



Ms Melanie McLaren
Financial Reporting Council
8th Floor
125 London Wall
LONDON
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8 December 2015

Dear Melanie,

Consultation on proposed new XBRL Charity Accounts taxonomy

Thank you for the opportunity to respond to this consultation. We are grateful for our engagement with you throughout the drafting process. This letter represents the views of PricewaterhouseCoopers LLP, the UK member firm of the PwC network, and is not intended to represent the views of our clients.

We think that the proposed extension to the existing taxonomies to enable better XBRL tagging of financial statements that apply the Charities SORP is a welcome development that we support. We note that the development of this extension enables other regulators, including the Charities Commission and HMRC to consider the extent that they might, in future, permit or require XBRL to be used in connection with their activities. Such considerations would be outside the scope of this consultation and accordingly our response does not address the extent of use of the extension taxonomy.

We have provided responses to your specific questions in the appendix to this letter, which we would be pleased to discuss with you in detail. If you would like to discuss our comments please contact Jon Rowden on 0207 212 4494, or jon.c.rowden@uk.pwc.com

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jon Rowden'.

Jon Rowden

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Appendix

1. Does the content of the draft taxonomy accurately reflect expected reporting under the relevant standard - FRS 102 and the Charity SORP (FRS 102)?

The content of the draft taxonomy seems an appropriate way to reflect the expected approach to presentation and disclosure that will be taken by users of the new Charities SORP.

2. In order to be helpful to preparers/users; the draft taxonomy includes tags based on 'should' provisions rather than just 'must' requirements in the SORP. Is the inclusion of these 'should' tags in the taxonomy considered helpful?

Yes, this is helpful.

3. We are particularly interested in views on the following areas. Do you consider the approach taken is appropriate and if not why not? Do you have any suggestions on how the tags could be better structured?

- a. The basis of creating the 'transfer of funds', by way of line items and a dimension.
- b. The content of the Audit and Independent Examiner Report sections
- c. Charitable activities in the Trustees Annual Report, on the face of the SoFA and in the notes to the accounts.
- d. The analysis and allocation of support costs across activities in the notes to the accounts.

The approaches taken seem appropriate.

4. Does the Design Document explain changes to the taxonomy usefully and pertinently? If not, how could it be improved?

Once the taxonomy is approved, it would be appropriate to update the Design Document dated May 2014 to reflect the publication of the Charities taxonomy.

5. What, if any additional materials, would users of the taxonomy value. For example, website examples of how the various parts of the charity accounts could be prepared and /or consistency checklists?

We have not identified any further materials that we would need to enable us to work with the new taxonomy.

6. For Charities that report under different SORPs (FEHE and Registered Providers of Social Housing); is the draft taxonomy sufficient or would such charities desire the development of additional tags?

We do not have a view on this matter.