

REVIEW OF CHARITY REGULATION IN SCOTLAND

A public consultation issued by the Scottish Government

Comments from ACCA to the Scottish Government

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We're a thriving global community of **252,500** members and **526,000** future members based in **180** countries and regions, who work across a wide range of sectors and industries. We uphold the highest professional and ethical values. Across the UK our community includes 100,000 members and around 70,000 future members, working across a range of sectors including in practice as critical advisors to SMEs, in the public sector, financial services, manufacturing and all key sectors of the economy

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We offer everyone everywhere the opportunity to experience a rewarding career in accountancy, finance, and management. Our qualifications and learning opportunities develop strategic business leaders, forward-thinking professionals with the financial, business, and digital expertise essential for the creation of sustainable organisations and flourishing societies.

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GENERAL COMMENTS

ACCA welcomes the Scottish Government's consultation on charity regulation in Scotland. Many ACCA members play a role supporting charities in Scotland – whether those working in finance across the charity sector, providing accountancy and audit services, or as trustees or volunteers for local or national organisations. Charity regulation is therefore an area of significant interest and importance for our members in Scotland and across the UK.

We have previously highlighted feedback from our members to the Scottish Government that concerns exist about the current threshold requirement for audit and the impact on smaller charities. During the consultation period we held an online discussion session open to all ACCA members in Scotland, and attended by Scottish Government officials, to hear more about the consultation and enable members to share feedback. To further support our response to this consultation, we have also undertaken a limited desktop research exercise exploring a sample of publicly available information relating to audit fees paid by charities. While the data we have gathered provides initial insight of the operation of the audit services market for charities in Scotland, we would encourage further research of this kind to support deeper analysis and would be happy to support such research.

While overall difficult to identify obvious patterns across our data sample, there are indications that a number of charities are changing their auditor or independent examination provider year on year, possibly driven by a desire to access more competitive pricing. The data also demonstrates that the cost of audit has a disproportionate impact on smaller charities, with the fee representing an average of 0.8% of charity income for charities with income of less than £1M in 2023 compared with 0.4% of charity income for charities with income of more than £1M in Scotland.

On balance, and with the recommendation that further analysis of this data be undertaken by the Scottish Government, our data sample, combined with feedback from members providing audit and independent examination services to charities, suggests that increasing the current audit income threshold would be beneficial.

1. Should there be a review of charity regulation?

- Yes
- No
- Don't know

2. Please explain why you think there should or should not be a review of charity regulation.

Following extensive discussion and consultation with ACCA members and stakeholders, there is a recognition that significant time has passed since certain aspects of regulation were introduced and a review would offer the opportunity for a number of improvements that would benefit charities and those they support. Given the feedback we have received, ACCA is therefore supportive of a review of charity regulation.

We have previously highlighted feedback from our members to the Scottish Government that they had concerns about the current threshold requirement for audit and the impact on smaller charities, so we are pleased to see this highlighted in the consultation. While we do see merit in a broader review, we would be keen to ensure swift progress on improvements to rules on audit requirements, irrespective of the decision on a wider regulatory review.

3. If a review of charity regulation is undertaken, which of the following should be the purpose of the review (choose one):

- To assess the effectiveness of current charity regulation in meeting the future needs of the sector
- To review the Charities and Trustee Investment (Scotland) Act 2005 - exploring if the Act is doing what it set out to do and if any changes are required
- Don't know
- Other – please specify

ACCA believes that the scope of the review must be broad enough to encompass the opportunity to capture required follow up based on the feedback from broad range of stakeholders. In order to be fit for the future it must both assess the effectiveness of current charity regulation in meeting the future needs of the sector and review the Charities and Trustee Investment (Scotland) Act 2005 - exploring if the Act is doing what it set out to do and if any changes are required.

4. Do you think you or your organisation will have capacity to contribute views to a review process in the next 12 months?

- **Yes**
- No
- Don't know

ACCA is pleased to have already worked with the Scottish Government to gather feedback from our profession. We look forward to continuing to support the review process following this period of consultation.

5. If a review of charity regulation is conducted, what topics should it cover and why?

ACCA believes the opportunity mustn't be missed to explore opportunities for improvements by enabling updates or amendments; however feedback from our members was clear that since many parts of the regulatory regime are longstanding and well-understood concepts, changes should only be made where there is clear evidence of a problem.

We would also suggest that as a matter of good practice, a review should explore opportunities to streamline existing regulatory requirements. For example, whether any other regulations, such as those within company law, now place requirements on organisations which were not in place when Scottish charity regulations took effect. Avoiding duplication (often referred to as 'gold plating') would be in line with the Scottish Government's Better Regulation principles.

6. What topics should it not cover, and why?

ACCA believes the opportunity mustn't be missed to explore opportunities for improvements by enabling updates or amendments; however, feedback from our members was clear that since many parts of the regulatory regime are longstanding and well-understood concepts, changes should only be made where there is clear evidence of a problem.

7 A. Charitable purposes: Should this aspect of charity regulation be reviewed?

- **Yes**
- No
- Don't know

On balance the feedback from our engagement with ACCA members and stakeholders suggests that the charitable purposes aspect of charity regulation should be within the scope of the review, however, it is important to acknowledge that this aspect of the regulation is long

established and therefore changes should only occur where there is a very strong justification to do so.

7 B. Public benefit: Should this aspect of charity regulation be reviewed?

- **Yes**
- No
- Don't know

As with the charitable purposes aspect of charity regulation, feedback from our engagement with ACCA members and stakeholders, suggests that the public benefit aspect of charity regulation should be within the scope of the review. However, similarly, the public benefit aspect of charity regulation has been long established and should therefore only be changed where there is a strong justification to do so, particularly given the potential implications for some charities of any changes.

7 C. Charity trustee duties: Should this aspect of charity regulation be reviewed?

- **Yes**
- No
- Don't know

ACCA believes that the charity trustee duties aspect of charity regulation should be reviewed, however it is important to ensure that changes are only considered where there is evidence that a problem exists in the existing regulation. Trustees play a crucial role in supporting charities of all sizes and it can often be incredibly challenging for charities to attract trustees to undertake these roles. We heard feedback that potential trustees can be put off by the perceived weight of responsibility in duties, while we heard from others that sometimes trustees don't have a good understanding of their role and duties. It's clear then that there is a careful balance to be achieved to maintain necessary standards of governance while ensuring that this role is not made more difficult than it already is for people to volunteer.

Where any changes are made to trustee requirements, clear and timely updated guidance must be made available for charities and trustees.

8. Is there anything else you think should be included in a review of charity regulation?

We would refer to the point we highlight in response to question 5 concerning the opportunity to consider charity regulation in the context of other regulatory requirements and exploring opportunities for streamlining.

Again, while not necessarily bound by the review, we make some additional suggestions in relation to audit requirements in response to question 10.

Audit income thresholds

9 C. Should this technical topic be reviewed?

- **Yes**
- No
- Don't know

Audit in the UK

In the UK, the Financial Reporting Council (FRC) is the independent regulator responsible for promoting high quality corporate governance and reporting. The FRC monitors and enforces auditing standards within the UK. It also oversees the regulatory activities of the professional accountancy bodies and operates independent disciplinary arrangements for public interest cases involving accountants. Qualified accountants require to be licensed by a professional accountancy body (such as ACCA) to undertake an audit.

In recent decades audit has become a more highly regulated area and audits more complex. The number of auditors has declined. Indeed, the FRC's most recent annual publication of key facts and trends in the Accountancy Profession¹ outlines the number of audit firms registered with the Recognised Supervisory Bodies (RSBs) and the data suggests a trend of declining numbers of registered firms. The total number of registered audit firms was 4,310 as at 31 December 2022, compared with 4,745 in 2021 and 5,007 in 2020 respectively. Declining numbers and increasing complexity can mean that many smaller audits are now non-viable for existing audit firms. An updated FRC Key Facts and Trends Report will become available in the coming months.

As outlined in this consultation documentation², the audit income threshold for charities in Scotland and Northern Ireland is currently £500k, while in England and Wales the threshold is

¹ https://media.frc.org.uk/documents/FRC_Key_Facts_and_Trends_in_the_Accountancy_Profession_for_2023.pdf

² <https://www.gov.scot/publications/review-charity-regulation/documents/>

higher, currently £1M. Some stakeholders have publicly called for the threshold to be raised to £1M. The Scottish charity sector in broad terms has a lower income than England and Wales, with only around 1,500 Scottish charities currently subject to the audit thresholds. However, given that audit thresholds for charities in Scotland have not changed since 2006, there is an argument to be made for an increase, not least in recognition of inflation over time.

Difference between Audit and Independent Examination of Accounts

Historically, the term 'audit' has been used loosely to describe any external scrutiny of accounts, although it now has a more specific meaning³ and is governed by a number of mandatory international standards. Complying with these standards will require the auditor to review a range of information from the client, including internal processes, policies and governance – information that may be more challenging for small organisations to prepare than for larger entities.

Under the accounting regulations, if the term 'audit' is used in a charity's constitution or governing document, the charity must have its accounts audited by either:

- a registered auditor
- the Auditor General for Scotland
- an auditor appointed by the Accounts Commission for Scotland (responsible principally for public bodies).

All ACCA members who take responsibility for audit work must be in possession of a current auditing practising certificate which is subject to annual renewal.

An independent examination (IE) of accounts involves reviewing the accounting records and the annual accounts of the charity and considering whether the annual accounts properly reflect the underlying records. For many charities⁴ an IE can only be conducted by a professionally qualified accountant (and a member of one of the professional accountancy bodies) and if an ACCA member, they must also hold a practising certificate. This certificate is a requirement we place on any accountant operating a public practice (providing paid advice and services to the public, businesses and organisations). However, far more accountants will hold a practising certificate, than an audit practising certificate.

³ <https://www.oscr.org.uk/media/4612/independent-examination-a-guide-for-independent-examiners.pdf>

⁴ Only a professionally qualified accountant can undertake an IE for non-company charities producing fully accrued accounts, typically required for an annual income over £250,000: <https://www.oscr.org.uk/media/3533/independent-examination-a-guide-for-charity-trustees.pdf>

While both processes must be undertaken by a professionally qualified accountant and provide external scrutiny, it is important to note that an audit is an internationally recognised standard, providing a high degree of assurance. By contrast, an independent examination is a process devised with charities in mind, taking account of the unique characteristics of charities, particularly smaller charities.

Feedback from our network

Over the past number of years, we have heard anecdotal feedback from ACCA members, particularly those working in practice providing audit and independent examination services, about inquiries from charities regarding audit services. They told us about numerous instances of charities approaching them to ask if they would take them on as a new client. Most often the charity reports this is due to their previous auditor informing them that they are no longer able to perform the function, while in other cases it is as because their previous auditor has quoted a substantial fee increase to complete the audit. Some members have expressed concern that they feel individual charities are suffering significant challenges, especially high costs, in attempting to secure audit services.

We have also heard feedback from our members delivering audit services in communities across Scotland who have shared additional challenges from their perspective; most notably that charities often don't appreciate the complexity of charity accounts and in many cases have unreasonable expectations about what auditors can do and the cost of undertaking an audit.

Data on audit fees and charities in Scotland

We wanted to explore this feedback further in order to provide additional information to support the Scottish Government's consideration of the issue. We have used publicly available data on audit fees, included in returns by charities to Companies House and OSCR, to probe the experience of charities and audit services in recent years.

We examined data available for the past six financial years for a random selection of 28 Scottish charities with income of less than £1M and a further 25 Scottish charities with income of over £1M. This was a limited desktop research exercise, and while the data provides initial insight, we would encourage further research of this kind to support deeper analysis, which ACCA would be pleased to support.

Based on this analysis it is difficult to identify many obvious patterns, and the situation varies significantly depending on the charity size and other charity-specific factors, with the data

showing a broad range of fees and incomes. However, the data indicates that a number of charities are changing their auditor or independent examination provider year on year, which the data suggests can lead to more competitive pricing.

The data also indicates that a large number of smaller charities (some of which would be recognised as local or regional charities) move in and out of the audit requirement from year to year. We have kept the names of these charities anonymous in this response but will share the full dataset with the Scottish Government.

We have included six example tables in the appendix to demonstrate this movement in the market - three of which are charities with an income of over £1M and three of which are charities with an income of under £1M.

Example 1 below details the income for a Scottish family support charity over the course of six years; the cost of the audit increased significantly in 2022, which may explain the shift to a new audit firm in 2023 for a slightly reduced fee. However, the fee as a percentage of income averages at 1% over the course of six years.

Example 2 below provides an overview of the income for a Scottish environmental charity. While the organisation was able to satisfy reporting requirements by having an independent examination of accounts for the three years up to and including 2020, they then required an audit. The cost of the fee increased from an average of 0.8% of income, at an average of £3,350 for an independent examination of accounts, up to an average of 1.5% of income at an average cost of £8,741 for an audit for each year between 2021 and 2023.

Example 1 – Scottish family support charity (under £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm / Independent Examination (IE)	Fee as % Income
£586,098	31/03/2023	2023	£6,000	Audit Firm B	1.0%
£553,232	31/03/2022	2022	£7,098	Audit Firm A	1.3%
£547,140	31/03/2021	2021	£4,380	Audit Firm A	0.8%
£571,875	31/03/2020	2020	£4,324	Audit Firm A	0.8%
£496,122	31/03/2019	2019	£4,484	Audit Firm A	0.8%
£387,266	31/03/2018	2018	£4,298	Audit Firm A	1.0%

Example 2 – Local environment charity (under £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm / Independent Examination (IE)	Fee as % Income
£640,616	31/03/2023	2023	£8,045	Audit – Firm A	1.3%
£519,914	31/03/2022	2022	£7,440	Audit – Firm A	1.4%
£625,011	31/03/2021	2021	£10,740	Audit – Firm A	1.7%
£420,453	31/03/2020	2020	£3,400	IE Firm A	0.8%
£456,245	31/03/2019	2019	£3,300	IE Firm A	0.7%
£356,188	31/03/2018	2018	£3,350	IE Firm A	0.9%

Example 3 below details the income for a local citizens advice charity over the course of six years. During the year end periods 2018 and 2019 the income was under the £500,000 threshold and so an independent examination of accounts was conducted at an average cost of £1,734, a fee which is equivalent to 0.4% of the income of the charity during each of those years. The following year, 2020, the charity had income of £524,196 making an audit necessary. This meant the charity needed to find a new firm to complete the audit at a cost of £4,740, equivalent to 0.9% of the charity income that year. This not only leads to a significant proportion of the charity’s resources needing to be re-directed to fund the audit and away from the core purpose of the charity – but also requires a far more significant time and resource commitment. The income for the charity dropped below the £500,000 threshold again in 2021,

leading to an independent examination at a fee equivalent to 0.4% of the charity income. In 2022 and 2023 the income is slightly above the threshold again leading to a fee equivalent to 0.9% and 1% of income respectively. This entering and exiting the of the audit income threshold causes significant cost and complexity for the charity, but also for the firms conducting audit and independent examination services.

Example 3 – Local citizens advice charity (under £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm / Independent Examination (IE)	Fee as % Income
£526,885	31/03/2023	2023	£5,160	Audit Firm B	1.0%
£556,877	31/03/2022	2022	£5,124	Audit Firm B	0.9%
£439,278	31/03/2021	2021	£1,886	IE Firm C	0.4%
£524,196	31/03/2020	2020	£4,740	Audit Firm B	0.9%
£487,313	31/03/2019	2019	£1,782	IE Firm A	0.4%
£400,458	31/03/2018	2018	£1,686	IE Firm A	0.4%

Figure 2 details the data we examined for the 28 charities with an income of less than £1M with data for 25 charities with income of over £1M where we observed some stark differences. When looking at the year ending 2023 the average audit cost (as a percentage of charity income) was, on average, double the amount for charities with a turnover of under £1M at 0.8% when compared to charities with an income of over £1M at 0.4%.

Conversely, Figure 1 below shows the compound increase over six years of audit fees. Based on the data in our sample, this stands at a 50% compound increase for larger charities with income over £1M, and 30% for charities with income under £1M. While the compound increase is significantly higher for larger charities, the fee as a proportion of income for smaller charities in 2022 and 2023 is 0.8%, significantly higher than 0.3% in 2022 and 0.4% in 2023 for larger charities (Figure 2 & Figure 3).

Figure 1: Average compound increase in audit fee as a percentage over 6 years (2018 – 2023, based on our data sample)

	Average Compound Increase % over 6 years (2018 – 2023)
Income under £1M*	30%
Income over £1M	50%

*average based on 17 charities with income under £1M, remaining 11 charities excluded due to having conducted an independent examination of accounts for 1 or more year in the 6 year period.

Figure 2: 2023 Average fee as a percentage of income for charities with an income of under £1M compared to charities with an income of over £1M (based on our data sample).

	2023 Average Income	2023 Average Audit Cost	2023 Fee as % Income
Income under £1M (28 charities in sample)	£731,383	£5,967	0.8%
Income over £1M (25 charities in sample)	£3,097,497	£11,627	0.4%

Figure 3: 2022 Average fee as a percentage of income for charities with an income of under £1M compared to charities with an income of over £1M (based on our data sample).

	2022 Average Income	2022 Average Audit Cost	2022 Fee as % Income
Income under £1M (26 charities in sample)	£705,514	£5,759	0.8%
Income over £1M (25 charities in sample)	£3,104,560	£10,027	0.3%

Figure 4: 2019 Average fee as a percentage of income for charities with an income of under £1M compared to charities with an income of over £1M (based on our data sample).

	2019 Average Income	2019 Average Audit Cost	2019 Fee as % Income
Income under £1M (18 charities in sample)	£669,013	£5,247	0.8%
Income over £1M (25 charities in sample)	£2,702,971	£8,460	0.3%

The way forward

While an increase in the audit threshold will not solve all of the challenges arising from audit requirements and we would recommend further analysis of the available data to understand the issue in more depth, ACCA would welcome an increase in the current threshold. We believe there are a number of compelling reasons for this change to be made:

1. The Scottish charity audit threshold has not been increased for a very significant period of time - it is reasonable for an increase to occur to take account of inflation since the threshold was set.
2. There is evidence that the current approach is having a negative impact on charities. Consistent feedback from our members suggests that charities are struggling to find audit services or are paying more to secure an audit. Our data further suggests that smaller charities are likely to face disproportionately higher costs to secure an audit.
3. Removing some charities from the scope of audit would still provide an appropriate level of external scrutiny but would reduce fee costs and open up a wider range of suppliers, since there is more capacity within the accountancy market across Scotland to undertake an IE, in comparison to an audit.
4. There is some merit, certainly from a fairness perspective, to closer alignment with thresholds elsewhere in the UK where the audit gross income threshold currently stands at £1 million⁵ (or gross assets over £3.26 million and income over £250,000.) Charity thresholds for Scottish charities and other UK charities for periods ending on or after 31 March 2015 are detailed in Figure 5 of the Annex.

While it is important to acknowledge that certain types of funding, such as government grants or lottery funding, will still require an audit, our evidence (which is subject to a more comprehensive analysis) suggests an increase to the audit income threshold would bring greater simplicity in the marketplace and reduce costs.

This would be particularly helpful for charities which fundraise and operate across different nations of the UK, and internationally – uniform limits and requirements would improve transparency and simplicity in the system. It is also crucial that the integrity of independent examination is maintained, ACCA therefore recommends that it is conducted by qualified professionals who can deliver proportionate levels of assurance.

⁵ <https://www.gov.uk/government/publications/independent-examination-of-charity-accounts-trustees-cc31/independent-examination-of-charity-accounts-trustees>

10. Are there any other technical issues you think should be added to the technical workstream?

During our discussions about the charity income threshold, we heard feedback from ACCA members undertaking charity audits about instances where an audit feels disproportionate. We believe such instances could arise more frequently and would be keen to discuss this issue in more detail with the Scottish Government but have included some initial information below.

Most commonly we heard about the impact of a one-off transaction pushing a charity, whose income would normally be well below the threshold, into the income threshold which requires an audit, therefore creating significant complexity and often diverting funds and resources away from the purpose of the charity and into securing an appropriate audit. A number of factors could lead to one-off transactions which tip a small-income charity over the audit threshold, including specific fundraising or the value of a single asset, such as a property.

In one example, a substantial one-off legacy donation was received by a charity, which in turn pushed the charity income above the threshold, leading to a requirement to conduct an audit. However this donation was exceptional, and the income of the charity had not and would not rise above the threshold in previous or subsequent years. In such cases we also heard feedback that specific donations, or fundraising, would be restricted funds (to be used for a specific purpose only) and thus this income could not be used to cover the perhaps-unexpected, substantial, cost of an audit.

Another example of exceptional circumstances leading to an audit requirement, is the sale of assets through winding up the charity – whereby the income from the sale of assets requires the charity to conduct an audit, when ordinarily the income was below the level requiring an audit.

In such cases it appears that the risk and complexity associated with the charity and the transaction is disproportionate to the requirement for an audit, however it creates significant difficulty and expense for the charity involved.

We would be keen to explore options for improvements to this aspect of audit requirement regulations. For example, enabling trustees to state that they have experienced a temporary or exceptional circumstance but do not require to complete an audit. We understand that

OSCR already has powers that would enable it to request further information from trustees where appropriate, which could be used in such circumstances.

We would be happy to discuss this issue further.

Annex

Example 1 – Local family support charity (under £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm / Independent Examination (IE)	Fee as % Income
£586,098	31/03/2023	2023	£6,000	Audit Firm B	1.0%
£553,232	31/03/2022	2022	£7,098	Audit Firm A	1.3%
£547,140	31/03/2021	2021	£4,380	Audit Firm A	0.8%
£571,875	31/03/2020	2020	£4,324	Audit Firm A	0.8%
£496,122	31/03/2019	2019	£4,484	Audit Firm A	0.8%
£387,266	31/03/2018	2018	£4,298	Audit Firm A	1.0%

Example 2 – Local environment charity (under £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm / Independent Examination (IE)	Fee as % Income
£640,616	31/03/2023	2023	£8,045	Audit – Firm A	1.3%
£519,914	31/03/2022	2022	£7,440	Audit – Firm A	1.4%
£625,011	31/03/2021	2021	£10,740	Audit – Firm A	1.7%
£420,453	31/03/2020	2020	£3,400	IE Firm A	0.8%
£456,245	31/03/2019	2019	£3,300	IE Firm A	0.7%
£356,188	31/03/2018	2018	£3,350	IE Firm A	0.9%

Example 3 – Local citizens advice charity (under £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm / Independent Examination (IE)	Fee as % Income
£526,885	31/03/2023	2023	£5,160	Audit Firm B	1.0%
£556,877	31/03/2022	2022	£5,124	Audit Firm B	0.9%
£439,278	31/03/2021	2021	£1,886	IE Firm C	0.4%
£524,196	31/03/2020	2020	£4,740	Audit Firm B	0.9%
£487,313	31/03/2019	2019	£1,782	IE Firm A	0.4%
£400,458	31/03/2018	2018	£1,686	IE Firm A	0.4%

Example 4 – Arts charity (over £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm	Fee as % Income
£1,236,014	31/03/2023	2023	£7,500	Audit Firm B	0.9%
£892,390	31/03/2022	2022	£7,200	Audit Firm B	0.7%
£586,906	31/03/2021	2021	£5,300	Audit Firm B	0.6%
£1,066,118	31/03/2020	2020	£5,620	Audit Firm B	0.6%
£995,918	31/03/2019	2019	£4,950	Audit Firm A	0.6%
£786,946	31/03/2018	2018	£4,000	Audit Firm A	0.6%

Example 5 – Arts charity (over £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm	Fee as % Income
£1,166,869	31/03/2023	2023	£10,095	Audit Firm D	0.9%
£1,175,067	31/03/2022	2022	£7,644	Audit Firm D	0.7%
£1,181,327	31/03/2021	2021	£6,550	Audit Firm D	0.6%
£991,984	31/03/2020	2020	£5,900	Audit Firm C	0.6%
£972,146	31/03/2019	2019	£5,650	Audit Firm B	0.6%
£864,062	31/03/2018	2018	£5,400	Audit Firm A	0.6%

Example 6 – Volunteering charity (over £1M)

Income per accounts	Full Year-end	Year-end	Audit Cost	Audit Firm	Fee as % Income
£2,205,372	31/03/2023	2023	£9,447	Audit Firm B	0.4%
£2,299,637	31/03/2022	2022	£8,568	Audit Firm B	0.4%
£1,764,744	31/03/2021	2021	£8,400	Audit Firm B	0.5%
£1,482,535	31/03/2020	2020	£13,400	Audit Firm A	0.9%
£1,347,255	31/03/2019	2019	£7,920	Audit Firm A	0.6%
£1,219,809	31/03/2018	2018	£7,800	Audit Firm A	0.6%

Figure 5: Charity thresholds for Scottish charities and other UK charities for periods ending on or after 31 March 2015

	'New limits (for periods ending on or after 31 March 2015) (Scotland)	'New limits (for periods ending on or after 31 March 2015) (Other UK charities)	'New' limits (for periods beginning on or after 1 January 2016) (Northern Ireland)
Gross income OR	<£500k OR	<£1m OR	<£500k OR
Gross assets and gross income	<£3.26m and £250K	<£3.26m and £250K	<£3.26m and £250K

