

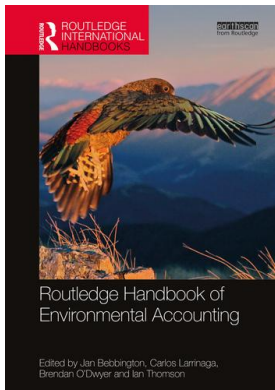
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9

ASSURANCE SERVICES FOR SUSTAINABILITY REPORTING AND BEYOND

Charika Channuntapipat

Introduction

This chapter discusses issues relating to assurance¹ practice for the so-called sustainability reporting (sometimes called social or environmental reporting), which is one form of corporate non-financial reporting practice. The demand for non-financial information drives the growth of this type of corporate reporting. As sustainability reporting has become a norm and a legitimising tool for organisations, auditing and assurance are perceived to play an important role in enhancing the credibility of and trust in the reported information. Assurance of such information can be called sustainability report assurance, which is considered as one of the non-financial assurance practices (Manetti and Becatti 2009). The information in these reports may involve information relating to environmental, social and governance aspects of organisational activities. The term “assurance” is sometimes used interchangeably with terms such as “audit” and “verification” (O’Dwyer and Owen 2005). In this chapter, the term “sustainability report assurance” (hereafter SRA) will be used as an overarching term to refer also to related practices and services.

Although users of sustainability reports have expressed positive perceptions towards sustainability reports when they are accompanied by SRA statements, differences in the scopes and levels of assurance, as evidenced by a number of studies, limit the information value of assurance to the report users. Moreover, the plurality of reporting guidelines and assurance standards lead to diversity in the content of reports and difficulties in setting the scope and levels of assurance (Channuntapipat et al. 2019).

As the services relating to SRA practice are largely unregulated, there are therefore many different types of SRA service providers in the assurance market. Large accounting firms (or professional firms) are among those service providers who hold the majority of the market share (KPMG 2015). Accounting is a dominant profession that has the potential to transfer knowledge from the financial statement audit process to new areas of assurance and that possesses independence as a quality, adding value to the assurance process. However, one of the main issues for non-financial assurance services is the expertise of the assurance practitioners in specific subject matters relevant to a particular practice. This provides an opportunity for environmental consultancy firms and certification bodies, who argue that they have more expertise on such aspects and tend to emphasise stakeholder involvement in the assurance process, to participate in the

market as SRA service providers. Still, the main aim of the assurance remains similar to that of financial assurance, which is to increase the relevance and reliability of the assured non-financial information. Figure 9.1 illustrates an overview of SRA practice, with the purpose of providing a brief understanding and introducing issues related to this practice (some of the elements included here are discussed in detail later in the chapter). The diagram outlines the rationales for sustainability reporting and assurance practice, related standards and guidelines, and the roles of SRA providers as well as posing questions about the stakeholders and users of the reports and assurance statements. At the top of the diagram, there are issues around perceived SRA quality, which is affected by various factors, including types of providers, assurance standard used, level and scope of the assurance engagement and the assurance opinion.

The purpose of this chapter is to address the following issues relevant to assurance practice: *why* reporting organisations engage with or commission SRA services, *which* bodies are qualified to conduct such assurance and *how* assurance engagements are structured (i.e. level and scope). The chapter also aims to critically evaluate the current trend and to comment on the future of SRA practice. By addressing these issues, the chapter elaborates on the purposes of SRA and the roles of assurance providers, the types of assurance providers and their (perceived) expertise, variability of assurance engagements and the concept of materiality used in the SRA context. The chapter is concluded by a reflection on the current practice and future development, including policy and future research recommendations.

Rationales and purposes of sustainability report assurance

There has been a considerable growth in SRA accompanying sustainability reports. KPMG, one of the Big Four accounting firms, has continuously conducted international surveys to record the trends in sustainability reporting and assurance (KPMG 2017; KPMG 2015; KPMG 2013; KPMG 2011; KPMG 2008; KPMG 2005). The most recent report in 2017 showed that around 67% of the world's 250 largest companies commission SRA for their sustainability-related data (KPMG 2017). The percentage of the surveyed companies having their sustainability reports assured has been increasing throughout the last decade, from 29% in 2002 to 67% in 2017 (KPMG 2017; KPMG 2013). The rate of SRA adoption has increased rapidly in countries where there is currently a high rate of sustainability reporting (KPMG 2017). In countries where sustainability reporting is still in its early development stage, such as Indonesia, Israel, Kazakhstan, Malaysia, Nigeria, Singapore and the UAE, there is a low rate of SRA commissioned for sustainability reports (KPMG 2013, p. 33). It is expected that the rate of SRA commissioning will increase in these countries as their sustainability reporting practice becomes more advanced and widespread (Park and Brorson 2005).

Jones and Solomon (2010) interviewed representatives from 20 United Kingdom (UK) companies regarding their views on SRA. The study provides managerial insights, highlighting that some representatives agreed that SRA could increase the credibility of reports, while others were uncertain about the benefits of this assurance. Besides these managerial perspectives, Wong and Millington (2014) explored the non-managerial demand for SRA engagements. They focused on three groups of stakeholders: investing professionals, local authorities and non-governmental organisations (NGOs). The results from 147 questionnaire surveys showed that only 56% of the respondents used SRA. The majority of the investing professionals and NGOs checked for the presence of SRA in corporate reports, while limited numbers of the local authorities used the SRA statements (Wong and Millington 2014). This shows that the users of sustainability reports might not be the same groups that use SRA statements, as depicted in Figure 9.1. Both studies mentioned above explored the demand (or user) side of the practice.

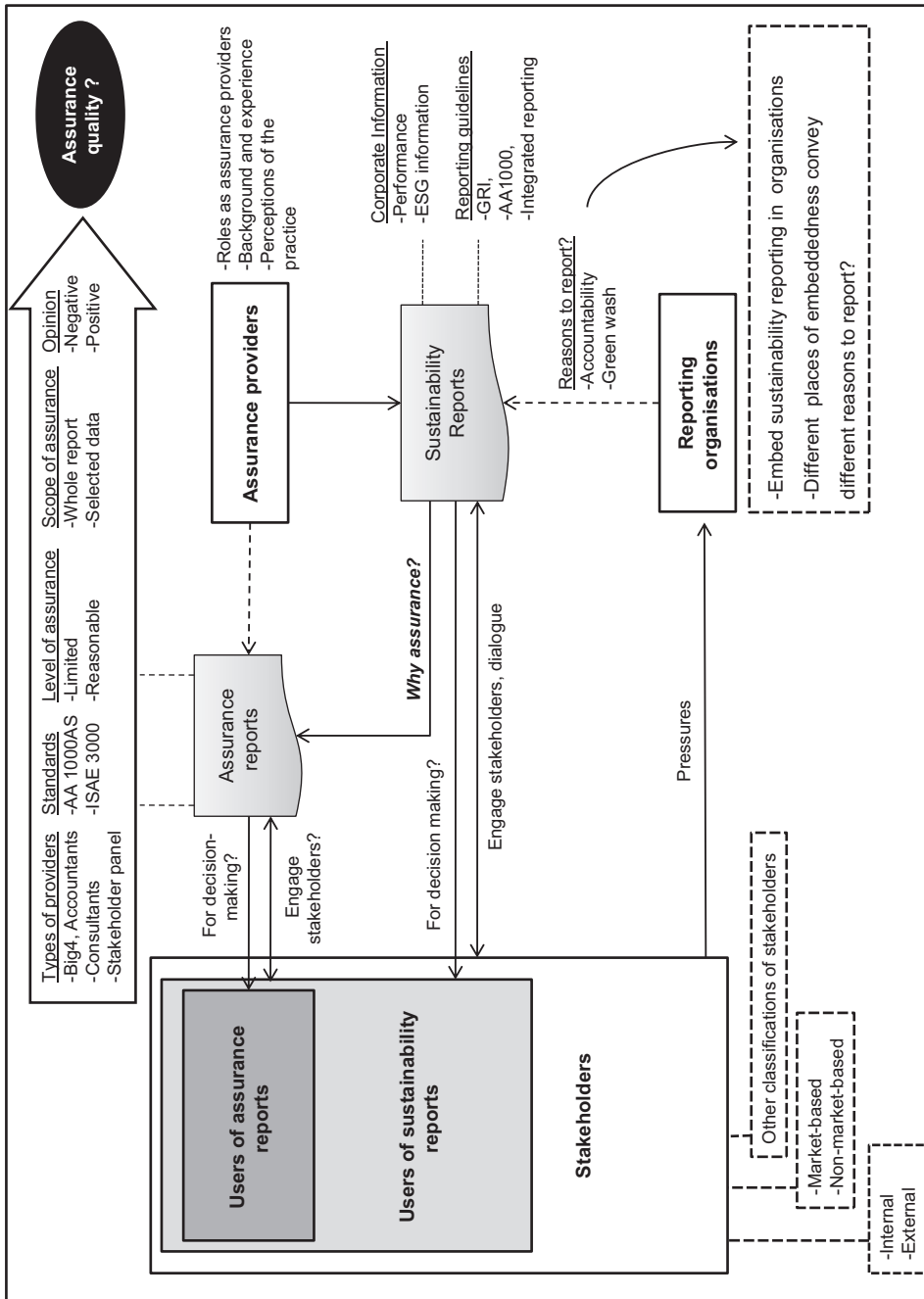


Figure 9.1 Overview of sustainability report assurance practice. (Source: Author's own work.)

They highlighted similar perceived benefits of the SRA, including its role as a monitoring tool to enhance the credibility of corporate information. Also, they emphasised concerns related to the necessity, value and quality of the assurance (Jones and Solomon 2010; Wong and Millington 2014). Another point added by Jones and Solomon (2010) is that the most basic form of SRA is internal assurance. SRA in this case is perceived by the management of reporting organisations as a managerial tool to enhance the internal efficiency of companies' operations, management control systems and corporate reports, rather than as an external accountability enhancing mechanism.

These different rationales for reporting organisations to commission SRA could be observed by how SRA providers problematise assurance practice. Channuntapipat (2018) discussed the problematisation of the practice by different SRA providers from the observation of narratives on the practice from providers' websites. The benefits provided by SRA include responding to the demand for credibility of reported information, improving internal efficiency and encouraging more sustainable corporate actions (Channuntapipat 2018), because SRA procedures can make related risks more observable for different stakeholders (Bebbington and Thomson 2007). Such rationales and benefits of SRA are consistent with Power and Terziovski's (2007) comment that the need for non-financial assurance is driven by either compliance purposes or continuous improvement in the assured organisations.

The issue of conflicting roles and identities of SRA providers could arise because of different perceptions of both the purposes of SRA practice and of their responsibility towards different stakeholder groups (Channuntapipat 2018; Power and Terziovski 2007). Ethical issues in SRA services relating to the client-provider relationship could arise as a result of these conflicting identities (Boiral et al. 2018), which could lead to the capture of SRA practice by managerial and professional interests (Smith et al. 2011). This issue of capture has been raised in a number of studies expressing concerns about the real function of assurance when current corporate governance structure places greater emphasis on managerial advantage over corporate transparency and accountability (see, e.g., Ball et al. 2000; Boiral et al. 2018; Dando and Swift 2003; Edgley et al. 2010; Jones and Solomon 2010; O'Dwyer and Owen 2005; Owen et al. 2000; Smith et al. 2011).

Different rationales and purposes of SRA could also be influenced by the conceptualisation of "sustainability" and "assurance" by different involved actors (Channuntapipat et al. 2019; Moneva et al. 2006). This conceptualisation depends on different factors, including the professional backgrounds of SRA providers. As highlighted by Channuntapipat et al. (2019), variation in SRA engagements can depend on the professional background of assurance providers and the underlying assurance standards, which can affect negotiation on the level and scope of SRA engagements.

The market for SRA and types of assurance providers

Unlike financial audit practice, the services relating to SRA practice are largely unregulated; therefore, accounting firms (or auditing firms) do not hold a monopoly in the SRA market. They operate alongside various kinds of non-accounting SRA providers, such as environmental and management consultancies and non-governmental organisations (Perego and Kolk 2012). The number of companies commissioning large accounting firms to assure their sustainability reports, according to KPMG market surveys, has increased from 58% in 2005 to 64% in the most recent year of survey (KPMG 2015; KPMG 2013; KPMG 2011; KPMG 2005). Although the accounting profession has gained the dominant brand position, non-accounting assurance providers are also important market players.

Empirical studies on types of assurance provider highlight that the type of provider affects how report users perceive the quality of assurance statements (see, e.g., Perego and Kolk 2012; Pflugrath et al. 2011; Perego 2009; Hodge et al. 2009; Zorio et al. 2013). Thus, there has been continuous debate and study regarding differences between SRA providers from different professional backgrounds. The aspects explored in the literature addressing types of SRA provider are mainly the independence, size advantage, expertise and approach of SRA providers in relation to the perceived quality of the assurance (Farooq and De Villiers 2019b). Thus, one professional group of SRA providers might have more competitive advantage in particular aspects compared to others (Channuntapipat et al. 2020).

One such competitive advantage could be assurance providers' degree of independence as perceived by report users (Wallage 2000). SRA delivered by accounting firms is perceived to have a higher quality and credibility (Hodge et al. 2009) because their perceived independence is greater due to their reputational capital and professional monitoring mechanism inherited from financial audit practice (Dixon et al. 2004; Simnett et al. 2009). Although the concept of independence has no fixed meaning (Dogui et al. 2013), a series of reassuring rationalisations of it by the accounting profession has gained strong support, as the independence attached to financial audit practice can be used to make sense of independence for SRA (Gendron and Spira 2010). In order to maintain this professional reputation, especially in terms of independence, the accounting profession therefore seems to focus its approach on data verifying activities (O'Dwyer and Owen 2005), rather than on providing recommendations on reporting or organisational activities, and potentially provides a clear distinction between the assurance and consulting functions that might be related to SRA engagements (Owen et al. 2000).

While SRA providers from the accounting profession have independence as a quality that adds value to their SRA services, non-accounting assurance providers bring their own social capital to the competition (Andon et al. 2015) and emphasise their expertise on related subject matters along with their useful recommendations that add value to the assured reports (Perego and Kolk 2012). Non-accounting practitioners tend to focus more on stakeholder engagement in the assurance process (Manetti and Toccafondi 2012). To some extent, they are also more likely to include within their assurance statements recommendations and comments on the sustainability reporting process (Perego and Kolk 2012). Such commentary on the reporting process could facilitate future assurance practice and help create an auditable environment for sustainability-related information (O'Dwyer 2011). However, this could weaken assurance providers' degree of independence and lead to conflicting roles for SRA providers (Channuntapipat et al. 2019; Channuntapipat 2018).

According to the extant literature, it seems that sustainability experts with a higher level of subject matter expertise tend to be non-accounting assurance providers (Huggins et al. 2011), while their accounting counterparts possess higher brand reputation to render a higher quality of assurance (Zorio et al. 2013). Martínez-Ferrero and García-Sánchez (2018) extended the understanding of such perceived brand premium and expertise by looking at industry specialisation in relation to quality of SRA. The results of their study indicate that the status of being Big Four SRA providers and that of having industry specialisation are the determinants of a higher level of assurance (Martínez-Ferrero and García-Sánchez 2018). However, a contrasting result regarding industry specialisation was reported by Ferguson and Pündrich (2015). There is weak evidence to suggest that changes in industry specialisation for non-financial assurance practice matter to the information users, as reflected through abnormal returns (Ferguson and Pündrich 2015). This could potentially be the case for SRA as one form of non-financial assurance practice.

Assurance providers from both professional groups have distinctive characteristics that could affect the perceived expertise and quality of assurance. Although accounting assurance providers are perceived to provide a higher quality of assurance due to their independence and more robust procedures, they need to demonstrate their subject matter expertise to some extent (i.e. using specialists from other departments, or specifically recruiting specialists to their teams). Here, assurance providers from non-accounting professions tend to attract clients by emphasising their expert knowledge of particular areas of reported information.

The dominance of accounting assurance professionals and accounting assurance standards

The dominance of SRA providers from the accounting profession has contributed to the development of assurance standards and vice versa. The efforts of the accounting profession to expand its professional work space beyond financial audits and assurance (Andon et al. 2015) include the creation of networks of support (Gendron and Barrett 2004) and of a link between the new area of practice and the more institutionalised financial assurance practice (Farooq and De Villiers 2019a; Manetti and Toccafondi 2012). This has managed to render accounting discourse as the core function of the business and to establish its claims of superior expertise and other characteristics (Power 1997). Establishing an accounting standard to guide this kind of non-financial assurance has been one part of the effort to show the intersection between financial audit technology and other areas of work (Andon et al. 2015).

The two primary assurance standards for SRA engagements are ISAE3000² and AA1000AS.³ The professional affiliations of those standards are related to different types of standard setters. ISAE3000 comes from the accounting profession, while AA1000AS comes from an international sustainability consulting and standard-setting institution. The focuses of the two standards are different, although they have no methodological conflicts and can be used together (Iansen-Rogers and Oelschlaegel 2005). Table 9.1 shows the timeline for the development of these two assurance standards.

The ISAE3000, the assurance standard of the accounting profession, is driven by concepts from financial audits and assurance (Deegan et al. 2006). It is proposed as a principle-based standard, which can be applied to different kinds of subject matters. As this standard is affiliated to the accounting profession, accounting assurance providers are obliged to use it. Since the launch of ISAE3000 in 2003 (for use by accounting firms for all statements issued after 1 January 2005), its adoption in comparison to that of AA1000AS has been increasing (KPMG 2008). This trend towards the adoption of this accounting assurance standard for SRA engagements has been gaining much traction, especially after the revised version in 2013. This is due to the fact that the revised ISAE3000 (2013) officially allows “competent” non-accounting assurance providers to comply with the standard.

Unlike AA1000AS, ISAE3000 has been criticised for not being developed specifically for SRA engagements (Manetti and Becatti 2009) and for being constrained by the logic of financial assurance (Dillard 2011). However, Simnett (2012) argued that specific SRA standards might be difficult to develop conceptually; the risk-based approach is then used to develop ISAE3000. The ambiguity of the concepts of “sustainability” and “assurance”, which can be interpreted and perceived differently by various actors (Channuntapipat et al. 2019; Moneva et al. 2006), could be one of the contributing factors for this principle-based standard covering the assurance for non-financial information.

This more or less shows the success of the accounting profession competing in the new arena of services by creating this link between their expertise in assurance procedures and

Table 9.1 Development of sustainability report assurance standards

	Period 2003-2019																
	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19
ISAE3000			ISAE 3000			ISAE3000 (Revised)					ISAE3000 (Revised)						*
AA1000AS	AA1000AS (2003)					AA1000AS (2008)											**

Source: author's own work.

* There was a call for public comments on the related standard called Extended External Reporting Assurance.

** There was a call for public comments on the revised assurance standard.

the subject of sustainability. However, the practice might be influenced by the vocabularies and rationales inherited from financial accounting practice (Dillard 2011), which leads to the criticism of the accounting profession in terms of its understanding of the emerging assurance practices beyond financial auditing. Therefore, accounting assurance practitioners offering SRA services need to expand the traditional connotations associated with their assurance (Ballou et al. 2012).

Trends towards limited level and scope of assurance justified by materiality assessment

The diversity of the content of sustainability reports and corporate reports in general due to different reporting criteria (Hodge et al. 2009) could result in difficulties in defining the scope and level of SRA engagements (Manetti and Becatti 2009). Differences in the scope and level of SRA stated in assurance statements could potentially restrain the quality and the usefulness of assurance statements for users (Low and Boo 2012). This is especially so for the level of assurance, which might be judgmental (O'Dwyer and Owen 2005) and could confuse report users (Perego and Kolk 2012), as it is difficult to distinguish between limited and reasonable assurance levels (Simnett 2012). However, Low and Boo (2012) suggested that description of the nature of assurance performed and of the types of opinion given, along with the inclusion of contrasting statements, could clarify the level of assurance provided.⁴

The market surveys by KPMG show that around 50% of the 100 largest companies chose to assure the whole report, while the rest commissioned assurance only on specific indicators and/or on particular chapters of their reports (KPMG 2015; KPMG 2013). The information on the level of assurance from the KPMG surveys also shows that the majority of SRA engagements were planned with a limited level of assurance, rather than reasonable assurance (i.e. high level of assurance) (KPMG 2013; KPMG 2008). Some companies decided to have a combination of assurance levels depending on the reported indicators. This trend towards limited scope (i.e. to assure parts of reports) and level is due to the negotiation between corporate management, who commission the assurance, and the assurance provider (Channuntapipat et al. 2019). This leads to the criticism that the practice is being captured by managerial and professional interests, as mentioned earlier (Smith et al. 2011).

In order to justify the chosen (limited) scope and level of SRA engagements, the importance of reported information from the stakeholders' perspective comes into question. With this, the notion of "materiality" and the materiality assessment procedure are helpful tools for justifying the level and scope of assurance engagements. Materiality assessment is a collaborative effort (Canning et al. 2018) between related actors influenced by different logics (Edgley et al. 2015). For example, traditionally the term "materiality" in the financial accounting domain has been driven by market and professional logics, while stakeholder logic is extensively involved in the domain of sustainability and non-financial reporting (Edgley et al. 2015). In addition, the meaning of "materiality" used in the domain of SRA might be different from its conventional meaning in financial audit practice, as reflected by the findings of Channuntapipat et al. (2019), in which the meaning of "materiality" is more a reflection of the qualitative perspective and refers to scope more than scale. In other words, materiality for the SRA context can help address what issues are important to include in the scope of the SRA engagement and are crucial enough to provide a high level of assurance. Still, the process of materiality assessment and utilisation of the concept are not straightforward. Materiality identification is a contested arena where meanings are constructed, and identification of material issues is negotiated (Unerman and Zappettini 2014). Thus, tensions can arise between different logics, stemming from different beliefs about,

and conceptualisations of, SRA practice on the part of different actors (Channuntapipat et al. 2019; Edgley et al. 2015).

Reflecting on current practice and future development

Sustainability reporting and assurance is one kind of non-financial reporting and assurance practice. As the term “sustainability” is the overarching term that covers many aspects of corporate activities, sustainability-related disclosures can involve diverse issues, from information relating to carbon emission to information on modern slavery. The growing demand for and supply of non-financial disclosures as one of the elements of corporate accountability are contributing to the rise of an array of non-financial assurance practices, especially assurance on integrated reports.

Integrated reporting practice is one of the dominant emerging forms of non-financial corporate reporting, which leads, in turn, to further demand and pressure for the assurance provided for this type of reporting. Existing assurance standards and guidelines have not been intended to cover the integration of financial and non-financial information (Simnett and Huggins 2015), or of historical and forward-looking information, which are the characteristics of the information in integrated reports. Also, the important issues for the provision of this type of assurance work are assurance providers’ independence and subject matter expertise, as well as the auditability of the underlying information.

There are some possible ways for different experts to contribute to the assurance of a report with an integrative nature, like sustainability or integrated reports (Manetti and Becatti 2009). Those are (1) a single assurance provider with undivided responsibility for a single assurance engagement, (2) shared responsibility of different experts or assurance providers for a single assurance engagement and (3) multiple experts or assurance providers with separate responsibility for separate assurance engagements (Manetti and Becatti 2009). While a particular approach might currently be more common than the others, the proposed revisions of related assurance standards by IAASB and AccountAbility could accommodate further developments of assurance practices on new forms of non-financial reporting practices that will emerge.

In addition to the revisions of existing assurance standards, regulatory requirements relating to the SRA and other non-financial assurance practices should be tightened. Interventions by relevant regulators are necessary to raise the level of corporate accountability which are expected from the assurance practice (Owen 2007). Recognising and understanding the diverse operationalisation of SRA could help regulators to place some requirements and regulations on specific types of assurance engagements (Channuntapipat et al. 2019). This could alleviate transparency issues, especially the problem that some assurance statements are not disclosed to the public (Ballou et al. 2012), and the potential expectation gap associated with assurance services. Although pressure from private institutions and the public could drive such accountability, authoritative intervention is necessary for the development of SRA and other types of non-financial assurance practices.

The discussion in this chapter opens up some future research directions. Firstly, future studies could explore further on how different individual assurance providers approach the operationalisation of SRA. Except one study by Channuntapipat et al. (2020), the previous literature has largely assumed the homogeneity of assurance providers in the same professional group (i.e. accounting and non-accounting) and has made overarching claims about their differences from mere observations of assurance statements. Exploring sub-groups of accounting providers (e.g. Big Four vs non-Big Four) and of non-accounting providers (e.g. environmental consultancy or certification body) could shed some light on practice variation.

Secondly, future research relating to SRA practice can potentially explore the influence of SRA process and SRA providers on the corporate decisions made by reporting organisations. The research on the use of management reports from the assurance process by reporting organisations could be explored by action research or interviews with the organisations' management and audit committees. This could provide more understanding on the value of SRA contributing to the development in sustainability reporting, and to more sustainable corporate decisions. Finally, as mentioned earlier, in the current era that corporate communication is not limited to corporate reports, it is important to explore assurance practices for sustainability-related disclosures beyond the assurance on particular non-financial reports. Such disclosures can include any kind of non-financial communication in different formats, such as information presented in websites or advertisements. Thus, the research on SRA can be expanded to sustainability "communication" assurance practices. The focus of future studies should not only be on the scope of the assurance itself, but also on the presentation of assured information and assurance opinions so that the expectation gap is minimised. There is a need for more innovative research and new theorisation of SRA and other forms of non-financial assurance practices, as this could possibly lead to developments in assurance practices (Tyson and Adams 2019).

Notes

- 1 An assurance engagement is defined as "an engagement in which a practitioner aims to obtain sufficient appropriate evidence in order to express a conclusion designed to enhance the degree of confidence of the intended users other than the responsible party about the subject matter information" (IAASB, 2013). ISAE 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information International Framework for Assurance Engagements and Related Conforming Amendments. This definition highlights the nature of the relationship among the three key parties: (1) the responsible party, (2) an assurance provider and (3) an intended user.
- 2 International Standard on Assurance Engagement 3000 (ISAE3000) was developed by the International Auditing and Assurance Standards Board (IAASB), an independent standard setting body of the International Federation of Accountants (IFAC).
- 3 AccountAbility 1000 Assurance Standard (AA1000AS) was developed by a non-profit organisation called AccountAbility, providing corporate responsibility and sustainability consultation.
- 4 When a lower level of assurance (limited assurance) is provided, a contrasting statement is used. Instead of providing positive wording in the assurance, negative wording is given in the assurance opinion (e.g. "Nothing has come to our attention that...").

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