. The legal framework should make provision for the SAI being able to obtain information from any entity that uses public funds.

3. However, the SAI must have accountability to the parliament as an essential *quid pro quo* for a funding mechanism that see the SAI's funds determined by the legislature without executive interference.

2.2.8 Independence Principle in Routine Works of SAI.

1. Independence Principle in Financial Audit (FA)

2. Independence Principle in Performance Audit (PA)

3. Independence Principle in Compliance Audit (CA)

2.2.9 ISSAI 100/36 - Auditors should comply with the relevant ethical requirements and be independent.

Ethical principles should be embodied in an auditor's professional behavior



The SAIs should have policies addressing ethical requirements and emphasizing the need for compliance by each auditor.

Auditors should remain independent so that their reports will be impartial and be seen as such by the intended users.

For ethical principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior are defined in ISSAI 30 – Code of Ethics.

2.2.10 ISSAI 200/40. The auditor should comply with the relevant ethical requirements, including those pertaining to independence, when carrying out audits of financial statements.

The auditor must have an independence of the mind or so-called “independence in fact” which means that he or she must have no bias in performing his or her auditing and must be neutral.

The auditor must have independence in appearance which means that he or she must have no close relationship in key position with the audited entity. (Key position means “those who prepare or have ability to influence the financial statement”)

Therefore, if the auditor has financial interest or a conflict of interest or litigation with the audited entity and/or its members who can exercise significant influence over the audited entity, it is not independent audit.

It should be noted that immaterial interest does not impair independence.

2.2.11 ISSAI GOV 9140 Internal Audit Independence in the Public Sector.

This guideline refers to problems related to independence and objectivity and provisions to achieve independence. Referring to the principle of this guideline, the document provides information why and how internal audit activity is required to perform its duties without restrictions – free from interference or pressures from the organization being reviewed or the area under audit.

The scope and content: The document defines independence and objectivity and explains why they are vital for the performance of internal audit activities by emphasizing the role of internal audit in general and for public sector entities in special, provides independence and objectivity criteria and indicates how to achieve or enhance independence and objectivity of internal audit in private and public sector organizations.

2.2.12 ISSAI GOV 9140 adopted IAA’s Standards for the Professional Practice of Internal Auditing as a Guidance for Good Governance of Internal Control.

Main key points are shown as follow:

1. The need for independence and objectivity in conducting an audit is essential for both SAIs and internal auditors.
2. The cooperation and coordination between SAIs and internal auditors need for independence and objectivity (INTOSAI GOV 9150), including in determining whether and to what extent SAIs can use the work of internal auditors (ISSAI 1610, ISA 610/par.9)
3. The Lima Declaration calls for internal audit services to be independent as far as possible within their respective constitutional framework (ISSAI/Section 3, para2).
4. In this regard, the IIA’s (Institute of Internal Auditing) standards are universal and are intended to apply to all members of the internal audit profession.

2.2.13 Independence and Objectivity Criteria (INTOSAI GOV 9140, Section 7).

The main ideas of INTOSAI GOV 9140 Section 7 are hereby established as indicated below:

ISA 610, ISSAI 1610 provides criteria to assess the objectivity of the internal audit function in the public sector. Thus, the criteria laid down under Section 7.2 are as follows:

1. Is the internal audit function in the public sector established by legislation or regulation?
2. Is it accountable to top management (for example the head or deputy head of the government entity, and to those charged with governance)?
3. Does it report the audit results both to top management (for example the head or deputy head of the government entity, and those charged with governance)?



4. Is it located organizationally outside the staff and management function of the unit under audit?
5. Is it sufficiently removed from political pressure to conduct audits and report findings, opinions and conclusions objectively without fear of political reprisal?
6. Does it not permit internal audit staff to audit operations for which they have previously been responsible for to avoid any perceived conflict of interest? And:
7. Has access to those charged with governance?

2.2.14 ISSAI GOV 9140 Section 7.2- Additional criteria may include.....

Clear and formally defined responsibilities and authorities of internal auditing in an audit charter;
 Functional and personal segregation of internal auditing from responsibilities for management tasks and decisions (e.g. as heads of operational working groups in administrative reform projects);
 Adequate freedom for the CAE in establishing audit plans;
 Adequate payment and grading within the salary scale according to the responsibility and significance of internal auditing; and Involvement and participation of the CAE in recruitment of audit staff.
 The internal audit activity must be free from interference in determining the scope of internal auditing, performing work, and communicating results (ISSAI GOV 9140 Section 7.5).

2.2.15 ISSAI GOV 9140 Section 9: How to Achieve Independence and Objectivity?

There are the following reasons that independence and objectivity of SAIs can be implemented for the following reasons:

Section 9.1 recommends the following measures:

Section 9.2 – Appropriate Placement and Organizational Status by adopting the effective measures such as;

- 9.2.1 The legal measures that endorse the legal status of independence and objectivity for internal audit within the organization;
- 9.2.2 The independence of internal audit activity in such organizational status should be recognized by its audit Charter;
- 9.2.3 The appointment, removal, and compensation considerations of the CAE should be consulted with the independent oversight body;
- 9.2.4 The CAE should be equal in rank to senior management of the organization and should report to a level in the organization that would allow the internal audit activity to effectively carry out its responsibility;
- 9.2.5 The CAE should have direct communication with those charged with governance in order to ensure that there is no impairment to independence.

Finally, Section 9.5 Confirm that the adequate legal protection of internal auditor independence is an important element of a legislative framework. Thus the law, in particular civil service law, must protect effectively the internal auditor independence.

2.3 The Limit of SAIs' Independence

SAIs have limitations, which differ among countries because of distinct constitutional, legal, political, social, and economic systems, thus making it impossible to suggest universal remedies. The major limitations are:

(1) Impairments to independence.

A shortage of qualified and sufficient personnel--a severe problem for many SAIs whose staff cannot keep pace with changing scope, techniques, and complexities. The scope of audits requires integrating various specialized skills including those of engineers, economists, statisticians, computer experts, and lawyers. However, most SAIs are staffed only with accountants and thus lack insight into many audited areas. Furthermore, most government entities require computer auditing, but capable professionals are often not available; and low salaries and poor terms of service result in high staff turnover.



(2) A lack of adequate monitoring and follow-up of audit findings. If audit queries or recommendations are not followed up by Parliament and acted upon by the Executive/Government, control over public funds is less effective.

(3) Limiting audits' scope. Restricted audits question the effectiveness of SAIs' interventions as well as the motivations for their existence. In some cases, SAIs cannot audit enterprises if the state has only a limited financial interest; in others, they cannot conduct external control over international organizations.

3. Materials and Methods

The research materials and methods of this paper are based on INTOSAI documents and other relevant international instruments in the field of government audit by applying documentary research together with the legal analysis method throughout the whole process of research in order to verify and justify the research outcome as reliable solution for each SAI in different countries.

4. Results and Discussion

The result of this research outcome is quite clear that most SAIs in developing countries have more or less the problem of intervention from the executive power; even though in Thailand, for example, Thai Constitution has a legal guarantee for SAI's independence but the Prime Minister still has full power to change or restrict its auditing process. Therefore, SAI Thailand still has no real independence and needs to have a new law in order to implement and endorse the independence of SAI Thailand's auditing. This example shows that there are a lot problems in terms of legal environment of SAI independence that needs to be guaranteed and protected not only because the laws and regulations require to do so, but also because their good implementation and enforcement are prior conditions for the efficiency and effectiveness of SAI routine's work.

5. Conclusion

After examining and exploring the independence principle of SAIs, it seems to be that law is the most important thing in order to make SAIs' functions go into the right direction. In this regard, SAIs must be independent and must be protected by law. Therefore, it is quite necessary that:

1. Law is a final answer to the question of independence auditing.
2. SAIs need to have effective laws in order to do its function properly.
3. However, SAIs need to be accountable to the people and help the government to spend money wisely for better development and better standards of living in their own country.

Finally, it would be better if further research can be done in the framework of comparative studies based on the concrete case study examples of some countries that have shown the failure of SAI independence such as in the case of a removal of the former auditor generals of Maldives, Solomon Island and Egypt.

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