



Department
for Business
Innovation & Skills

**UK IMPLEMENTATION OF EU
ACCOUNTING DIRECTIVE**

Chapters 1-9: Annual financial
statements, consolidated
financial statements, related
reports of certain types of
undertakings and general
requirements for audit

RESPONSE FORM

AUGUST 2014

UK Implementation of the EU Accounting Directive – Chapters 1-9: Annual financial statements, consolidated financial statements, related reports of certain types of undertakings and general requirements for audit

Consultation response form

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 24 October 2014

Name:

Organisation (if applicable): **BDO LLP**

Address:

Please return completed forms to:

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Please tick a box from the list below that best describes you as a respondent.

	Business representative organisation/trade body
	Non-government standard setting/regulatory body
	Charity or social enterprise
	Individual
x	Large business (over 250 staff)
	Legal representative
	Local Government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
	Other (please describe)

SECTION 6. The Government's Approach to Implementation

Question 1: Do you agree that the Government should maintain the UK's existing approach to financial reporting and only introduce changes where imposed by the Directive or where new options have been introduced? (Paras 6.3-6.4)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

Whilst accepting that government will be requirement to make changes where imposed by the Directive, we consider that new options, or existing options that have not been taken, should be introduced where they will remove unnecessary complexities or aid transparency.

Question 2: Do you agree that the Government should maintain the current position of providing discrete regulations for small companies and for large and medium-sized companies? (Para 6.7)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

The current system of discrete regulations works and users are familiar with the layout of regulations. We therefore do not see a need to change the current approach.

If one set of regulations were to be drafted to cover all sizes we would recommend discrete sections or schedules are provided for, micro, small and for large and medium sized companies.

Question 3: Do you agree it would be helpful to have a new set of Small Companies and Group Regulations which set out the new small company regime and incorporate both the small companies' exemption and the micro-entities exemptions clearly and in one place? (Para 6.8)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

It would be appropriate to have all legal provisions for small and micro entities together in one place as this will facilitate transition for entities moving from one regime to another at a point in their lifecycle when they are likely to be relatively unsophisticated from a financial reporting perspective. However, we would recommend discrete sections or schedules are provided for micro and for small companies so as to not confuse the two sets of requirements.

Question 4: Do you have suggestions for other regulations that might reasonably be consolidated as part of the implementation of this Directive? If so, please provide references to the relevant regulations with an explanation for your proposal and the benefits you expect this would deliver. (Para 6.8)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

The current consolidation does not include any consideration of the regulations applicable to the accounts of Limited Liability Partnerships (e.g. SI 2008/1911, 1912 and 1913). These regulations will need to be reviewed in due course.

SECTION 7. Timetable for implementation

Question 5: Do you agree that the new regulations should apply to financial statements for financial years commencing on or after 1 January 2016? (Para 7.1)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

Implementing the changes from 1 January 2016 is the best option available within the constraints of the Directive. However, early adoption should be available where practicable; particularly in respect of the proposed changes in size thresholds and the implementation of new UK GAAP (see response to question 6).

Question 6: Should companies be able to access the new financial reporting regime (increased thresholds and revised reporting requirements) ahead of the mandatory application date of 1 January 2016? (Para 7.2)

☒ Yes ☐ No ☐ Not sure

Please provide an explanation for your position. In particular, we would welcome information about the costs/benefits associated with your preferred option:

Given the 11,000 additional small companies expected to be created as a result of the changes, it would be advantageous to make the new regime available for early adoption. This would avoid the need for a potential new small company to prepare full FRS 102 financial statements for December 2015 year ends only to subsequently move to the new small option within FRS 102 for December 2016 year ends. This would naturally require the revised financial reporting standards accompanying the new regime to be in place so that companies have a standard(s) with which to state compliance.

SECTION 8. The Proposal

Question 7: Do you agree with the Government's proposal to maximise the small company thresholds and provide as many eligible companies as possible with the opportunity to access the small company regime? (Para 8.10)

☐ Yes ☐ No ☒ Not sure

Please provide information in support of your answer:

Our view on the proposals is consistent with that of the FRC:

“The FRC supports appropriate deregulation and clear and concise reporting by entities, but is concerned that some of the changes in legislation could impair the usefulness of the resulting financial information and/or place an even greater onus on the directors of small companies in their assessment of whether the resulting financial statements provide a true and fair view, and if not to take appropriate action. Although the FRC will make the changes to accounting standards that are required by the changes in legislation, not all of these changes are consistent with the FRC’s vision for financial reporting.”

[Extracted from FRC’s Consultation Document: Accounting Standards for Smaller Entities, September 2014, paragraph 1.8]

Whilst in principle we support a reduction in the burden of unnecessary accounting complexities on small companies and therefore an increase in the accounting thresholds, we importantly welcome a de-coupling of the audit and accounting thresholds such that an assurance regime continues to be in place for the benefit of stakeholders.

Although defined as ‘small’ by the regulations we take the view that companies at the top end of the proposed thresholds are of significant size and will therefore have a number of different stakeholders interested in their financial reporting. They may also have a shareholder base that is not actively involved in the management of the business. An audit regime for the expected 11,000 newly small companies is important to ensure the statements continue to give a true and fair view and to provide useful information to stakeholders.

Question 8: We have been able to draw on academic studies and responses to earlier consultations but we would welcome any additional information/evidence you are able to provide to support your response. What benefits or costs do you think will arise from raising the company size thresholds? (Information may relate to both monetised and non-monetised benefits and costs.) (Para 8.10)

We are concerned as to how practice around the preparation of small company accounts will develop. In particular, with only thirteen disclosures mandated it is not yet clear what view will be taken in relation to additional disclosures required to give a true and fair view. As noted by the FRC (see Q7 above) there is a risk that the changes could impair the usefulness of the resulting financial information and/or place an even greater onus on the directors of small companies in their assessment of whether the resulting financial statements provide a true and fair view, and if not to take appropriate action. For example, there is a risk that disclosure may not be sufficient in all cases for other parties to undertake credit checks and that this could affect credit availability and cost for the small company.

Question 9: Do you agree that the Government should continue to measure a company’s size by reference to its balance sheet total, net turnover and average number of employees? (Para 8.12)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

We believe these are the relevant primary indicators in most cases however there are some instances where alternative measures may be more appropriate, see our response to Q10.

Question 10: Do you consider that there are circumstances where the Government should include other sources of income as net turnover for the purposes of determining company size? (Para 8.12)

☒ Yes ☐ No ☐ Not sure

Please provide details of the circumstances in which you consider the option should be applied, indicating the problem to be addressed and the costs/benefits that would arise. Information about the number of companies affected would be useful in assessing the impact of any change:

Investment companies that hold investments at fair value can often qualify as small due to a low number of employees and low turnover however these companies can have very large balance sheets and significant fair value movements accounted for outside of turnover. In these cases, where there are significant items going through the profit or loss which do not qualify as turnover we believe there is merit in applying alternative measures.

Question 11: Do you consider that there are circumstances (beyond those already in the UK accounting framework) where it would be appropriate to require:

- (a) parent undertakings to calculate their thresholds on a consolidated basis rather than an individual basis; or
- (b) “affiliated undertakings” to calculate their thresholds on a consolidated or aggregated basis?

☐ Yes ☒ No ☐ Not sure

Please provide details of the circumstances to which the option should be applied, indicating the problem to be addressed and the costs/benefits that would arise:

Question 12: Do you consider that there are circumstances where the Government should adopt either or both of the above provisions? (Para 8.13)

☐ Yes ☒ No ☐ Not sure

Please provide details of the circumstances to which the option should be applied, indicating the problem to be addressed and the costs/benefits that would arise:

We do not believe that there are circumstances beyond those already in the UK accounting framework (see Q 11) where it would be appropriate to adopt either or both of the above provisions.

Question 13: The Accounting Directive offers an option to reduce from 13 to 8 the number of mandatory notes required from small companies. Do you agree with the Government position to continue to require the five notes listed at paragraph 8.18? (Para 8.19)

☒ Yes ☐ No ☐ Not sure

If no, please provide an explanation, indicating which, if any, of the five notes you believe should be mandatory for small companies:

In our view the five notes listed at paragraph 8.18 will be required if the accounts are to provide a true and fair view and therefore should be mandated. As noted in Q7 above, the reduction of mandatory disclosure to 13 will place an even greater onus on the directors of small companies to assess whether the resulting financial statements provide a true and fair view, and if not to take appropriate action.

Question 14: Should the requirement for these additional notes be set out in regulations or should the need for additional notes be set out in accounting standards? (Para 8.19)

☒ Yes ☐ No ☐ Not sure

Please provide any information to support your views:

In our view the current approach within the UK should be maintained. Regulations should be used to provide details of minimum requirements and accounting standards should be used to provide guidance and any additional requirements.

Question 15: Do you agree that small companies should have the choice of preparing an abbreviated balance sheet and profit and loss account if they wish? (Para 8.21)

☐ Yes ☒ No ☐ Not sure

Please provide information in support of your answer:

The preparation of an abbreviated balance sheet and profit and loss account for shareholders would be unlikely to provide a true and fair view. Such a choice should not be permitted without adequate protection for shareholders and in particular minority shareholders not directly involved in the running of the business. For example, a process similar to that in FRS 102, paragraph 1.11 for qualifying entities wishing to give reduced disclosures.

Question 16: If small companies were permitted to prepare an abbreviated balance sheet and profit and loss account, please indicate if there are any line items which you would consider it essential to retain to support the presentation of a true and fair view of a company's financial position? Please explain. (Para 8.21)

In our view all lines currently required by SI 2008/409 Schedule 1 are required to provide a true and fair view to the extent those lines are applicable to the company. The current formats already permit the aggregation of line items to which Arabic numbers are given if the individual amounts are not material to assessing the state of affairs or profit and loss of the company.

Question 17: What benefits or costs might a small company see from deciding to prepare an abbreviated balance sheet and P&L? Evidence in support of your views would be helpful (Para 8.21)

We believe any benefit would be minimal. Where material information is not provided on the face of the primary statements additional information will need to be provided in the notes to the accounts to provide a true and fair view.

Question 18: What benefits do you believe exempting small groups from consolidation will offer to small groups of companies? Evidence in support of your views would be helpful (Para 8.22)

A loosening of the definition of an ineligible company or ineligible group will inevitably lead to an increase in the number of small groups exempt from the requirement to prepare group accounts and hence the cost of having to prepare consolidated accounts will be removed. The extent that this will be of benefit will depend on whether business agreements, covenants etc. are linked to consolidated figures.

Question 19: Should the Government only exclude from the small company accounting regime those public companies whose securities are traded on a regulated market? (Para 8.24)

☐ Yes ☒ No ☐ Not sure

Please explain. If no, are there any types of public companies (other than those whose trading securities are traded on a regulated market) which should be allowed to access the small company regime (and why)?

In our view any company whose shares are publicly traded (such as on AIM which is not a regulated market) should be required to prepare accounts as if the company is large. We believe there will always be sufficient stakeholder group interest to warrant the additional effort involved in preparing 'large accounts' in such situations.

If companies consider this not to be the case we would question whether it is appropriate for them to be traded on a public market.

Question 20: Should the Government allow small companies who are members of a group which includes a public company to access the small companies regime? (Para 8.25)

☒ Yes ☐ No ☐ Not sure

Please explain. If no, are there any circumstances in which other small companies within a group which includes a public company should be allowed to access the small company regime (and why)?

Question 21: Should the Government only exclude from the medium-sized company regime those public companies whose securities are traded on a regulated market? (Para 8.26)

☐ Yes ☒ No ☐ Not sure

Please explain. If no, are there any types of public companies (other than those whose securities are traded on a regulated market) who should be allowed to access the medium-sized companies regime (and why)?

In our view any company whose shares are publicly traded (such as on AIM which is not a regulated market) should be required to prepare accounts as if the company is large. We believe there will always be sufficient stakeholder group interest to warrant the additional effort involved in preparing 'large accounts'.

Question 22: Should the Government allow companies who are members of a group which includes a public company to access the medium-sized companies' regime? (Para 8.26)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

We consider a reduction in the burden on such groups is appropriate, particularly given our responses to questions 19 and 21 as in our view the cost and effort should be focussed on the consolidated accounts.

Question 23: Do you consider that the exclusions from the dormant subsidiaries accounting exemptions (where the subsidiary has a parent company guarantee) should be amended so that:

a) Companies are excluded because they have securities traded on a regulated market rather than because they are quoted companies? (Para 8.27)

☐ Yes ☐ No ☒ Not sure

Please provide information in support of your answer:

We do not believe there will be a significant impact resulting from the change in regulations as we are not aware of any dormant subsidiaries that have securities traded on a regulated market but do not meet the definition of a quoted company.

b) Companies are excluded if they are part of an "ineligible group" under that definition as amended for the purposes of the small companies accounting regime? (Para 8.27)

☐ Yes ☒ No ☐ Not sure

Please provide any information in support of your answer:

We are not aware of concerns relating to the current legislation that would warrant removing the exemption from preparing and filing accounts from dormant companies that are members of an ineligible group. If there is evidence of abuse of this exemption we would reconsider our response.

Question 24: Do you agree that only permitting Formats 1 and 2 of the P&L should not impact significantly on UK companies? (Para 8.29)

☒ Yes ☐ No ☐ Not sure

If no, please provide an explanation for the impact (for example, which companies and in what circumstances) and what its effects might be. Any evidence of the cost of the impact would be welcome.

Question 25: Should the UK take advantage of this option to provide greater flexibility in the layout(s)? (Para 8.30)

☒ Yes ☐ No ☐ Not sure

Please provide any information in support of your views here including any cost and benefits of providing greater flexibility in the use layouts.

If sector-specific layouts are suggested, please can you provide information on the need for such a layout within the sector, the issues the standard layouts currently present to that sector and the nature and value of any benefits greater flexibility might bring.

We believe there is significant merit in making IFRS layouts available within Companies Act accounts, particularly for those companies adopting FRS 101 going forward.

Question 26: If the UK took up this option, should flexibilities be dealt with in the regulations or in accounting standards and why? (Para 8.30)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

In our view the current approach within the UK should be maintained. Regulations should be used to provide details of minimum requirements and accounting standards should be used to provide guidance and any additional requirements.

Question 27: Do you agree that the legislation should enable participating interests to be accounted for using the equity method in individual company financial statements? (Para 8.33)

☐ Yes ☐ No ☒ Not sure

Please provide any information in support of your views, including any costs and benefits of allowing this option:

In principle we agree that the equity method should be available in individual company financial statements as that option is now available under IFRS. However, we believe take-up of the option will be minimal and any consequence of taking the option would need further consideration (for example, tax consequences and any impact on distributable profits).

Question 28: Do you agree that the Government should provide for the 10 year maximum period for write-off offered in the Accounting Directive? (Para 8.36)

☒ Yes ☐ No ☐ Not sure

Please provide any information in support of your views, including any reasons that the period should be kept to 5 years, or to any alternative period:

Question 29: Do you agree that the removal of this option should take effect alongside other changes to the UK's financial reporting framework? (Para 8.38)

☒ Yes ☐ No ☐ Not sure

If no, please provide an explanation and indicate when the change should be effective and what the reasons are for this:

If the government is already minded to make this change it would seem preferable for it to take effect along with the other changes.

Question 30: Do you agree that the companies eligible to take advantage of the micro-entity regime should be relieved of the obligation to prepare a Directors' Report? What costs or benefits would result from this change? (Para 8.42)

☒ Yes ☐ No ☐ Not sure

If no, please provide information in support of your view and the value that the Directors' Report offers to a micro-entity company:

We agree that micro entities should be relieved of the obligation to prepare a Director's Report providing that the note on any acquisition of own shares is added as a required disclosure in the accounts.

SECTION 9: Implications for the UK's Approach to Statutory Audit

Question 31: Do you agree that the thresholds for the small companies audit exemption should remain unchanged for the time being i.e that the thresholds for the audit exemption should not be increased in line with thresholds for the small company regime for accounting purposes at this time? (Para 9.5)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

Although defined as 'small' by the regulations we take the view that companies at the top end of the proposed thresholds are of significant size and will therefore have a number of different stakeholders interested in their financial reporting. They may also have a shareholder base that is not actively involved in the management of the business. An audit regime for the expected 11,000 newly small companies is important to ensure the statements continue to give a true and fair view and to provide useful information to stakeholders.

Accordingly we believe that audit exemption limits should only be reconsidered when a better enforcement regime and alternative and reliable assurance model is in place. Meanwhile we believe that the current assurance regime should be maintained, primarily for the purpose of stakeholder protection

Question 32: Do you consider that the exclusions from the small companies audit exemption should be amended so that:

a) Small companies are no longer excluded simply because they are public companies, though they are excluded if they have securities admitted to trading on a regulated market? (Para 9.10)

☐ Yes ☒ No ☐ Not sure

If no, are there any types of public company (other than those with securities admitted to trading on a regulated market) which should be allowed to access the small companies audit exemption?

Consistent with our comments on Q19 and 21, any company whose shares are publicly traded (such as on AIM which is not a regulated market) should be subject to audit. We believe there will always be sufficient stakeholder group interest to warrant the additional effort involved in preparing 'large accounts'.

- b) Small companies are only excluded if they are part of an "ineligible group" under this definition as amended for the purpose of implementing changes to the small companies accounting regime? (Para 9.10)

☐ Yes ☒ No ☐ Not sure

If no, are there any circumstances in which small companies that are part of an "ineligible group" (as amended) should be allowed to access the small companies audit exemption?

We are not aware of concerns relating to the current legislation that would warrant removing the audit exemption from subsidiary companies that are members of an ineligible group. If there is evidence of abuse of this exemption we would reconsider our response.

Question 33: Do you consider that the exclusions from the subsidiaries audit exemption (where the subsidiary has a parent company guarantee) should be amended so that:

- a) Companies are excluded because they have securities admitted to trading on a regulated market rather than because they are quoted companies? (Para 9.10)

☐ Yes ☒ No ☐ Not sure

Please provide information in support of your answer:

Consistent with our comments on Q19 and 21, any company whose shares are publicly traded (such as on AIM which is not a regulated market) should be subject to audit.

- b) Companies are excluded if they are part of an "ineligible group" under that definition as amended for the purpose of implementing changes to the small companies accounting regime? (Para 9.10)

☐ Yes ☒ No ☐ Not sure

Please provide information in support of your answer:

We are not aware of concerns relating to the current legislation that would warrant removing the audit exemption from subsidiary companies that are members of an ineligible group. If there is evidence of abuse of this exemption we would reconsider our response.

Question 34: Do you consider that the exclusions from the dormant companies audit exemption should be amended so that:

- a) Companies are excluded if their securities are traded on a regulated market? (Para 9.11)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

Consistent with our comments on Q19 and 21, any company whose shares are publicly traded (such as on AIM which is not a regulated market) should be subject to audit.

b) Companies are excluded if they are part of an “ineligible group” under that definition as amended for the purpose of implementing the small companies accounting regime? (Para 9.11)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

We are not aware of concerns relating to the current legislation that would warrant removing the audit exemption from subsidiary companies that are members of an ineligible group. If there is evidence of abuse of this exemption we would reconsider our response.

Question 35: Do you agree that Article 28 (2)(e) of the Audit Directive, as inserted by Article 1 paragraph 23 of the Audit Directive 2014/56/EU, should be implemented with the changes included in the new Audit Directive? (Para 9.15)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your answer:

We agree that the changes should be implemented at the same time to avoid additional burden for one year.

Question 36: Are there any other changes made to Article 28 of the Audit Directive under Directive 2014/56/EU that you consider should be implemented at the same time as the changes introduced with the insertion of Article 28 of the Audit Directive by Article 35 of the Accounting Directive? (Para 9.15)

☐ Yes ☒ No ☐ Not sure

Please provide information in support of your answer:

Question 37: Do you agree that the regulations¹ should be amended to revoke the current requirement for disclosure of fees paid to auditors of medium sized companies for non-audit services? (Para 9.16)

☐ Yes ☐ No ☒ Not sure

If no, are there any types of medium sized company (other than banks or insurers or those with securities traded on a regulated market) who should be required to disclose the fees paid to their auditor for non-audit services?

¹ The Companies (Disclosure of Auditor Remuneration and Liability Limitation Agreements) Regulations 2008 (SI 2008/489)

Medium-sized companies are not currently required to disclose fees paid to their auditors for non-audit services (SI 2008/489 Regulations 4 and 5).

Question 38: Do you agree that the current requirement for disclosure by large companies of fees they have paid to auditors for non-audit services should no longer be extended to public companies unless they have securities traded on a regulated market? (Para 9.16)

☐ Yes ☒ No ☐ Not sure

If no, are there any types of public companies (other than banks or insurers or those with securities traded on a regulated market) who should be required to disclose the fees paid to their auditor for non-audit services?

In our view all large sized companies should be required to disclose fees paid to auditors for non-audit services as this is critical in demonstrating auditor independence and to remove the requirement for some large companies would appear contra to the move to greater transparency in relationships with auditors.

Question 39: Do you agree that the current requirement for disclosure by large companies of fees they have paid to auditors for non-audit services should no longer be extended to companies in the same group as a public company? (Para 9.16)

☐ Yes ☒ No ☐ Not sure

If no, are there any circumstances in which other small or medium sized companies within a group which includes a public company should be required to disclose the fees paid to their auditor for non-audit services?

As per our response to question 38, we believe all large sized companies should always disclose fees paid to auditor for non-audit services.

We believe there is rational for relaxing the requirements for small companies in this scenario providing disclosure is made at group level.

Question 40: Do you consider that the current requirement for disclosure by large companies of fees they have paid to auditors for non-audit services should continue to be extended to medium sized and small companies that are members of ineligible groups? (Para 9.17)

☐ Yes ☒ No ☐ Not sure

Please provide information in support of your response:

We believe there is rational for relaxing the requirements for small companies in this scenario providing disclosure is made at group level.

Question 41: Do you:

- (a) agree that the regulation should be amended so that the current exemption from the disclosure of non-audit fees paid by subsidiaries is no longer available to a subsidiary whose auditor is not the group auditor; or
- (b) think the exemption should be available to these subsidiaries where the total non-audit service fees paid to their auditor by all the companies in the group is disclosed in the notes to the consolidated accounts? (Para 9.20)

☒ a ☐ b ☐ Not sure

Please provide information in support of your response:

In the interest of transparency and demonstrating auditor independence at all levels of the group we believe option 'a' is appropriate.

SECTION 10: Application to Charitable Companies

Question 42: Do you agree that there would be merit in specifically stating in regulations made under company law that the information provided in the notes to the financial statements of a company charity is not limited to the information required by the Accounting Directive? (Para 10.6)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your view:

We believe that such a statement will add clarity to the requirements for Charities.

Question 43: Do you agree that the current flexibility in presentation of financial statements of charities, in particular the requirement for an income and expenditure account and to adapt the arrangement, headings and sub-heading of financial statements to reflect the special nature of the company's activities, should be retained? (Para 10.7)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your view:

We believe this is necessary for charities as the focus of the user of those statements is not profit or loss in the same way as it would be for a profit focused company.

Question 44: Do you agree that a threshold based on gross income is more appropriate than its turnover for company charities? (Para 10.8)

☒ Yes ☐ No ☐ Not sure

Please provide information in support of your view:

Turnover is generally not a relevant measure for charities as the aim of charities is not the sale of goods and services.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☐

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

☒ Yes

☐ No

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