

## ACCA's Consultation Responses and Policy Submissions – 2016

ACCA (the Association of Chartered Certified Accountants) is the global body for professional accountants. We aim to offer business-relevant, first-choice qualifications to people of application, ability and ambition around the world who seek a rewarding career in accountancy, finance and management.

Founded in 1904, ACCA has consistently held unique core values: opportunity, diversity, innovation, integrity and accountability. We believe that accountants bring value to economies in all stages of development. We aim to develop capacity in the profession and encourage the adoption of global standards. Our values are aligned to the needs of employers in all sectors and we ensure that, through our qualifications, we prepare accountants for business. We seek to open up the profession to people of all backgrounds and remove artificial barriers, innovating our qualifications and their delivery to meet the diverse needs of trainee professionals and their employers.

ACCA works to strengthen a global profession based on the application of consistent standards, because we believe this best supports international business and the desire of talented people to have successful, international careers. We champion the needs of small and medium-sized business (SMEs) and emerging economies, and promote the value of sustainable business.

To achieve this, we work with global bodies such as the International Federation of Accountants (IFAC) and with over 80 global partnerships. Above all, we seek to bring long-term value to the economies in which we develop and support professional accountants.

We support our **188,000** members and **480,000** students in **178** countries, helping them to develop successful careers in accounting and business, with the skills required by employers. We work through a network of **100** offices and centres and more than **7,400** Approved Employers worldwide, who provide high standards of employee learning and development. Through our public interest remit, we promote appropriate regulation of accounting and conduct relevant research to ensure that accountancy continues to grow in reputation and influence.

ACCA works in the public interest, ensuring that its members are appropriately regulated for the work they carry out and promoting principles-based approaches to regulation. We actively seek to enhance the public value of accounting in society through international research and we take a progressive stance on global issues to ensure that accountancy, as a profession, continues to grow in reputation and influence.

You will find details of our recent and past views on technical issues, published in the public interest, below and in additional yearly volumes that can be found on our website.

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## ACCA'S CONSULTATION RESPONSES AND POLICY SUBMISSIONS – 2016

| OUR<br>REFERENCE | CONSULTATION TITLE  | CONSULTING BODY   | RESPONSE DATE                         |
|------------------|---|---|---------------------------------------|
| 1371             | IFRIC Interpretation DI/2015/1 Uncertainty over Income Tax Treatments   | IFRS Interpretations Committee                            | 18/01/2016<br>Link to response        |
| 1361             | An Examination of the OECD'S BEPS<br>Recommendations to the G20   | All-Party Parliamentary Group<br>on Responsible Tax       | 21/01/2016                            |
| 1379             | IESBA Consultation on Improving the Structure of<br>the Code of Ethics for Professional Accountants –<br>Phase 1            | International Ethics Standards<br>Board for Accountants   | 04/02/2016<br>Link to response        |
| 1372             | Annual Improvements to IFRSs 2014–2016 Cycle (ED/2015/11)   | International Accounting<br>Standards Board               | 09/02/2016<br>Link to response        |
| 1373             | Finance Bill 2016: Company Distributions<br>Consultation (Comments from ACCA to HMRC)                                       | HM Revenue & Customs                                      | 11/02/2016<br>Link to response        |
| 1362             | Simpler Assessments   | HM Revenue & Customs                                      | 28/02/2016                            |
| 1364             | Client Notification   | HM Revenue & Customs                                      | 28/02/2016                            |
| 1374             | Consultation on Guidance on Aspects of the ICAEW Code of Ethics   | Institute of Chartered<br>Accountants of England & Wales  | 01/03/2016<br><b>Link to response</b> |
| 1375             | The Five Fundamental Ethics Principles: Time for Evaluation? A Discussion Paper Issued by ICAS (March 2016)                 | Institute of Chartered<br>Accountants of Scotland         | 01/03/2016<br>Link to response        |
| 1376             | Proposed Revisions to Safeguards in the Code –<br>Phase 1. IESBA Exposure Draft (March 2016)                                | International Ethics Standards<br>Board for Accountants   | 01/03/2016<br>Link to response        |
| 1381             | Hong Kong's Programme for Comprehensive<br>Avoidance of Double Taxation Agreement and Tax<br>Information Exchange Agreement | Financial Services and the<br>Treasury Bureau, Hong Kong  | 24/03/2016                            |
| 1377             | BIS Consultation on the UK implementation of the EU Non-financial Reporting Directive                                       | Business, Innovation and Skills<br>Select Committee       | 15/04/2016<br>Link to response        |
| 1378             | EC Public Consultation on Non-binding Guidelines on Methodology for Reporting Non-financial Information                     | European Commission                                       | 15/04/2016<br>Link to response        |
| 1439             | Proposed Amendment to the 2013 Accounting Directive   | European Commission                                       | 18/04/2016<br>Input via FEE           |
| 1380             | Enhancing Confidence in Audit: The FRC's Audit<br>Enforcement Procedures  | Financial Reporting Council                               | 10/05/2016<br>Link to response        |
| 1370             | ACCA Response to the IAASB Consultation on<br>Enhancing Audit Quality in the Public Interest                                | International Auditing &<br>Assurance Standards Board     | 16/05/2016<br>Link to response        |
| 1365             | Enforcement Procedures  | Financial Reporting Council                               | 31/05/2016                            |
| 1366             | Improving Double Taxation Dispute Mechanisms  | European Commission                                       | 31/05/2016                            |
| 1382             | New Support Scheme for Professional Services in<br>Hong Kong  | Commerce and Economic<br>Development Bureau,<br>Hong Kong | 31/05/2016                            |
| 1367             | EU Insolvency Survey JUSTA1   | European Commission                                       | 14/06/2016                            |
| 1369             | The Future of Corporate Reporting – Creating the Dynamics for Change  | Federation of European<br>Accountants                     | 30/06/2016                            |

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|------------------|--|--|--------------------------------|
| 1368             | HM Gov Consultation – Business Rates: Delivering<br>More Frequent Revaluations   | HM Treasury  | 04/07/2016<br>Link to response |
| 1391             | Ministry of Justice Consultation on Removing<br>Barriers to Competition in the Legal Services                                      | Ministry of Justice  | 01/08/2016<br>Link to response |
| 1393             | HM Gov Consultation on Tax Deductibility of Corporate Interest Expense   | HM Treasury  | 04/08/2016<br>Link to response |
| 1394             | HM Treasury Consultation on Delivery of Reforms to<br>Corporation Tax Loss Relief  | HM Revenue & Customs   | 12/08/2016<br>Link to response |
| 1395             | Off-payroll Working in the Public Sector: Reform of the Intermediaries Legislation   | HM Revenue & Customs   | 18/08/2016<br>Link to response |
| 1396             | CMA Interim Report on the Legal Services Market<br>Study   | Competition & Markets<br>Authority                                     | 24/08/2016<br>Link to response |
| 1435             | Independent Examination of Charity Accounts: Direction and Guidance for Examiners  | Charity Commission   | 05/09/2016<br>Link to response |
| 1436             | Reporting Matters of Material Significance to a UK<br>Charity Regulator  | Charity Regulators in Scotland,<br>England & Wales & NI                | 05/09/2016<br>Link to response |
| 1392             | ACCA Response to COSO ERM Consultation<br>Comment on Review and Update of the Enterprise<br>Risk Management – Integrated Framework | Committee of Sponsoring<br>Organizations of the Treadway<br>Commission | 30/09/2016<br>Link to response |
| 1414             | Strengthening Tax Avoidance Sanctions and Deterrents   | HM Revenue & Customs   | 13/10/2016<br>Link to response |
| 1437             | ACCA Response to FASB Agenda Consultation<br>Invitation to Comment for Feedback about the<br>FASB Agenda                           | Financial Accounting Standards<br>Board                                | 17/10/2016<br>Link to response |
| 1418             | HMRC Consultation on Tackling Offshore Tax<br>Evasion: A Requirement to Correct  | HM Revenue & Customs   | 18/10/2016<br>Link to response |
| 1421             | HMRC Consultation on Tackling the Hidden<br>Economy – Conditionality   | HM Revenue & Customs   | 21/10/2016<br>Link to response |
| 1422             | HMRC Consultation on Tackling the Hidden<br>Economy – Extension of Data-Gathering Powers   | HM Revenue & Customs   | 21/10/2016<br>Link to response |
| 1423             | HMRC Consultation on Tackling the Hidden<br>Economy – Sanctions  | HM Revenue & Customs   | 21/10/2016<br>Link to response |
| 1454             | BIS Select Committee Corporate Governance<br>Inquiry   | Business, Innovation and Skills<br>Select Committee                    | 26/10/2016<br>Link to response |
| 1440             | Public Consultation on Liability of Legal Persons:<br>Issues for Discussion  | Organisation for Economic<br>Co-operation & Development                | 28/10/2016<br>Input via BIAC   |
| 1457             | FRC Consultation on FRS102 Implementation Issues   | Financial Reporting Council  | 28/10/2016<br>Link to response |
| 1458             | IASB Definition of a Business and Accounting for Previously Held Interests   | International Accounting<br>Standards Board                            | 31/10/2016<br>Link to response |
| 1428             | ACCA Response to HMRC Consultation on Making<br>Tax Digital  | HM Revenue & Customs   | 07/11/2016<br>Link to response |

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|------------------|--|---|---------------------------------------|
| 1429             | Making Tax Digital: Tax Administration   | HM Revenue & Customs  | 07/11/2016<br>Link to response        |
| 1430             | Making Tax Digital: Voluntary Pay As You Go  | HM Revenue & Customs  | 07/11/2016<br><b>Link to response</b> |
| 1431             | Business Income Tax: Simplified Cash Basis for<br>Unincorporated Property Businesses   | HM Revenue & Customs  | 07/11/2016<br>Link to response        |
| 1432             | Business Income Tax: Simplifying Tax for<br>Unincorporated Businesses  | HM Revenue & Customs  | 07/11/2016<br>Link to response        |
| 1433             | Making Tax Digital: Transforming the Tax System through the Better Use of Information  | HM Revenue & Customs  | 07/11/2016<br>Link to response        |
| 1438             | Response to HM Treasury Consultation on the<br>Transposition of the Fourth Money Laundering<br>Directive   | HM Treasury   | 14/11/2016<br>Link to response        |
| 1383             | Proposed Enhancements to the Decision-making and Governance Structure for Listing Regulation of the Stock Exchange of Hong Kong Limited (Exchange) | Hong Kong Stock Exchange /<br>Securities & Futures Commission             | 18/11/2016                            |
| 1404             | Internal Market: Single Digital Gateway  | European Commission   | 21/11/2016<br>Input via UEAPME        |
| 1456             | The Future Auditing Framework for Ireland  | Irish Auditing and Accounting<br>Supervisory Authority                    | 28/11/2016<br>Link to response        |
| 1405             | 2017–2019 PIOB Strategy  | Public Interest Oversight Board   | 02/12/2016<br>Link to response        |
| 1475             | Treasury Committee Inquiry into the Autumn<br>Statement Delivered by the Chancellor of the<br>Exchequer on Wednesday 23 November 2016              | HM Treasury   | 08/12/2016                            |
| 1459             | Research Exercise on Charities SORP (FRS 102)  | Charity Commission and the<br>Office of The Scottish Charity<br>Regulator | 09/12/2016<br>Link to response        |
| 1467             | Third Country Auditors Deregistration Procedures   | Financial Reporting Council   | 16/12/2016<br>Link to response        |
| 1473             | Bonding Arrangements for Insolvency Practitioners  | The Insolvency Service  | 16/12/2016<br>Link to response        |
| 1481             | Simplification of the Corporation Tax Computation  | Office of Tax Simplification  | 23/12/2016<br>Link to response        |
| 1443             | Consultation: Triennial review of UK and Ireland<br>Accounting Standards – Approach to Changes in<br>IFRS  | Financial Reporting Council   | 30/12/2016<br>Link to response        |
| 1384             | Budget Submission 2017/18  | Financial Services and the<br>Treasury Bureau, Hong Kong                  | 31/12/2016                            |
| 1385             | Consultation Paper on Measures to Counter Base<br>Erosion and Profit Sharing   | Financial Services and the<br>Treasury Bureau, Hong Kong                  | 31/12/2016                            |