



for birds
for people
for ever

RSPB Scotland

Headquarters
Dunedin House
25 Ravelston Terrace
Edinburgh EH4 3TP
Tel: 0131 311 6500
Fax: 0131 311 6569
www.rspb.org.uk

Fiona Warne
Charity Bill Accounts Regulations Consultation
Voluntary Issues Unit
Scottish Executive Development Department
2-G Victoria Quay
Edinburgh EH6 6QQ

8 July 2005

Dear Ms Warne

Thank you for giving us the opportunity to comment on the proposed Charity Accounting Regulations. We welcome the overall approach taken by the Executive, the opportunity to bring the regulations into line with UK accounting practice and to ensure that the requirements are proportional.

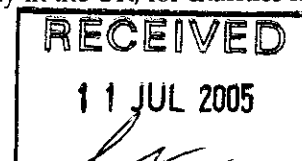
RSPB Scotland is part of the RSPB, the UK-wide charity working to secure a healthy environment for birds and wildlife, helping to create a better world for us all. In due course, we will register with OSCR for our Scottish operations, and support the proposed approach to UK charities, enabling us to submit our UK accounts. We hope that OSCR will work closely with the Charity Commission for England and Wales, and other regulators, to minimise the burdens on charities which are subject to more than one regulatory regime e.g. granting exemptions where the same information is required to be submitted more than once.

We welcome, in particular, the intention to rely on the Charity SORP, and are keen to see consistency wherever possible with UK best practice for reporting and accounting. We note that certain tailored solutions may be adopted for Scotland and urge that variance from the Charity SORP, which is adapted as accounting practices change, should be introduced only as a matter of last resort.

We have some specific comments on the proposals, set out below.

Thresholds

Thresholds are of course a matter for the various regulators, however variations will inevitably lead to confusion and therefore a statement of intent to move towards harmonisation over time would be welcomed. Meanwhile, it would be helpful to include in the notes a table setting out clearly the audit and accrual requirements of each regulatory body in the UK, for charities falling within specified bands.



100 years working for Scotland's wildlife

Patron Her Majesty the Queen **President** Jonathan Dumbleby **Chairman of Council** Professor Ian Newton OBE FRS
Chairman Scottish Committee Pamela Pumphrey **Director Scotland** Stuart Housden OBE

Registered charity no 207076

52-1223-02-03


BirdLife
INTERNATIONAL

Accounting periods

We note the proposal to reduce the period for submitting accounts to that applicable to public companies (7 months). As the accounting resources available to most charities will be more closely resemble those for private companies, we would suggest that 10 months would be fairer.

The Charities SORP

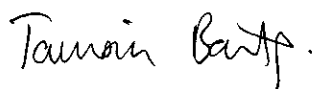
As indicated above, we welcome the intention to ensure consistency with SORP and understand the desire to nevertheless reserve the right to vary specific requirements. Such variations would need to be handled in a way that made them easy to identify and understand, and the reasons for them should be made clear. Preferably, they would only occur after attempts to change the SORP itself have failed.

Within the consultation itself, there appear to be subtle differences from SORP and these are not signposted. It may be this results simply from different use of language are unintentional. If so, we would urge that the language used is consistent with that of SORP to avoid confusion. For example:

- The content of the Trustee Report (section 4 "Proposals" p.23) includes under xvi a requirement for additional information not required under SORP. This does not necessarily present a problem, but such variances should be highlighted and the reasons for them made clear.
- Further disclosure would be required "as stipulated in the Charities SORP" (section 4, p.26) includes (under paragraph ii) the requirement to analyse costs and related incomes of charitable expenditure. This appears to be rather more prescriptive than under SORP.

We are grateful for this opportunity to comment on the proposals, and look forward to further involvement in the development of the regulatory regime for charities in Scotland.

Yours sincerely



Tamsin Bailey
Head of Public Affairs & Marketing