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— OF GOVERNMENT AUDITING —

*Special Issue: Supreme Audit Institution
Independence*

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Einar Gørrissen, Director General of the INTOSAI Development Initiative. Source: INTOSAI Development Initiative (IDI)

Understanding Contextual Factors Impacting SAI Independence: The IDI-OECD Global Project

Author: Einar Gørrissen, Director General of IDI

In October 2022, the INTOSAI Development Initiative (IDI) and the Organisation for Economic Co-operation and Development (OECD) began collaborating on a joint effort to explore the challenges faced by Supreme Audit Institutions (SAIs) in safeguarding their independence. Rather than focusing solely on legal frameworks, the goal was to examine SAI independence from a broader and more practical perspective, taking into account informal pressures, institutional dynamics, and political realities that affect how independence is exercised in practice.

As a result of this shared understanding, we launched the Global Project on SAI Independence. This initiative brought together key partners, including the INTOSAI Policy, Finance, and Administration Committee (PFAC), the INTOSAI General Secretariat, the Swiss State Secretariat for Economic Affairs (SECO), the World Bank, and the International Monetary Fund (IMF). The wide range of partners reflects the recognition that SAI independence is a cross-cutting topic that supports broader agendas such as good governance, anti-corruption, fiscal transparency, and public accountability. Ensuring that SAIs can operate independently is essential to building trust in public institutions and strengthening democratic systems.

The main goal of the Global Project is to strengthen the implementation of the Mexico Declaration principles by generating knowledge and insights on how these principles can be applied in practice.

Why include informal factors at the core of the Global Project on SAI Independence?

Based on IDI and OECD's experience in different countries, we know that legal rules alone do not fully explain the challenges that SAIs face. There are also numerous informal and political factors that affect how independent SAIs really are.

Both IDI and OECD believe that even when a country has strong laws that protect SAIs—following the Mexico Declaration principles—these are not always sufficient to safeguard SAIs from threats and independence risks as there are also other practical or de facto elements that influence SAI's context. In practice, the level of SAI independence is usually determined by the legal framework and by how the discretion of the legal provisions is used, and how the Executive, Legislature, Judiciary, civil society organizations (CSOs) and media interact with the SAI.

In the initial discussions, there was a shared understanding that in countries where democratic checks and balances are weakening, SAIs often come under growing pressure. In such contexts, we have seen heads of SAIs being removed without legal justification, budgets drastically reduced, social media used to politicize the work of SAIs and audit reports being disregarded by key institutions. As a result, the SAI's ability to hold the government accountable is significantly weakened. Over time, this leads to a shrinking of their mandate and reduced impact.

IDI and OECD believe the understanding of these non-legal factors should complement the analysis of the laws. To truly understand SAI independence, it's important to look at how SAIs are perceived, what is expected from them, how much political pressure they face, and whether they are allowed to do their job without interference in practice.

What kind of things will the Global Project help us to understand?

The Global Project will shed light on the different forms of interference SAIs face, the protections available to their leadership, and the contextual factors that shape their independence and effectiveness. It will also help clarify how reputation and other non-legal tools can function as safeguards, and how threats manifest differently across national and political environments. Here are some examples:

What does it mean for a head of SAI to be protected, given the national context?

The ultimate goal of the Mexico Declaration regarding the independence of the head of the SAI is to ensure that they can carry out their duties from a legal and technical standpoint, free from political interference or retaliation. However, what “protection” means in practice depends heavily on the national context.

This protection must consider how the nature of the head of SAI’s interactions may change over the course of their tenure—what applies at the beginning of the term may differ significantly at the end. Additionally, the effectiveness of protective measures often varies throughout the electoral cycle, with certain periods posing greater risks.

It is also essential to account for the expectations held by the political actors who appoint the head of the SAI. These expectations can shape both the perceived and actual independence of the SAI, and thus influence the forms of protection that are most relevant and necessary.

How important is the reputation of the SAI?

Reputation is a critical form of non-legal protection. A well-regarded SAI with a strong public image and a consistent record of professionalism is better equipped to withstand informal pressures and political attacks. The role of the head of SAI is key in the building of this reputation.

When key stakeholders—including the media, civil society, international partners, and the public have trust in the SAI’s integrity and the professionalism of their work, it becomes politically more costly for governments or other actors to interfere. This kind of “soft power” acts as a buffer against undue influence and strengthens the SAI’s position when defending its independence.

While reputation cannot replace legal protections, it can significantly reinforce them. The Global Project will contribute to a deeper understanding of the role, meaning, and contextual relevance of reputation in safeguarding SAI independence.

What are the types of indirect interferences from governments and audited entities?

SAIs are often subject to indirect forms of interference. These include attempts to discredit audit findings, public attacks aimed at undermining the institution's credibility, and informal (non-official) communications (including conversations) intended to pressure audit staff.

The Global Project will help identify and systematize the patterns, conditions, and circumstances in which these interferences occur. It will also explore potential strategies and measures to mitigate their negative impact on the performance and independence of SAIs.

What does it mean to be financial independent in a context of fiscal constraints?

The Global Stocktaking report prepared by IDI generally reflects challenges related to the availability of financial resources (budget) and human resources (staffing).

The Global Project will help us better understand:

- How the Executive and Legislative branches share power in setting the national budget, including the SAI's budget.
- The practical barriers for SAIs to have a suitable recruitment process?
- How budgets are determined for other independent public bodies like the Central Bank, the Ombudsman, or the Judiciary, and what SAIs can learn from that.
- The arguments given by governments to raise or cut the SAI's budget—and whether those reasons were technical or political.
- How political realities and behind-the-scenes decisions can influence the resourcing of SAIs.

In addition, the Global Project will generate both qualitative and quantitative information to support the development of deeper knowledge and analysis on SAI independence—including new approaches to assess and measure it.

Ultimately, the Project will also provide a strong basis for engaging other actors within the accountability ecosystem and for building a long-term agenda to advocate for the independence of SAIs.



The Right Honourable Helen Clark. Source: INTOSAI Donor Cooperation

Building Coalitions, Developing Regional Approaches, and Raising Public Trust for Greater Supreme Audit Institution Independence: Perspectives from The Right Honourable Helen Clark

By: The Right Honourable Helen Clark, INTOSAI Donor Cooperation Goodwill Ambassador for Supreme Audit Institution Independence

This article is based on a speech originally recorded by the Right Honourable Helen Clark for the XXV INTOSAI Congress in Sharm El-Sheikh, Egypt on 31 October 2025.

A long road has been travelled by INTOSAI since its first Congress in Cuba in 1953. Its ongoing existence shows the enduring value of external auditing and that INTOSAI itself has been able to stand the test of time as a professional organisation.

The proceedings of this Congress are both relevant and timely. Geopolitical instability, war and conflict, climate shocks, digital disruption, pandemics, and more are putting significant stress on public finances, shrinking available fiscal space and driving changes in government spending priorities which can ultimately impact on service delivery.

Independent oversight of public financial management is an important part of the checks and balances existing in any system. Supreme Audit Institutions provide that oversight on the regularity, propriety and performance of government use of public resources, and contribute to public accountability. They are anchors of transparency, accountability, and good governance.

Yet they can only appropriately perform their tasks if they have appropriate levels of institutional, organizational, and financial independence from the entities they audit. This need was first articulated by INTOSAI in 1977 in its Declaration on Audit Principles – also known as the Lima Declaration. Since then, several legal instruments have reiterated this call, including two UN General Assembly Resolutions.

The evidence we have, however, suggests that only a small fraction of Supreme Audit Institutions in developing countries meet the independence criteria outlined in INTOSAI's Lima and Mexico Declarations. They often lack the necessary independence to perform their duties, and that trend is moving in an adverse direction according to recent data.

In 2023, the INTOSAI Development Initiative issued its triennial Global Stocktaking Report (GSR). It measures and assesses developments and trends in Supreme Audit Institutions (SAIs) around the world.

For the third consecutive Stocktaking, independence levels are assessed to have declined. The access of Supreme Audit Institutions to information continues to fall, and interference in budget execution and audit planning has increased. Ten per cent of respondents to the 2023 Global Survey reported interference against SAI leadership.

An SAI Independence Rapid Advocacy Mechanism (SIRAM) was established in 2018 through the INTOSAI Donor Cooperation. It advocates SAI independence, and it raises awareness of threats to and breaches of that. It can also broker support for SAIs facing challenges to their independence. Analysis of cases which have come to the attention of the mechanism suggest two key trends:

1. Threats to the independence of Supreme Audit Institutions are by no means confined to low- and middle-income countries. There are growing reasons to be concerned in some high-income countries too where the assumed barriers to corruption and cronyism are under pressure.

2. Threats to Supreme Audit Institution independence are generally part of a broader set of challenges which are also affecting other independent institutions. These are associated with the deterioration of conditions around accountability, including the shrinking of civic space which is all too common these days.

How can these trends be countered? Let me suggest some ways forward.

1. Building coalitions at the global level can raise awareness of the importance of SAI Independence and enhance the potential for collective action.

Coalition building should include Development Partners and other relevant platforms:

- The INTOSAI Donor Cooperation is a natural place to discuss these issues as it brings together SAIs and Donors. Its Kingston Implementation Plan ramps up its efforts on SAI independence.
- The Global Project on SAI Independence is a joint effort by a number of partners to develop new approaches to promoting the independence of Supreme Audit Institutions (SAIs), with a focus on the informal factors—beyond legal frameworks—which influence how they interact with the executive and legislative branches, and how those interactions affect their independence. OECD, the IDI, INTOSAI's General Secretariat and Policy, Finance, and Administration Committee, and the Swiss State Secretariat for Economic Affairs (SECO) are all collaborating on this. The International Monetary Fund (IMF) and the World Bank has helped shape the project to ensure alignment with global goals related to public financial management and fiscal transparency.

Going forward, such partnerships should be inclusive of civil society and contextualized to sectors like the extractives industries and health where there are significant corruption risks. I chair the Board of the Extractive Industries Transparency Initiative (EITI), which works for transparency and good governance in that sector and has civil society as a major constituency. It is vital that Supreme Audit Institutions are aware of and use the EITI disclosure data on contracts, revenue, payments, beneficial ownership and more.

2. Developing regional approaches which take into consideration the context in which Supreme Audit Institutions operate and create the necessary synergies among regional actors.

Institutions within the same region will often face similar realities and challenges – although even within a region contexts can be diverse. The Pacific Association of Supreme Audit Institutions (PASAI), does a good job of supporting its members by being a responsive and member-driven organization. Constructive relationships and dedicated support from key regional development partners like Australia and New Zealand have also helped strengthen SAIs in the Pacific.

In Anglophone Africa, AFROSAI-E also does a commendable job of assisting its members, and has recently developed a Model Audit Act which is a resource for proactive advocacy, even beyond the AFROSAI-E Region.

3. Raising the profile of Independent SAIs at the country level to strengthen legitimacy and support around their actions.

Public trust in national audit institutions is very important for effective advocacy for their independence. A strong reputation is a resource which a SAI can draw on if its autonomy is threatened. Therefore, public audit offices should not feel shy about being proactive in raising their own profile.

Public trust will be kept when audit reports are of good quality and are timely. That requires dedicated professionalism from staff and high-quality management systems. As an example, the publication of audits of stimulus packages provided during the COVID-19 pandemic have helped raise the profile of SAIs at the country level.

SAIs should also focus on stakeholder engagement and their interactions with other actors in national accountability ecosystems. These include Parliaments, Ombudspersons' Offices and other such statutory offices, and non-state actors, such as civil society organizations with a transparency focus, and the news media.

Though current geopolitical challenges don't paint a dazzling picture for the future, we can all be proud of the commitment, professionalism, and impact that SAIs deliver. They embody the core institutional values that improve and enhance society around them. And together, we must continue to adapt and evolve; to build coalitions, leverage regional approaches, and enhance trust in strong, independent institutions.



The author, Freddy Yves Ndjemba. Source: INTOSAI Development Initiative

Developing Relevant and Innovative Approaches to Support SAI Independence: From the SAI Independence Rapid Advocacy Mechanism (SIRAM) to the SAI Independence Workstream

By Freddy Yves Ndjemba, Assistant Director General, SAI Governance Department, INTOSAI Development Initiative

Supreme Audit Institutions (SAIs) have a vital role for public sector accountability, integrity, and transparency. To fulfill their role and build trust between the organs of the state and society, SAIs need to be independent.

SAI independence may be understood as the ability of a Supreme Audit Institution to operate autonomously of the government, without undue influence and control. It is considered a fundamental condition for SAIs to effectively carry out their mandate. The INTOSAI Mexico Declaration on SAI Independence identifies eight conditions, known as the pillars of independence, as the benchmark against which the independence of an SAI can be assessed. Data from the INTOSAI Development Initiative (IDI) and the World Bank show that Supreme Audit Institutions (SAIs) around the world face increased threats to their independent operation and execution of audit mandates.

For instance, the last INTOSAI Global stocktaking report showed that at least 40% of SAIs experienced major interference in the execution of their budgets, and only 44% of SAIs said that they fully experienced timely, unconstrained, and free access to information for the proper discharge of their statutory responsibilities— a dramatic drop from the 70% who reported having full access in 2017.

Similarly, according to the most recent World Bank index on SAI Independence, most SAI budgets and financing were subject to approval by central government budgeting institution and only 22 countries out of 118 assessed, fully met the criteria on staffing autonomy.

INTOSAI through its Bodies, has always been very active in advocating and supporting SAI independence. These efforts have culminated with the adoption by INTOSAI of the Lima Declaration on Audit Principles in 1977 and the Mexico Declaration on SAI Independence in 2007, several instruments have recognized the importance of SAI Independence including three UN Resolutions and other high level political declarations.

Additionally, efforts to support SAI independence were driven by SAIs taking a leading role to advocate for greater independence through legislative changes. Over time, though, it has become clear that legislative changes are just one factor in a SAI's independence. Political and institutional landscapes around the world are in a constant state of flux, and a variety of actions by the executive or legislative can threaten various aspects of SAI independence.

These threats can manifest in a variety of ways, such as through amendments to a country's constitution, changes to the upcoming budget, alterations to the audit law, and attempts to remove the current Head(s) of the SAI or delay the appointment of a new Head. In a few cases, there have even been proposals to fully abolish the SAI as an independent institution.

The Emergence of SIRAM

These ongoing risks highlight the need for the INTOSAI community and relevant stakeholders to develop tools and approaches which will help SAIs quickly and effectively respond to challenges to their independence.

It is against this backdrop that the SAI Independence Rapid advocacy Mechanism (SIRAM) was developed by IDI through the INTOSAI Donor Cooperation (IDC) to advocate and raise awareness to threats and breaches of SAI independence, as well as brokering support for SAIs facing challenges to their independence.

Over the years SIRAM has grown from a pilot initiative to a well-known and sought after mechanism. It has been mainstreamed within the INTOSAI and Donor Community and benefitted from tremendous support from various actors such as civil society organizations (CSOs) and academia, as the case process grew in complexity.

Reflecting on its implementation over the years several facts emerged, including:

1. Although we are only seeing “a tip of the iceberg” as we are only capturing self-reported threats, the geographical dispersion of the cases indicates the globalized nature of the issue combined with a greater concentration in specific INTOSAI regions.
2. In areas of concentration, we see a correlation with threats affecting other independent institutions i.e., judiciary and the deterioration of the conditions around accountability, such as the shrinking of civic space.
3. From a conceptual standpoint, threats to SAI independence are generally from the perspective of Executive interference, however, empirical evidence highlights additional drivers and angles from which SAI independence is threatened in practice.
4. The growing complexity of the cases required a deeper understanding of the country context and the SAIs’ institutional set-up (legal framework and model), which could come at the expense of the rapidity of the response.
5. Most threats evolve around specific INTOSAI principles, including security of tenure of the Auditor General, powers and mandate, timely and unrestricted access to information, as well as access to human resources and financial resources.
6. Leveraging on donors’ influence, and outreach is critical in successfully advocating for SAI independence. Similarly, effective advocacy at the country level requires expanding the breadth of stakeholders to consult with at the country level and even going beyond parliamentarians and CSOs to include politicians, media and institutional actors.

From Reactive to Proactive Advocacy: IDI SAI Independence Workstream

All these findings showed the relevance of the reactive approach through SIRAM, but they also point out to a more fundamental issue.

In fact, we saw a need to complement the ad hoc and reactive advocacy provided through SIRAM with a more proactive advocacy approach, which would support INTOSAI's efforts by enabling a holistic and complete approach to Advocacy on SAI Independence.

It is in that context that through IDI's SAI Independence workstream we have positioned our efforts to proactively advocate for SAI independence, including by developing relevant and innovative approaches to support SAI independence. Three interrelated tracks have been explored over the years.

The first one is related to the Global Project on SAI Independence which is the result of a partnership between the IDI and the Organization for Economic Cooperation and Development (OECD), with contribution from the INTOSAI General Secretariat, the INTOSAI Policy, Finance, and Administration Committee (PFAC) and the Swiss State Secretariat for Economic Affairs (SECO). This project comes from the recognition that further advocacy is needed and should be targeted towards Ministers of Finance and Parliaments. Through this project we aim to set a global agenda on SAI Independence which will go beyond looking at formal factors affecting SAI Independence.

The second track is linked to the enhancement of the role of SAIs legal unit in safeguarding and strengthening SAI Independence. Insights from SIRAM have shown that SAIs ability to proactively identify threats to independence is enhanced when they have dedicated legal support which can take the form of a legal unit or a legal counsel. Through a dedicated initiative called LEGSAI (Strengthening Legal Units within SAIs), we are supporting SAIs in establishing or strengthening their legal capacities on one hand, and we provide expert input to SAIs legislative reforms processes, on the other hand. Through this initiative we are also exploring SAIs interaction with the judiciary and law-enforcement agencies.

The third track pertains to strengthening the collaboration with other actors within the accountability ecosystem to consolidate the public value of an SAI and strengthen its reputation towards stakeholders. This track builds on the insight that SAI reputation is an informal asset an SAI can leverage on, when its independence is under threat. To further consolidate the reputation of SAIs through the "collab initiative" we are strengthening SAIs interactions with CSOs and anti-corruption agencies amongst others. Recent engagement in Zambia and Malawi through the French Ministry for Europe and Foreign Affairs (MFA) funded CADRE project or during the United Nations Convention against Corruption (UNCAC) Conference of the States Parties (COSP) in Qatar, show a lot of interest from all parties involved. Ultimately, strengthening SAI independence requires an all-hands-on deck approach, we will continuously work alongside stakeholders, and engage in relevant forums and platforms, including the INTOSAI Donor Cooperation, to mainstream and contextualize SAI independence.

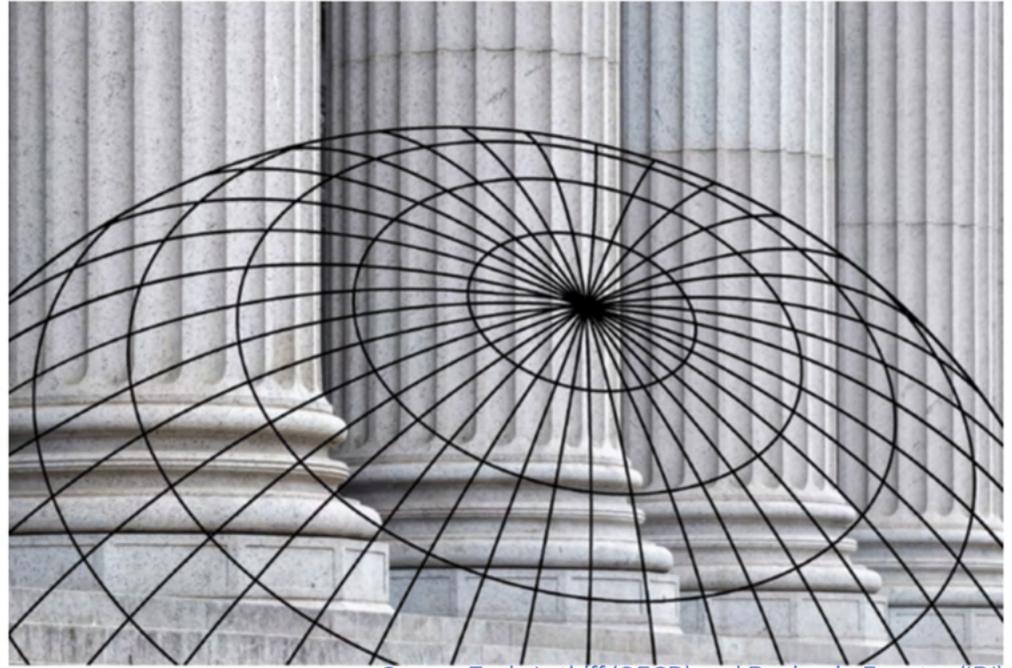


Learn more about SIRAM and access the video:



Learn more about SAI Independence and access the video:





Source: Tuzla Lathiff (OECD) and Benjamin Fuentes (IDI)

The Global Project: Rethinking SAI Independence

Authors: Tuzla Lathiff (OECD) and Benjamin Fuentes (IDI)

Amid today's complex political climate, low public trust in institutions, and tighter government budgets, the independence of Supreme Audit Institutions (SAIs) becomes more relevant than ever in ensuring that governments manage public funds openly, efficiently and for the benefit of citizens. However, both the Organisation for Economic Development (OECD) and the INTOSAI Development Initiative (IDI) have found that SAIs face major – and sometimes increasing – obstacles. These challenges are not just legal, but also practical—especially in their relationships with executive and legislative branches.

To operate effectively and fulfil their mandate, the independence of SAIs is key. Since the 2007 adoption of the Mexico Declaration on SAI Independence by INTOSAI, many countries have taken steps to formally protect SAIs from outside influence. But in an increasingly complex environment, where public discourse can be influenced by rapid information flows and social media, formal protections alone may not be enough.

The Global Project on SAI Independence, led jointly by the OECD and IDI, aims to bring new insights into these challenges. The project looks beyond legal frameworks to understand the informal, political, and institutional realities that shape SAI independence in practice. The goal is to provide guidance on how the principles of the Mexico Declaration are applied and protected in real-world contexts.

IDI–OECD Joint Report

After nearly two years of planning, research, consultations, and data collection, the OECD and IDI are preparing a joint report to be finalised in 2026. The report will examine the real-life challenges SAIs face in working with the executive and legislative branches, highlighting both challenges, good practices and informal dynamics.

It will showcase effective practices that have contributed to SAIs' independence, effectiveness and impact despite political or financial pressures, and identify success factors—such as ways to maintain constructive engagement with institutional actors while protecting institutional autonomy. These findings are expected to support future collaboration between international partners and national institutions and help promote better environments for SAIs to operate independently. While designed primarily for SAIs, the report may also offer valuable lessons for other independent oversight bodies facing similar challenges, with content grounded in the INTOSAI community's values and the principles of the Mexico Declaration.

In the lead-up to its release, IDI and OECD will stay closely engaged with the INTOSAI community to ensure the findings are widely shared and support meaningful follow-up at global and national levels.

Initial High-Level Findings from the Data Collection

Preliminary analysis of the collected data indicates several recurring patterns across regions. These reflect the contexts in which Supreme Audit Institutions (SAIs) operate, particularly in relation to political dynamics, stakeholder expectations, and their interactions with the executive, legislative, and judiciary.

These observations are based on the perspectives and experiences reported through the data collection process and are presented here to inform further discussion and analysis.

Political Dynamics

According to data gathered from participating SAIs, many report operating in more fluid and fast-changing political environments than in 2007, when the Mexico Declaration principles were adopted. Respondents highlighted that social media increasingly influences public narratives and perceptions. Within this context, the data suggest that legal safeguards alone may not be sufficient to protect SAI independence; credibility and resilience to informal pressures were identified as increasingly important.

Expectations on SAIs

Data indicates that SAIs are frequently expected to fill accountability gaps where other institutions, such as parliaments or internal audit bodies, face capacity and/or capability constraints. In some instances, respondents noted that SAIs are taking on additional responsibilities, including in areas related to integrity or anti-corruption initiatives. While this can reflect strong confidence in SAIs, the data also points to concerns about resource strain and the potential impact on independence.

Executive Relations

Compared with the context around 2007, the data shows that it can now be more challenging for SAIs to justify institutional arrangements such as distinct budgetary or administrative frameworks, particularly in discussions with ministries of finance or executive authorities. These dynamics were reported as influencing how SAIs negotiate their operational autonomy.

Legislative Relations

While the Mexico Declaration characterised parliaments as natural allies of SAIs, data from several regions suggest that this relationship may be under strain. Contributing factors identified in the data include:

Limited Parliamentary Capacity

Respondents noted that many parliaments lack sufficient expertise or resources to use audit reports effectively in oversight activities.

Political Polarisation

Several SAIs reported that heightened polarisation can delay appointments or legal reforms, and may lead to audit findings being interpreted through a political lens rather than fostering policy debate.

Complex Legal Frameworks

Data reveal that overlapping or ambiguous procedures for report publication or follow-up can create uncertainty, sometimes leading to different interpretations between SAIs and parliaments.

Power Imbalance

Even where laws appear balanced, respondents observed that the executive often wields more influence and resources, which can affect SAIs' budgetary independence and leadership appointments.

Judiciary

Although the judiciary was not a focus of the Mexico Declaration, the data suggest that it plays a growing role in shaping SAI independence, especially through constitutional and legal interpretations. However, some respondents expressed concern about the consistency and independence of judicial decisions in certain contexts, highlighting the importance of a stable and impartial legal environment for safeguarding SAI autonomy.

Emerging Lessons from the Data

The findings from this initial phase of data collection reaffirm several established ideas while also offering new perspectives on how SAI independence functions in practice.

Independence Does Not Mean Isolation

Respondents emphasised that SAIs cannot defend their independence alone. Partnerships with development partners, civil society, academia, global networks, parliaments, and citizens were seen as important for raising awareness and reinforcing the value of independent external audit.

Informal Factors Matter

The data highlight that informal norms and practices often complement formal legal frameworks. Respondents noted that SAI legislation is frequently shaped by periods of political change or reform, and when laws become outdated, informal mechanisms can emerge to fill the gaps. These informal dynamics are significant and should be acknowledged when assessing or strengthening SAI independence.

Independence Is Linked to Value and Relevance

Across regions, the data suggest that independence and relevance are closely connected. Respondents observed that public and institutional trust in SAIs can reinforce their independence. SAIs that demonstrate transparency, integrity, and accountability in their own operations are seen as more credible and better positioned to safeguard their autonomy. In this sense, legitimacy and trust are integral components of institutional independence.

The Global Project and the XXV INCOSAI

In addition to the high-level findings and insights outlined above, the IDI-OECD presented an informative summary of the Global Project at the XXV INTOSAI Congress in Egypt. This summary included key results related to each of the Mexico Declaration principles, offering an overview of the project's implementation, scope, and insights.

The IDI-OECD side event held during the XXV INCOSAI marked the first occasion where the results of the Global Project were publicly presented. The session was dynamic and participatory, with valuable contributions from global project partners and stakeholders.

Additional Information

Data Collection Process

Methodology

With guidance from experts at the U.S. GAO and using a conceptual framework developed by the University of Oslo, the OECD and IDI used an exploratory research approach. The IDI OECD report will benefit from input from four main sources of information:

1. Country Visits
2. Regional Workshops
3. SAI Questionnaires
4. Stakeholder Surveys

The methodology focuses on informal aspects such as trust, perceptions, expectations, and organizational culture—factors that are often missed in formal reviews. During country visits, semi-structured interviews were held using open-ended questions. The same approach was used in regional workshops to encourage diverse viewpoints. Questionnaires also included open-ended prompts to allow for deeper reflection.

Participants were informed that their responses would remain anonymous—no names, institutions, or other identifiers would be linked to their comments. This was essential to create a safe space for open, honest conversations, given the sensitive nature of the topic.

Brief description of activities

- Country Visits
 - Seven countries were visited: Indonesia (ASOSAI), Jamaica (CAROSAI), Jordan (ARABOSAI), Liberia (AFROSAI-E), Morocco (AFROSAI and ARABOSAI), Paraguay (OLACEFS), and Spain (EUROSAI). Over 90 interviews were conducted with auditors, civil servants, parliamentarians, and civil society representatives. These visits gave in-depth insight into how formal rules work—or don't—in practice.
- Regional Workshops
 - Workshops were held in Djibouti (CREFIAF), Jordan (ARABOSAI), New Caledonia (PASAI), and the Philippines (ASOSAI). These brought together SAIs from across regions to share experiences and validate findings.
- SAI Questionnaires
 - In partnership with the U.S. GAO, a detailed questionnaire was sent to SAIs of OECD countries and 21 non-OECD countries. It explored legal protections, experiences of interference, institutional strengths, and areas needing improvement.

- Stakeholder Surveys
 - Surveys were also sent to external stakeholders, including:
 - Members of the OECD Parliamentary Network
 - The OECD Central Harmonisation Function
 - Civil Society Organizations (CSOs), through a partnership with the World Justice Project (WJP). More than 1,700 responses from legal experts across 80 countries were collected through the WJP network, offering valuable insights into perceptions and institutional dynamics.

◦

Partnering with Relevant Actors

The Global Project on SAI Independence has brought together a diverse group of partners to support its planning, design, and implementation. These partnerships have been instrumental in shaping the project's direction and ensuring its alignment with international standards and good practices.

The INTOSAI General Secretariat has played a key role in emphasizing the continued relevance of the Mexico Declaration, while also encouraging the exploration of innovative, complementary approaches to strengthen SAI independence.

The INTOSAI Policy, Finance, and Administration Committee (PFAC) has supported the project through two of its member institutions:

- The General Court of Audit of Saudi Arabia, which provided financial resources and technical expertise for the in-country visits.
- The U.S. Government Accountability Office (GAO), which contributed to the project's overall design and the development of its data collection methodology.

The Swiss State Secretariat for Economic Affairs (SECO) has offered critical support by providing strategic input, technical guidance, and financial resources.

From the outset, the International Monetary Fund (IMF) and the World Bank have also played important roles, ensuring that the project is aligned with broader efforts to improve public financial management and promote fiscal transparency.



Source: AFROSAI-E

Advancing SAI Independence Through the AFROSAI-E Model Public Audit Act

Authors: Annerie Loubser, Wynand Wentzel, and Gordon Kandoro

Across Africa, the independence of Supreme Audit Institutions (SAIs) faces growing pressure. Political transitions, fiscal crises, and governance challenges have, in some cases, led to attempts to limit the authority of SAIs, restrict access to resources, or interfere with the tenure of Auditors General. Such threats undermine not only the credibility of SAIs but also their ability to deliver impartial audits that safeguard public funds and strengthen trust in government. In this context, legislative, administrative, and financial independence is not a theoretical aspiration; it is a practical necessity for SAIs to fulfil their constitutional mandates without fear or favor.

As a regional organization, AFROSAI-E plays a pivotal role in equipping its 26-member SAIs to respond to these risks. By providing tools, guidance, and platforms for peer learning, AFROSAI-E helps members identify vulnerabilities and strengthen their legal frameworks. One of the most significant initiatives in this regard is the Model Public Audit Act, developed with the support of the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)'s Good Financial Governance in Africa program.

The eight principles of SAI independence, as articulated by the International Organization of Supreme Audit Institutions (INTOSAI), provide a global benchmark. Yet, for many countries, the challenge lies in translating these principles into national legal frameworks that are clear, comprehensive, and enforceable. The Model Public Audit Act directly addresses this need by offering a best-practice legislative framework with modern provisions to safeguard and strengthen SAI independence. It is designed as a practical tool that countries can use to:

- Draft new audit legislation where none currently exists.
- Review or amend existing laws to address gaps in SAI legal frameworks.
- Engage parliaments, ministries of finance, civil society and other stakeholders to build a shared understanding of why legal independence matters.

A Collaborative and Consultative Process

Last year, AFROSAI-E published the draft Model Act for public exposure, inviting feedback from SAIs, legal experts, and governance stakeholders across the region. Building on this input, a group of regional legal experts convened in South Africa to review the draft Model Public Audit Act in detail and finalize it for publication.

The team of experts focused on ensuring that the framework reflects international standards while responding to the realities of the African governance landscape. Deliberations highlighted several practical issues often faced by SAIs, such as:

- Differentiating between the Auditor General (the individual) and the National Audit Office (the institution).
- Clarifying the relationship, powers, and responsibilities of the Auditor General.
- Defining the appointment and tenure of the Deputy Auditor General.
- Addressing misconceptions around who is authorized to sign audit reports.

These discussions underscored the importance of context-specific guidance. To support this, the Model Act includes annotations explaining how particular provisions can be adapted to different legal and institutional environments.

From Principles to Practice

AFROSAI-E is developing further guidance on SAI independence and legal frameworks, including model regulations, to complement the Model Act and provide further practical support. These supplementary guides and tools will:

- Define the conceptual foundations of independence, drawing from the Lima, Mexico, and United Nations declarations.
- Introduce the AFROSAI-E Institutional Capacity Building (ICBF) self-assessment approach to identify and mitigate threats to independence.
- Benchmark regional and global best practices within the INTOSAI community.
- Provide guidance on ensuring role clarity of Boards or Commissions without infringing on the independence of the head of the SAI.
- Equip SAIs to engage with executive and legislative stakeholders when advocating for legal reforms.

Pathways Forward

The Model Public Audit Act is a powerful tool for SAIs and their advocates to promote legislative reforms that strengthen independence, enhance credibility, and ultimately increase the impact of public auditing. By grounding the INTOSAI principles of independence in enforceable national law, countries can take decisive steps to ensure their audit institutions have the freedom, mandate, and resources to fulfil their constitutional role—without fear or favor.

The Model Public Audit Act was officially launched at the 20th AFROSAI-E Technical Conference on 9 October 2025. It is publicly available on the AFROSAI-E website: www.afrosai-e.org.za.

In a context where SAI independence remains both a challenge and a triumph, the AFROSAI-E Model Public Audit Act represents a concrete pathway forward—transforming principles into practice and aspirations into lasting institutional safeguards.



Source: INTOSAI CBC

SAI Independence – the Bedrock of Effective Capacity Development in SAIs

Author: The INTOSAI Capacity Building Committee Secretariat

The INTOSAI Strategic Plan for 2023-2028 identifies advocacy for and support of the independence of Supreme Audit Institutions (SAIs) as a central priority. It highlights how INTOSAI promotes and supports SAIs' efforts to improve and protect their independence to enable SAIs to fulfil their mandate to the benefit of citizens.

While the first Goal 2 Operational Plan – developed in 2022 by the INTOSAI Capacity Building Committee (CBC), the INTOSAI Regional Organisations, the INTOSAI Development Initiative (IDI), peer support SAIs and the INTOSAI-Donor Cooperation – did not list independence as a specific indicator given the numerous initiatives already underway across INTOSAI, it has since become clear that independence is a recurring theme that underpins nearly every challenge SAIs face, including capacity development.



The Capacity Building Committee Meeting in London, 2025. Source: INTOSAI Journal

Reflecting on this growing recognition, the Goal 2 Operational Plan for 2026-2028, approved by the CBC Steering Committee in June 2025 and the INTOSAI Governing Board in October 2025, introduces a new indicator focusing on SAI independence:

Percentage (%) of SAIs with (a) a legal framework prescribing conditions for the SAIs' financial and operational independence and (b) independence in recruitment of staff.

SAI independence is not just a legal principle, but also a practical requirement for SAIs to develop and sustain their capacity and capabilities. The following are some of the major practical reasons why:

- *Stable and predictable resourcing for capacity building* – without financial independence, SAIs may be subject to arbitrary budget cuts or delays by the executive, limiting their ability to invest in training, modern audit methods, digital tools, or staff development. And, predictable funding allows SAIs to plan long-term capacity-building initiatives.
- *Ability to recruit, retain, and develop talent* – operational independence ensures SAIs can set their own human resource (HR) policies, recruit qualified professionals, and reward performance. Without it, they may be bound by restrictive public service rules or political interference, hampering their ability to attract scarce skills.

- *Flexibility in operations and innovation* – independent control over operations enables SAIs to modernise their audit methods, adopt international standards/ International Standards of Supreme Audit Institutions (ISSAIs), and engage in international cooperation in support of development.
- *Strengthened accountability and credibility* – SAIs that are visibly independent, including financially and operationally, signals to Parliament, citizens, and international partners that it is a professional institution worth supporting. This credibility attracts donor support, regional cooperation opportunities, and knowledge exchange that directly enhance capacity.

Building on this Goal 2 commitment, the remainder of this article, highlights some of the initiatives where the CBC has worked to raise awareness, identifying threats to SAI independence and supporting SAIs in charting sustainable pathways towards independence.

Challenges experienced in adhering to international standards: independence as a root cause

At the 2023 CBC Steering Committee meeting, CAROSAI—supported by PASAI and AFROSAI-E—highlighted the pressing challenges faced by SAIs operating in small island developing states and other complex environments. While the initial focus was on the application of ISSAIs in these contexts, the CBC recognized the need to delve deeper and commissioned research to uncover the root causes of the difficulties experienced by these SAIs.

The research identified several recurring issues, including resource and financial constraints, staffing and competency gaps, technological limitations, and the complexity of ISSAIs. However, a key insight from the study was that the lack of genuine independence—both financial and operational—was a fundamental barrier to overcoming these challenges.

Independence emerged not only as a solution but as a prerequisite for sustainable improvement. The research underscored the importance of robust policies and legal frameworks that guarantee SAIs the autonomy to manage their own resources, recruit qualified personnel, and operate free from external interference. Researchers strongly advocated for continued support to SAIs in their efforts to push for legal reforms that reinforce their independence, thereby enhancing their organizational stability and effectiveness.

Illustrating the nuanced nature of these challenges, some SAIs reported having theoretical financial independence but lacked the authority to recruit staff. Others had the autonomy to hire but were constrained by insufficient funding. These examples reflect the fragmented and often superficial nature of independence in practice, and reinforce the need for a holistic approach to strengthening SAI autonomy.

Maintaining Independence in the Audit of Donor Funds

During the COVID-19 pandemic, the CBC hosted two webinars focused on how SAIs audit donor funds within their own countries. These sessions explored challenges, good practices, and opportunities, with a particular emphasis on fostering mutual understanding and cooperation between SAIs and donors in the context of development aid and financial accountability.

The discussions revealed a critical tension: while SAIs generally welcome the mandate to audit donor funds—recognizing its importance for ensuring comprehensive oversight of public finances—this role can pose significant risks to their independence.

A central tenet of SAI independence is the ability to determine what to audit and how, based on objective assessments of risk and materiality. However, this autonomy is often compromised when donors enter into agreements with governments that obligate SAIs to audit donor funds under specific conditions—such as fixed timelines, prescribed standards, or reporting formats that fall outside the SAI's normal procedures. Such externally imposed requirements undermine the SAI's ability to operate independently and strategically. Adapting to varying donor expectations also places strain on limited financial and staffing resources, hampering the SAIs' ability to fulfill their broader mandate and inhibiting the development of sustainable institutional capacity.

Moreover, SAIs are rarely adequately remunerated for these audits. In some cases, training is offered in lieu of financial support, but training narrowly tailored to donor needs often fails to build lasting institutional capacity. This approach risks positioning SAIs as service providers for donor/external agendas, rather than as independent institutions accountable to citizens to deliver value within the scope of their national mandate.

Recognizing these risks, the CBC launched a dedicated workstream to further investigate these concerns. SAIs are encouraged to contribute to this ongoing work by contacting the CBC Secretariat (secretariat@intosaicbc.org).



Eva Theisz, International Relations Director of Riksrevisionen, moderates a discussion on maintaining independence in the audit of donor funds during the 2025 INTOSAI Capacity Building Committee meeting in London. Source: INTOSAI Journal.



Nancy Gathungu, Auditor General of Kenya; Karin Nordlöf, Senior International Advisor of Riksrevisionen, and; Collins Acheampong, Head of Professional Services at Office of Inspector General at the Global Fund, speak on a panel about maintaining independence in the audit of donor funds during the 2025 INTOSAI Capacity Building Committee meeting in London. Source: INTOSAI Journal.

Independence in complex and challenging contexts

Independence is particularly difficult to achieve where political and institutional fragility is high. The CBC workstream on SAIs in complex and challenging contexts addresses many issues raised by its members, including those relating to SAI independence. Yet progress is possible.

In February 2024, SAI Somalia shared its achievement of securing the passage of Audit Law No 14 (2023), an important milestone given the country's political complexity. The new law strengthens financial accountability and transparency, making a significant step toward modernizing the oversight framework. This process required perseverance and strategic engagement, serving as an example of how legal reforms can be advanced even in the most challenging contexts. The webinar recording on SAI Somalia's journey and key insights is available on the [INTOSAI Capacity Building Committee Website](#).

Regional initiatives supporting SAI independence

Regional organizations are playing a crucial role in advancing the independence agenda.

At the June 2025 CBC meeting, AFROSAI-E presented its ongoing efforts to address the independence challenges faced by SAIs in its region. Drawing on findings from the INTOSAI Global Survey, the IDI Global SAI Stocktaking Report, and self-assessments conducted by regional SAIs, AFROSAI-E identified several persistent threats to SAI independence. These include:

- Inadequate legislative provisions safeguarding independence
- Limited audit mandates
- Lack of financial and administrative autonomy
- Unclear or constrained mandates and terms for Auditors General

Recognizing that legislative improvements have been slow and that existing audit acts are often not implemented in practice, AFROSAI-E has adopted a proactive and strategic approach to support its members in securing genuine independence.

Central to this effort is the development of a Model Audit Act structure, grounded in regional experience and aligned with INTOSAI standards and best practices. This Model Audit Act, which was shared for comment during the CBC meeting, aims to provide a clear, ISSAI-compliant framework for amending national legislation. By doing so, AFROSAI-E seeks to empower SAIs to advocate for reforms that ensure their autonomy in law and in practice.

Beyond legislative drafting, AFROSAI-E is committed to collaborating with country-level stakeholders to promote SAI independence and is actively engaging with global organizations, research institutions, and development partners to share its work and amplify its impact.

Elsewhere, PASAI has embedded SAI independence as a strategic priority in its 2024–2034 Strategic Plan, recognizing that independence is a prerequisite for building resilience among SAIs in the Pacific. By mainstreaming independence into long-term planning, PASAI signals that autonomy will remain central to the region’s development agenda for the coming decade.



Esther Lameko-Poutoa, Chief Executive of the PASAI Secretariat, speaks about PASAI initiatives at the 2025 INTOSAI Capacity Building Committee meeting in London. Source: INTOSAI Journal.



PASAI shares the Pacific SAI experience with the 2025 INTOSAI Capacity Building Committee meeting in London. Source: INTOSAI Journal. Source: INTOSAI Journal.



Source: World Bank

Perspectives from the World Bank on SAI Independence through the Independence Index

Author: Mona El-Chami, Senior Governance Specialist, World Bank

Introduction

Supreme Audit Institutions (SAIs) are a cornerstone for public financial management and good governance. Being able to work independently is necessary for transparency, accountability, and the good use of public resources. The World Bank considers that SAI independence is not only a legal or technical aspiration but also a developmental necessity. SAIs' mandate is to build trust in the public, hold governments accountable, and contribute to national development goals, particularly Sustainable Development Goal (SDG) 16 on peace, justice, and strong institutions (United Nations, 2015). But they cannot do these things if they are not fully independent.

This article explores the origins and structure of the [SAI Independence Index \(InSAI\)](#), highlights key trends and insights from recent reports, and discusses the implications for SAIs and the donor community. It also talks about important new developments and insights from recent reports. It also sees opportunities for collaboration and continuous improvement in the quest for stronger, more independent SAIs worldwide.

Origins of the SAI Independence Index

The SAI Independence Index (InSAI) was developed in response to a growing recognition among the international accountability community that SAI independence is both essential and unevenly realized across countries and regions. Even though many countries have officially committed to SAI independence, there wasn't enough regular, comparable data to figure out what level of independence there really was and track progress over time.

The InSAI complemented International Standards of Supreme Audit Institutions (ISSAIs), International Organisation of Supreme Audit Institution (INTOSAI)'s SAI Performance Measurement Framework (SAI PMF) tool, and other existing tools and approaches to provide insights into SAI independence. It was intended to be utilized to inform and better equip World Bank task teams and development partners to support the strengthening of SAIs in client countries and help focus the ongoing collaboration between INTOSAI and development agencies to address the intractable SAI independence issue. The InSAI was developed by a team of SAI experts at the World Bank and reviewed by experts from INTOSAI Development Initiative (IDI), US Government Accountability Office (US GAO), French Court of Accounts, Ghana Audit Service, The Global Fund, and UK's Foreign, Commonwealth and Development Office.

The Structure of the SAI Independence Index

The InSAI includes 10 indicators that are based on international standards and practices and capture the multifaceted nature of SAI independence. These indicators are grouped based on the following important dimensions:

- *Legal Framework*: How well do country constitutions and laws protect SAI's independence?
- *Financial autonomy*: The ability of SAIs to handle their own funds and give resources to the right places as needed.
- *Staffing autonomy*: The authority to hire, keep, and manage qualified workers without too much help from outside sources.
- *Operational autonomy*: The freedom to set audit priorities, methodologies, and reporting practices.
- *Access to Information*: The right to obtain access to all the records and information needed to do audits well.
- *Reporting and follow-up*: The ability to report findings publicly and ensure that recommendations are acted upon.

The methodology of the index combines using documentation and professional judgment, with written justifications for each score. The final score (0–10) reflects the level of SAI independence. This approach allows for a nuanced understanding of the formal and informal factors that affect SAI independence in real-life situations.

Trends and Insights

Regional and Global Patterns

The first InSAI Index, which came out in 2021, revealed significant disparities in SAI independence across regions and countries. Only two countries reached the highest level of independence, which shows the challenges that remain. Some of the key findings included:

Weaknesses in Financial and Staffing Autonomy: Many SAIs lack control over their own budgets and face constraints in recruiting and retaining skilled personnel. These limitations undermine their ability to conduct effective audits and respond to emerging risks.

Variations in Independence Across Regions: Some regions, such as South Asia, scored relatively higher, particularly in operational autonomy and audit scope, while regions like Sub-Saharan Africa and the Middle East had lower levels of independence, especially in financial autonomy and legal frameworks.

Donor Influence in Promoting Independence: The findings underscored that SAIs receiving sustained donor support showed more significant improvements in their legal frameworks, audit capabilities, and operational independence.

The second InSAI Index completed in 2023, emphasized that, while progress has been made—especially in transparency and operational autonomy—persistent challenges remain. Financial and staffing constraints continue to impede the ability of many SAIs to function independently. Political pressures, resource limitations, and gaps in legal frameworks are recurring themes in countries where SAI independence is weakest.

Notable Improvements and Challenges

The InSAI Index has shown a number of positive trends, such as:

Stronger legal protections: In many countries, legal changes have been made to strengthen government promises of SAI independence, which are often made possible by technical help from donors.

Better Accountability: More and more SAIs are talking to the public and sharing their results, which is creating a culture of accountability.

Improved operational practices: Thanks to programs that build capability, SAIs can use modern auditing methods and international standards.

However, challenges persist. In many contexts, the gap between formal independence and actual practice remains wide. Informal norms, political dynamics, and limited resources can undermine even the best-designed legal frameworks.

Implications for SAIs

Informing Reform and Policy Dialogue

The InSAI Index has become a valuable tool for SAIs, policymakers, and development partners. By providing a clear, evidence-based assessment of SAI independence, the index informs reform efforts and policy dialogue at both the national and international levels.

For SAIs, the index serves as a benchmark for self-assessment and strategic planning. It helps identify areas of strength and weakness, prioritize reforms, and track progress over time. For governments and legislators, the index highlights the importance of enacting and enforcing legal protections for SAI independence.

Use Cases in Country-Level Assessments and Donor Coordination

Development partners, including the World Bank, use the InSAI Index to inform the design and implementation of public financial management (PFM) projects. The index helps donors target their support to areas where it is most needed, coordinate efforts with other partners, and monitor the impact of their interventions.

For example, World Bank PFM projects often include components aimed at strengthening SAI autonomy, such as supporting legal reforms, providing technical assistance, and building institutional capacity. The index provides a framework for measuring the effectiveness of these interventions and ensuring that they contribute to sustainable improvements in SAI independence.

Broader Donor Efforts in Supporting SAI Independence

The World Bank and other donors are committed to supporting SAI independence through a variety of mechanisms and partnerships:

Institutional Strengthening: Many SAIs need both financial and technical resources to have stronger independence. Donor-funded projects often focus on developing SAIs' institutional capability including investments in technology, infrastructure, and training.

Technical Assistance and Legal Reforms: Donors have played a key role helping SAIs in drafting legislation that supports autonomy.

Global Advocacy: Collaboration and advocacy by development partners has always been impactful. It has helped embed the principle of independence into global frameworks such as the Addis Ababa Action Agenda on Financing for Development (United Nations, 2015; INTOSAI, 2007).

Looking Ahead: The Global Project on SAI Independence

While substantial progress has been made, the journey toward full SAI independence is ongoing. Political pressures, resource constraints, and informal barriers continue to pose significant challenges. The World Bank recognizes that achieving true independence is a long-term endeavor that requires sustained commitment from all stakeholders.

The Global Project on SAI Independence, led by the World Bank, International Monetary Fund (IMF), Organisation for Economic Co-operation and Development (OECD), IDI, and US GAO marks a new phase in donor support. This initiative aims to explore not only the legal and formal aspects of independence but also the informal factors—such as norms, traditions, and relationships with key government stakeholders—that influence SAI effectiveness. By addressing both the written and unwritten rules of the game, the project seeks to drive meaningful, lasting change. The InSAI methodology has the chance to be upgraded based on the findings of the Global Project.

Conclusion

SAI independence is a key part of good governance, sustainable growth, and efficient management of public funds. The InSAI Index has provided the international community with a tool to assess, compare, and strengthen SAI independence worldwide. It will be upgraded to improve its coverage, precision, and responsiveness to evolving governance realities. The World Bank and development partners are committed to helping SAIs have the independence they need to serve the public interest and contribute to a more transparent, accountable, and prosperous world.

Call to Action

We invite everyone in the INTOSAI community to engage with us to advance the cause of independent, effective, and trusted SAIs worldwide.

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Participants of the High Level Event on EU SAIs Independence. Source: SAI Cyprus

SAI Cyprus Organises High Level Event on EU SAIs Independence

Author: Akis Kikas, Director of Audit, Audit Office of the Republic of Cyprus

The Supreme Audit Institution (SAI) of Cyprus hosted a High Level event on European Union (EU) SAIs Independence in Pafos on October 15th 2024, with keynote speakers from the European Commission, the INTOSAI Development Initiative (IDI), the Support for Improvement in Governance and Management (SIGMA)/ Organisation for Economic Co-operation and Development (OECD) and the House of Representatives of the Republic of Cyprus. The event was attended by 21 SAIs of the European Union and 5 SAIs of Candidate and potential Candidate countries. The purpose of the event was for SAIs to reaffirm their commitment to safeguard their independence, address challenges that could pose a threat to it and discuss possible solutions.

During the event, Mr. Akis Kikas, Director of Audit of SAI Cyprus, presented the professional pronouncements in place relating to SAIs Independence, stressing that the independence of audit bodies is not only a technical requirement; it is a cornerstone of democracy and a vital tool for ensuring the integrity of public administration and therefore, adherence to the principles set out in the Mexico Declaration on SAI Independence is of paramount importance. He further pointed out that the United Nations General Assembly (UNGA) in its Resolutions 66/209 of 2011 and 69/228 of 2014 acknowledges the role SAIs have in fostering governmental accountability for the use of resources and their performance in achieving development goals. Aware that independence should remain an overarching goal of all SAIs, the resolutions also take note and encourage Member States to apply in a manner consistent with their national institutional structures, the Lima and the Mexico Declarations. Furthermore, he reminded the participants that the Addis Ababa Action Agenda on Financing for Development, endorsed by UNGA Resolution 69/313 from 2015, calls Member States to commit themselves to strengthening national control mechanisms, such as SAIs. To ensure that SAIs are able to deliver on this aspiration, the document encourages Member States to give due consideration to the independence and capacity building of SAIs in a manner consistent with their national institutional structures. It was also pointed out that, a significant development in recent years for European Union SAIs is that adherence to the above INTOSAI principles is inserted as a pre-accession requirement for candidate countries. Therefore, it is evident that these form now part of the Aquis Communautaire and therefore their application is expected, mutatis mutandis, in all member states.



Source: SAI Cyprus

Ms Androulla Ioannou, Deputy Director of the Joint Audit Directorate for Cohesion of the European Commission, explained the role of independent SAIs in good governance and the Rule of Law, stressing the long-term benefits for both SAIs and the public. She pinpointed that SAIs are a central component of the anticorruption framework, contributing to building integrity in the public finance, but also a significant part of the checks and balances in national systems. She further highlighted that the European Commission monitors developments related to the independence, resources and powers of SAIs in the Rule of Law Report that it prepares annually.

Mr Chrisis Pantelides, Deputy Chairman of the Standing Committee on Development Plans and Public Expenditure Control of the House of Representatives of the Republic of Cyprus stressed that, without the contribution of the SAI, the Parliamentary Committee on Control cannot function, and the exercise of parliamentary control will be very deficient , if non-existent.

Mr Einar Johan Gørrissen, Director General of IDI, presented the results of the INTOSAI Global Stocktaking report – SAI Independence section, which is a triannual exercise where the objective is to give a snapshot of performance and capacities of SAIs. Mr Gørrissen explained that an overall decline in the SAI Independence Index, based on the Mexico Declaration principles, has been noted, with negative trends for adequate legal frameworks (Principle 1), access to information (Principle 4) and financial autonomy (Principle 8). He also noted an increase in reported SAI interference cases, especially in selecting audit areas. More than half SAIs cannot appeal to Supreme Court in cases of interferences, and 10% reported that Heads of SAI had experienced interference in conducting their mandates.

Mr Freddy Ndjemba, Senior Manager of IDI, shared with the participants insights from IDI's SAI Independence Rapid Advocacy Mechanism (SIRAM) and Ms Bianca Brétéché, Deputy Head of SIGMA programme, OECD, presented the IDI/OECD global project on SAI Independence.



Source: SAI Cyprus

In the ensuing discussion participants agreed that existing INTOSAI pronouncements, especially the Mexico Declaration, offer a solid framework for SAI independence, and reiterated their unwavering commitment to the Mexico Declaration Principles of independence, as a cornerstone of their effectiveness and credibility but also acknowledged that there is great variation in the effectiveness of implementing these Principles in different jurisdictions. They recognised the importance of formal references to INTOSAI Standards regarding SAI independence in the Acquis Communautaire, not only as a pre-accession requirement for candidate countries, but for all member states. Independence is vital for SAIs to properly carry out their role in providing oversight in public spending and supporting the rule of law, however the following key challenges are observed:

- Restricted access to data.
- Financial independence.
- Lack of legal immunity for SAI Heads & members.

The participants recognised the importance of collaboration among EU SAIs and with EU institutions, through regular exchange of information, joint initiatives, and advocacy and expressed their commitment to promote SAI independence at the EU and national levels. The following considerations for advocacy on EU SAI Independence were put forward:

- Knowledge sharing and peer to peer learning, to support the contextualization of independence in different jurisdictions.
- Develop specific capabilities such as the legal capacities within SAIs to safeguard independence and protect the SAIs statute. SAIs should review and strengthen their applicable legal and institutional frameworks on a national level, and advocate for strengthening these frameworks in order to safeguard their independence.
- Steps should be taken to encourage the European Commission to explicitly require the implementation of SAI independence principles in EU member states. This is essential to facilitate and enhance the role of SAIs and enable them to fulfil their role in the rule of law, in an effective manner. Systematize the assessment of SAI independence through inclusion in the EC Rule of Law report, and use the results as a basis for future reforms.
- Articulate and demonstrate more effectively SAIs contribution to good governance, transparency and accountability. SAIs should enhance their communication efforts to raise public awareness of their role and the importance of their independence.
- International cooperation: SAIs should continue to collaborate with international organizations and other oversight bodies to promote good governance and accountability.



Source : Adobe Stock Images, tarasov_VI

Three Misconceptions on the Independence of Supreme Audit Institutions

By Vincent Frigon

Independence is what Supreme Audit Institutions need to fulfill their vital role of promoting transparency and accountability in public administration. Yet it is often jeopardized by political interference. What are the most effective strategies for safeguarding it? Research suggests that we may have some misconceptions about the effectiveness of existing measures in this crucial area.

Misconception #1: Money Will Buy Willingness

Various socioeconomic factors, such as the gross domestic product, can have an impact on the capacity of a government to allocate adequate resources to SAIs. But the assumption that SAI independence relies heavily on a government's income level is a misconception, according to the World Bank's [Supreme Audit Institutions Independence Index](#) which studied 118 countries. Results indicate that many SAIs in low-income countries outperformed counterparts in richer States and suggest that independence is more a matter of choice and priority.¹

Governments with a willingness to strengthen their SAI can enact robust legislation to guarantee its independence, with laws delineating their authority, mandate, and protection from executive or political interference. They allow and encourage this institution to distance itself from the executive, except when necessary for their work, to foster objectivity.

In South Africa, for example, the role of the SAI was embedded in the country's Constitution since its inception in 1911. When the country's new Constitution came into effect in 1994, the role and responsibilities of the Auditor-General of South Africa (AGSA) were expanded to enable the institution to fulfill its constitutional mandate. At the same time, the institution "gained independence and was set apart from the public sector, so it is not bound by any public service rules and regulations", explains AGSA spokesperson Harold Maloka.² This structural independence empowers the institution to govern itself under its own act, the Public Audit Act (PAA), enhancing its autonomy. According to the World Bank's index, the AGSA is one of too few SAIs able to enjoy full independence in carrying out their audit mandate.

Misconception #2: Paved Highways are Free of Potholes

Another misconception is that legal independence equates to actual independence. A solid legal framework serves as a highway: it can facilitate a quicker journey, but obstacles—like potholes—may still impede progress. In the day-to-day operations of SAIs, *de facto* independence can be compromised by political pressure, insufficient funding, or limited access to information. As highlighted [in a literature review by the INTOSAI Development Initiative](#), these institutions may also grapple with issues such as understaffing, the dismissal of their recommendations, or a lack of credibility that hinders their ability to drive meaningful change.³ To effectively fulfill their mission, SAIs rely on support from various stakeholders, including parliament, civil society, and the media. In South Africa, for instance, Parliament supports the AGSA through the Standing Committee on the Auditor-General (SCOAG).

Misconception #3: Independence is Not Compatible with Engagement

There is a misconception among some public institutions regulators that SAIs should be entirely insulated from all stakeholders to mitigate potential political bias. However, fostering balanced engagement with civil society, parliament, and international organizations bolsters both the independence and effectiveness of these institutions. SAIs should not be viewed as adversaries by politicians; rather, they ought to be recognized as impartial allies aimed at enhancing services and programs for citizens through their auditing work. Elected officials can also reap the benefits of this collaboration, provided they refrain from interfering with the audit processes.

To alleviate the perceived threat against governments, SAIs are encouraged to engage more frequently with their stakeholders to clarify roles and responsibilities and to be more transparent about their work. Openness also helps build trust and manage expectations. In South Africa, for example, the AGSA developed its own system to navigate challenges like resistance or non-cooperation from government departments during audits. As Maloka notes, “while there are various parliamentary legislative oversight mechanisms that protect the AGSA in delivering on its mandate, such as the Public Audit Act, 2004 (PAA) and the Standing Committee on the Auditor-General (SCoAG), the AGSA has, over the years, entrenched a cooperative and developmental approach with its auditees.” This approach not only lessens tension but fosters a productive dialogue between auditors and government entities, reinforcing the importance of cooperation in achieving a common goal—effective service delivery to citizens.

Engaging with the media is another crucial method for reinforcing independence. While media reports do not always align with the views of the SAI, they play an essential role in bringing audit findings into the public domain and motivating elected officials to take notice. Public institutions regulators often fear that allowing SAIs to communicate with journalists could jeopardize politicians’ public support, especially if issues of mismanagement become front-page news. However, experienced legislators understand that such reports can also enhance their public standing if they show that they are responsive to concerns and are actively implementing recommendations.

Media coverage is also an indicator of the level of independence of the SAI. This is often the case in South Africa, said expert Herman de Jager. The AGSA “is prepared to let the public know about the maladministration and shortcomings of government institutions, further illustrating that, because of his independence, the Auditor-General does not shy away from confronting state institutions, and the government”⁴, he wrote.

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Footnotes:

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Scanning Supreme Audit Institutions Independence: A Spotlight on Indirect Interference

Authors: Nicolás Lagos, PhD Candidate, Rutgers University, Osvaldo Rudloff, Lawyer, MSc y International Consultant

Introduction: The Importance of SAI Independence

The principle of independence is the cornerstone of credible public sector auditing. Foundational documents, as the Lima Declaration (INTOSAI 1977) the Mexico Declaration (INTOSAI 2007), and landmark United Nations General Assembly resolutions, including A/RES/66/209 (2011), A/RES/69/228 (2014), and the political declaration from the special session against corruption, A/S-32/L.1 (2021), support a global consensus that strong, independent SAIs are essential pillars of democratic accountability and public trust.

The imperative for robust independence is intensified by the evolving role of SAIs in modern governance. Driven by public management reforms (Bouckaert and Put 2016), SAIs have moved beyond their traditional focus on financial integrity to become key players in assessing the economy, efficiency and effectiveness of government programs (Pollitt and Summa 1997) (Power 2009). These organisations have adopted crucial governance and policy analysis functions, tackling complex and politically sensitive issues such as anti-corruption efforts (Dye and Stapenhurst 1998), environmental protection (OISC/CPLP 2023), and gender equality (OLACEFS 2019). As SAIs transition from being traditional watchdogs to influential partners in governance, their insulation from political and administrative pressure becomes more critical than ever. This evolution creates a fundamental tension between maintaining autonomy and having a direct impact on policy, requiring SAIs to carefully manage their relationships with stakeholders to ensure their findings remain impartial and credible (Pierre and De Fine Licht 2017).

While the independence principle is widely recognised, evaluating its implementation across SAIs remains challenging. This article analyses key global data to highlight lessons and best practices for strengthening independence throughout the INTOSAI community.

Our Data-Driven Framework for Analysis: IDI Global Stocktaking Report

Our analysis is based on data from the INTOSAI Development Initiative (IDI) Global Stocktaking Report (INTOSAI Development Initiative, 2024) which provides a comprehensive global assessment of SAIs performance and capacities.

However, in using this data, it is essential to acknowledge its strengths and limitations. The report's primary value lies in its comprehensive scope and standardised data collection, which enable unprecedented global and regional comparisons. This allows the SAI community to identify systemic trends, shared challenges, and areas of collective strength. Conversely, a limitation is the report's reliance on SAIs' self-reported data. As academic studies have noted, a critical distinction exists between de jure institutional frameworks and the more nuanced de facto realities of day-to-day operations (Blume and Voigt 2011). Therefore, this article uses the report not as a definitive judgment on any single SAI, but as an indicator that illuminates the overall landscape of independence and guides the collective discussion and capacity-building efforts.

Key Insights from the 2023 IDI Global Stocktaking Report

The Stocktaking Report offers the most comprehensive assessment of SAI performance worldwide. Of particular interest is Question 13, answered by 166 SAIs, which asked to what extent they were free from Legislative or Executive interference in core activities during 2020–2022. This approach moves the debate from abstract legal principles toward concrete situations where independence is undermined, making it possible to see how interference affects SAIs in practice.

The question distinguishes nine core activities in which SAIs may experience interference, which can be analytically grouped into direct and indirect forms. Direct interference refers to overt restrictions that strike at the heart of a SAI's mandate and public accountability role and includes constraints on the selection of audit programmes, planning and conducting audits, submitting an annual report, deciding on the content and timing of reports, publishing audit reports in the public domain, and carrying out follow-up audits. In contrast, indirect interference captures pressures that do not formally alter the audit mandate but nonetheless erode the SAI's autonomy to perform effectively. These interferences are reflected in limitations on obtaining timely and unconstrained access to documents and information, restrictions on managing the organisation's budget, and reduced control over administrative and organisational management. This distinction underscores that independence can be undermined not only through visible encroachments on audit functions, but also through subtler operational constraints that quietly weaken the institution's capacity to act.

The survey question employed a four-point ordinal scale ranging from "Not at all" (1), "To a limited extent" (2), "To a greater extent" (3), and "To a full extent" (4). For analytical purposes, the first two categories (Not free at all and Free to a limited extent) were combined. Both responses reflect the existence of interference – whether complete or partial – so grouping them provides a clearer picture of where SAIs encounter limitations in practice. In contrast, the last two categories (Free to a greater extent and Free to a full extent) capture situations in which interference was less present, making it possible to distinguish more easily between those activities where challenges are frequent and those where they are relatively rare.

The results show a consistent pattern across the nine activities. At the upper end, the vast majority of SAIs reported being free from interference when carrying out core audit tasks, including submitting an annual report (75%), planning and conducting audits (74%), selection of the audit programme (72%), and follow-up of audits (69%). Similarly, over two-thirds indicated no interference in deciding on the content and timing of reports (68%) and publishing audit findings (66%). By contrast, the lowest levels of freedom from interference are observed in indirect dimensions. Only 41% of SAIs reported being fully free from interference in budget management, 46% in obtaining timely access to documents and information, and 57% in administrative and organisational management. These findings highlight a clear distinction: while most SAIs can perform their formal audit functions without significant obstruction, a considerable proportion still face constraints in the internal and operational conditions necessary to sustain those functions effectively.



Image 1: Extent of Reported Freedom from Interference in SAI Activities (2020–2022). Source: 2023 IDI Global Stocktaking Report.

Why it is Important to Focus on Indirect Interference

For decades, both academic debates and practitioner reforms have framed SAI independence as a fundamental pillar for effective public auditing. Much of this attention has concentrated on high-level political independence – protecting SAIs from overt political pressures, undue interventions to avoid scrutiny, restrictions on the audit mandate, or limitations on the dissemination of reports. While such forms of direct interference remain relevant, the data show that they are not the only, nor necessarily the most frequent, threats that SAIs face in practice.

The evidence highlights that indirect interference is increasingly shaping the daily functioning of SAIs. This interference manifests in two main ways. First, there are constraints on internal management, particularly regarding financial, human, and technological resources. Limiting the control that SAIs have over their budgets restricts their ability to plan and invest in the medium and long term, resulting in insufficient staffing, difficulties in retaining qualified personnel, and inadequate access to modern technologies required for complex audits. These constraints weaken institutional capacity from within, gradually undermining effectiveness even when formal independence is guaranteed by law.

Second, there are barriers to timely and unrestricted access to information, which is indispensable for fulfilling statutory responsibilities. Even if legal frameworks formally grant broad mandates, SAIs cannot perform their work if audited entities delay, obstruct, or provide incomplete data. This undermines the quality of audit findings and diminishes their relevance for accountability and policymaking. In practice, audit teams face these obstacles daily, often with more immediate impact than high-level political interference.

Therefore, while it remains essential to continue strengthening the legal and constitutional safeguards of SAI independence, it is equally important to focus on the operational realities that audit institutions face. Paying attention to how senior management and audit teams navigate internal management constraints and access to information challenges provides a more complete picture of what independence means in practice, and where reforms are most urgently needed.

Conclusions

Today, SAI independence is experiencing growing threats by indirect interference that quietly but persistently undermines their capacity to function. These pressures, manifested in budgetary restrictions, limits on staffing and internal management, and obstacles to timely access to information, strike at the heart of SAI operations, weakening their ability to fulfil their mandate even when legal safeguards appear strong. Recognizing and addressing these forms of interference is therefore as important as protecting SAIs from direct political pressure.

There is no single silver bullet to resolve these challenges. However, advancing stronger regulatory frameworks that guarantee long-term budgetary stability and give SAIs greater freedom to manage their teams is indispensable to secure their operational independence. At the same time, strengthening access to timely and complete information is crucial. The ongoing digitalisation of government data offers a promising opportunity: rather than depending on the delivery of specific documents, SAIs can be granted secure access to entire databases. This shift has the potential to enhance the efficiency, comprehensiveness, and timeliness of audits while closing avenues for indirect interference through obstruction or delay.

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Charles Deguara, Auditor General of the National Audit Office of Malta. Source: National Audit Office of Malta

The Establishment of the National Audit Office of Malta: Safeguarding of SAI Independence Enshrined in the Constitution

Author: Charles Deguara, Auditor General of the National Audit Office of Malta

The 1997 constitutional and legal enactments stand as a defining event in the history of the Maltese National Audit Office, which originated as an auditing department within the public service. This historical date is comparable to the founding of the former Department of Audit, established by the first British Governor of Malta, Sir Thomas Maitland, back in 1814, and the grant of elementary constitutional protections to the Director of Audit when Malta became an independent state in 1964.

To commemorate this important milestone in 2022, amongst other initiatives, the National Audit Office of Malta (NAO) issued a scholarly book entitled 'State Audit in Times of Transition – Reflections on Change and Continuity, Challenge and Opportunity from Malta and Beyond'. Edited by Professor Edward Warrington, it includes a collection of studies that essentially reflect on the past and present with an eye to our institution's future. This article is based on the introduction to this book that is accessible on our website ([State-Audit-in-Times-of-Transition](#)).

Indeed, one cannot overstate the critical importance of the legislation enacted in July 1997 with the unanimous approval of Government and Opposition members of Parliament (MPs). Until then, the Department of Audit generally fell under the control of the Ministry for Finance. With the amendment of Article 108 of the Constitution and the enactment of the Auditor General and National Audit Office Act 1997, the NAO emerged as a fully autonomous oversight institution led by an Auditor General and Deputy Auditor General, whose appointment invariably requires the support of no less than two-thirds of the Members of Parliament. Other important provisions in the legislation, such as those related to the recruiting and financing of the NAO reinforce the Office's total independence from the Executive.

Thanks to these important amendments, Malta's NAO complies with the Lima and Mexico Declarations on the functions, independence, and ethos of Supreme Audit Institutions. Undoubtedly, only a fully independent external audit function can guarantee a reliable, fair, and trustworthy reporting of audit findings and recommendations.

In all fairness, notwithstanding the obvious constraints on its independence and resources, the former Department of Audit consistently followed, as far as possible, a policy of fair and objective reporting. The fundamental audit methodology and the experience of public sector auditing accumulated over one hundred and fifty years constituted a very useful starting point for the newly set up NAO. The institutional knowledge and experience of certain members of management, some of whom are still in service at the NAO, have proven to be extremely useful throughout this gradual but determined transition. Thus, our Office inherited the ethos and core values of its predecessor and is committed to continue cherishing them in line with international public sector auditing standards.

Among the responsibilities and powers vested in the Office of Auditor General, I emphasise the core duty to invariably provide fair, truthful and objective assurance to Parliament, and ultimately to our citizens, our principal stakeholders, that public funds are being used for the purpose for which they were approved, in compliance with prevailing rules and regulations, and in the most economical, effective and efficient manner possible (the famous three e's). Observers of contemporary governance now refer to two additional important e's: 'environment' and 'ethics', both of which have today become increasingly evident in our audit work. We discharge this onerous duty essentially through a fully independent selection of audit subjects which form our Audit Plan for a particular year. This calls for a careful internal consultation and discernment process which is guided by certain criteria, such as materiality and risk. In this regard, we have developed within our Office an extensive risk assessment framework that is very useful in the designation of our Audit Plan. Among other elements, these risk assessments consider the financial materiality, the socio-economic sensitivity of public sector programmes and activities as well as the status of previous concerns raised by the Office in recent years.



DOI Clodagh O'Neill

National Audit Office of Malta with HE President of the Republic of Malta, Dr Myriam Spiteri Debono. Source: National Audit Office of Malta.

To do our work well, and consistent with international auditing standards, the enabling legislation confers authority on the Auditor General and the NAO's staff to have free access at all reasonable times to such information from officers and other personnel of government departments or offices, or of entities subject to his audit, that may be required by them for the proper execution of their functions according to law. The NAO shall be entitled to receive from such officers and other personnel such reports and explanations as they may deem necessary for such purposes.

Moreover, in terms of sub-article 108(12) of the Constitution, in the exercise of their functions the Auditor General and the Deputy Auditor General shall not be subject to the authority or control of any person. This reflects the full autonomy that the NAO enjoys – a 'sine qua non' condition required to enable it to carry out its Constitutional duties in the most objective and independent manner possible.

Throughout my long tenure within this Office, I have always emphatically believed that our staff are undoubtedly the NAO's most valuable asset. Consequently, we need to continuously invest in our highly qualified employees, particularly through the provision of appropriately designed professional development programmes, to ensure that they possess the right tools to carry out audit work to the highest professional standards. The NAO needs the right tools, at all levels of the organisation, to ensure we are duly prepared for such new challenges brought about by these complex changes, especially those occurring within the public sector itself. This implies adaptations and innovations in the way the public sector conducts its business, particularly the use of more complex public procurement procedures and whole of government approaches. Having such tools is a critical requirement to ensure that a national audit institution enjoys and is able to practice full operational independence.

In times of complex social, economic, cultural and technological transition, an institution's external relationships assume even greater salience, perhaps none more so than the NAO's relationship with the leadership of its auditee, namely the Public Service of Malta. While jealously guarding our constitutional and professional autonomy, the NAO strives assiduously to maintain a good working relationship with the leadership of the public service, as clearly stipulated in our Strategic Plan 2024-2028, entitled 'Enhancing Audit Impact'. I refer to my introduction thereto 'Central to the NAO's ethos is the commitment to independence and autonomy, ensuring that audits are conducted impartially and objectively, free from external influences.....'

Another aspect of the NAO's full autonomy, is that despite being the smallest national audit institution within the European Union, we have become more visible in the international sphere. We are very active in several international working groups, such as the EU Contact Committee (an active network of the Heads of national audit institutions of the EU Member States), and in the European Organization of Supreme Audit Institutions (EUROSAI) Environmental Auditing as well as the EUROSAI Information Technology (IT) Auditing Working Groups. Suffice it to state that this year we have hosted in Malta the important 23rd INTOSAI Working Group on Environmental Auditing Assembly (July 2025) whilst we are presently preparing, in close collaboration with the European Court of Auditors, to host this year's Contact Committee in November 2025.

The NAO sits at the centre of a web of institutional relationships, particularly with its auditees, extending right across the State. In essence, I would define the ethos of these relationships as mutual trust and respect. The values are interdependent. Trust and respect ensure that the NAO's reports and assignments are duly accepted by Parliament, by the auditees and by the general public, whose interests we strive to safeguard, particularly since ultimately it is the tax-paying public that finances Government's operations. Of course, such trust needs to be continuously earned, and that in turn means that all our work must be based on the fundamental values of objectivity and fairness without any bias or favour.



National Audit Office of Malta. Source: National Audit Office of Malta.

Undoubtedly, the NAO has evolved significantly throughout the past twenty-eight years: in saying this, I warmly acknowledge the efforts undertaken by my predecessors and all the staff who have worked within the NAO. Suffice it to say that prior to the 1997 legislative amendments, only the Annual Report on Public Accounts was published (comprising the financial audit of the Government Financial Report and a number of Compliance Audits); very few stand-alone reports were issued. At present, apart from the two Annual Reports, one focusing on Public Accounts and the other on the Workings of Local Government, the NAO publishes several stand-alone reports, such as Performance Audit Reports, IT Audit Reports, and Special Audits and Investigations Reports. For the most part, the latter are undertaken at the request of the Public Accounts Committee, a Parliamentary Select Committee. Moreover, nearly a decade ago, the NAO started issuing Follow-Up Audit Reports, which focus on the extent of implementation of the NAO's main recommendations in reports issued in previous years. It is satisfying to note that the vast majority of our recommendations have either been or are in the process of being implemented.

I strongly believe that the main reason for this significant development is the rigorous, transparent and forward-looking staff selection process adopted since the inception of the NAO. This being an extremely important aspect of the total autonomy that the NAO enjoys today, as emphasised above. Gradually, it led to the recruitment of professionally qualified and competent staff in accounting (for Financial and Compliance Audits) and in other academic fields (for the other types of audits). We also worked hard to raise the morale and motivation of our staff, particularly during a very challenging time for the NAO, when the conditions of engagement were not so attractive and we were losing very good people from our team. Today, resignations from our Office have been reduced drastically.

While the number of employees we have today is similar to what it was decades ago, the depth of their skills, expertise, and professionalism has grown remarkably. This is one of the principal results of the autonomy that our Office enjoys.

To conclude, the National Audit Office is the heir to one of the oldest governing institutions in Malta: as heir, it has inherited the mission entrusted to the State Auditor as well as the enduring ethos of its predecessor, the Department of Audit. Through its work the NAO strives not to be the passive custodian of a dead legacy. On the contrary: it cultivates that legacy with extraordinary commitment and vigour, with a view to helping Malta's public administration to discharge faithfully its own distinctive mission towards the common good in the challenging circumstances of the twenty-first century. Essentially, through the continued enhancement of good governance across the public sector keeping in view the high priority given to the attainment of the sustainable development goals. This steadfast commitment and vigour makes me confident that, notwithstanding the challenges it faces, the National Audit Office will continue to carry out its constitutional mandate in the best manner possible. Ultimately, in the best interest of the citizens it aspires to serve.

- Charles Deguara, Auditor General



Bikram Gurung, Assistant Auditor General. Source: SAI Bhutan

Upholding Independence: Triumphs and Challenges of the Royal Audit Authority of Bhutan

Author: Bikram Gurung, Assistant Auditor General, SAI Bhutan

Introduction

Supreme Audit Institutions (SAIs) are crucial for good governance, accountability, and transparency. In Bhutan, the Royal Audit Authority (RAA) audits public resources, with its effectiveness critically dependent on independence amidst political, economic, or institutional pressures. This article examines SAI Bhutan's real-world experiences, highlighting its successes in safeguarding independence and the persistent challenges it faces, drawing insights from official publications, peer reviews, and specific audit cases.

Legal and Constitutional Foundations of RAA's Independence

The RAA's independence is deeply embedded in Bhutan's legal and constitutional framework. The Constitution of Bhutan (2008) and the Audit Act of Bhutan 2018 [1, 2] establish the RAA as an independent authority with several key safeguards:

- *Auditor General (AG) Appointment and Tenure:* The AG is appointed by the Druk Gyalpo (King) from a jointly recommended list by key constitutional office holders, ensuring a non-partisan selection. Serving a fixed, non-renewable five-year term or until the age of 65, and removable only through impeachment, the AG enjoys substantial security of tenure, insulating the office from political interference [1, 2].
- *Functional Autonomy:* The Audit Act grants the RAA full functional independence in all auditing aspects—planning, programming, investigation, and reporting. It mandates operations without fear, favor, or prejudice, and explicitly states that the RAA is not subject to external direction unless specified by the Act [2].
- *Access to Information:* Unrestricted access to necessary audit information is guaranteed by both the Constitution and the Audit Act [1, 2].
- *Reporting and Dissemination:* The RAA is obligated to report its findings through Annual Audit Reports to the Druk Gyalpo, Prime Minister, and Parliament, with full freedom over content, timing, and dissemination [1, 2].
- *Financial Safeguards:* The State is constitutionally mandated to provide adequate financial provisions. A critical provision ensures interim funding, guaranteeing at least the previous year's budget if the national budget is delayed, thereby mitigating financial pressures [2].

These provisions collectively protect the RAA's independence from political, economic, and institutional interference, ensuring its role in upholding public sector accountability and transparency.

Challenges to RAA's Independence

Despite its strong legal framework, the RAA faces several challenges:

- *Parliamentary Audit Requests:* While the RAA controls audit scope, the legal framework lacks an explicit right for the AG to refuse parliamentary requests for specific audits [3]. Though the AG has historically resisted such pressures, this ambiguity remains a potential vulnerability for external influence.

- **Overlap with Royal Civil Service Commission (RCSC):** The Royal Civil Service Act grants the RCSC oversight over the RAA, including internal organizational approval and a mandate to audit the RAA and its staff [3]. This creates a potential conflict with the RAA's managerial and administrative autonomy and its core audit mandate, as it involves an external body auditing the SAI itself, potentially compromising RAA's independence in human resource management and internal governance.
- **Budgetary Constraints:** Despite constitutional mandates for adequate funding, the RAA's budget share of the state budget was small (0.36% – 0.38% between 2012-2015) [3]. Budget reductions, such as those during the COVID-19 pandemic, can significantly impact the RAA's capacity for high-quality audits, limiting its reach and effectiveness [3].

Cases Illustrating Independence and its Impact

Two cases exemplify the RAA's independence and its tangible impact on public sector accountability:

Case 1: RAA Confronts Nu. 2,840.092 Million Financial Irregularities (FY 2022-23)

This case highlights the RAA's proactive role in financial accountability. In FY 2022-23, the RAA published 456 audit reports, identifying irregularities totaling Nu. 2,840.092 million (approximately USD 34 million) [4]. These included:

Category of Irregularity	Amount (Nu. Million)	Percentage of Total	Description
Fraud and Corruption	39.604	1.39%	Willful intent to derive undue benefits, prima facie evidence of fraud or deception.
Non-compliances to Laws and Rules & Regulations	2,244.80	79.04%	Deviations from acts, rules, regulations, policies, SOPs, and agreements.
Shortfalls, Lapses, and Deficiencies	555.683	19.57%	Material impact, posing a potential threat to economic and efficient functioning.

The report detailed required actions from auditees, identifying accountable officials for resolution, sanctions, and corrective actions. Public disclosure of these findings, attributing fraud and non-compliance to specific agencies underscores the RAA's functional independence and commitment to transparency, driving accountability despite significant financial implications [4].

Case 2: RAA's Review of the Judiciary System (2019)

In its "Review of Judiciary System and Practices, 2019," the RAA found court judgments largely inaccessible to the public [5]. This audit is significant, demonstrating the RAA's willingness to scrutinize the judiciary, a co-equal branch, without fear, favor and prejudice. The RAA's findings prompted positive developments: a media and communication unit was established at the Supreme Court, and judicial services were delinked from the Bhutan Civil Service Commission in 2022 to enhance judicial independence [5]. This case exemplifies the RAA's strengthening role in promoting accountability and transparency across all government branches, even in sensitive areas.

Successful Models, Safeguards, and Advocacy Efforts

The RAA's ability to maintain independence stems from:

- *Robust Legal Provisions:* Constitutional enshrinement and detailed provisions in the Audit Act of Bhutan 2018 provide primary safeguards, including the AG's secure tenure, functional autonomy, and guaranteed access to information, forming a strong protective shield [1, 2].
- *Parliamentary Oversight:* The Public Accounts Committee (PAC) in Parliament reviews RAA reports and ensures follow-up, providing external accountability and translating audit observations into concrete reforms [1].
- *Proactive Advocacy:* The INTOSAI Peer Review (2016) recommended continuous advocacy to strengthen legal and financial independence, especially regarding parliamentary audit requests and the RCSC overlap [3]. The RAA's historical refusal of certain parliamentary requests, even without explicit legal backing, demonstrates its internal advocacy and commitment to its mandate.

Impact on Public Sector Accountability and Transparency

RAA's independence directly enhances audit effectiveness, public sector accountability, and transparency. Findings on financial irregularities (Nu. 2,840.092 million in FY 2022-23) and the judiciary review highlight the RAA's ability to identify systemic weaknesses and hold public entities accountable [4, 5]. By publicly reporting fraud, non-compliance, and inefficiencies, the RAA provides crucial information to the public and Parliament, fostering transparency and driving necessary reforms. Follow-up actions and reforms demonstrate a tangible impact on governance and resource management in Bhutan.

Strategies and Lessons Learned for Other SAIs

For other developing nation SAIs, the RAA's experience offers practical strategies:

- *Prioritize a Strong Legal Framework:* Advocate for constitutional and legislative provisions explicitly guaranteeing SAI independence, including secure tenure, functional autonomy, and adequate financial resources. These are the first line of defense.
- *Cultivate Proactive Advocacy:* Proactively advocate for independence, especially when legal ambiguities exist. Principled stands, even without explicit legal backing, can establish precedents and strengthen institutional resolve.
- *Foster Engagement with Oversight Bodies:* Build strong, collaborative relationships with parliamentary oversight committees (like Bhutan's PAC) to ensure audit findings lead to concrete actions and reforms, amplifying the SAI's impact.
- *Embrace Transparency in Reporting:* Publicly disseminate audit findings, even from sensitive sectors, to build public trust and generate external pressure for accountability. Transparency is a powerful tool.
- *Invest in Continuous Capacity Building:* Invest in professional development and adopt modern auditing techniques (e.g., digital auditing, data analytics) to enhance audit quality and impact. This strengthens credibility and effectiveness, as suggested by RAA's strategic reforms.

Conclusion

The Royal Audit Authority of Bhutan exemplifies a Supreme Audit Institution that, despite operating within a developing nation context, has largely succeeded in upholding its independence. Its strong constitutional and legal backing, coupled with a proactive approach to auditing and reporting, has enabled it to expose significant financial irregularities and drive reforms even in sensitive areas like the judiciary. While challenges persist, particularly concerning parliamentary oversight and the role of the RCSC, the RAA's journey offers valuable lessons for SAIs worldwide: a robust legal framework, continuous advocacy, strategic engagement with oversight bodies, and unwavering transparency are paramount in safeguarding independence and ensuring effective public sector accountability.

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Finau Nagera, Auditor-General of Fiji. Source: Office of the Auditor General, Fiji

Strengthening Independence: Fiji's Journey to a Modern Audit Act

Author: Grace Tuvakasiga, Senior Communications Officer, Office of the Auditor General of Fiji

The independence of Supreme Audit Institutions (SAIs) is fundamental to ensuring accountability, transparency, and good governance in the public sector. For SAI Fiji, this principle has been at the heart of a long and determined journey to modernize the legislative framework guiding its work. The enactment of the Audit Act 2025 marks a historic milestone, one that reflects perseverance, collaboration, and commitment to safeguarding the independence of Fiji's Office of the Auditor General. The Audit Act 2025 came into force in May 2025.

Why Independence Matters

An independent SAI ensures that public resources are managed effectively, government programs deliver value, and decision-making is informed by accurate and objective information. Without independence, whether institutional, financial, or operational, a SAI risks losing credibility and its ability to act as an impartial guardian of public interest.

Globally, the principles of SAI independence are enshrined in the Mexico Declaration on SAI Independence (ISSAI P-10), adopted by the International Organization of Supreme Audit Institutions (INTOSAI). The Mexico Declaration outlines eight core principles, including the independence of SAIs' legal framework, financial autonomy, freedom in selecting audit subjects, and unrestricted access to information. These principles have become the benchmark for measuring the strength of SAIs worldwide.

The Fiji Audit Act 1969 did not fully reflect these principles. While it served the country well for decades, it did not capture the strengthened mandate in the 2013 Constitution of the Republic of Fiji, nor did it align with international standards and emerging public sector challenges.

A Long Journey of Reform

The recognition that Fiji's Audit Act was outdated sparked the reform journey. This journey formally commenced in 2018, when SAI Fiji, with technical support from the Pacific Association of Supreme Audit Institutions (PASAI), engaged a legal consultant to review the Audit Act 1969. The consultant was tasked to benchmark Fiji's legislation against global best practices and recommend ways to strengthen SAI Fiji's mandate in line with the 2013 Constitution of the Republic of Fiji and International Standards.

In 2023, the Fijian Government approved the review process, providing the political mandate to advance the reform. This marked a turning point, as momentum shifted from technical groundwork towards active consultation and legislative development.

Importantly, the reform process was not carried out in isolation. Written submissions were invited from the public, and consultation workshops were held drawing in representatives from government ministries and departments, civil society organizations, and other interested groups. This inclusive approach ensured the draft proposals reflected Fiji's governance environment and the aspiration of its people as far as accountability and transparency is concerned.

A major success factor in this legislative reform was SAI Fiji's ability to leverage stakeholder engagement. Throughout the process, stakeholders contributed through written submissions, oral feedback and attended in-person consultation workshops.

This broad-based engagement created a sense of shared ownership over the legal reform, securing buy-in from both government and non-government actors. It also underscored the role of consultation as a cornerstone of effective governance reform.

The OAG benefitted from its strong partnership with PASAI, which provided funding and technical support throughout the process. This collaboration highlighted the influence of regional cooperation in strengthening public institutions and underlined the importance of solidarity among SAIs across the Pacific.

Growing Independence: Institutional, Financial, and Operational

The Audit Act 2025 enhances the Auditor-General's powers and duties, reaffirming the authority to act, within the boundaries of the law, without interference. A key feature is the immunity clause, which protects the Auditor-General and staff against any liability when carrying out official duties. While concise with just 26 sections over 17 pages, the Act is reinforced by strong Constitutional provisions on appointment, removal, remuneration, independence, audit mandate, aspects of access to information, funding and governance of the office.

Perseverance and Resilience

The journey to this achievement was long and, at times, challenging. Legislative reform is inherently complex, involving multiple actors, technical debates, and competing interests. Guided by its constitutional mandate and by the conviction that independence is essential for effective auditing, the OAG stayed the course.

Each stage of the process from legal review to nationwide consultations, to parliamentary debate-built momentum. SAI Fiji's resilience was matched by the support of its stakeholders, who recognized that strengthening the independence of the Auditor-General is ultimately about strengthening governance in the public sector.

A Milestone for SAI Fiji

The Audit Act 2025 marks a new era for SAI Fiji. It modernizes the legislative framework, repeals outdated laws, and embeds stronger provisions that enhance the powers, duties, and independence of the Auditor-General. It is not only a legal milestone but also a symbolic one: a recognition of the importance of independent audit in building public trust and accountability.

This achievement also contributes to the Pacific region's growing momentum towards aligning with international standards for SAI independence. By modernizing its Audit Act, Fiji joins other countries in the region and beyond in demonstrating commitment to the Mexico Declaration and INTOSAI principles.

For Fiji, it is a reminder that institutions can grow stronger, more resilient, and more relevant in the face of change. For the global SAI community, it is an example of how persistence, collaboration, and stakeholder engagement can turn the principles of independence into a lived reality.

For the SAI Fiji, this milestone is a conclusion to a long journey and the beginning of a new chapter, one where independence is not just a principle but a practical foundation for accountability, transparency, and better governance in service of the people of Fiji.



Office of the Auditor General
Republic of Fiji

Auditing for Better Public Sector
Performance and Accountability

Source: SAI Fiji



Source: The Audit Board of the Republic of Indonesia (BPK RI)

SAI Indonesia's Pathway to Safeguarding Independence

Authors: R. Yudi Ramdan Budiman, Teguh Widodo, and Sherlita Nurosidah, SAI Indonesia

The independence of Supreme Audit Institutions (SAIs) has long been recognized as a fundamental principle for ensuring the credibility and effectiveness of public sector auditing. Since the adoption of the Lima Declaration in 1977, the global consensus has been clear mentioning SAIs cannot fulfill their oversight mandate effectively without a high degree of independence, both formally guaranteed and practically exercised. Independence serves not only a technical function but also carries normative significance, as it underpins the accountability of governments to citizens and contributes to the broader goal of strengthening institutions as articulated in the United Nations Sustainable Development Goals, particularly Goal 16 on peace, justice, and strong institutions.

In conceptual terms, independence is multidimensional. It is often distinguished between de jure independence, which is embedded in constitutions and statutory frameworks, and de facto independence, which concerns the actual ability of SAIs to operate without interference in practice. While de jure independence provides legitimacy, it is insufficient unless matched by de facto independence that enables institutions to act autonomously and enforce their findings. The Audit Board of the Republic of Indonesia (SAI Indonesia or BPK) offers an illustrative case of how these two aspects interact. Although BPK's independence is enshrined in the Indonesian Constitution and subsequent legislation, the Board has had to continuously consolidate and defend its independence in practice through institutional reforms, engagement with stakeholders, and strategic allocation of resources.

Frameworks developed by international organizations provide useful benchmarks for examining SAI independence. The INTOSAI Mexico Declaration outlines eight principles, including a broad audit mandate, unrestricted access to information, and freedom in reporting, while the World Bank's InSAI indicators identify ten measurable dimensions of independence. These frameworks emphasize that independence is not a static or one-time achievement but rather a dynamic process that must be safeguarded and adapted to changing circumstances. Within this context, BPK's experience can be understood across four interrelated dimensions, namely operational autonomy, financial autonomy, staffing autonomy, and mechanisms for ensuring the effective follow-up of audit recommendations. Further details on the ten InSAI indicators of BPK's independence are available at <https://bpk.id/appendix-BPK-Independence>.

Operational autonomy forms the foundation of independence. In Indonesia, this autonomy is not only guaranteed by the Constitution but also elaborated in statutory law, particularly the State Audit Law of 2004 and the BPK Law of 2006. These laws establish BPK's authorities and affirm its equal standing with other high state institutions, ensuring that it cannot be subordinated to the executive. Yet, operational autonomy must be translated into practice. BPK has undertaken significant organizational reforms, including revising the internal distribution of duties among Board members and establishing new directorates and regional offices to address emerging administrative and territorial needs. In a country of more than seventeen thousand islands, where auditors must adapt to diverse local conditions, these reforms have strengthened BPK's independence by deepening its contextual understanding (Nurosidah, 2024). Furthermore, BPK has also issued internal regulations that operationalize its mandate, ranging from auditing standards and codes of ethics to detailed procedures for investigative audits and for calculating state losses. These instruments enhance professionalism, consistency, and credibility in audit practices.

Equally important, operational independence is not exercised in isolation but in constant interaction with external stakeholders. BPK collaborates with Parliament, law enforcement agencies, professional organizations, and civil society to ensure that its findings are both legitimate and actionable. For instance, its engagement with Parliament strengthens the political authority behind audit reports, while cooperation with law enforcement agencies supports the enforcement of findings related to fraud or corruption. By cultivating networks of support, BPK not only defends its independence against potential interference but also ensures that its work translates into real accountability outcomes.

The second dimension is financial autonomy, which is critical because without adequate resources, independence risks being purely symbolic. Indonesian legislation requires that BPK's budget be included as a separate line in the state budget. However, in practice, budget submission and approval initially involved intermediary ministries, creating the potential for executive influence. Reforms have gradually reduced this vulnerability by allowing BPK to submit its budget directly to Parliament, with subsequent discussions involving the Ministry of Finance only for technical matters. This adjustment has strengthened institutional independence and yielded tangible outcomes, most notably a 25 percent budget increase in 2025 compared to 2024. With greater resources, BPK has been able to expand its infrastructure, invest in modern auditing technologies, and improve remuneration, all of which reinforce its institutional resilience.

Financial autonomy is not solely about securing adequate funding yet it also concerns how funds are managed. BPK has demonstrated prudent financial governance, ensuring that resources are aligned with strategic priorities and that expenditures are transparent. By managing its budget responsibly, BPK reinforces its credibility in demanding accountability from other institutions. Financial independence, therefore, is both a precondition for and a reflection of institutional integrity.

The third dimension, staffing autonomy, is particularly significant in ensuring the quality of audit work. Human resources are the pillar of institutional capacity, and the ability to recruit, develop, and retain qualified staff is indispensable for maintaining independence. In Indonesia, the recruitment of civil servants is centrally managed by the Ministry of State Apparatus and the National Civil Service Agency, but BPK actively participates in the process by defining its staffing needs, conducting interviews, and ensuring candidates meet professional standards, thus allowing BPK's institutional capacity to be strengthened significantly.

Beyond civil service recruitment, BPK possesses the authority to engage external auditors and experts, giving it flexibility in addressing specialized or technical audit requirements. The presence of a dedicated training and education center further reinforces internal capacity by offering continuous professional development programs. Moreover, BPK has successfully advocated for differentiated allowances for its employees, recognizing the unique demands of audit work and safeguarding professional integrity by aligning compensation with responsibility. Together, these measures ensure that staffing autonomy is not undermined by broader bureaucratic constraints and that the institution can maintain a high level of technical competence.

The fourth dimension concerns the effectiveness of follow-up mechanisms for audit recommendations. Independence does not end with the issuance of reports. It must also be reflected in whether recommendations are acted upon. BPK has established clear procedures requiring auditees to respond to recommendations within 60 days. These responses are reviewed and verified. To enhance efficiency and accountability, BPK has introduced an integrated information technology system that tracks follow-up actions from time to time. This innovation not only increases transparency but also ensures that audit findings translate into tangible improvements in governance. The system has also enabled BPK to generate data on compliance rates, which in turn strengthens oversight by Parliament and fosters greater accountability among auditees.

The Indonesian experience yields several broader lessons for the study and practice of SAI independence. First, constitutional and statutory guarantees are essential but insufficient on their own. Independence must be continuously exercised and reinforced through daily practices, institutional reforms, and strategic engagement. Second, independence requires adequate resources. Without sufficient financial and human capital, even the most formally independent institution risks ineffectiveness. Third, stakeholder engagement is crucial. Independence does not imply isolation but rather, SAIs must cultivate constructive relationships with other institutions, thereby increasing legitimacy and facilitating the enforcement of findings. Fourth, technological innovation plays a growing role in safeguarding independence by improving transparency, efficiency, and accountability in audit processes. Finally, independence should be understood as a process rather than a destination. It requires constant vigilance, adaptation, and reinforcement in the face of evolving political, institutional, and social dynamics.

Conclusion

Nearly five decades after the Lima Declaration, the principle of SAI independence remains fundamental to effective governance. The experience of BPK demonstrates that while constitutional guarantees provide a solid foundation, the practical realization of independence requires strategic reforms across multiple dimensions. Through efforts in operational autonomy, financial arrangements, staffing policies, and follow-up mechanisms, BPK has successfully consolidated both de jure and de facto independence. These reforms have not only enhanced its domestic credibility but also contributed to the global objective of strengthening institutions under Sustainable Development Goal 16. Independence, as shown in this case, is both a legal principle and a lived institutional practice that must be continuously safeguarded to maintain accountability, transparency, and integrity in public financial management.

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Caroline Spencer, Auditor General for Western Australia. Source: Office of the Auditor General for Western Australia

Independence in Auditing

By Caroline Spencer, Auditor General for Western Australia.

Independence is the cornerstone of effective auditing.

In my role as the Auditor General for Western Australia, independence is not just a concept but a practice that underpins every audit we conduct. This independence ensures that our audits are conducted without influence or interference, thereby maintaining the trust and confidence of the Parliament and the community.

In Western Australia (WA), the Auditor General is appointed for a non-renewable 10-year term and as an independent officer of Parliament has complete discretion on what to audit, when and how to report, and what to include in reports.

This allows the Auditor General to carry out their duties without concern for reappointment, ensuring that decisions are guided solely by evidence, the public interest, and a commitment to ensuring that public sector entities are doing the job that we, as citizens, entrust them to do. This governance model promotes transparency, accountability and public confidence. It also provides stability and the opportunity for new leadership at the end of each term.

Our focus is on providing independent assurance on public spending, while highlighting shortcomings in public administration and positive findings that recognise effective and efficient government service delivery. Our audit findings inform legislative scrutiny and debate. We provide operational information and intelligence that would often be otherwise unavailable to members of Parliament and parliamentary committees. In this respect we act as Parliament's eyes and ears.

We also strive to recommend ways in which quality and standards can be improved across the entire public sector not just within the entities we audit. However, we rely on parliamentary committees such as the WA Legislative Assembly's Public Accounts Committee (PAC) and the Legislative Council's Standing Committee on Estimates and Financial Operations (EFOC) to ensure entities act on our recommendations. PAC and EFOC remain critical to the work and effectiveness of the Office, and we are accountable to the Parliament through them.

The Auditor General Amendment Act 2022 (Amendment Act), passed by Parliament in November 2022, but yet to be proclaimed, introduces provisions that raise significant concerns regarding the independence of the Auditor General. These provisions appear to conflict with the overarching independence guarantee in the current legislation, which clearly state that the Auditor General is not subject to direction from any person in relation to what to audit or report. Such changes have the potential to diminish the effectiveness of the role by constraining professional judgement and limiting the ability to report freely in the public interest.

While the Amendment Act was introduced with the stated intention of enhancing transparency, accountability and integrity across government, particularly by clarifying access to information powers, it also alters the operational framework of the Auditor General. More importantly, it imposes constraints on reporting discretion, including restrictions on who the Auditor General may report to and who may access draft reports prior to publication.

As the Auditor General, I felt duty-bound to publicly raise the issues in the OAG's annual reports for 2022-23 and 2023-24¹, noting that the amendments would affect the ability to report directly to Parliament on matters deemed to be in the public interest. Nearly three years on, the Amendment Act is still not proclaimed. My Office and I do not support proclamation in its current form and considers it appropriate that the legislation be subject to careful review by the Joint Audit Committee of Parliament.²

As auditors, we need to remain fearless and thorough in our approach, but mindful and respectful in our dealings with government and entities. While parties may ultimately agree to disagree, it remains essential that our Office maintain a “no-surprises” approach throughout the audit process through proactive and transparent liaison at ministerial, departmental and parliamentary levels. This principle forms a key part of our operational philosophy and practice. Despite these efforts, it is understandable that government entities may approach audit reporting with caution, particularly given the potential impact of our findings in the media and among the public, who serve as the ultimate assessors of government performance. To maintain credibility, we must remain apolitical. A consistent and balanced approach to reporting is critical, and all we can do is audit and report what is in front of us.

This underscores the importance of balanced reporting, which includes giving appropriate recognition where it is due. Although positive findings may not attract the same level of media attention, they serve to acknowledge effective governance and provide a benchmark for better practice across the sector.

A defining strength of our democratic system is governments accepting independent scrutiny of critical issues of public interest and commitment to addressing recommendations for improvement. Nothing similar is evident under authoritarian regimes.

It is critical that our State continues to uphold strong public audit legislation. The role of the Auditor General must remain anchored in unambiguous, statutorily enshrined independence to ensure that whoever holds the office can fulfil their duties to the Parliament and the people of Western Australia with integrity, impartiality and effectiveness.

Footnotes

1. Office of the Auditor General, [OAG Annual Report 2022-23](#), OAG website, 27 September 2023, pp. 11, 110-111; Office of the Auditor General, [OAG Annual Report 2023-24](#), OAG website, 26 September 2024, p. 12. [↗](#)
2. Per section 48 of the Auditor General Act 2006. [↗](#)



Source: General Court of Audit of Saudi Arabia

Strengthening SAI Independence: Global Progress and the Saudi Experience in Auditing

By Ms. Areej Mousa Aljehani, General Court of Audit, SAI of the Kingdom of Saudi Arabia

Introduction

Supreme Audit Institutions (SAIs) are pivotal in safeguarding public resources, ensuring that governments are held accountable and fostering transparency in the management of public funds. A key to fulfilling this role is their independence from undue external influence, which allows them to perform audits with objectivity and credibility. As emphasized by INTOSAI's guidance, SAIs operate most effectively when shielded from interference, allowing them to properly strategize, acquire necessary information, and report findings without restrictions (INTOSAI, 2019). Political influence, budgetary constraints, and limited access to records can undermine audit quality and public trust.

This article examines how the General Court of Audit (GCA) of Saudi Arabia has successfully navigated challenges to its independence through robust legal frameworks and disciplined execution, offering practical insights that other SAIs can adopt to reinforce independence and thereby enhance governance and public confidence.

Strengthening Independence: Saudi Arabia's General Court of Audit (GCA) Reforms

Prior to 2019, GCA operated under a governance and financial framework where it reported to the Council of Ministers, with leadership appointments requiring both ministerial decision and royal endorsement. However, without a clearly established audit framework, the GCA's ability to systematically plan and prioritize audits was constrained. Resource allocation followed centralized budgeting channels, which posed a risk in GCA's ability to plan and operate independently. While functional, this structure exposed the institution to public influence, making its work vulnerable to external pressures.

Significant reforms were introduced with the issuance of a Royal Decree in 2020, which shifted leadership appointments to the King. This marked a major governance change, reducing political influence and strengthening operational autonomy. Key provisions included royal appointment of the President and Vice President, and financial and administrative independence allowing the President to prepare the organizational structure, budget, and bylaws for royal approval. These reforms aligned GCA with INTOSAI-P 10 principles (INTOSAI, 2019), embedding independence into law and translating statutory protections into daily operational practice.

Operational Independence in Practice

Independence in Saudi Arabia is not only statutory, but also operational. GCA's mandate guarantees unrestricted access to records, backed by legal consequences for non-compliance. It also provides authority to escalate unresolved issues to the highest executive levels, ensuring accountability, while direct reporting to the King strengthens institutional safeguards against interference. Between 2020 and 2025, these protections enabled audit teams to conduct procedures free from undue influence, significantly improving the quality and frequency of audit reports.

In daily operations, the legal framework and institutional practices ensure seamless access to necessary records and clear consequences when auditees resist cooperation. GCA can submit reports to the highest authority and engage with auditees to address findings, escalating issues when unresolved. This combination of legal safeguards and operational protocols converts statutory independence into effective practice, safeguarding objectivity, protecting public resources, and advancing the GCA's vision to pioneer excellence in public auditing.

Nevertheless, institutional pressures that are inherent during the conduct of an audit persist. Auditees often prefer cooperative rather than critical assessments. GCA has responded by anchoring its work in international benchmarks, aligning with International Standards of Supreme Audit Institutions (ISSAIs) and International Standards on Auditing (ISAs) to guarantee objectivity. It has also invested in specialized expertise in information technology (IT) systems, financial assets, and contract reviews, equipping teams to handle complex audits confidently. Transparency has been enhanced through reporting to the King, and GCA has maintained constructive dialogue with ministries while making clear that final audit judgments rest solely with the institution. For example, audits of privatization programs and large-scale infrastructure projects placed particular emphasis on procurement transparency, asset valuation, and contract compliance. Even when politically sensitive findings were reported with clarity, reinforcing GCA's credibility as a neutral guardian of public funds.



Figure 1. Evolution of GCA reforms in Saudi Arabia (Bureau of Experts, 2019; General Court of Audit, 2020).

Practical Insights for Strengthening SAI Independence

Saudi Arabia's experience demonstrates that independence must be embedded in law but also sustained in daily practice, meaning access to information, expertise, and tools is essential. Legal reforms such as explicit mandates, clear reporting lines, and safeguarded leadership appointments provide the foundation, but these must be reinforced by financial and administrative autonomy to protect internal decision-making.

Operational independence is equally critical, requiring guaranteed access to records, technical expertise to manage complex audits, and transparent reporting to the highest levels of government and the public. Transparency enhances credibility, while constructive engagement with audited entities can strengthen independence, it is imperative that the SAI retains full and unequivocal control over the reporting of its findings, without any interference in the material content of its reports. Perhaps most importantly, adaptability is key: as governments reform, SAIs must evolve their methods and capabilities to remain relevant and credible.

Building on this foundation, GCA has proactively engaged in international peer networks, including INTOSAI and INTOSAI Development Initiative (IDI) initiatives, as part of its own strategy to strengthen independence. Through these engagements, GCA has benchmarked its legal, financial, and operational safeguards against global best practices and adapted lessons to its domestic context. The institution has benefited from exchanging experiences with other SAIs, learning how to manage challenges such as political pressure, budgetary constraints, and sensitive audits. These interactions have enhanced the GCA's credibility and operational autonomy, reinforced its de facto independence, and provided access to technical guidance, frameworks, and tools that complement domestic reforms. By integrating insights from global networks into its own practices, GCA has turned international engagement into a concrete, practical mechanism for sustaining and strengthening its independence.

Conclusion

Independence is not a single reform but an ongoing process. The experience of Saudi Arabia's General Court of Audit shows that legal safeguards, operational autonomy, and strong institutional practices must work together to make independence a practical reality. By establishing clear mandates, protecting leadership appointments, and ensuring robust budgetary frameworks and transparent reporting, GCA has strengthened its ability to audit without interference and safeguard public resources. Its proactive approach, including specialized expertise and engagement with international peer networks, demonstrates how practical measures can reinforce independence in both law and practice. This experience shows that SAI independence is strongest when legal, institutional, and operational measures work together to ensure accountability and public trust.

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The author, Ms. Areej Mousa Aljehani. Source: General Court of Audit



Temple of Garni, Armenia. Source: Adobe Stock Images, Vladimir Voronin

Independence through Governance

Author: Zhirayr Mkhitarian, Board Member of the Audit Chamber of Armenia, PhD in Economics

Disclaimer. The views expressed in the article are those of the author and do not necessarily represent the views of the Audit Chamber of Armenia.

Since its adoption in 2007, the Mexico Declaration on SAI Independence has been a landmark in strengthening the independence of Supreme Audit Institutions (SAIs) worldwide. By codifying eight principles, it established a global consensus: independence is essential for credible public audit.

Yet the Declaration's principles are largely focused on the external and negative dimension of independence—what others (Parliament, Government) must do or refrain from doing. Legislatures should grant SAIs a broad mandate, financial and managerial autonomy, and unrestricted access to information. Governments should not unduly interfere in the prescribed areas. These safeguards remain indispensable, particularly in contexts where many SAIs around the world still face direct external pressure.

But this is only one side of the coin. The internal and positive dimension of independence—how SAIs are institutionally designed and governed—matters just as much. Independence is not only about external guarantees but also about internal resilience. Institutions that lack clear checks and balances may fail to act, or be seen to act, independently—even if external protections are in place.

A recent reform of the governance model of the Audit Chamber of Armenia illustrates how this dimension can be operationalized. Previously, its Board consisted of seven members—all executive directors, each coordinating different audit teams and projects. Today, the Board includes both executive and non-executive directors, with non-executives holding the majority in the boardroom. Four board committees now provide structured oversight:

- *Executive Committee* – comprising the Chairman and two board members. Each of the two members coordinates either the performance audit or the financial/compliance audit department.
- *Quality Committee* – composed of three non-executive directors, overseeing all stages of audit projects, from planning to reporting.
- *Ethics Committee* – composed of three non-executive directors, responsible for ethical oversight across the institution.
- *Audit Committee* – composed of three non-executive directors, overseeing the internal procedures of the SAI.

This system of intra-institutional checks and balances—both horizontal (between Board committees) and vertical (between the Board and management)—adds an additional layer of safeguards, strengthening the independence of the SAI.

Almost two decades after the Mexico Declaration, the time is ripe to ask: should we expand it with a “Ninth Principle”—one that secures the internal dimension of independence through governance?



Source: The authors, Gustavo Felipe Mendes Corrêa and Andre de Oliveira Navarro.

Strengthening Independence through Operational Procedures: The Experience of the Tribunal de Contas do Estado de Goiás

By Gustavo Felipe Mendes Corrêa and Andre de Oliveira Navarro

The independence of Supreme Audit Institutions (SAIs) is widely recognized as a cornerstone of effective public oversight. The Lima Declaration¹ (INTOSAI P-1) emphasized that SAIs “can only accomplish their tasks objectively and effectively if they are independent of the audited entity and protected against outside influence.” Building on this principle, the Tribunal de Contas do Estado de Goiás (TCE-GO), Brazil’s state-level Court of Accounts, has invested in transforming the fundamental principles of ISSAIs into concrete operational routines. This effort has aimed not only at raising methodological quality but also at safeguarding independence in practice, ensuring that oversight activities remain resistant to political, economic, and institutional pressures.

From Principles to Operations

At the core of this initiative lies the adoption of Operational Procedures (OPs), a framework designed to translate ISSAI guidance into standardized, auditable, and replicable practices. Each OP is composed of three complementary components:

1. Process mapping, which lays out the full workflow of each audit, clearly identifying steps and responsibilities.
2. Work instructions, providing details, technical references, and practical guidance to facilitate execution.
3. Descriptive guidelines, offering tailored advice for the specificities of each type of audit engagement.

By consolidating these tools, TCE-GO standardized the operationalization of ISSAI principles—particularly those enshrined in ISSAI 100², which stresses the role of ethics and independence in guiding audit work. What once remained abstract principles are now embedded in day-to-day workflows. This provides auditors with clear methodological support, while also shielding them from discretionary instructions or inconsistent practices.

Strengthening Independence through Operational Discipline

The OPs have become a protective barrier against external pressures. In practice, such pressures often manifest through delays in responses to audit requests, attempts to contest findings on political grounds, or pressures to postpone or soften conclusions. The standardized structure of OPs prevents such influences from altering the process. Each stage—from criteria definition to evidence collection and reporting—is predefined, documented, and traceable. This makes it difficult for external actors to interfere and ensures that audit judgments are consistent and defensible.

Moreover, OPs enhance internal independence. By reducing excessive reliance on hierarchical guidance, they empower early-career auditors to act autonomously within a robust methodological framework. Instead of depending on subjective instructions, auditors can consult standardized workflows that anchor their professional judgment. This aligns with the Lima Declaration's call for auditors themselves to be free from undue influence, ensuring that independence is not only institutional but also operational.

Tangible Impacts

The institutionalization of OPs has produced measurable and symbolic results. TCE-GO successfully earned four ISO certifications — ISO 9001 (quality management), ISO 14001 (environmental management), ISO 27001 (information security management), and ISO 37001 (anti-bribery management). Together, these certifications attest to the maturity of its governance and control systems, while also signaling alignment with international benchmarks adopted by SAIs worldwide. Equally important, the adoption of OPs has elevated the credibility of its audits by demonstrating that findings are not products of individual discretion but of a transparent and replicable process.

For auditors, the impact has been transformative. Instead of navigating ambiguity, auditors—junior and senior alike—benefit from a structured roadmap of the audit cycle. This allows them to anticipate challenges, plan subsequent stages, and document key decisions. By embedding professional judgment within a transparent framework, OPs enhance both confidence and accountability. In practical terms, this independence translates into more effective oversight of payroll irregularities, pension miscalculations, and deficiencies in internal controls—issues with significant financial and social implications.

Alignment with International Good Practices

TCE-GO's approach resonates with good practices adopted by leading SAIs globally:

- *National Audit Office (United Kingdom)*³: Uses Auditor Guidance Notes and structured templates with built-in quality checks.
- *European Court of Auditors (European Union)*⁴: Operates the AWARE platform, centralizing methodology and mandatory documentation of risk assessments.
- *Office of the Auditor General (Canada)*⁵: Requires systematic documentation of contradictory evidence and consolidates findings in central repositories.
- *U.S. Government Accountability Office (USA)*⁶: Through the Yellow Book, mandates transparent documentation of evidence, judgments, and conclusions.

These experiences highlight common themes: digitalization, standard templates, decision logs, and proactive quality reviews—all elements incorporated into TCE-GO's OPs. By doing so, the Court of Accounts has positioned itself within a global community of SAIs committed to embedding independence into practice through methodological rigor.

Challenges and Next Steps: The Cultural Transformation

While technical achievements are significant, the next challenge is cultural transformation. OPs can only sustain independence if they are embraced as essential tools by the entire organization. This requires continuous investment in:

- *Training and capacity building:* Regular workshops to ensure all auditors understand both ISSAI principles and their practical application.
- *Updating OPs through feedback loops:* Adjustments based on lessons learned during audit execution, ensuring methodologies remain relevant and dynamic.
- *Peer learning and knowledge exchange:* Encouraging teams to share experiences and dilemmas, consolidating a culture of professional skepticism and collective accountability.
- *Quality assurance:* Reinforcing the idea that independence is preserved not only by resisting external influence but also by delivering high-quality, credible audit work.

In essence, independence must be seen not as a defensive shield but as a constructive tool. OPs make independence tangible by embedding it into workflows, but it is organizational culture—continuous training, updating, and collaboration—that ensures it remains vibrant and sustainable.

Conclusion

The case of TCE-GO demonstrates how SAls can translate the ideals of independence into practice. Anchoring audit work in standardized Operational Procedures has strengthened the Court's ability to resist external pressures, improved professional autonomy for auditors, and elevated its standing through international certifications. More importantly, it has shown that independence is not merely a constitutional guarantee, but an operational reality that shapes how audits are planned, executed, and reported.

As the Lima Declaration reminds us, independence is indispensable for objective and effective auditing. By transforming ISSAI principles into concrete operational routines, TCE-GO has not only safeguarded its autonomy but also reinforced its commitment to transparency, accountability, and the responsible use of public funds. Its experience offers a replicable model for SAls worldwide seeking to institutionalize independence through methodological innovation and cultural transformation.

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The headquarters of the Audit Court in Rabat. Source: SAI Morocco

The Independence of the Supreme Audit Institution: Challenges and Opportunities

Authors: Samir Damou, Senior Advisor; Abdelssadek Tadist, Senior Advisor, Supreme Audit Institution – Kingdom of Morocco

Introduction

The issue of the independence of Supreme Audit Institutions (SAIs) is back in the spotlight, more than ever before, in the context of complex and intertwined geopolitical, economic and environmental changes and crises. At a time when there is an urgent need for independent and effective oversight institutions, particularly given the steady increase in public spending and the growth of public debt, coupled with limited revenue growth, these institutions are facing pressures that undermine their independence and negatively affect their ability to perform their mandated roles. These pressures have taken various forms, such as budget cuts or failure to provide sufficient resources to carry out their work, interference in their programs and results, and in some cases the dismissal of officials or delays in their appointment¹.

This article aims to examine the experience of the Supreme Audit Institution of the Kingdom of Morocco, including regional audit institutions (referred to as “SAIs” in the rest of the article), in strengthening its legal and actual independence within an institutional and societal environment marked by a series of transformations and challenges and driven by many aspirations. This experience will be presented through three main themes: the SAI’s policy in promoting its independence and the factors contributing to its success, the impact of promoting this independence on the SAI’s work, and the challenges and prospects of this experience.

The article draws on the INTOSAI framework for professional publications, in particular the Lima Declaration (INTOSAI Principle 1) and the Mexico Declaration (INTOSAI Principle 10), as well as the principles for the exercise of judicial functions by supreme audit institutions (INTOSAI Principle 50).

The SAI’s policy in promoting its independence and factors for its success

This policy can be summarized in its most important elements, which are cumulative historical development, a clear vision, strengthening of its resources, and proactive initiatives.

Cumulative historical path to the SAI of Morocco’s independence

The establishment and strengthening of the SAI of Morocco’s independence followed a cumulative historical path, during which it went through four basic stages:

1. An accounts committee affiliated with the Ministry of Finance until 1978.
2. An independent institution governed by law but with limited powers and capabilities (1979-1995),
3. A constitutional institution with clear powers, reinforced by regional audit SAIs to support local governance (2010-1996),
4. A supreme audit institution whose independence is enshrined in the Constitution and whose powers have been expanded since 2011 to protect the principles and values of good governance, transparency, and accountability. The Constitution enshrines the SAI’s mission to receive, track, and monitor mandatory property declarations. It has also been entrusted with the task of certifying the state accounts under the 2015 Organic Law on Finance.

Thus, thanks to the political will of the country’s highest authorities, the SAI now enjoys complete independence in the exercise of its judicial and non-judicial powers. Its work is carried out by independent judges under the supervision of a president appointed by the King in his capacity as head of state. It is also an institution independent of Parliament, the government, and the judiciary. All public bodies and institutions, as well as all those involved in the management of public funds, are subject to its oversight.

Each of these stages has been marked by milestones and orientations that have shaped the SAI's strategies to strengthen its independence and performance, as is the case with its current strategy for 2022-2026.

[Strengthening planning and programming independence](#)

The 2022-2026 strategy² has helped strengthen SAI Morocco's independence in planning and programming. This strategy has ensured balance and integration in the exercise of all the SAI's constitutional and legal powers aimed at strengthening and protecting the principles and values of good governance, transparency, and accountability for the State and other public bodies. It also strengthened its work by including a series of related projects and initiatives, such as monitoring reforms and public infrastructure projects, clarifying programming criteria, and improving the quality of published work and protecting it from inappropriate use.

This strategy took into account the country's major trends and the SAI of Morocco's level of maturity. Communication with various stakeholders, particularly the government and Parliament, had a beneficial effect in terms of understanding the SAI's strategy, helping to empower it with human and material resources, and responding positively to its initiatives. This led to the consolidation of legal independence with effective independence.

[Strengthening the independence of the SAI's resources](#)

The SAI of Morocco has continuously worked to strengthen the independence of its human resources, as its judges are appointed by the King, cannot be transferred or dismissed, are managed by an elected internal council chaired by the President of the SAI, and are bound by a code of ethics that makes independence and objectivity one of its fundamental pillars.

The SAI was able to increase its human resources between 2021 and 2024 from 621 to 738³ employees, an increase of 20 percent, with auditors accounting for a significant portion of this increase, rising from 338 to 412, or approximately 22 percent. The year 2025 saw a similar trend with the recruitment of 103 employees, 43 of whom were auditors with various skills and specializations in information technology, engineering, management sciences, economics, law, and other fields.

This recruitment was accompanied by incentive measures such as improving their financial situation, establishing a special framework for the court clerks' office, and developing a strategy for continuing education, among others. A modern administrative structure has also been recently established, centered around several administrative poles and structures. The number of branches within the chambers has been increased, with the aim of completing its institutional structure and strengthening its professional qualifications.

In terms of financial resources, the SAI has been able to increase its budget by 36% between 2021 and 2025, at an annual rate of 9%⁴. Most of these increases have been allocated to improving the SAI's work, its working conditions, and its human resources. Some of it has also been allocated to strengthening international cooperation, particularly with the SAI hosting the General Secretariat of AFROSAI (since July 2025) and the Secretariat of the JURISAI, or Supreme Audit Institutions with Judicial Powers (October 2024).

Proactive initiatives to strengthen independence

Aware of the importance of taking proactive initiatives to strengthen its independence in order to improve its performance and enhance its impact, and after two decades of practice, the SAI of Morocco worked to submit proposals for amendments to its governing legal code, aimed at expanding its powers and the basis of those subject to its oversight, developing its procedures, strengthening the investigative and auditing powers of its judges, diversifying its outputs and doubling their legal or material impact, and other areas that continue to be emphasized by the INTOSAI principles on independence.

In the same context, it is also working to contribute to the amendment of the law governing compulsory disclosure of assets and the legal framework relating to the system of accountability of public administrators, and to plan the development of regulatory texts to institutionalize the relationship with the judiciary and the Office of the Public Prosecutor.



Madame Zineb El Adaoui, First President of the Audit Court, Presenting the 2023–2024 Biennial Report to Parliament. Source: SAI Morocco

Impact of strengthening the SAI's independence on its work

The policy of strengthening the SAI of Morocco's independence has been reflected in the improvement of its work, the strengthening of its performance, and the enhancement of its impact on the state and society at several levels, the most important of which are:

Improving programming

Importance has been given to monitoring the structural reforms and public programs on which the public authorities are relying to promote the country's economic and social development, such as universal social protection, reform of the investment system, restructuring of the public portfolio, tax reform, water management, and advanced regionalization. The SAI's support for these major projects has added value in addressing the constraints and obstacles that prevent their completion at a reasonable cost, quality, and timeframe.

Improving performance, enhancing results, and strengthening communication

Greater independence has directly contributed to the development of the SAI's performance monitoring and judicial activities. As a result, the rate of recommendations fully or partially implemented by the SAI during the period 2021-2024 reached approximately 80 percent⁵.

The total amount of fines and sums ordered to be recovered by the SAI from perpetrators of financial and budgetary irregularities increased by approximately 117 percent during the period from 2020 to 2024 (6). In addition, the amounts of deficits imposed on public accountants increased significantly during the same period, reaching 144 percent.

In the same context, the SAI has made a remarkable effort to improve the readability and quality of its reports by reducing their size and improving their content. The annual report⁶ is now less than 340 pages long in 2024, down from more than 1,500 pages in previous years. The reports now focus on horizontal issues at the national and local levels and are accompanied by illustrated summaries to facilitate understanding of their findings.

Challenges and prospects

The SAI's policy, based on promoting the national interest, balanced performance, and partnership with all stakeholders, has contributed to maintaining and strengthening its independence. However, this path still needs to be fortified and reinforced by addressing three main challenges:

Preparing strategic leadership

Despite the efforts made, the SAI of Morocco still urgently needs to develop strategic leadership at the level of positions of responsibility in its various chambers, regional SAIs, and administrative structures, which will carry the torch of continuity in strengthening the SAI's independence and its effective contribution to the country's development achievements. This will only be possible if this leadership is able to take proactive initiatives and develop strategies for monitoring, managing change, aligning resources to achieve ambitious goals, and managing relationships with all stakeholders.

Establishing the foundations of integrated oversight

One aspect of the SAI of Morocco's independence, namely the diversity of its powers, poses a challenge in terms of how to exercise them effectively and efficiently. The SAI has therefore adopted integrated oversight in recent years. However, this approach still needs to develop its own standards and consolidate them in practice and in terms of human resources. The SAI is also betting on meeting this challenge by legally consolidating this approach through the bill currently under consideration to reform the law governing the SAI.

Increasing the impact of the SAI's work on citizens

Translating and strengthening the SAI's independence in terms of the quality of its work, so that it has a greater impact on society and citizens and contributes to reducing regional and social disparities, is an ongoing process that requires continuous effort. Success in meeting this challenge will lie in raising the SAI's actual importance to society and citizens, as well as strengthening its constitutional and institutional legitimacy.

Conclusion

Since 1960, the Supreme Audit Institution of the Kingdom of Morocco has successfully built its independence and made the SAI more responsive to INTOSAI standards through a cumulative historical process, benefiting from the constitutional and institutional developments that the country has undergone. However, the SAI intends to continue strengthening its independence and investing it in more balanced performance of its programs and activities in line with the interests of the state and society on the one hand, and increasing the impact of its activities through the implementation of its outputs on the other. The completion of the implementation and evaluation of the 2022-2026 strategy and the preparation of the subsequent strategy provide a golden opportunity to achieve this goal.

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Auditor General Maria Rodriguez. Source: Office of the Auditor General of Belize (OAGB)

Leveraging a Coalition to Bring Change and Engaging Parliament for SAI Belize's Need for Greater Independence

Author: Maria Rodriguez, Auditor General of Belize

SAI Belize is not a fully independent institution. While its legal mandate allows for audits to be carried out as deemed necessary, the Office is dependent on respective line ministries for the hiring of staff and approval of budget. In March 2025, I was appointed as the new Auditor General, and have dedicated the first six months of my term to carry out awareness sessions with different stakeholders to introduce the conversation of why SAI Belize should enhance its independence.



GSAI Master Plan

SAI Belize

A document guiding partners in establishing collaboration and crafting SAI capacity development support

Source: SAI Belize

SAI Belize has begun a coalition to bring change and engage Belize's Parliament to discuss the SAI's need for greater independence. This process began with the acceptance to participate in the INTOSAI Development Initiative's Global SAI Accountability Initiative (GSAI) project in December of 2022. The initiative aims to enhance the capacity and performance of SAIs by mobilizing stable long-term capacity development support. Shortly after, SAI Belize prepared a master plan outlining the project components and a memorandum of understanding, engaging into a two-year project that will support SAI Belize in its strategic development priorities. Thereafter, SAI Belize was successfully partnered with SAI India in a peer-to-peer partnership.



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CIRCULAR MEMORANDUM

NO. 3 OF 2025

MY REF: GEN/3/01/25 (03) Vol. II
FROM: Auditor General, Office of the Auditor General
TO: Office of the Governor General, Chief Justice, Solicitor General, Financial Secretary, Cabinet Secretary, Chief Executive Officers and Heads of Department

Subject: TIMELINE FOR DETAILED ACTIVITIES FOR EXAMINATION OF
AUDIT REPORTS BY THE JOINT PUBLIC ACCOUNTS COMMITTEE

Date: March 19, 2025

Source: SAI Belize

One of the components of SAI Belize's GSAI priorities was: "Strengthened SAI Independence and Legal Framework." Under this component, SAI Belize was tasked to inform stakeholders on its constitutional obligations. On March 2025, SAI Belize issued a Circular Memorandum with subject, Timeline for detailed activities for Examination of Audit Reports by the Joint Public Accounts Committee. This Circular Memorandum provided the legal requirements and roles and responsibilities of key stakeholders such as Parliament in their role in examining the Auditor General's Annual Reports. This Circular Memorandum was shared using the Government of Belize's intranet system and was addressed to the Office of the Governor General, Chief Justice, Solicitor General, Financial Secretary, Cabinet Secretary, Chief Executive Officers of each line ministry and Heads of Departments. The Memorandum was also placed on all of SAI Belize's social media platforms and our official website. Thereafter, for the first time, the Office of the Auditor General was invited to present on its roles and functions during an Orientation Workshop for Honorables and Ministers in April 2025. At this meeting, I, as the recently appointed Auditor General, emphasized to the Parliament that we share the same goals of transparency and accountability.



Source: SAI Belize

In May 2025, the Office once more issued and distributed another Circular Memorandum on the subject of Timeline for submission of Annual Financial Statements. This allowed stakeholders, interested parties and the public to learn about the legal requirements with regards to Constitutional role of the Office of the Auditor General, as well as other key players in the accountability cycle.



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CIRCULAR MEMORANDUM

NO. 4 OF 2025

MY REF: GEN/3/01/25 (04) Vol. II
FROM: Auditor General, Office of the Auditor General
TO: Office of the Governor General, Chief Justice, Solicitor General, Financial Secretary, Cabinet Secretary, Chief Executive Officers and Heads of Department

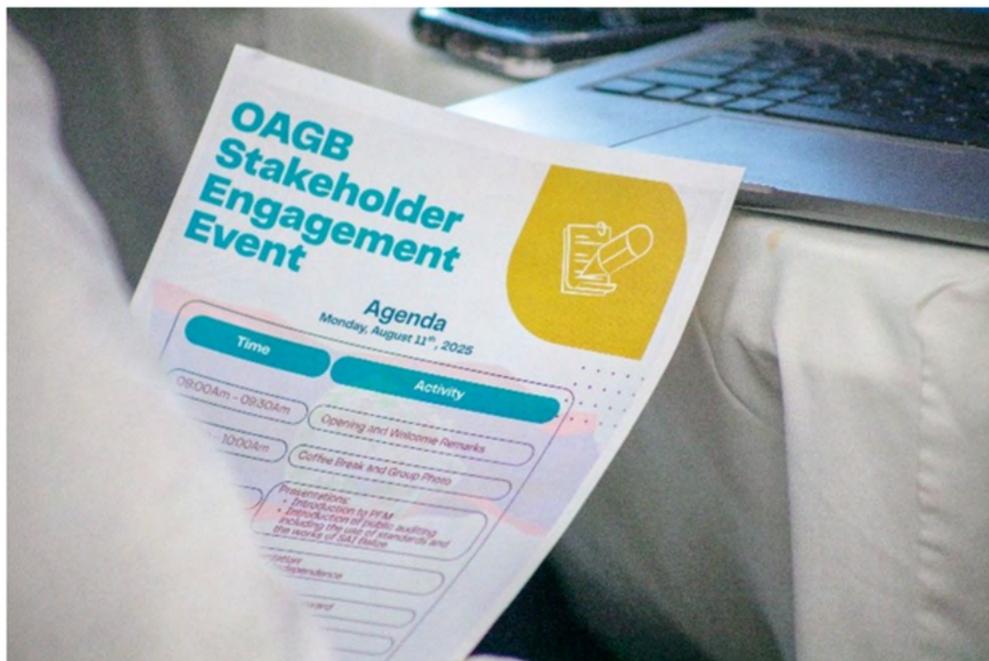
Subject: TIMELINE FOR SUBMISSION OF ANNUAL FINANCIAL STATEMENTS

Date: May 12, 2025

Source: SAI Belize

In June 2025, the Office of the Auditor General participated in the Commonwealth Parliamentary Association seminar for Members of Parliament, which was a Post-Election Seminar. Here, the Office presented its role in supporting the Joint Public Accounts Committee (JPAC)'s oversight of public expenditure, how its work is carried out, the importance of timely follow-up on JPAC's recommendations and tracking implementation by government departments, common challenges in the JPAC-Audit relationship, and reflections on strengthening collaboration between the Office of the Auditor General and the National Assembly. By now, the conversation was very open between both parties, driven by the growth in communication and understanding.

Under the GSAI Project, the Office of the Auditor General held a stakeholder engagement event in August 2025. This engagement fostered knowledge sharing on Public Financial Management, Introduction of Public Auditing, including the use of standards and the audit work of SAI Belize with invited stakeholders. Finally, with the support of the INTOSAI Development Initiative (IDI) and our technical support partner, SAI India, we presented on SAI independence, and requirements of SAIs as per the International Standards for Supreme Audit Institutions (ISSAIs). This event engaged senior Members of Parliament, including Joint Public Accounts Committee members, Senators, and Members of the House of Representatives. They were receptive to the information and knowledge shared. We also hosted representatives from the Accountant General's Department, who are directly linked to the functions of the Office of the Auditor General. Lastly, we included representatives from donor agencies to understand our challenges as a country and as a SAI.



Source: SAI Belize

SAI Belize is early in its journey towards SAI independence, but we hope to continue the positive progress we have made in creating greater awareness of the value and role of the Office of the Auditor General. Future plans for SAI Belize include incorporating the strategic outcome of Enhancing Independence of SAI Belize in its upcoming 2026-2030 strategic plan. Through this strategic outcome, we aim to continue working towards creating awareness of the importance of SAI Belize's independence and Parliament and staff. It also focuses on engagement with respective authorities in charge of personnel and finance, as SAI Belize still depends on these authorities to obtain funds and key human resource functions like hiring personnel. There are also plans to conduct another stakeholder engagement event on public financial management (PFM) as a follow-up session in February 2026, with support from a donor agent present in the last stakeholder engagement event. The stakeholder knowledge sharing event will target SAI Belize staff, the Accountant General's staff and members of the Joint Public Accounts Committee. These will be technical sessions aimed at creating awareness and enhancing knowledge on the subject matter.

The partnership between SAI Belize, IDI and SAI India led to our Office starting the conversation about independence. Empowered by this partnership, SAI Belize's journey towards independence continues by us sharing our roles and expectations, and our functions and challenges to show why full independence should be one of our outcomes.



Jean-Luc LE MERCIER, President of the Territorial Chamber of Accounts of French Polynesia. Source: Territorial Chamber of Accounts of French Polynesia

25 Years in French Polynesia: A Recognized Presence and Independence

Author: Jean-Luc LE MERCIER, President of the Territorial Chamber of Accounts of French Polynesia

Created in 1990, the Territorial Chamber of Accounts of French Polynesia has been based in Papeete (Tahiti) since 2000. Since then, as a supreme audit institution (SAI), it has carried out its judicial and audit functions. With a total staff of 13, including six magistrates, it contributes to informing citizens and improving local public management.

1. Work that has affirmed its independence

This independence stems both from the provisions of the Code of Financial Jurisdictions and from a program freely decided by the court, based on choices linked to the challenges facing the territory and the need for a presence across all five archipelagos. Furthermore, the relative renewal of magistrates (most of whom have been in the territory for less than three years), while sometimes difficult to manage, also contributes to this ability to approach cases with a “fresh eye.”

In 25 years, the SAI has produced more than 270 reports on the management of Polynesian public authorities. While the Territory of French Polynesia (aka “Pays”), the local government with numerous prerogatives due to the autonomous status of French Polynesia, has been the most audited authority, the SAI has also audited many other public bodies or bodies receiving public funds (municipalities, associations, semi-public companies, etc.). With 18 reports published in 2024, the objectives related to the challenges and territorialization of controls have been achieved. This required, in a jurisdiction with modest staff resources, that each magistrate’s program be “thematized”: social and health issues are thus dealt with by the same magistrate.

For several years now, these reports have been accompanied by recommendations that enable a more effective and efficient service to be provided to citizens: in 2023, the implementation rate for these recommendations was close to 75%.

For example, among the topics recently addressed by our SAI, those relating to “youth policy,” the “blue economy,” and the “Territory’s tourism policy”, which are the region’s primary resources, are all useful tools for decision-making at the regional level.

In addition to this work, which is now recognized throughout the Territory and receives around 250 mentions in the local press each year, the SAI of French Polynesia has been keen to work with other financial jurisdictions: the French Cour des comptes and its neighbor in Nouméa, the Territorial Chamber of Accounts of New Caledonia, on joint projects on issues that transcend the Polynesian territory. The aim is both to create common working cultures and to address issues in a more cross-cutting manner. For example, together with its New Caledonian counterpart, it has addressed issues such as “preventing violence against women” and “combating obesity among young people,” which are particularly prevalent in Oceanian societies (Polynesian and Melanesian).

The SAI’s independence allows it to produce objective, quantified and impartial reports that provide citizens with verified and documented information, the result of several months of investigation and consultation with the entity being audited. In the age of social media, the chamber has thus assumed the status of a trusted third party that it has earned over the past 25 years among the citizens of this territory.



Territorial Chamber of Accounts of French Polynesia. Source: Territorial Chamber of Accounts of French Polynesia

2. Constant innovation and adaptation

Over the past 25 years, our SAI has evolved to adapt to a rapidly changing society. For example, it is working to be more open to the local community.

This is particularly true of the choice of topics proposed by citizens. In this regard, the “citizen platform”, launched by the French Cour des comptes in 2022, has also been adopted by the SAI of French Polynesia. This platform allows citizens to express their views on issues that are close to their hearts. The last two topics dealt with economic issues such as “local tax exemption” and “local development tax,” the latter being perceived by citizens as one of the causes of high prices in the Territory.

In addition, it recently broke new ground by asking the President of French Polynesia to submit three or four audit topics each year, from which one is selected by the SAI. Attentive to the concerns of citizens, the SAI of French Polynesia also wishes to remain independent and act as a partner to the country, providing expertise on issues where the latter wishes to benefit from its capacity to conduct professional, cross-cutting, and impartial analyses.

While our SAI has been able to build constructive relationships with its institutional partners and citizens over the past 25 years, it has also implemented innovations and internal changes aimed at greater diversity and inclusion.

In this regard, the SAI has now achieved its goal of gender parity in its workforce (including among its magistrates). This necessary and legitimate move is at the heart of the overall “2025 project” led by the First President of the French Cour des comptes, Pierre Moscovici.

In order to be accessible to all Polynesians who speak Tahitian, summaries of reports have been translated into “Reo Tahiti” for the past four years. The SAI’s aim is to convey its message to everyone in the territory, a movement that is facilitated by the presence of Tahitians within the chamber’s teams.

Finally, the SAI is committed, together with its partners, to a move towards digitization, with the threefold objective of streamlining and securing exchanges, facilitating research, and drastically reducing paper consumption and therefore its environmental impact.

For 25 years, three words have guided the SAI of French Polynesia’s actions: independence, usefulness, and impartiality.

It has been committed to providing information externally and reforming internally in order to remain in tune with societies undergoing profound changes and populations that are increasingly demanding of public decision-makers.

- Jean-Luc LE MERCIER, President of the Territorial Chamber of Accounts of French Polynesia



Source: Adobe Stock Images, Semoga

Strengthening BPK's Independence: Leveraging Strategic Planning, Digital Innovation, and Institutional Integrity

Authors: Akhsanul Khaq, Nyoman Adhi Suryadnyana, and Indra. The Audit Board of the Republic of Indonesia (SAI Indonesia)

Independence is not merely a theoretical principle in the governance of state financial audit institutions, but rather an absolute requirement for the realization of credible public accountability. Independence is the primary foundation of INTOSAI-P10. INTOSAI-P10 emphasizes that the Indonesian Audit Board can only be objective and effective if it is independent from the audited entity and protected from external influences. Public trust is the greatest asset for any state institution. This trust is born from one fundamental key: independence, namely the freedom to work objectively, honestly, and free from pressure from any party. The independence of the BPK is the primary foundation for audit results to be recognized, trusted, and have a real impact on improving state financial governance.

This article examines three key aspects of strengthening BPK independence: strategic planning, information technology, and integrity enforcement. These three aspects complement each other because they each play a distinct role, offsetting each other's shortcomings—strategic planning provides direction, information technology strengthens systems, and integrity serves as a moral foundation. Together, they form a cohesive ecosystem, enabling the BPK to carry out its oversight function independently while remaining relevant, dignified, and beneficial to the nation, as well as contributing to fraud prevention.

Strategic Plan: Targeted Independence

The BPK's Strategic Plan is not merely a planning document, but a compass for independence. Through a risk-based "Renstra" strategic planning process aligned with the National Medium-Term Development Plan and the Golden Indonesia 2045 vision, the BPK ensures that the audit agenda is directed at national strategic issues, not merely short-term political demands.

Objectivity is maintained because the audit focus is determined through a comprehensive risk analysis, including the identification of potential irregularities, the evaluation of audit priorities, and the mapping of public interests. Concrete examples of BPK actions include the implementation of Risk-Based Audit Planning in the 2020–2024 Renstra, the establishment of a cross-sectoral audit program, and prioritization of strategic energy and environmental issues. Thus, the audit direction is not only neutral from external intervention but also truly focused on the most strategic areas impacting state financial management. Transparency is increased because the public can assess the consistency of the BPK's agenda with national development targets through the open publication of audit plans, stakeholder involvement in the planning process, and the delivery of clear performance reports.

With the Renstra, BPK's independence is not only *de jure* (constitutional) but also *de facto* (operational). This means that the BPK is not only constitutionally guaranteed freedom from intervention on paper, but in daily practice, the Strategic Plan provides concrete direction for auditors to work independently, free from political pressure, and oriented toward the public interest. With a transparent, measurable, and risk-based strategic planning mechanism, independence extends beyond legal norms and is truly implemented in the process of selecting audit objects, determining priorities, and preparing publicly auditable reports.

Information Technology: A Pillar of Digital Independence

The digital era brings both challenges and opportunities for the independence of the BPK. The use of big data analytics, e-Audit, artificial intelligence (AI), and digital dashboards makes the audit process more independent, faster, and more accurate. Direct access to audited data reduces auditors' dependence on auditees, for example, through the implementation of e-audits, which allow auditors to download transaction data in real time from ministries/agencies or local governments.

With this mechanism, auditors no longer wait for physical documents or manual reports from entities but instead obtain data directly from the state financial system. This strengthens independence by ensuring the quality of audit evidence, speeding up the process, and minimizing the opportunity for auditee intervention. Internal transparency through a real-time performance dashboard enhances auditor integrity, as both management and auditors can directly monitor the achievement of audit targets, the progress of follow-up recommendations, and the use of resources. This mechanism allows potential deviations or delays to be detected early, thereby further maintaining a culture of accountability and integrity.

Technology serves as a safeguard for independence, as the audit process no longer relies on manual documents that are prone to manipulation, but instead relies on objective and protected digital systems. Concrete examples at the BPK include the development of the Follow-Up Monitoring Information System, the Audit Application System used during the audit process, and the use of e-audit applications for direct electronic data collection. These innovations strengthen auditor independence while improving the quality of audit results.

Integrity Enforcement: Pillars of Strengthening Independence

The independence of the BPK is not only defined as freedom from interference by the executive, legislative, or judicial branches, but is also underpinned by strong internal integrity. This integrity includes adherence to the code of ethics, consistent behavior in line with organizational values, transparency in reporting, and accountability for every auditor's actions. Without integrity, independence loses its meaning, as every audit decision produced could be perceived as biased, compromised by particular interests, or vulnerable to conflicts of interest that undermine the institution's credibility.

Integrity enforcement serves as the moral foundation for BPK auditors to carry out their constitutional mandate objectively, fairly, and professionally. Integrity ensures that auditors are not tempted by political, economic, or personal pressures. As a concrete example, the BPK has implemented an Integrity Zone towards a Corruption-Free Area in various work units, established a Whistleblowing System (WBS) for secure reporting of violations, and integrated the E-State Asset Report. With these concrete steps, the independence upheld by the BPK is complete—both *de jure* (based on regulations and the constitution) and *de facto* (in daily practice).

The Impact of Independence on Audit Effectiveness and Fraud Prevention

The independence of the SAI is directly correlated with audit effectiveness and contributes significantly to state financial governance, improved public policy, and stakeholder trust. Audit quality is determined by the competence and independence of the auditor, with independence being a key factor influencing the objectivity and credibility of the audit report (DeAngelo, 1981).

SAI independence not only enhances audit effectiveness but also plays a role in preventing fraud and corruption. Auditor independence enables the implementation of skeptical audit procedures and the effective detection of fraud (Knechel et al., 2013). A surprising finding suggests that in countries with independent SAIs, corruption rates tend to be lower (Toma, 2017). SAIs with high institutional independence can produce sharper audit recommendations, drive significant improvements in fiscal governance, and reduce state budget waste (Hay and Cordery, 2018). Audits and recommendations from the BPK can improve state financial management and suppress fraud (Indra et al., 2022). When independence is low, audit recommendations tend to be ignored or responded to symbolically.

Independence for SAI Indonesia improves entity compliance in following up on audit recommendations. The Summary Report of Audit Results for Semester I of 2024 revealed that the BPK succeeded in significantly saving state finances. The BPK's strong independence enables auditees to follow up on findings effectively. Furthermore, auditor independence allows auditors to disclose findings firmly and comprehensively without pressure from stakeholders.

Independence also impacts public perception. A 2022 survey by the Indonesian Survey Institute (LSI) showed that public trust in the BPK reached 72%, higher than several other state institutions. The perception of public sector auditor independence directly contributes to increased institutional legitimacy in the eyes of the public and parliament (Putri and Utama, 2021).

Conclusion

The BPK will continue to strengthen its independence to uphold its mandate as the external state auditor in Indonesia, thereby impacting audit quality and contributing to fraud prevention. Independence is strengthened by developing a risk-based strategic plan, utilizing information technology to enhance systems, and upholding integrity as a moral foundation, as stated in the Lima Declaration (1977). Strengthening the independence of the BPK is not only a legal obligation but also a moral endeavor to ensure this institution remains dignified, trusted, and beneficial to the nation. This includes translating the value of independence into the auditors' daily work culture, courage to reject intervention, and steadfastness in maintaining integrity despite external pressure. Thus, independence is not only interpreted as a constitutional principle but also as a concrete practice that supports the BPK's legitimacy in the eyes of the national public and the international community

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Auditing Sensitive Government Bodies: Finding the Right Balance Between Transparency and Security

By Mohammed S. Alharbi, General Court of Audit, SAI of the Kingdom of Saudi Arabia

Introduction

The independence of Supreme Audit Institutions (SAIs) is an essential element to ensure the effectiveness of auditing. It ensures that audit results are objective, credible, and free from external influence. Independence reinforces public confidence in the audit process and strengthens accountability mechanisms in government. Although, when auditing sensitive government entities, such as national security agencies, SAI independence can encounter significant challenges.

The audit process is often met with resistance from entities entrusted with handling highly sensitive activities and classified information. This creates tension between state security requirements and public accountability obligations. This article explores this complex dilemma, outlines the consequences of limited audit access, and proposes a set of creative and context-sensitive solutions to safeguard both the independence of audit process and national security.

The Dilemma of Auditing Sensitive Entities

Auditing institutions responsible for national defense and internal security presents challenges. These entities often manage significant portion of the public budget, yet they operate behind layers of legal and operational secrecy. While confidentiality is essential for national security, secrecy can be used – deliberately or not – to limit audit access.

While security agencies view the sharing of sensitive information, even with trusted audit bodies, as a potential risk, the need for oversight over state security remains paramount. Classified documents, particularly those related to defense contracts, intelligence operations, and weapons procurement, are often deemed too sensitive for disclosure. Officials may argue that the risks of a security breach outweigh the benefits of external oversight.

Nevertheless, the absence of effective oversight is deeply concerning. Defense and security agencies typically receive the largest share of government funding. Without adequate scrutiny, there is a real risk of inefficiency, mismanagement, or even corruption. Therefore, it is crucial to establish oversight mechanisms that safeguard fiscal responsibility and transparency, while implementing robust safeguards to protect sensitive information. Striking this balance ensures both national security and the public's right to accountability, avoiding dangerous blind spots and fostering greater trust in the governance process.

Impact on SAI Independence

This ongoing conflict poses a direct challenge to SAI independence. When entities limit or deny access to information – whether by discretion or by law – it undermines the SAI's ability to fulfill its mandate of ensuring transparency, accountability, and effective governance. According to the Mexico Declaration on SAI Independence, access to information is a fundamental principle that supports the independence of SAIs in carrying out their oversight responsibilities. The Declaration emphasizes that audit bodies must have unimpeded access to all relevant information needed to conduct their audits effectively, regardless of the nature of the entities they audit.

When access to information is restricted, it not only limits the SAI's capacity to assess whether public resources are being managed efficiently and ethically, but it also hinders its ability to report findings that are crucial for public trust. The principles outlined in the Mexico Declaration make it clear that, for SAIs to maintain their independence, they must be empowered with the right to access the information necessary to fulfill their mandate without interference from political or institutional entities. Failure to ensure this access results in weakened oversight, diminished accountability, and a potential erosion of public confidence in both the SAI and the government it serves.

A Path Forward: Reconciling Independence with National Security

Instead of viewing transparency and security as a mutually exclusive, solutions should seek to accommodate both. A number of countries and international audit bodies already experiment with models that ensure oversight while protecting confidentiality.

1. Establishment of a Special Audit Team

To address the tension between national security concerns and the need for audit independence, a balanced approach can be implemented by classifying certain accounts, expenditures, or assets into confidential and non-confidential categories. This would allow for targeted oversight, while still protecting sensitive information.

A Special Audit Team, equipped with necessary security clearances, could be designated to review confidential accounts. This team would have exclusive access to sensitive information, conducting audits under strict protocols to ensure security. Such teams could then issue aggregated reports that maintain transparency without compromising classified details.

2. Strengthening Legal Mandates

A strong legal framework is essential for defining the boundaries of information protection and access within any system. It includes laws and regulations that safeguard sensitive data, ensuring confidentiality while also granting institutions the authority to manage such information within legal limits. This framework not only protects privacy and security but also builds trust, providing comfort to those sharing sensitive information by assuring them of legal protections against misuse. Ultimately, it balances the need for transparency with the requirement to maintain secrecy where necessary.

The General Court of Audit of Saudi Arabia operates under strict legal provisions that require the maintenance of secrecy regarding the information of auditees. These legal frameworks, such as specific articles or clauses in our governing laws, provide clear confirmation that all sensitive information disclosed during the audit process will be protected. This legal assurance gives comfort to auditees, as they can trust that their confidential data will not be exposed. At the same time, these legal safeguards grant the SAI the authority to conduct its audits effectively and independently, ensuring that auditors can access necessary information while upholding confidentiality and securing the integrity of the audit process.

Conclusion

The independence of SAIs is an essential element for transparent public financial management and cannot be compromised. But auditing defense and national security bodies introduces a dilemma requiring flexible and innovative approaches.

Instead of conceding oversight, SAIs should advocate for legal reforms that promote accountability, without jeopardizing confidentiality. These strategies protect the integrity of the audits while also fostering better governance, reducing financial risks, and boosting public confidence.

As global security challenges expand and defense budgets grow, the path forwards is not about choosing between independence and security, but in creating robust frameworks that integrate both priorities.



The author, Mohammed S. Alharbi. Source: The author.



Source: SAI Mozambique (Tribunal Administrativo de Moçambique)

A Journey of Institutional Development Towards the Creation of a Truly Specialized and Independent SAI: How Mozambique's SAI Became a Benchmark in Specialized Audits and its Prospects

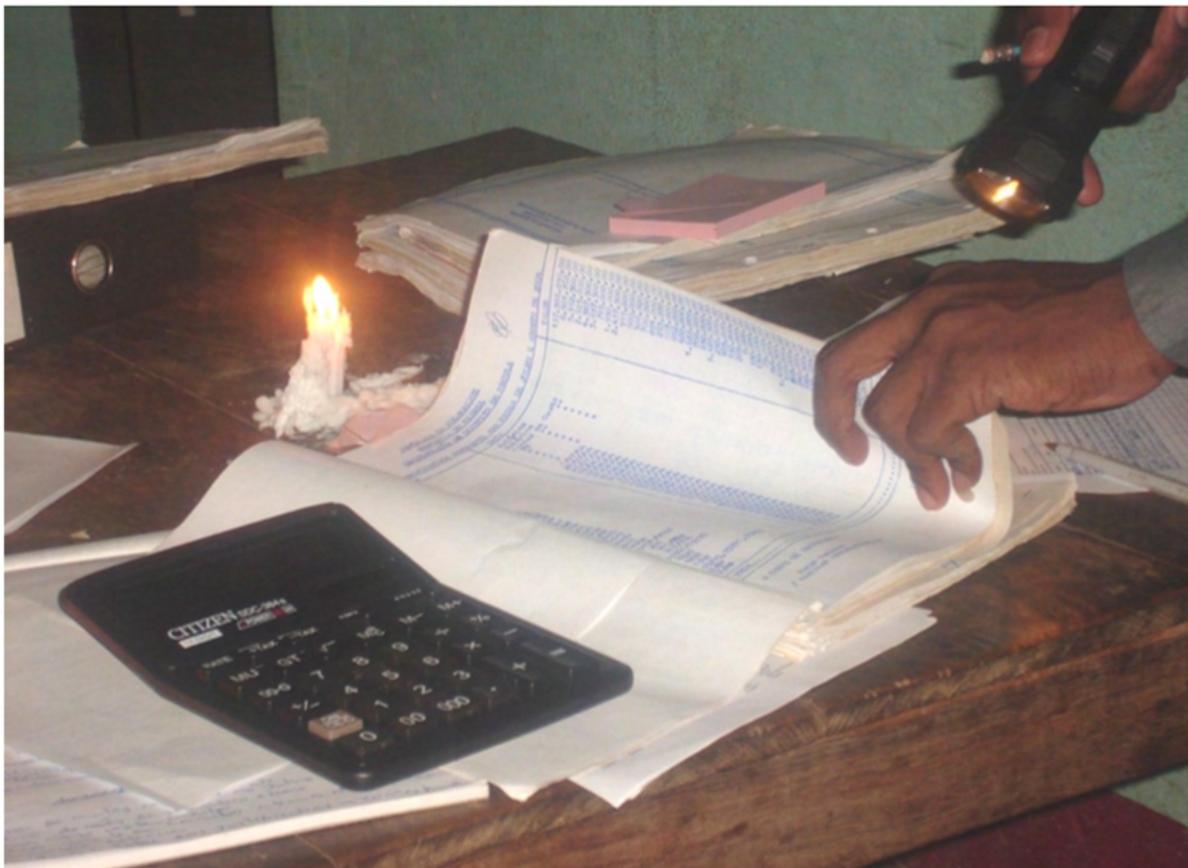
Author: Stefano Capello

Mozambique's supreme audit institution (SAI) continues to operate under a hybrid model inherited from the colonial epoch, resembling the jurisdictional model. Mozambique's Administrative Court (Tribunal Administrativo, TA) consolidates three distinct courts within a single organization, represented by its respective chambers. The First and Second Chambers are focused on Administrative, and Tax and Customs litigation, respectively. The Third Chamber performs the functions of an SAI.

Despite a visible and steady process of institutional development in recent years, the main obstacle to its progress has been its hybrid structure. This configuration hinders the institution's organizational, financial, and functional independence, the foundational basis for the effective functioning of an SAI as recognized in the 1977 Lima Declaration. Consequently, there is no fully functional SAI in Mozambique that meets the recommendations of the United Nations (UN), INTOSAI, and international best practices.

The GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit), a key technical partner of the TA since 2006, authored this article. GIZ's support continues through the Good Financial Governance Program, a collaboration between the Republic of Mozambique, German Cooperation, the Swiss Embassy, and the European Union. Despite the TA's institutional challenges stemming from its hybrid structure, the TA has significantly advanced its external control function. This progress, driven by synergies with various partners, has culminated with the consensus at the highest level of government of the need to establish a fully independent, specialized, and autonomous Supreme Audit Institution, the Tribunal de Contas de Moçambique. The paragraphs below cover this journey of institutional development, highlighting key milestones, challenges, and the significance of the current constitutional reform underway.

At the outset of the cooperation with GIZ, the Third Chamber of the TA focused its entire operations on the prior control of acts and contracts, a preliminary verification process ensuring legal and budgetary compliance. At that time, the TA had conducted only a limited number of audits and had never audited local governments. By 2026, the institution's mandate has shifted significantly, with 80% of its activities now dedicated to audits and judgements. The TA now conducts ongoing audits across all levels of government—central, provincial, district, and municipal. A clear indicator of this transformation is the increase from 35 audits conducted in 2006 to 600 audits in 2010. To this date, the TA has conducted over a total of 8000 audits since 2006.



First audits conducted on Districts with candlelight, illustrating the challenging circumstances auditors faced (i.e. limited electricity, difficult roads, etc). Source: Stefano Capello, GIZ

Strengthening a Culture of Accountability

In 2007, only 107 public entities submitted their accounts to the Administrative Court (Tribunal Administrativo, TA), representing less than 8% of all public entities. In essence, virtually no entities were accountable to the TA. By 2025, all public entities now submit their management accounts to the TA, albeit still in physical format. However, a pioneering initiative, the “Electronic Submission of Public Accounts System,” is currently being implemented, marking a paradigm shift in public financial management in Mozambique.

Introduction of Performance Audits

In 2010, GIZ supported the introduction of performance audits at the TA, fostering peer-to-peer learning with Brazilian Courts of Accounts. The newly established TA performance audit team underwent training facilitated by these Brazilian institutions. In 2010, the TA conducted its first-ever performance audit, focusing on the “Distribution of Textbooks,” in collaboration with all Brazilian Courts of Accounts. Since then, the TA has consistently conducted annual performance audits in key sectors, including health, education, agriculture, transportation, and others.

Introduction of Specialized Audits

Over the past decade, the TA has significantly advanced its audit capabilities, transitioning from a primarily compliance-focused institution to one that conducts specialized audits in critical sectors. With support from GIZ and international partnerships, the TA has developed expertise in public works, extractive industries, and environmental audits, aligning with global standards and addressing Mozambique’s unique governance challenges. These initiatives have strengthened transparency, accountability, and public debate on resource management, marking a pivotal shift in the TA’s role as the nation’s Supreme Audit Institution.

Through a pioneering initiative by GIZ with Supreme Audit Institutions (SAIs) in the region, the Administrative Court (Tribunal Administrativo, TA) of Mozambique established the public works audit sector in 2009. It recruited engineers and architects who were trained through cooperation agreements with other courts of accounts. Today, this sector is well-established and conducts audits of complex infrastructure projects, such as highways. GIZ equipped the TA with a Public Works Audit Laboratory, the only one of its kind among SAIs in Africa.



TA's Public Works Laboratory, inaugurated in 2018 and the first of its kind in Sub-Saharan Africa. Source: Stefano Capello, GIZ

In 2015, the TA began auditing the extractive industry and introduced an exclusive chapter on the Extractive Industry in its annual Report and Opinion on General State Budget Execution, aiming to cover the entire value chain of the sector. This chapter is prepared and published annually, including on the internet. Key areas of focus include the analysis of recoverable costs in natural gas projects (the first report identified USD 2 billion unconfirmed by the Government of Mozambique), royalty payments, capital gains calculations, and the analysis of the resource revenue sharing mechanism where 2.75% of production taxes from mineral resource exploitation is destined to local development. The inclusion of these matters in the TA's analyses has fostered public debate on governance in the country's extractive sector, thereby promoting transparency and accountability.

On the topic of climate and environment, a cooperation agreement was signed between the TA and the Amazonas Court of Accounts (TCE-AM), Brazil, to develop environmental audits. The TA participated in the first coordinated audit of protected areas, alongside SAIs from five Portuguese-speaking African countries, coordinated by Brazil's Federal Court of Accounts (TCU) with GIZ support. In the environmental domain, with a focus on climate change, the TA applied INTOSAI's Climate Scanner tool in 2024, which provides an overview of the country's governance, public policies, and climate financing. As a result of this work, the TA was the only African SAI to present its experience at an INTOSAI side event during COP 29, in Baku.

Advisory on Legal Reforms Related to the TA and Defense of Its Independence

In 2024, a legislative proposal threatened the TA's independence by seeking to significantly curtail its authority. The proposal aimed to remove the TA's oversight of critical entities and transfer audit and judgment powers to provincial administrative courts. This unprecedented move would have established subnational courts of accounts in a unitary state, a structure unique globally and likely to undermine the TA's autonomy, weaken its role as a centralized Supreme Audit Institution, and fragment its oversight capabilities. Such changes risked eroding the TA's ability to ensure consistent, independent financial governance across Mozambique, potentially exposing public finances to inefficiencies and reduced accountability. The GIZ, in close collaboration with key partners, notably the International Monetary Fund (IMF), provided robust advisory support to counter these proposals. GIZ, through its advisory services, developed a comprehensive technical opinion that bolstered the TA's position. This opinion was instrumental in parliamentary debates, where it was thoroughly discussed by various technical committees. Through these concerted advisory efforts and strategic partnerships, the TA's competencies and independence were successfully preserved, safeguarding its critical role in Mozambique's financial governance framework, and the need for the establishment of a modern and autonomous SAI.

Towards the Creation of the Court of Accounts of Mozambique

The establishment of the Tribunal de Contas de Moçambique (TCM) represents the culmination of years of institutional capacity building and underscores the growing public recognition that robust and mature control systems are essential for democratic development, economic growth, and enhanced social well-being. Since 2008, GIZ has been a pioneer among cooperation partners in advocating for the need to reform the TA's institutional design, transforming the Public Accounts Chamber into a proper SAI aligned with international standards; independent, and specialized. The latest TA Strategic Plan reflected the need to establish a dedicated Court of Accounts to address the constraints and challenges posed by the current institutional structure. A comprehensive study on this matter was prepared by GIZ, which was extensively discussed with the Government, Judiciary, Legislature, and civil society organizations (CSOs).

A technical and political consensus emerged regarding this need, most notably expressed through the President of the Republic's inaugural address in January 2025 and the unified stance of all political parties in Parliament. The reform requires a constitutional amendment, the proposal for which was submitted by the TA to the Government on June 30, 2025, and was developed based on the GIZ study. Once the Court of Accounts of Mozambique is established, external audit oversight will achieve a qualitative leap, even more significant than the progress witnessed to date, marking a crucial step in strengthening institutional independence.



Source: Adobe Stock Images, Tupungato

A Century of Change: The Albanian SAI's Journey to Independence and Modernization

Author: Xhesila Nano PhD (c), Head of Communication and International Relations Directorate, Supreme Audit Institution of Albania

Introduction

As the independence of SAIs is the cornerstone of their ability to safeguard public resources, promote transparency, and strengthen trust in government, it is widely accepted in the international audit sphere that without institutional, financial and operational autonomy, audit findings and recommendations risk being influenced, underestimated, or ignored, undermining accountability. As such, through frameworks as the Lima and Mexico Declarations, it has been consistently affirmed that independent SAIs are essential pillars of democratic governance. Yet, independence is not a fixed state as it requires protection and adaption to dynamic realities.

In this context, on May 20th, 2025, the Supreme Audit Institution of Albania (ALSAI) celebrated its 100th anniversary, which presents a meaningful occasion to reflect its complex journey towards institutional independence. Over the course of a century, ALSAI has operated under vastly different political systems, from monarchy to a tightly controlled communist regime and finally to a developing democracy with growing aspirations for transparency, accountability and good governance. Throughout the years, ALSAI has faced numerous challenges in preserving and strengthening its independence, which have shaped its institutional identity and guided its efforts toward modernization and international alignment. This article explores the path of ALSAI throughout history, while analyzing its independence in each phase, concluding on the key points on the legal, structural, and professional conditions necessary to safeguard and strengthen SAI independence in the context of democratic governance and European Union (EU) integration.

From a New Independent Government to Communism

The foundations of financial oversight in Albania were laid soon after declaring the independence in 1912, when the newly formed government recognized that managing public finances required not just collecting and spending funds, but also ensuring accountability. Early efforts to establish oversight structures included the proposal of a Council of Elders in the 1912 Vlorë Assembly to support government accountability, although this body never became functional. In the following years, several efforts were made to formalize financial control mechanisms, notably through the legislative developments in the early 1920s, including proposals to establish a more structured body to monitor state revenues and expenditures, but this institution functioned under the authority of the executive, limiting its autonomy.



Decree Law of May 20th, 1925 on the establishment of the Control Council. Source: Supreme Audit Institution of Albania

A major institutional milestone was noted in 1925 with the creation of the Control Council of Finances under the parliamentary republic. This marked the official beginning of public finance control in Albania. The council, modeled after the French Court des Comptes, was granted preventive and repressive audit functions and was formalized through the Foundational Statute, giving it constitutional status. Despite its formal establishment and legal framework, the council remained dependent on the executive branch and its members were appointed by the President of the Republic. Its existence served both an administrative purpose and a tool for the consolidations of state authority during a time of political centralization. This framework continued into the monarchy period (1928–1939), after the King replaced the 1925 Constitution with the Fundamental Statute of the Albanian Kingdom, which strengthened the formal status of the Control Council by explicitly stating that it was independent in the exercise of its duties. However, despite this recognition on paper, the reality remained largely unchanged, as the Council operated under significant influence from the royal administration.

During the communist era from 1945 to 1991, the oversight audit body operated without any institutional independence, under different names and organizational structures. The audit function was absorbed into the broader machinery of state control, with institutions such as the State Control Commission and later State Inspection tasked with overseeing financial activity in strict alignment with party directives while ensuring compliance with centralized economic plans. Frequent restructuring and limited mandates reflected their lack of autonomy, and the concept of independent external auditing, as understood today, was absent throughout this period.

The Path Toward Independence and EU

Following the collapse of the centralized communist system and a turbulent transition period in the early 1990s, the foundations for democratic governance began laying in Albania. The adoption of a new law by the Albanian Parliament on 1997, officially named the institution the Supreme State Audit (Kontrolli i Lartë i Shtetit). The law introduced important changes in line with international auditing standards. While in 1998, following the severe political and economic crisis of 1997, for the first time, the independence of the Supreme Audit Institution of Albania was formally established in the Constitution through Articles 162 to 165. The Constitution defined the institution's authority and functions, the scope of its auditing activities, reporting obligations, and its relationship with Parliament. Importantly, the Constitution established that the Chairman would be elected by Parliament and not the executive, reinforcing the separation of powers. In 2000, amendments were made to the original 1997 law to reflect these constitutional provisions.

Further progress came in 2014 with the drafting and adoption of Law No. 154/2014, supported by the European Commission's Directorate General for Budget, Support for Improvement in Governance and Management (SIGMA), and the EU Delegation in Tirana. This new legal framework brought the institution into full alignment with International Standards of Supreme Audit Institutions (ISSAIs). Under this law, ALSAI gained the authority to independently set its audit agenda, report directly to Parliament, and publish its findings, fostering greater transparency and accountability in the management of public funds. It also reaffirmed its functions as a depoliticized and non-partisan body.

Throughout years, ALSAI has also placed high importance on the exchange of experience and collaboration with peer institutions, viewing it as a vital component of institutional growth and professional development. As a member of both European Organisation of Supreme Audit Institutions (EUROSAI) and the International Organisation of Supreme Audit Institutions (INTOSAI), ALSAI has regularly participated in joint initiatives, training programs, thematic working groups, and peer reviews. These platforms provide valuable opportunities to share best practices, align methodologies with international standards, and stay informed on emerging trends in public sector auditing. This approach is strongly aligned with INTOSAI's motto, *Experientia Mutua Omnibus Prodest* (Mutual experience benefits all), which reflects the core belief that shared knowledge and cooperation enhance the effectiveness of all SAIs. Through such engagement, ALSAI not only strengthens its own capacities but also contributes to the global mission of improving good governance.

Moreover, as Albania continues its journey toward European Union membership, the independence and effectiveness of its oversight institutions, especially ALSAI, have taken on even greater strategic importance. The European Commission, in its annual progress reports, has consistently emphasized the role of Supreme Audit Institutions as guardians of public accountability, transparency, and the rule of law. A functionally and operationally independent ALSAI is core benchmark for aligning with EU Chapter 32: Financial Control, which assesses a candidate country's ability to manage and audit public funds according to EU standards.

Conclusions

As ALSAI marks its centenary, its journey underscores that independence is a continuous process of strengthening resilience against evolving pressures. This anniversary is not just a celebration of its longevity, but a reminder that the independence of a SAI must be continuously earned, protected, and reinforced. While the 1997 Constitution and the 2014 law laid solid legal foundations, true independence also depends on adequate resources, skilled human capital, and the consistent implementation of audit recommendations. Looking ahead, ALSAI's role will be defined by how effectively it adapts to new challenges. The evolving nature of public sector governance, including increased complexity in financial systems, digitalization, and cross-border challenges, demands that Supreme Audit Institutions continuously refine their methods and expand their areas of expertise. By deepening cooperation with international peers, engaging with civil society, and maintaining transparency, ALSAI can ensure that its next 100 years are marked not only by formal independence, but by tangible impact in protecting the public interest and reinforcing democratic accountability.



Source: Adobe Stock Images, Chris

SAI Independence of Nepal: Triumphs and Challenges

Author: Maheshwar Kaphle¹

Foundation of Independence

The term “Supreme Audit Institution (SAI) independence” is defined as the ability to accomplish tasks objectively and effectively and to be protected against outside influence. Such independence, or a necessary degree of independence, shall be laid down in the Constitution, details may be set out in legislation, and an independence audit mandate shall be guaranteed (Lima Declaration 1977). Organizational independence refers to financial, managerial, and administrative autonomy (The Mexico Declaration, 2007). It is achieved through the application of key principles, various means, and safeguards that promote accountability and ensure transparency.

(1) Former Deputy Auditor General, Office of the Auditor General of Nepal, served as an Acting Auditor General from August 2023 to January 2024. [↗](#)

Constitutional and Legal Framework

The Constitution of Nepal, 2015, and the Audit Act, 2019, have mandated the Auditor General to carry out the government audit. As per Article 240 of the Constitution, the Auditor General is appointed by the President on the recommendation of the Constitutional council. The process for appointing the head of the SAI is highly transparent. As per the article 241, the Auditor General has the clear mandate to carry out the audit of all levels of government with due consideration of regularity, economy, efficiency, effectiveness and propriety. Likewise, the Audit Act of 2019 has clearly defined the government audit, follow up audit, subjects to be audited, types of audit and so on. Therefore, the Constitutional and legal provision is clearly mandated for the Office of the Auditor General of Nepal (OAG).

Triumphs of Independence

The qualifications for the appointment of the Auditor General of Nepal, and his/her remuneration, and removal, are clearly spelled out in the Constitution. Specifically, the functions, rights, and duties of the Auditor General are outlined in Article 241 of the Constitution. The Auditor General may be removed from his/her post following the same procedures as the removal of a judge of the Supreme Court.

The Auditor General has a broad mandate and power to carry out the financial, compliance, performance, and special audits of all offices of all levels of government with due consideration of regularities, economy, efficiency, effectiveness, and propriety. The Auditor General has power for unrestricted access to the documents related to the account. He or she has the right and obligation to prepare the audit report. The Auditor General submits their annual report to the President, and the President sends this annual report to the Parliament through the Prime Minister, and the Parliament sends such a report to the Public Account Committee for discussion.

The Auditor General has operational autonomy for preparing and approving the annual audit plan, ministry-level audit plan, and entity-level audit plan. The Auditor General determines the audit objectives, scope, and methodology on the basis of the priority through the scoring of the risk assessment tool, and prepares the audit plan. The Auditor General is empowered to carry out the follow-up audit. Likewise, in a performance audit, the Auditor General may carry out the follow-up audit within the 3- or 4-year period.

The remuneration and other facilities of the Auditor General and administrative expenses of the audit office are directly charged to the consolidated fund and do not need parliamentary approval. The Auditor General has administrative autonomy for placement, transfer, and assigning the duty of their personnel.

On the basis of such facts and information, the provisions in the Lima Declaration and the Mexico Declaration, and all the conditions needed for independence, demonstrate that the Auditor General of Nepal has a significant degree of independence.

Challenges of Independence

There are nevertheless, numerous challenges and obstacles to the real implementation of SAI independence at the desired level. True independence is essential for the OAG to perform its duties and functions effectively, which directly contributes to promoting accountability, transparency, value for money, and safeguarding the public assets. The major challenges of maintaining independence are managerial and financial autonomy. The Constitution clearly provides for appointing the SAI head or Auditor General of Nepal, his remuneration, other facilities, removal, and audit mandates. The auditors are governed by the Civil Service Act, and as per the act, the auditors are appointed by the Secretary of the Ministry of Finance after the completion of the selection process and recommended by the Public Service Commission. The performance appraisal of senior officials of the OAG is done by the Chief Secretary of the Nepal government, Likewise, the Ministry of Finance executes the budget control through the budget ceiling, budget approval, budget transfer, budget monitoring, etc. Thus, these factors present significant challenges to managerial and financial autonomy and independence of the government audit.

Way Forward

The challenges facing the OAG Nepal that influence its independence are not just a matter of budgetary and administrative procedure; they are a fundamental effects to the principles of transparency, accountability, and public trust upon which democratic governance is built. For improving and strengthening the SAI independence, the OAG of Nepal must pay attention to the values and benefits of SAI independence, focus on key principles, and contribute to strategic goals (INTOSAI Strategic Plan 2023 to 28). Likewise, the OAG should also focus on institutional capacity, and the SAI audit impact, SAI governance, professional capacity, SAI role in the control of fraud and corruption (Global SAI stocktaking report 2023).

Conclusion

The independence of the Office of the Auditor General is not a static achievement but a dynamic condition that requires constant vigilance from all pillars of independence, including accountability, transparency, democratic norms, trust, value for money. It is necessary to promote the triumphs, that accountability and good governance are undeniable and make our democracies stronger and more resilient, and to mitigate the challenges in the desired level of independence.

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- 4.Global SAI stock taking report 2023, INTOSAI Development Initiative
- 5.The Constitution of Nepal 2015. Nepal Law Commission
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The Author, Maheshwar Kaphle. Source: Maheshwar Kaphle.



Source: Adobe Stock Images, Natalia

Women's Leadership in Supreme Audit Institutions

Author: Aziza MSAAF, Chief Ethics Officer, Court of Accounts of Morocco

Global Women's Representation

The Beijing Declaration in 1995 set a roadmap for gender equality and women's empowerment. Since then, the international community has been increasingly aware that women's leadership is essential for the development of public strategies and programs, so that rights, priorities, and needs of all members of society are fairly represented.

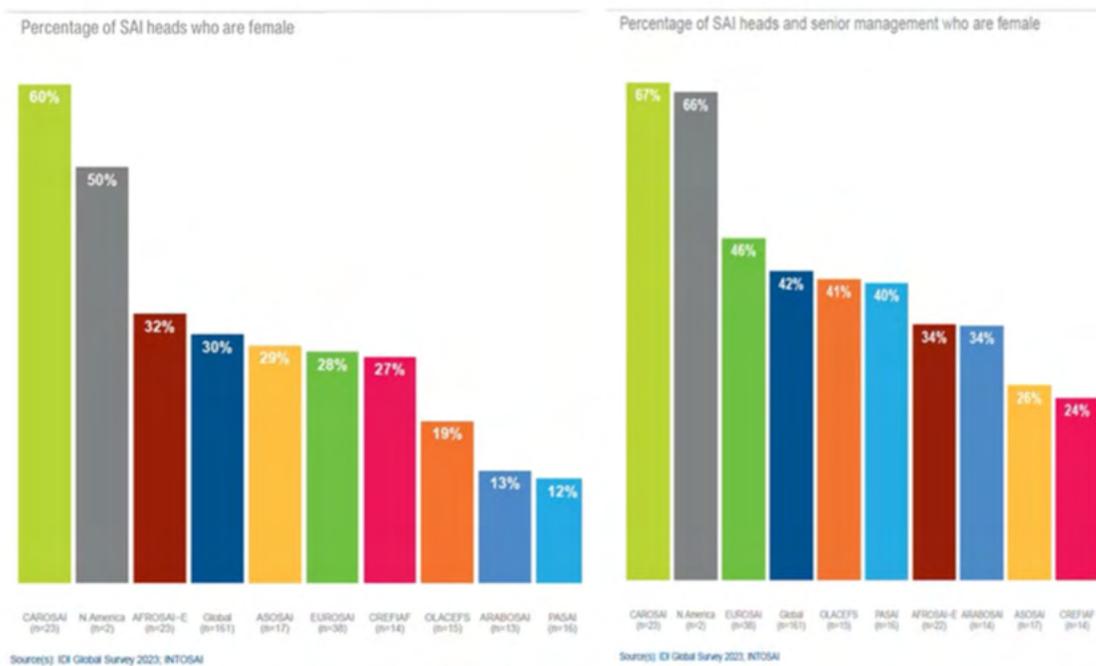
However, 30 years later, no country in the world has yet achieved full gender parity, as stated by the 2025 Global Gender Gap Report¹. The average of the “Parity Gap Index” stands at 68.8% for all 148 countries in 2025. Although there has been great progress, closing the Parity Gap could take decades to be achieved. In the public sector workforce, women make up 50% of employees but only 28.8% of senior leadership. Enhancing women’s representation in leadership could strengthen talent availability and support long-term growth.

Women’s Representation in SAIs

Supreme Audit Institutions (SAIs) around the world continue to face challenges in achieving gender equality, despite notable progress in promoting women’s integration within their organizations.

According to the Global SAI Stocktaking Reports (GSR) realized by the INTOSAI Development Initiative (IDI), from 2014 to 2023, the average of female staff composition in the overall SAI staff numbers has increased from 37% to 51%. Still, there are variations across INTOSAI regions. For instance, only 35% of SAI staff in ARABOSAI, were female in 2023.

Female representation at the heads of SAIs and in senior management remains limited. In 2023, 30% of SAI heads were women. Regionally, CAROSAI led with 60%, while ARABOSAI ranked second lowest at 13% (see graph, GSR 2023). Female senior management as a share of overall SAI staff also showed slight growth, rising from 39% in 2020 to 44% in 2023. CAROSAI again had the highest proportion at 71%, ASOSAI the lowest at 25%, and ARABOSAI at 31% (see graph, GSR 2023).



Source: IDI Global Survey 2023, INTOSAI

Challenges and Progress of Women’s Leadership in the Court of Accounts of Morocco

From 2000 to 2015, female composition in the overall staff number of the Court of Accounts of the Moroccan Kingdom improved slightly from 25% to 28%, concentrated in support staff. Female representation in professional staff increased from 12% to 19% and from 41% to 48% in support staff. However, in the last decade, the female composition of staff increased significantly to 39% in 2025 (28% of professional staff and 51% of support staff in 2025).

Women remain underrepresented in the Court of Accounts, specifically for professional staff. However, the rate of 39% illustrates a small, better representation than the ARABOSAI region (35%), to which we belong, as well as, the national current rate of women in the public administration (36%).

The Court of Accounts demonstrates a strong commitment to fairness, equality, and gender inclusion in its human resource management, consistent with national priorities and the Sustainable Development Goals (SDGs). Recruitment is open equally to all candidates, with selection and appointments based solely on competence and qualifications, despite the absence of a formalized strategy for assigning positions of responsibility.

A key milestone for women’s leadership progress was the appointment of Mrs. Zineb El Adaoui as the “First President”, Head of the Court of Accounts in 2021. Ms. El Adaoui is the first woman to lead the institution since its creation in 1979, marking a transformative moment for gender equality in the Moroccan public governance.

Recognizing the importance of gender equality, the value of women’s leadership, and the SAI role in leading by example, the First President has actively encouraged women’s participation in leadership. As a result, the proportion of women in senior management has risen significantly, though it remains below the desired level.

Consequently, Moroccan SAI, as for other peers in the INTOSAI community, has a long pathway toward gender equality, but that could be significantly narrowed because of a declared and assured will and commitment of the First President and senior management to encourage and promote female and young staff to take their chance in middle and senior management positions.

Global Challenges in Women’s Leadership and Strategies for Advancement

While women’s low representation in leadership positions is sometimes attributed to intrinsic factors—such as limited career vision, self-censorship, or a reluctance to exercise hierarchical authority—research suggests that gender differences in career ambition are relatively modest. Therefore, the persistent underrepresentation of women in leadership is better explained by the continuing presence of “glass ceiling” barriers, rooted in both socio-cultural norms and traditional organizational practices within public administration.

To overcome these challenges, it is important to reaffirm a women's right to access senior positions and promote inclusive, stereotype-free workplaces. Decision-makers should raise awareness of career barriers, provide mentorship to help women build confidence, and support their reintegration after maternity leave to retain talent. Adopting a long-term view of women's contributions and fostering a culture of encouragement are key to advancing gender equality in leadership.

SAI Measures to Promote Women Leadership and Gender Equality

The Beijing Declaration and Platform of Action has constituted the milestone in the commitment toward gender equality. It was translated in the United Nations 2030 Agenda, and in particular in SDG 5, an ambitious goal that seeks to “Achieve gender equality and empower all women and girls”, among the 17 SDGs that concern all area of development. The UN called on SAIs to help track progress on specific targets, and audit national programs that support the SDGs, including SDG 5.

According to the INTOSAI-P12, “Value and benefit of SAIs: making a difference to the lives of citizens”, to gain trust and credibility, a SAI needs to be a model institution, setting an example, from which others in the public sector can learn. In the specific case of the SDG 5, SAIs seek gender equality through providing and demonstrating a positive workplace environment for women in their own organizations, and in the audited organisations. INTOSAI's strategy on gender equality involves the promotion of this principal within SAIs and through audit work, focusing on diversity, inclusion, and empowerment. Additionally, the IDI and INTOSAI regions are implementing initiatives and providing support to SAIs to help institutionalize gender responsiveness in governance and incorporate gender into performance measurements and audits.

SAI's Growing Gender Awareness

- 40% of SAIs integrate gender equality into their strategic plan; 30% of SAIs have a gender policy.
- In OLACEFS 67% of SAIs have a gender policy. In contrast only 14% and 11% have such a policy in ARABOSAI and PASAI, respectively;
- 38% have designated a gender focal point: a sharp increase from 25% in 2020.
- In OLACEFS, 87% of SAIs have a gender focal point, in CREFIAF the number is 73% and in ARABOSAI the number is 57%.



Mrs Zineb El Adaoui, First President of the Court of Accounts; Kingdom of Morocco

As a female leader, what has been your most significant challenge?

As the first woman to serve as head of SAI in Morocco, the greatest challenge for any leader of this prestigious institution, regardless of gender, is the ability to unite people around a shared vision and values.

I have felt also, as a woman, the responsibility to foster an inclusive and equitable culture without ever compromising on excellence or meritocracy;

When you face challenges, what encourages you to push forward?

What keeps me moving forward, even in difficult times, is a deep belief in the mission of our institution: to contribute to improving the lives of our citizens.

Recognizing that our work serves the public interest and that our professional actions have a broader impact on our society, gives a meaning to every effort and transforms challenges into motivation;

What advice would you give to increase Supreme Audit Institution female leadership?

There are many mechanisms to promote women's leadership, but none will truly succeed unless women themselves believe in their capacity to inspire, to lead, and to make a difference. Self-confidence is the foundation of all leadership.



Mrs Fatima Bouzourh, President of the Budgetary and Financial Disciplinary Chamber

As a female leader, what has been your most significant challenge?

As the first woman leading the budgetary and financial disciplinary chamber at the Moroccan SAI, my challenge was to capitalize on the chamber's experience as a jurisdictional chamber in order to ensure the quality of its outputs, and to offer professional supervision to my team while preserving a climate of mutual respect and conviviality;

When you face challenges, what encourages you to push forward?

What encourages me to overcome the difficulties encountered is above all: the encouragement of our leadership, the support of my family, the pleasure and satisfaction that I feel when achieving my objectives, and most of all, the feeling of serving my country through the work that I carry out with dedication;

What advice would you give to increase Supreme Audit Institution female leadership?

Women in the SAI must sharpen their skills, demonstrate great professionalism and the ability to work in a team, in order to assert themselves through their human and professional qualities.



Mrs Salima Chafiki, President of the Court of Accounts of Rabat- Sale-Kenitra Region

As a female leader, what has been your most significant challenge?

As a female leader, my greatest challenge was to succeed in my mission to successfully capitalize on previous experiences, to further raise our institution on the regional institutional scene and to ensure the regional oversight of good governance, transparency, and accountability.

Another challenge, and not the least, was to value my team's commitment, to establish a culture of listening, exchange, trust and solidarity. For me, this meant anchoring a firm belief in collective intelligence and aligning all managerial actions with a modern, co-constructive, solution and results-based approach;

When you face challenges, what encourages you to push forward?

In face of difficulties, my driving force is to be always remain optimistic and believe in a better future. Our profession is extraordinary because it gives us the opportunity to contribute to changes in citizens' lives and to contribute to render justice to them.

Our audits allow us to see the tangible impact of public action on people's lives. They help prevent and correct shortcomings and even drive changes in regulations and laws. Seeing these results every day gives us the motivation to keep moving forward.

What advice would you give to increase Supreme Audit Institution female leadership?

To increase female leadership, we need to share and cultivate a passion for the profession, a sense for measured risk and challenges. We need always to lead by example, take the initiative, innovate, persevere, and never give up. It is also essential to accept to deal with differences.

We must embody empathy and ethical values, and unite around shared ideas and objectives. We should know how to serve the group and uphold noble causes, while valuing consultation and fostering a win-win spirit as guiding principles. We must learn to be both protective and determined: "An iron fist in a velvet glove".



Mrs MBARKA El Ifriki, Public Prosecutor at the Regional Court of Accounts of Casablanca – Settat

As a female leader, what has been your most significant challenge?

As a woman leader, my biggest challenge is to be able to manage existing stereotypes alongside my standard leadership roles. It is constantly necessary to prove that women are able to behave as “true leaders” capable of managing and making the right decisions, even in the same way as their male colleagues or simply differently;

When you face challenges, what encourages you to push forward?

What encourages me to move forward is hope, responsibility and a positive environment. A hope of seeing things change in our work environment. A responsibility to be an exemplary leader and a permanent source of inspiration to young female colleagues, not only in terms of professional skills but also in terms of human relationship and resilience. And finally, being surrounded by family, friends, and colleagues who bring positive energy in my life;

What advice would you give to increase Supreme Audit Institution female leadership?

To increase women leadership in SAIs, we need to work, in parallel, on encouraging women to access the various positions of responsibility, especially senior management positions, providing women leaders by ongoing support to overcome the inherent challenges they could face and also, focusing on women’s professional and personal capacities building.

It is important to highlight that “Only capable and competent women can drive real change on the ground”.



The author, Aziza Msaaf Chief Ethics Officer, Court of Accounts of Morocco

Footnotes

1. Report published by the World Economic Forum. [↗](#)



Source: ASOSAI Secretariat

ASOSAI Young Auditors Meet in China

Author: ASOSAI Secretariat

The first Young ASOSAI Excellence Program was held in Nanjing and Shanghai, China from September 22nd to 26th, 2025. More than 90 young auditors from 42 SAIs attended the program.

The host Mr. HOU Kai, Auditor General of the National Audit Office of China and Secretary General of ASOSAI, together with other three guests of honor: Mr. Alikhan Smailov, Chairman of the Supreme Audit Chamber of the Republic of Kazakhstan; Ms. Isma Yatun, Chairperson of the Audit Board of the Republic of Indonesia; and Mr. Ammar Khalaf, President of the Federal Board of Supreme Audit of the Republic of Iraq, delivered keynote speeches at the opening ceremony and had a dialogue session with young auditors.



Source: ASOSAI Secretariat

Theme Discussions

There were two main themes of the program, Sharpening Professional Skills and Embracing Technological Innovation. In two days, participants had several group discussions, shared views on building core auditing competencies, and delved into case studies on the application of technological tools in auditing practices.



Source: ASOSAI Secretariat

The Advocacy

The International Advocacy of ASOSAI Young Auditors: Sharpening Professional Skills and Embracing Technological Innovation was adopted at the program, calling on ASOSAI young auditors strengthen professionalism and expertise by adhering to the mandate of economic oversight and focusing on core audit responsibilities. By enhancing government efficiency, transparency and accountability, audit institutions aim to promote the modernization of the system and capacity for governance in Asia and contribute to the achievement of the Sustainable Development Goals.



Source: ASOSAI Secretariat

Dialogue with Heads of SAIs

During the dialogue with SAIs leaders, participants raised questions covering various aspects of work and life, including what qualities make an outstanding auditor, what challenges SAIs face in the information age, and what technological innovations are applied in public sector audits. The dialogue reflected the transformation of audit thinking, innovation in audit techniques, and enhancement of audit skills among young auditors in the digital era, as well as the insightful thinking of heads of SAIs.



Source: ASOSAI Secretariat

Exchange with Local Young Auditors

A face-to-face exchanging session was held between participants and young auditors from the Shanghai Municipal Audit Office, discussing the necessity and capability for young auditors to, not only explore cutting-edge technologies and track development in emerging fields, but also focus on the logic of various algorithms and data management to maintain audit reliability.



Source: ASOSAI Secretariat

Meeting with Students of Master Program of Auditing

Participants also met with international students of the Master Program of Auditing, whom came from SAIs of developing countries for the master's degree in auditing in the Nanjing Audit University. They shared different audit methods and practices in their respective countries.



Source: ASOSAI Secretariat

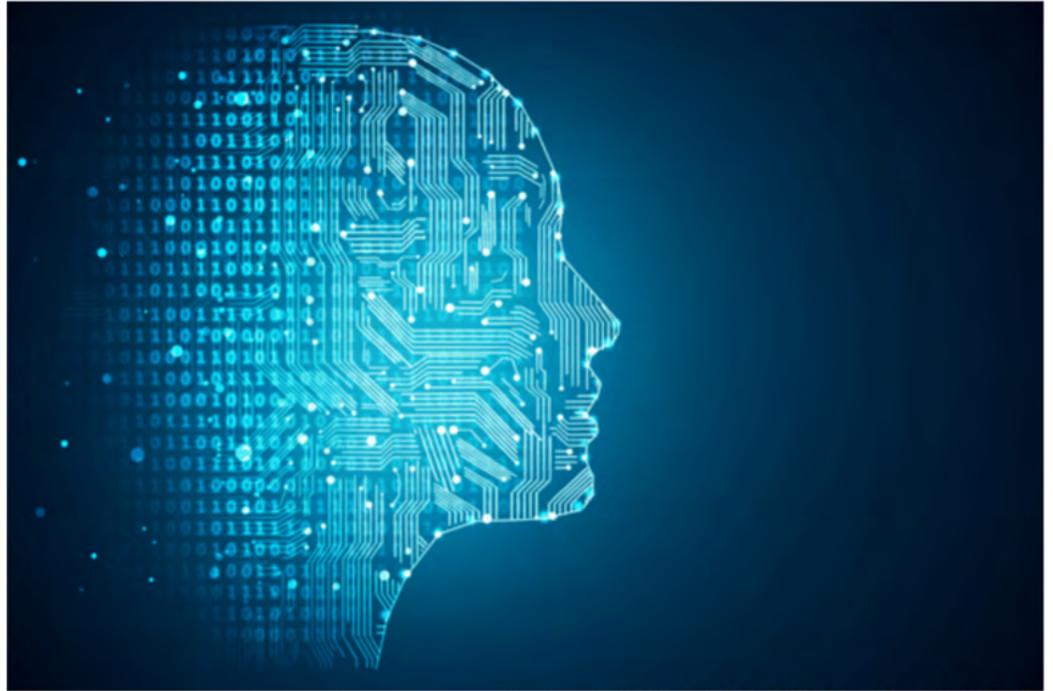
Friendship Building

A variety of social and cultural activities were organized for participants to break the ice and build friendships. On September 22nd, participants planted trees at the Audit Academy of National Audit Office of China, creating a Friendship Garden as a symbol of youth solidarity.



Source: ASOSAI Secretariat

The Young ASOSAI Excellence Program was introduced in response to the initiative set out in the Strategic Plan of ASOSAI (2022-2027) and consensus reached at the ASOSAI Assembly. Participants highly appreciated the program as it provides an equal and mutual learning platform for young auditors in Asia, fills the gap in youth activities within ASOSAI, and shows ASOSAI's efforts in building a model regional organization.



Source: Adobe Stock Images, peshkova

Regulating the Regulation: How the TCU Exercised Its Independence to Address Artificial Intelligence Challenges in the Brazilian Public Sector

Authors: Diego Farias; Klauss Nogueira; Pedro Coutinho Filho; Thacio Scandaroli, auditors of the Specialized Information Technology Audit Unit of TCU (Brazilian Federal Court of Accounts).

1. Introduction: The Crossroads of Innovation and Independence

The rapid expansion of artificial intelligence (AI) in the public sector has placed Supreme Audit Institutions (SAIs) at a new frontier of oversight. Amid promises of increased efficiency and significant risks to ethics, transparency, and accountability, the role of SAIs demands technical discernment and institutional autonomy.

The Brazilian Federal Court of Accounts (TCU) has assumed a practical leadership role in this context. Beyond implementing AI in its own operations, the TCU has actively influenced the public sector ecosystem by sharing the source code of its tools with other institutions. One example is ChatTCU—a generative AI-based support tool—whose code was made publicly available to allow other agencies to develop customized applications.

TCU's leadership also extends to the regulatory field. In 2024, the Court submitted the executive summary “Risks of Regulating Artificial Intelligence in Brazil” to the National Congress, warning of potential negative effects of poorly calibrated regulation and advocating for balanced and technically sound approaches. The publication was widely disseminated and helped solidify TCU's role as an independent and credible voice in the governance of emerging technologies.

This leadership also encompasses other emerging technologies. TCU published an executive summary on blockchain, evaluating both risks and potential in the public sector. These publications, along with concrete actions for sharing knowledge and technology, illustrate how TCU exercises its independence constructively, offering technical solutions even in uncertain regulatory environments.

This article presents TCU's experience as an example of how independence is not only resistance to external pressures, but also the ability to act with autonomy, technical consistency, and a sense of public responsibility in the face of technological challenges.

2. TCU as a Technical Leader: Use and Dissemination of AI in the Public Sector

TCU has emerged as a national and international reference in the use of AI to enhance audit and oversight activities. Since the launch of ChatTCU in March 2023, the tool has been widely adopted internally, assisting auditors and staff in improving processes and efficiency. By May 2025, ChatTCU had over 2,700 active users, representing around 90% of the institution's workforce.

Beyond internal use, TCU has taken a collaborative approach by sharing ChatTCU's source code with other public institutions. As of mid-2025, 136 institutions—including public agencies, regulatory bodies, professional councils, universities, and audit courts—had signed agreements to adopt the technology. The initiative also led to a formal technology transfer agreement with the SAI of Honduras and the Office of the Comptroller General of Chile.

This reflects TCU's commitment to innovation and its role as a catalyst for digital transformation in the public sector. By enabling widespread access to ChatTCU's foundations, the Court reinforces its technical leadership and collaborative ethos.

TCU's international recognition further supports its position. In April 2024, the Organisation for Economic Co-operation and Development (OECD) recognized TCU as the only government entity to reach an advanced stage in the use of generative AI, citing ChatTCU as a model of innovation and efficiency.

In 2025, Rainério Leite, TCU's Secretary for IT Oversight and Digital Evolution, was included in the "Government AI 100" list as one of the world's 100 most influential individuals in AI applied to the public sector. This recognition underscores TCU's leadership in balancing innovation, ethics, and effective public sector oversight. Its approach is rooted in principles of algorithmic ethics, transparency, and accountability, which guide both internal development and the external evaluation of AI tools.

3. Blockchain and the expansion of TCU's regulatory role

TCU's innovative and independent posture is also evident in its engagement with other emerging technologies, such as blockchain. In 2020, the Court released the executive summary "Mapping Blockchain Technology," which provides a framework for guiding public institutions in developing blockchain projects, based on national and international experience.

The publication emphasized that blockchain adoption should follow a feasibility assessment, supported by cost-benefit analysis, problem alignment, and strong governance structures. It also warned of the risks of ineffective public investment if blockchain were adopted solely for its novelty, without solid technical justification.

One key risk highlighted was the lack of a consolidated legal framework, which can lead to legal uncertainty, diverging interpretations, and misallocation of public funds. The document recommends conditioning blockchain use on demonstrable public value and careful planning of interoperability, security, and sustainability requirements.

TCU also stressed that blockchain is not a universal solution. Its applicability depends on specific conditions, such as the need for immutable records and decentralized trust.

Notably, the report anticipated the potential role of the federal government as a provider of public infrastructure for blockchain solutions. This vision materialized in April 2022 with the creation of the Brazilian Blockchain Network (RBB), coordinated by the federal data processing service (Serpro) and the national development bank (BNDES), with participation from various government bodies.

This pioneering initiative reinforces TCU's role as a promoter of sound regulatory practices, even in uncertain and evolving technological landscapes, and exemplifies how institutional independence can be exercised through the production of qualified public knowledge.

4. The publication “Risks of Regulating AI in Brazil”

In April 2024, TCU presented to the National Congress the executive summary “Risks of Regulating Artificial Intelligence in Brazil,” a technical document prepared to support the legislative debate on the topic by presenting and discussing key regulatory risks and their potential impacts on Brazil’s national AI strategy.

The publication identified nine main risks, which can be grouped into four categories:

1. Restriction of innovation and digital transformation – includes disincentives to innovation, delays in implementation, and limits to the digital transformation capacity of the state.
2. Market concentration and exclusion of small actors – includes barriers to startups, regulatory advantages for monopolies or oligopolies, and challenges in retaining AI talent.
3. Poorly calibrated regulation and legal uncertainty – includes outdated or ineffective regulatory models, generic legal definitions that affect unrelated areas, and rules incompatible with AI realities (e.g., copyright law).
4. Institutional and international misalignment – includes conflict among regulatory bodies, lack of technical capacity among regulators, and misalignment with international best practices.

Using clear and accessible language, and accompanied by an explanatory infographic, the TCU publication helped raise awareness of the risks posed by poorly designed regulation. It did not propose new rules, but rather acted as a technical alert and institutional contribution to public governance. Its dissemination in a politically sensitive context reaffirmed TCU’s role as a neutral yet proactive institution.

5. Dilemmas faced: between innovation and external pressures

TCU’s AI initiatives brought visibility and praise but also significant institutional challenges. The publication on AI regulatory risks was welcomed by technical sectors but sparked divergent reactions from lawmakers and executive officials advocating stricter or more centralized regulation.

In this context, the Court had to balance a proactive stance with the need to maintain technical neutrality. By advocating a prudent, evidence-based regulatory approach, TCU mitigated reputational risks and avoided the perception of political bias.

Internally, the deployment of tools like ChatTCU also required caution to avoid perceptions of self-promotion or undue reliance on technology over traditional methods. The Court addressed these risks by releasing source code, hosting public debates, and opening its strategies to expert and international critique.

These dilemmas illustrate that independence is not merely a legal or formal concept—it is a continuous exercise in institutional judgment, especially when innovation challenges established expectations.

6. Paths forward: Independence as a regulatory asset

TCU's experience in the field of artificial intelligence points to valuable lessons for other SAIs facing similar challenges amid regulatory and technological change.

First, action in emerging regulatory environments requires a combination of technical knowledge, strategic timing, and institutional prudence. TCU's leadership in producing guidance—such as the executive summary on AI regulation—shows that it is possible to influence public policy while preserving neutrality and institutional credibility.

Another replicable practice is algorithmic transparency. By releasing the ChatTCU source code and supporting its adaptation by other institutions, TCU fosters a culture of cooperation while avoiding technological monopolies. This shows that independence means having the autonomy to lead responsibly, not acting in isolation.

Finally, active listening to civil society and dialogue with experts, universities, and international organizations strengthen the legitimacy of oversight actions. These strategies affirm the value of independence as a regulatory asset—a necessary condition for SAIs to not only oversee but also contribute solutions to the most complex public challenges.

7. Conclusion

TCU's recent experience demonstrates that institutional independence is not only about resisting external interference, but about leading technically, contributing to public policy, and acting with consistency between discourse and practice.

By combining the responsible use of AI with a critical and collaborative stance toward emerging regulation, the Court reaffirmed its functional autonomy and its commitment to the public interest. Its publications and technical analyses on AI regulation and blockchain adoption in public administration are concrete expressions of an independence that looks outward, benefiting the broader public ecosystem.

TCU's case illustrates that leadership in sensitive areas, when exercised with prudence, transparency, and technical grounding, can enhance the legitimacy and impact of Supreme Audit Institutions. In a rapidly changing world, maintaining independence means more than resisting—it means being prepared to act with judgment and courage when inaction would be too costly.

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