



THE INSTITUTE  
OF CHARTERED  
ACCOUNTANTS  
IN ENGLAND AND WALES

22 September 2009

Our ref: ICAEW Rep 104/09

Matthew Cowie  
Savings and Investments  
HM Treasury  
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Dear Mr Cowie

### **Consultation on Introducing a Protected Cell Regime for OEICs**

The Institute of Chartered Accountants in England and Wales (the Institute) welcomes the opportunity to comment on the paper *Consultation on Introducing a Protected Cell Regime for OEICs* published by the Financial Services Authority and HM Treasury in July 2009.

The Institute operates under a Royal Charter, working in the public interest. Its regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the Financial Reporting Council. As a world leading professional accountancy body, the Institute provides leadership and practical support to over 132,000 members in more than 160 countries, working with governments, regulators and industry in order to ensure the highest standards are maintained. The Institute is a founding member of the Global Accounting Alliance with over 775,000 members worldwide.

We support the proposals, which will in our view further reduce any risk of contagion between sub-funds under the same umbrella. However, the paper doesn't seem to address whether aggregate accounts provide useful information for Open-Ended Investment Companies (OEICs). We think that they may not, as OEICs are not invested in as a single entity, and recommend that further consideration be given to the matter. In particular, it may be useful to review the requirements currently in statutory instrument 2001 No. 1228, The Open-Ended Investment Companies Regulations 2001, regulation 66 along with the Financial Services Authority's rules in Collective Investment Schemes (COLL 4.5.7). Please contact me should you wish to discuss any of the points raised in this response.

Yours sincerely

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