

Invitation to Comment on Exposure Draft Charities SORP

Do you consent to personal data you provide being held, in accordance with UK GDPR and the Privacy Policy of the Charities SORP making body and its delegated parties? If you select 'no' your name and email address will not be stored, but your organisational data (if relevant) and all consultation responses will be collected.

Yes

Name:

Chris Jones

Email address:

[REDACTED]

Role (for example, Chair, Trustee, Accountant, Treasurer etc):

professional body volunteer

Are you happy for the SORP-making body to contact you if needed to discuss your responses?

Yes

Do you want your response to be treated confidentially by the SORP-making body and not published?

No

Are you responding:

As an individual

Responding on behalf of an organisation/body

If responding on behalf of an organisation or body, please provide its name :

No Response

Please select what best describes the organisation:

No Response

A charity applying FRS 102 and the Charities SORP

What was the last reported gross income as set out in the charity's last annual accounts?

No Response

A user of accounts prepared under FRS 102 and the Charities SORP

In which capacity were you using accounts prepared under FRS102 and the Charities SORP?

No Response

An accounting firm / auditor

How many charity clients do you supply your services to?

No Response

An accounting firm providing independent examination services to charities

How many charity clients do you supply your service to?

No Response

A sector body

How many member charities does your organisation have?

No Response

Responding as an individual

Which of the following describes you?

Other (please specify):
volunteer

Question 1: Do you support the move to three tiers?

Yes

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 2: Do you consider that the proposed thresholds have been set at an appropriate monetary level in order to support a proportionate approach to reporting?

Yes

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 3: Do you agree that the Exposure Draft SORP clearly sets out the proposed reporting requirements for each tier?

No

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

As I understand it, there are a variety of charitable forms that need to use Charities SORP, for example Mutuals with charitable functions, Industrial & Provident Societies with charitable functions, Charitable Companies, Registered Charities.

However, the different REGULATORS and REGULATORY FRAMEWORKS are sometimes not immediately obvious in Accounts I've reviewed.

The potential confusion could be easily avoided.

There should be a clear statement in the Auditor's Report of WHICH BODY REGULATES the organisation, I think this is sometimes the Financial Conduct Authority, sometimes the Charity Commission, and sometimes they may be subject to the Companies Act.

A clear statement would be welcome.

Question 4: Do you agree that charities within the largest income threshold should be referred to as 'tier 3' charities, or should they be referred to as 'tier 1' charities?

Disagree – should be referred as tier 1

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 5: Do you have any additional comments in relation to the proposed tiered reporting structure in the Exposure Draft SORP?

No Response

Question 6: Do you agree that including prompt questions will help trustees to develop their Trustees' Annual Report?

Yes

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

.1.26: ADDITIONAL QUESTIONS FOR MEMBERSHIP SUBSCRIPTION CHARITIES

Question (a): Where the charity charges membership subscriptions and/or membership approval and/or membership award and/or membership licensing fees, and has included any proportion of its membership administration costs as part of its charitable expenditure, please explain how the cost proportion directly contributes to its charitable activities ?

Question (b): Does the charity offer any memberships free of charge, and what distinguishes membership of the charity as a relationship based upon donations towards funding a range of charitable activities which are readily available to the public, versus a membership service and/or resources which are exclusive or largely confined to supporting the charity's members ?

Question 7: Do you consider the requirements for impact reporting for each tier to be proportionate?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

See suggested additional questions

Question 8: Do you consider the requirements for sustainability reporting for each tier to be proportionate?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 9: Do you consider the disclosures for volunteers to be proportionate?

No

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 10: Do you consider the explanation of reserves in the glossary helpful?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 11: Do you consider the disclosures for reserves are proportionate?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 12: Do you consider the requirement for tier 1 charities to provide a summary of their plans for the future is proportionate?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 13: Do you consider that the additional disclosure will help to explain the treatment of legacies in the accounts?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 14: Do you have any other comments on module 1 and the proposals for the Trustees' Annual Report?

No Response

Question 15: Is the example table helpful?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 16: Do you have any other comments on module 4?

No Response

Question 17: Does the module explain the relevant requirements of the five-step model in FRS 102 in a clear and understandable way?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 18: Do you find the module easy to navigate as drafted?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 19: Do you consider that the guidance on exchange and non-exchange transactions should be set out in separate modules of the SORP rather than separate sections of the same module?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 20: In the Exposure Draft SORP, all the disclosure requirements are listed at the end of the module. Would it be clearer instead to set out the relevant disclosures at the end of each section within the module?

Yes

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

RELATED PARTY TRANSACTIONS

I have seen one charity move from "nil" to a long list of Related Party Transactions.

Areas I would highlight:

1. In a charity group, the governing documents may distinguish services to a limited company trading arm from the main charity. This may give the impression that a Related Party Transaction with a trustee does not need to be disclosed if the service was provided by a trustee via the limited company.
2. There can be strong reluctance to name a trustee in a Related Party Transaction, the Accounts only identifying them only as "a trustee" and on occasions the exact SORP wording has needed to be pointed out.

Hence a clear schedule of disclosures might help.

Clarity about disclosures would help.

Question 21: Do you consider this clarification a helpful addition to the SORP?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 22: Does the module set out the accounting requirements for legacy income clearly?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 23: Accounting for legacies can be a complex area for charities to navigate. Is there a need for further guidance on this topic outside of the SORP?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 24: Do you have any other comments on module 5?

No Response

Question 25: Do you find the module easy to navigate as drafted?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 26: Does the module explain the relevant requirements of FRS 102 in a clear and understandable way? Please select all options that apply.

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 27: Does the section (paragraphs 10B.68 to 10B.84) on arrangements that are significantly below market value provide clarity on how to account for such arrangements?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 28: Are the additional disclosure requirements set out in paragraphs 10B.95 and 10B.129 reasonable for charities with such arrangements?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 29 - please provide any other comments you have on module 10B:

No Response

Question 30: Do you agree with the proposal in the Exposure Draft SORP that only tier 1 and tier 2 charities, that do not meet the small entity threshold, and all tier 3 charities are required to prepare a statement of cash flows?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 31: Do you have any other comments on module 14?

No Response

Question 32: Do you agree that the additional disclosures are helpful?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 33: Do you agree that the additional disclosures are proportionate?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 34: Do you have any other comments on module 20?

No Response

Question 35: Do you agree with the new approach to using the generic term 'social investments' instead of referring to 'programme related' and 'mixed motive' investments?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 36: Do you agree that the simplification of how gains and losses on social investments are reported is beneficial?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 37: Is the Exposure Draft SORP clear on the requirements for comparative figures and disclosures?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 38: Do you think there is a need for further guidance on the treatment of comparative figures and disclosures in this area?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 39: Do you have any other comments on module 21?

No Response

Question 40: Do you agree that the drafting, structure and proposals in the Exposure Draft SORP support the needs of smaller charities whilst addressing the needs of users of charity reports and accounts?

No opinion

Please provide any reasons for your answer here, if you wish to do so: (250 word limit applies)

No Response

Question 41: Do you agree with the SORP-making body's decision to continue to disallow the application of Section 1A?

Do not understand the position enough to comment

Please provide reasons for your answer or suggestions on how you think Section 1A could be applied differently: (250 word limit applies)

No Response

Question 42: Do you have any other comments on the Exposure Draft SORP?

1. WHY ISSUE TWO VERSIONS ?

Some charities continue to issue two versions, both entitled as the Annual Report and Financial Statements, which are actually very different in terms of disclosure.

One is a COLOUR ILLUSTRATED VERSION, the other BLACK & WHITE TEXT ONLY.

The attractive, colour-illustrated version is often regarded by charity members as "The Annual Report". It usually includes the trustees' and auditors' full statement of compliance with Charities SORP, unedited, but this cannot be correct.

Whereas the necessary supporting auditors' notes and the necessary SORP disclosures ONLY APPEAR IN THE TEXT VERSION which many members simply don't read.

STATEMENTS OF CHARITIES SORP COMPLIANCE NEED TO RELATE TO THE DOCUMENT IN QUESTION, not a family of seemingly-interchangeable documents which gain different levels of interest and exposure.

2. VERSION CONTROL?

On occasions and when requested, a charity has needed to add to the (Related Party Transaction) disclosures required by the SORP.

In one case, the auditors and charity properly agreed to withdraw the Annual Report & Financial Statements, amend the document, get it signed again and then disclose which page had been amended.

However, another SORP compliance issue arose. It was raised with the auditors during the stipulated period for members' review of the Annual Report & Financial Statements, without announcement the charity substituted a new version of the Annual Report & Financial Statements online. The new version could only be distinguished by a very subtle change in the file name, plus a revised signature date. The amendment was not marked in the document, and not recorded anywhere in the document.

There needs to be CLEAR VERSION CONTROL for Annual Reports & Financial Statements, shown on the front page.