

# Minutes

**Board** Charities SORP Committee

**Date** 12 July 2023

**Time** 10:00 – 13:00

**Venue** Microsoft Teams

---

Joint Chair	Laura Anderson Amie Woods	<i>Office of the Scottish Charity Regulator (OSCR)</i> <i>Charity Commission for England and Wales (CCEW)</i>
Members present	Michael Brougham Daniel Chan Tom Connaughton Diarmaid Ó Corrbuí Noel Hyndman Francesca de Munnich Joanna Pittman Carol Rudge Jenny Simpson Neal Trup	<i>Independent Examiner</i> <i>PwC</i> <i>The Rehab Group</i> <i>Carmichael Centre for Voluntary Groups</i> <i>Queen's University Belfast</i> <i>Association of Charitable Foundations</i> <i>Sayer Vincent</i> <i>HW Fisher</i> <i>Neal Howard Limited</i>
In attendance	Alison Bonathan Helen Bryden Steven Cain	<i>CIPFA, Secretariat to the SORP Committee</i> <i>CIPFA, Secretariat to the SORP Committee</i> <i>CIPFA, Secretariat to the SORP Committee</i>
Observers	Deirdre O'Dwyer Jelena Griscenko Adrian Wallis	<i>Charity Commission for England and Wales (CCEW)</i> <i>The Charities Regulator in Ireland</i> <i>Financial Reporting Council (FRC)</i>

Apologies	Caron Bradshaw	<i>Charity Finance Group</i>
	Tony Clarke	<i>Clarke &amp; Co Accountants</i>
	Tim Hencher	<i>Scottish Council for Voluntary Organisations</i>
	Gareth Hughes	<i>Diocese of Down and Connor</i>
	Rossa Keown	<i>Charity Commission for Northern Ireland (CCNI)</i>
	Sarah Sheen	<i>CIPFA, Contract Manager</i>

- 1. Welcome, apologies for absences and declarations of interest** **Action**
- 1.1 The Chair welcomed SORP Committee Members to the meeting.
- 1.2 Declarations of interest**
- 1.3 The Chair noted four standing declarations of interest:
- Daniel Chan sits on the CIPFA Charities and Public Benefit Entities Board.
- Caron Bradshaw is a Country Champion for the IFR4NPO project.
- CIPFA works with Humentum on the IFR4NPO project.
- Sarah Sheen is Secretary to the CIPFA Charities and Public Benefit Entities Faculty Forum.
- No additional declarations of interest were noted.
- 2. Paper 1 – Minutes of the Meeting of 22 February 2023**
- 2.1 Minor amendments were noted. Otherwise, the minutes were accepted as an accurate record of the meeting held on 22 February 2023.
- 3. Paper 2 - Minutes of the Meeting of 27 March 2023**
- 3.1 A minor amendment was noted. Otherwise, the minutes were accepted as an accurate record of the meeting held on 27 March 2023.
- The Chair thanked the Charities SORP Committee for its work in supporting the development of the joint SORP-making body's response to FRED 82 *Draft amendments to FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland and other FRSs Periodic Review (the FRED)*.
- 4. Paper 3 – SORP drafting – Approach to Tiers for SORP Drafting Process**
- 4.1 The Chair introduced paper 3 noting that the paper was presented by the joint SORP-making body (SMB) rather than CIPFA as indicated on the meeting agenda.
- 4.2 The Chair reflected that:
- a decision is needed on the number of tiers and the thresholds for the tiers.
  - consensus has not been reached in committee meetings on the appropriate thresholds for the tiers.
  - early in the drafting process, it was necessary for the SMB to make working assumptions about the number of tiers and thresholds for the tiers.

- work related to finalising decisions on tiers was paused while the SMB and the Charities SORP Committee reviewed the content of the FRED, as the FRED may have allowed for flexibility with respect to reporting requirements, in particular for small charities.

The Chair noted that Appendix C to Section 1A of the FRED (*Disclosure requirements for small entities in the UK*), which sets out the minimum disclosures required for financial statements to give a true and fair view, allows for the removal of very few disclosure requirements. The SMB is of the view that providing guidance to allow small charities to apply section 1A would lead to additional complexity in the SORP, and that this will outweigh the potential benefits of reducing disclosure requirements for small charities where section 1A permits.

The Chair advised that the SMB has reviewed disclosure requirements that are required by the SORP rather than by FRS 102 to determine whether any requirements could be removed for charities in tier 1. However, the SMB has decided that these requirements are crucial for transparency and good stewardship irrespective of the size of charity and therefore cannot be removed for charities in tier 1.

The SMB has therefore decided that, on the basis of information available at the time of writing paper 3, the SORP will be written for three tiers of charity with the thresholds as follows:

- Tier 1: charities with not more than £500k gross income.
- Tier 2: charities falling between the tier 1 threshold for gross income and the higher threshold of £10.2m.
- Tier 3: charities with gross income higher than the £10.2m threshold.

The Chair noted that the SMB will review FRS 102 when it is available in its final form to determine whether any amendments to the requirements as set out in the FRED will allow flexibility to reduce disclosure requirements for charities in tier 1, and reflected that the greatest opportunity for tiered reporting requirements is in narrative reporting.

The Chair invited views on paper 1, including the additional paragraph proposed for inclusion in the SORP (Appendix 1) and the summary of tiered reporting decisions to date (Appendix 2).

- 4.3 A Committee Member noted that FRS 102 limits the extent to which the SMB can alter reporting requirements for smaller charities and commented that a charity-specific standard is needed as a long-term solution.

With reference to the proposed thresholds for tiers, the Committee Member expressed the view that if an inflationary increase was applied to the current threshold for smaller charities of £500,000, the threshold would be taken to £1m, therefore it may be inappropriate to retain the £500,000 threshold. The Committee Member added that approximately 12,500 charities would fall within tier 2 as defined in paper 3, with most of these charities at the lower end of the tier. The Committee Member expressed the view that the difference between charities with income of £1.1m and £10m is the scale of the charity, whereas the difference between charities with income of £600,000 and £10m is related to the capacity and governance structures of the charities rather than scale, and that these differences are important when determining the thresholds. Another Committee Member agreed with these comments.

4.4 A Committee Member expressed the view that the SMB's proposals are pragmatic and sensible. Referring to Appendix 1, the Committee Member suggested increasing the prominence of the proposed additional paragraph. The Committee Member commented that the different tiers could cause confusion so the SORP text on the tiers should sit higher within the section on 'How to use the modular SORP'. Two other Committee Members expressed agreement with this suggestion.

4.5 A Committee Member expressed the view that if the idea of including a time period to allow for transitions between tiers over two years to avoid charities with income close to a threshold from changing tier every year was considered too complex, this needs to be communicated clearly in the SORP. The Committee Member commented that it would be against the principle of tiered reporting if charities close to a threshold adopt the requirements of the higher threshold every year for simplicity.

The Chair confirmed that a 'two-year rule' (or similar) was not being proposed, noting that regulatory requirements are based on a 'one-year rule' therefore the proposals for the SORP align with regulatory requirements which is likely to avoid potential for confusion.

4.6 The Chair noted that the SMB was candid in its response to the FRED that the current reporting requirements created difficulties for some charities, in particular smaller charities. The Chair commented that the SMB is considering how to approach this issue with the FRC.

A Committee Member expressed the view that serious thought is needed about the framework for smaller charities as there is a risk that trustees are overly reliant on the views of professional advisors leading them to sign off on documentation that they don't fully understand. The Committee Member expressed support for work towards a longer-term solution that reduced regulatory requirements for smaller charities.

The Chair added that constraints can come from regulations beyond the FRC's remit but noted that if charity regulators change regulations in their own jurisdictions, this could increase complexity.

4.7 The Chair encouraged Committee Members to send any additional comments to CIPFA and/or the SMB if they had further feedback after the meeting.

## **5. Paper 4 – SORP drafting – plans for the remaining modules**

5.1 Introducing paper 4, the Chair reflected on the new process for SORP development. The Chair commented that the SMB entered the process understanding that it would be important to learn and be agile. The Chair expressed the view that drafting has been challenging for the Committee, the SMB and the Secretariat due to the nature of the detailed technical papers being developed and discussed. Further the need to pause SORP drafting to develop a response to the FRED has caused further time pressures.

The Chair stated that the Committee and the SMB need continue to work on the assumption that the effective date of FRS 102 will be 1 January 2025, therefore there is a need to work at pace to produce the draft SORP and obtain approval from the FRC to allow the consultation on the SORP to take place in Spring 2024. The Chair commented that there is a need to provide the sector sufficient time to understand the new SORP before its effective date.

The Chair reflected that the process so far has provided time for discussion of the 15 topics identified during the reflection and problem-solving stage of the process, and that the Committee's positive engagement with discussions has helped shape the modules that have been drafted so far.

The Chair expressed the view that less discussion is expected to be required during drafting of the remaining modules as they do not relate to the 15 topics identified for particular attention therefore the work on the remaining modules will primarily involve 'tidying up', for example ensuring consistent use of language across the SORP. The SMB anticipates there will be a reduced need for detailed committee papers and module-by-module discussion of the remaining modules, therefore meaning fewer meetings will be necessary.

The Chair noted the proposal of the SMB, i.e. that review and discussion of the remaining modules will mainly be conducted through correspondence and, where necessary, working groups at which CIPFA may be present but the SMB may not be. The intention behind this proposal is to help ensure the most effective use of resources.

The Chair commented that there is a need for the Committee to review the draft SORP as a whole and noted that the SMB is currently considering how this review will be facilitated, including the need for meetings.

The Chair invited comments on paper 4.

- 5.2 A Committee Member referred to the governance process and commented on the need for communication with the Engagement Strands, for example by clarifying expected engagement levels.

The Chair responded that the SMB has written to Engagement Strand Convenors to provide updates and to inform them that Engagement Strands would be invited to provide further comments and feedback if required during drafting, for example, if they have specialist expertise on a certain topic. The Chair agreed that communication is important.

- 5.3 A Committee Member expressed the view that there is a risk that regulators have too much power over the drafting process if voices beyond the SMB are not prominent in discussions and review of the draft SORP. The Committee Member expressed the need for caution when trying to condense the drafting process as the initial governance review identified issues around who has a voice in the process.

The Committee Member noted scepticism over the likelihood of an effective date of 1 January 2025 for FRS 102.

The Chair accepted the observation regarding the SMB as regulators but noted the difference between the charities sector and other sectors where there is a SORP. Organisations in the charities sector are not homogenous and the regulators are able to take a view across the totality of the sector.

The Chair acknowledged the Committee Member's note of caution and reiterated that the way forward for the SORP drafting process will take the Committee's views into account. The Chair noted that the SMB's response to the FRED consultation demonstrates its commitment to a reporting framework that better accommodates the needs of charities.

- 5.4 A Committee Member expressed the view that conducting discussions and providing advice by correspondence is difficult and commented that review by correspondence risks devaluing the contribution of Committee Members as previous discussions have involved participants with technical backgrounds and therefore the discussions have added value to the outcomes.

The Chair responded that the SMB would continue to review how the process is working and that meetings will be held where it is felt they are needed.

- 5.5 A Committee Member expressed the view that the SMB may conclude that a discussion on a certain topic is unnecessary, but that the SORP Committee would have concluded differently, i.e. that a discussion would be beneficial. The Committee Member commented that there is a risk of a reduction in diversity of thought if the SORP Committee's advice is provided by correspondence.

The Chair reiterated that the SMB is not expecting any major changes to the remaining modules of the SORP and stated that the SMB is of the view that if there are any major issues with the remaining modules, this would have been identified at the problem-solving stage and included in the topics that the Charities SORP Committee has already discussed.

- 5.6 A Committee Member expressed concern at the potential volume of email traffic if all SORP Committee Members were cc'd on other Committee Members' responses to requests for advice. The Committee Member suggested it would be preferable for Committee Members to send responses to a central point for responses to be analysed and the need for a meeting identified. The Committee Member also highlighted the need for a more detailed timetable to be produced as Committee Members will need to set aside time to review and provide feedback on any documentation that is circulated.

The Chair agreed with the need for a more detailed timetable and advised that the SMB and CIPFA are working on this.

- 5.7 A Committee Member reiterated concerns over future work with Engagement Strands and that opportunities for learning will be lost if advice is provided through correspondence rather than at meetings. The Committee Member expressed the view that discussions in the meetings are leading to improvements in the SORP. The Committee Member noted that the Committee has not yet returned to all the points that have been 'parked' earlier in the process, for example recognition of income from legacies, therefore it is disappointing that the process is now expected to be about 'tidying up' the SORP.

The Chair responded that any items previously 'parked' will be returned to and noted that the SMB will continue reflecting on discussions held to date. The Chair acknowledged that discussions allow Committee Members to develop their thoughts in light of other Committee Members' points.

- 5.8 A Committee Member noted that it will be unlikely that people will be able to join working groups at short notice and suggested holding time in Committee Members' diaries.

- 5.9 The Chair assured Committee Members that the SMB does value the advice and input it receives from the SORP Committee, and commented that plans to reshape the process are to ensure that a good SORP that represents an improvement on the existing SORP is produced on a timely basis. The Chair stressed that the plans are not about losing input from the SORP Committee, as the input is valuable. The Chair reiterated that the timetable the SMB is working within is tight and that the plans are about achieving the shared aims of the SMB and the SORP Committee.

A Committee Member expressed understanding that the SORP Committee's contributions are valued, but also disappointment that the Committee may not be able to make the contribution that Members expected to make. The Committee Member noted that the effective date of FRS 102 has been known for a while.

Another Committee Member echoed these comments and noted that the Committee and the SMB should not lose sight of what the group set out to achieve. The Committee Member expressed the view that the Committee needs to be able to 'stand

behind' the SORP that is produced and challenged the group to consider whether it had been ambitious enough.

Another Committee Member agreed it was disappointing that email correspondence will replace meetings, as the meetings have been insightful.

- 5.10 The Chair thanked the Committee for its comments and stated that the SMB will reflect on the discussion.

## **6. Paper 5 – SORP drafting – Presentation of financial statements**

- 6.1 The Chair invited CIPFA to introduce questions 1 and 2 from paper 5.

*A full list of questions from paper 5 is available below in Annex 1.*

A Committee Member expressed the view that the additional glossary content as suggested for the glossary explanation of "capital" risks creating confusion, and that it would be preferable to clarify in the glossary that references to capital in the context of fund accounting are to the legal understanding of capital.

The Chair agreed that the SMB and Secretariat would reflect on the feedback and make further amendments to the suggested explanation of "capital".

- 6.2 A Committee Member expressed the view that paragraph 2.9 should not be removed from the module. The Secretariat clarified that the intention is not to remove paragraph 2.9; rather, the Secretariat is liaising with the SMB to determine whether paragraph 2.9 should refer to "specific" or "special" trusts. The Chair commented that legal advice is being considered to ensure the terminology used in the SORP is both accurate and consistently applied.

- 6.3 The Chair invited the Secretariat to introduce question 3 from paper 5.

No comments were made by Committee Members, which the Chair understood to indicate agreement with the proposals to reflect the possibility that charities may cover a shortfall on a restricted fund via a transfer from general funds.

- 6.4 The Chair invited the Secretariat to introduce question 4 from paper 5.

A Committee Member commented that they had suggested re-ordering the disclosure table to position unrestricted funds at the top and endowment funds at the bottom to follow the order of columns in the Statement of Financial Activity (SoFA). Another Committee Member expressed agreement with this suggestion.

The Secretariat noted that the disclosure table follows the order of funds as presented on the balance sheet and asked if, should the Committee support reordering the funds disclosure table as suggested, it would also support reordering the funds on the balance sheet to follow the order of the columns on the SoFA.

One Committee Member expressed the view that they would be content to reorder the funds on the balance sheet to follow the presentation on the SoFA. However, another Committee Member expressed a preference for the funds disclosure table to remain as it is currently presented, as the template presents general funds as a 'residual'. The Committee Member commented that unrestricted funds are more important than restricted funds when reading a charity's accounts, therefore it is appropriate to present them first on the SoFA, but expressed the view that unrestricted funds are more 'visible' if presented at the bottom of the balance sheet rather than between other line items.

A Committee Member agreed with the proposal to leave the disclosure table as it is currently presented, expressing the view that it is important for the disclosure to match the presentation of the balance sheet. However, two more Committee Members

agreed with the suggestion to reorder both the disclosure table and the balance sheet, as trustees are most interested in unrestricted funds.

The Chair noted that most charities do not have restricted funds.

While noting the absence of a firm conclusion, the Chair acknowledged the range of views in the Committee and concluded that the Secretariat and SMB will reflect on these views.

6.5 The Chair invited the Secretariat to introduce question 5 of paper 5.

A Committee Member questioned whether it is confusing to discuss income and expenses in the same place, and asked whether then glossary explanation should make clear that charities can use their own headings for expenses.

The Chair expressed the view that the explanation of natural classification of income is currently less helpful than the corresponding explanation of expenses, which provides examples of expense categories that a charity adopting natural classification might use.

A Committee Member suggested that the glossary should refer to natural classification of income and expenses. However, the Secretariat clarified that as accounting standards generally do not refer to classification of income by nature, it is difficult to provide a SORP definition of natural classification of income that is grounded in accounting standards; this is not the case for natural classification of expenses as accounting standards do refer to classification of expenses by nature.

A Committee Member expressed the view that the guidance on natural classification of expenses is helpful and should remain in the SORP.

A Committee Member suggesting framing the explanation of classification of income as either 'by activity' or 'by source'.

The Chair concluded that the discussion had provided ideas for the Secretariat and the SMB to consider in improving the explanation and noted that the SORP should help people better understand the requirements for charity accounts.

6.6 The Chair invited the Secretariat to introduce questions 6 and 7 of paper 5.

The Chair confirmed the Committee is content with the proposals to remove 'their expenses' from paragraph 4.5 in accordance with question 6.

A Committee Member suggested an amendment to the wording of paragraph 4.31 to replace "produced" with wording such as "gives rise to" or "gave rise to".

The Chair concluded that the wording of paragraph 4.31 would be amended as suggested.

6.7 The Chair invited the Secretariat to introduce question 8 of paper 5.

A Committee Member commented that the use of bold font to highlight the principal headings in the table reduces opportunity for confusion.

A Committee Member suggested that one of the line items could be amended to read "additional" rather than "other". The Secretariat noted that making the suggested change would require further, consequential amendments to the SORP. Another Committee Member expressed concern, as amending the wording as suggested may adversely affect consistency across the SORP. The Committee Member questioned whether the suggested amendment would reduce confusion and noted that "other" is more commonly used in accounting.



A Committee Member questioned whether the bold text is sufficient to avoid confusion, as a change in wording may no longer be necessary. The Chair confirmed with the Committee that the bold text is sufficient to avoid confusion and that there were no residual concerns with either table 2a or table 2b.

The Chair confirmed that there was no need to discuss question 10 given the decisions reached on questions 8 and 9.

6.8 The Chair invited the Secretariat to introduce question 11 of paper 5.

A Committee Member noted that “gift” is still used in paragraph 4.35. The Secretariat responded that consideration had been given to removing this use of “gift” for consistency, but that it was considered helpful in this case. The Secretariat noted that “gift” can have different meanings, for example as a verb or as a noun, therefore each use of “gift” in the SORP had been considered separately. A Committee Member noted that changing “gift” to, for example “donation/legacy” in paragraph 4.35 would not make sense. The Chair concluded that the use of “gift” in paragraph 4.35 helps SORP users understand the substance of the transaction and does not need to be amended.

6.9 The Chair noted the final point in the table in paper 5 regarding the use of the word ‘permanent’ endowment.

6.10 The Chair invited comments on any other aspect of modules 2 and 4 relating to the presentation of financial statements.

A Committee Member requested that the first sentence of paragraph 4.3 should be deleted. The Committee Member noted that this sentence appears due to an error in the 2015 SORP and expressed the view that as the information is in paragraph 3.49, it should either be deleted from paragraph 4.3 or be repeated throughout the SORP to ensure consistency with paragraph 4.3. The Committee Member noted that this point has been raised before. The Secretariat agreed that the point had been raised before, but that it was not clear whether the Committee supported deleting the sentence as advised. The Secretariat agreed to review minutes from previous meetings to allow reflection on earlier discussion before discussing the point with the SMB.

6.11 A Committee Member noted that the suggested line item heading of “charitable activity” in table 2a (which is a template for charities using natural classification) is unhelpful. The Committee Member suggested replacing this heading with other types of income, e.g. donations, grants or contracts.

The Chair confirmed that the Committee would support such an amendment. A Committee Member suggested including line item headings from the OSCR receipts and payments work pack in table 2a in place of “charitable activity”.

6.12 A Committee Member questioned whether “fundraising costs” in paragraph 4.50 should refer to including a share of fundraising costs.

The Chair agreed that it seems remiss to not mention a share of fundraising costs in paragraph 4.50, as such mention is made in paragraph 4.58, and agreed that paragraph 4.50 should be amended as suggested.

6.13 The Secretariat advised the Committee that the Secretary had spoken to a Committee Member about suggested amendments before this meeting, but that the suggested amendments have not yet been reflected in the SORP. The Secretariat will reflect on the required amendments and update the SMB to ensure any amendments made are suitable. The Secretariat thanked the Committee Member for assisting in this respect.

## **7. FRC update**

- 7.1 The Chair invited FRC to present a verbal update on FRS102. The FRC confirmed that on 11 July 2023 [amendments to FRS102 International tax reform – Pillar Two model rules](#) had been published on its website. The changes on deferred taxes are unlikely to be relevant to small charities but might be relevant to larger charities with trading subsidiaries.
- 7.2 The FRC confirmed that the consultation on FRED 82 had closed at the end of April with 54 responses and thanked the joint SORP-making body for its response following the advice from the Committee. All responses are available on the FRC website and there were some key themes:
- There was support for the five-step revenue recognition model.
  - Concerns were raised about on balance sheet accounting for leases, particularly for small entities (including charities) especially where entities were not able to apply the micro-entities reporting requirements.
  - There was some hesitancy on effective date.

The FRC are now giving all comments appropriate consideration and may conduct further outreach work.

FRC noted that there was a wide range of comments on other areas of the proposals such as those for public benefit entities.

- 7.3 The FRC confirmed that the intention is to retain the original timetable but noted there was a possibility that the amended FRS 102 might be published next year which would have an impact on the effective date.
- 7.4 The Chair thanked the FRC for their update and enquired when a decision would be made on the timeline. The FRC confirmed that there is no decision yet, but they are aware of the needs of SORP Making Bodies.

A Committee Member commented on that their experience was that effective dates were regularly amended. The Committee Member commented that discussion earlier in the meeting on compressing our timetable may not be needed.

Another Committee Member asked the FRC if the date could move to any calendar date, or it would always be the first of January. The FRC confirmed it would always be first of January.

The Chair commented that the consultation responses needed careful consideration.

## **8. Any other business including future Committee meetings**

### **8.1 Future meetings**

- 20<sup>th</sup> September 2023 (10am – 1pm)

- 8.2 The Chair congratulated Daniel Chain on the award of their MBE.

- 8.3 A Committee Member raised a question on the SORP Microsite regarding progress on updates. The Chair confirmed that work was ongoing and that they were aware that updates were needed. The Chair requested that if Committee Members received any queries on the microsite to forward them to her.

- 8.4 The Chair noted that it was Alison Bonathan's last meeting as the Secretary to the Committee and thanked her for her contributions to the work of the Committee.

*Disclaimer*

*These Charities SORP Committee minutes have been developed during the drafting stage of the Charities SORP. They set out areas of agreement or otherwise and present the Charities SORP Committee advice to the joint SORP-making body. Charities should not treat this advice as being definitive for the production of the Charities SORP FRS 102 (Third Edition) which will be subject to due process including a detailed consultation.*

**ANNEX 1**

**Summary of questions from Paper 5 on Modules 2 and 4 – Fund Accounting and Statement of Financial Activities**

<b>Summary</b>	<b>Questions</b>
Module 2 – Discussion on the use and explanation of “capital” in the SORP	1. Is the Committee content with proposed explanation of “capital” alongside paragraph 2.4? If not, what further amendments would the Committee recommend?
Module 2 – Removal of the word ‘capital’ where references might be confusing (amendments to paragraphs 2.17 and 2.19)	2. Is the Committee content with the amendments to the SORP to remove potentially confusing references to “capital”?
Module 2 – Paragraph 2.16 has been amended to reflect the possibility that charities may cover a shortfall on a restricted fund via a transfer from general funds.	3. Is the Committee content with proposed amendment to paragraph 2.16?
Module 2 – Revisions to Outline summary of fund movements Table	4. Is the Committee content with the table in Module 2 as revised?
Module 4/Glossary – explanation of “natural classification”	5. Is the Committee content with the proposed explanation of “natural classification” for inclusion in the glossary? If not, what further amendments would the Committee recommend?
Module 4 – Paragraph 4.5	6. Is the Committee content with the proposed deletion of “their expenses” from paragraph 4.5?
Module 4 – Paragraph 4.31 relating to activity basis of reporting	7. Is the Committee content with the proposed wording of paragraph 4.31?
Module 4 - Presentation of Other recognised gains/(losses) in table 2a	8. Does the Charities SORP Committee remain concerned that there is potential for confusion in the “Other recognised gains/(losses)” section of Table 2a? 9. If so, is the Committee similarly concerned that there is the potential for confusion in Table 2b? 10. If the Committee is of the view that amendments are required to avoid confusion in Table 2a (and possibly Table 2b), what amendments do the Committee recommend?
Module 4 – Removal of the word ‘gift’ from the relevant paragraphs	11. Is the Committee content with the proposed amendments to paragraphs 4.36 and 4.47?