

### Thresholds

Revised thresholds seem reasonable. £250K seems a big jump from current levels but provided the independent examination really is independent then this should be okay. I can understand that audit fees for a charity below £250K would not be a good use of limited resources. It will all depend on the skills & honesty of the independent examiner - perhaps this needs to be defined in some way.

I think that all charities should have an independent review and small charities with only, say, one person involved are the most vulnerable to fraud.

### UK charities

I think that the thresholds should be the same for England & Scotland. It is a complete nonsense & a poor use of funds to have to create several sets of accounts.

However, if essential to have different thresholds then it seems a sensible compromise to give the charity the option on registering its Scottish operation & producing Scottish accounts, or to register whole charity and supply UK accounts.

### Exemptions

Your recommendation seems sensible

### Designated religious charities

I agree all charities should follow the same rules

### Charitable companies

I think that the same thresholds should apply in Scotland & England but also agree that there should be the same accounting regime across all charities in Scotland. I presume most of the national charities are registered in England & Wales which is why their thresholds need to be higher. However, I do not think that Scotland should have more bureaucracy than England. It also means that as a charity grows to become national, it may opt to change its registration to England.

Personally, I think that £500K seems very high before an audit is required. So I am in a quandary as to what is more important a national threshold or the benefit of a third party audit.

### Accounting Periods

I agree that changes in accounting periods should be agreed with OSCR. 7 months is a tight timetable for my charity to manage and I think 10 months would be more reasonable.

Currently, our year end is 31 March, draft accounts for end of May, audit in June, audit committee in July, Board approval August, AGM in October. We would only just make 7 months and this provides no allowance for illness or unforeseen events. I think that 10 months would be better.

### Accounts in Gaelic

I agree all accounts need to be accessible in English

### Charities SORP

I think that option (1) would be clearer. It would not then be necessary to read the SORP & Accounting regulations together to see which bit applies where. This sounds complicated & open to misinterpretation if (2) is necessary because the documents might conflict. If things are open to misinterpretation then we have to pay for expensive professional advice or possibly wait for case law to develop. If however, the SORP is silent on somethings such a receipts & apyment accounts then it would make sense for the Accounting regulations to cover this.

### Draft Regulatory Impact Assessment

Quite happy if no additional burdens. Training times seems sensible. The SORP will also require a considerable amount of Board time to look at Board training & development. But this work is a result of the SORP and not the Charity regulations

Good luck with your consultation