

Charity Trustees' Report Disclosures Checklist (SORP 2026) – Tier 3

The new Charity SORP has introduced different disclosure requirements based on the size of your charity. They have introduced three 'Tiers' to be proportionate. These new requirements will be relevant for your first accounting period starting on or after 1st January 2026.

The three tiers are

- ★ Tier 1: Income less than £500,000
- ★ Tier 2: Income between £500,000 and £15,000,000
- ★ Tier 3: Income over £15,000,000

The checklists attached are designed to ensure compliance with SORP Tier 3. If you are also a company, there will be additional disclosure requirements that you will also need to make in order to comply with the Companies Act minimum disclosures.

There are then separate carbon reporting requirements for companies that have different thresholds to the Companies Act that need to be considered. A separate section is included on these requirements.

Tier 3 – For those charities with income above £15m

(if consolidated accounts are prepared, the report must include relevant information relating to subsidiaries as well as the parent charity)

Objectives and Activities – Must Include

Summary of the charity's purposes as set out in its governing document	☐
Summary of main activities undertaken in relation to those purposes	☐
Explanation of main activities undertaken to further the charity's purpose for public benefit	☐
Statement confirming trustees have had regard to Charity Commission's guidance on public benefit	☐
Explanation of the scale and nature of activities by different volunteer roles and input from volunteers	☐
Detailed understanding of short- and long-term aims and objectives, and how short-term relate to long-term	☐
Aims and objectives set for the period and performance against them	☐
Significant activities and their contribution to aims	☐
Changes or differences the charity seeks to make	☐
Strategies for achieving aims	☐
Criteria/measures used to assess success	☐
Grant-making and social investment policies (if material)	☐

Objectives and Activities – Should Include

Explanation of activities, projects, or services identified in the accounts (financial information should be consistent with the SOFA and Notes)	☐
Information on the number of general volunteers and explanation of their activities	☐

Objectives and Activities – May Include

Details of volunteer contribution in hours or staff equivalents	☐
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Achievements and Performance – Must Include

Summary of main achievements	☐
Review of how well activities met aims and objectives	☐
Review of investment performance (if material)	☐
Impact of activities on beneficiaries and society	☐
Review of fundraising performance and impact of fundraising expenditure	☐
Explanation of the effect of fundraising expenditure on net return (current and future periods) (if fundraising expenditure is significant)	☐

Achievements and Performance – Should Include

Summary of measures or indicators to assess performance	☐
Explanation of outputs achieved, especially where numerical targets set	☐
Explanation of how activities, outputs, and outcomes contributed to aims and objectives	☐
Significant positive and negative factors affecting achievement of objectives and influence on future plans	☐



Financial Review – Must Include

Review of the charity's financial position at period end (consistent with accounts)	☐
Identification and explanation of any fund or subsidiary undertaking that is materially in deficit and the steps being taken to eliminate the deficit	☐
Explanation of reserves policy, including amount held and reasons for holding reserves	☐
Consistency of reserves figure with accounts, including a reconciliation of reserves to the funds presented in the accounts if these are not the same	☐
Comparison of reserves held with reserves policy	☐
Explanation of planned steps to align reserves with policy (if applicable)	☐
Explanation of designated/committed reserves and likely timing of expenditure	☐
Explanation of going concern if no reserves or negative net assets	☐
Explanation of material uncertainties about going concern (if applicable)	☐
Significant events affecting financial performance/position	☐
Principal sources of income and how spent	☐
Principal risks (including environmental/cyber) and management strategies	☐
Investment policies (where material financial investments are held), including any social, environmental or ethical considerations	☐
Factors likely to affect future financial performance/position	☐

Financial Review – Should Include

Impact of material pension liability or asset	☐
Impact of material legacy income recognised before receipt	☐

Plans for Future Periods – Must Include

Summary of the charity's plans for the future, considering reserves and going concern	☐
Summary of future plans, aims, objectives, and planned activities	☐

Plans for Future Periods – Should Include

Trustees' perspective on future direction, including lessons learned and resource allocation	☐
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Structure, Governance, and Management – Must Include

Nature of governing documents	☐
How the charity is constituted	☐
Methods for recruiting and appointing trustees	☐
Organisational structure (and subsidiaries if relevant)	☐
Policies and procedures for induction and training of trustees	☐
Decision-making arrangements (trustees vs. staff)	☐
Pay and remuneration arrangements for key management, including benchmarks, parameters and criteria used in setting their pay	☐
Impact of wider network affiliations	☐
Relationships with related parties and co-operating organisations	☐

Structure, Governance, and Management – Should Include

Explanation if any other person/body is entitled to appoint trustees (name required)	☐
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Structure, Governance, and Management – May Include

Withhold certain governance/management details if exemption criteria are met	☐
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Reference and Administrative Details – Must Include

Name of the charity	☐
Any other names used	☐
Charity registration number(s) (and company number if applicable)	☐
Address of principal office or contact address (registered office for charitable companies)	☐
Names of all trustees at approval date or during the period	☐
Names of directors of any corporate trustee(s)	☐
Names of trustees holding title to property at approval date or during the period	☐
Name of auditors	☐
Name of CEO or senior management delegated day-to-day management	☐
Names/addresses of other relevant organisations (bankers, advisers, etc.)	☐

Reference and Administration Details – May Include

Withhold certain details if exemption criteria are met ☐

Sustainability – Must Include

Summary of how the charity is responding to and managing environmental, governance, and social matters ☐

Sustainability – Should/May Include

Where to find further sustainability information ☐

Key performance indicators for climate-related risks/opportunities

Details of governance matters (privacy, cyber, business ethics)

Details of social matters (employee engagement, diversity, community support)

Other – Must Disclose (in report or accounts note)

Description of assets held as agent or holding trustee ☐

Name and objects of charities on whose behalf assets are held ☐

Arrangements for safe custody and segregation of such assets ☐

Additional (if subject to audit)

Fundraising disclosures (approach, standards, complaints, protection of vulnerable people) ☐

Consolidated accounts disclosures (if applicable) ☐

Consolidated Accounts (if applicable)

Expand report to include relevant information about subsidiary undertakings ☐

Fundraising

Fundraising approach and use of professional fundraisers	☐
Fundraising standards/regulation schemes subscribed to	☐
Details of any failures to comply with fundraising standards	☐
Monitoring of fundraising activities	☐
Number of complaints about fundraising	☐
Protection of vulnerable people and the public from unreasonable fundraising practices	☐

Charitable Company Supplementary Checklist

Use alongside the relevant tier checklist.

Directors' Report

Approval and signature by a director/secretary	☐
Names of all directors during the year	☐
Disclosure of third-party indemnity provisions for directors/associated companies	☐
Disclosure of political donations/expenditure in the EU (if >£2,000)	☐

Strategic Report (Medium/Large Companies)

Approval and signature by a director/secretary	☐
Fair review of business	☐
Description of principal risks and uncertainties	☐
Analysis using financial and (for large companies) other key performance indicators	☐
Section 172(1) statement (regard for long-term consequences, employees, relationships, community/environment, business conduct, fairness)	☐



Energy and Carbon Reporting

Energy and carbon reporting is a requirement set out in separate legislation for Companies and has a different threshold.

The SECR regulations are required for any company that meets two out of the following three tests:

- ✦ £36m turnover;
- ✦ £18m balance sheet total;
- ✦ More than 250 employees on average.

If you meet these requirements then the disclosure requirements are:

Annual UK energy use (kWh) and associated greenhouse gas emissions (CO2e)	☐
At least one intensity ratio (e.g., emissions per turnover)	☐
Previous year's energy/emissions data (except first year)	☐
Description of energy efficiency actions taken	☐
Methodologies used for calculations	☐
Offshore undertakings: UK and offshore energy/emissions	☐

Further information can be found at: <https://www.gov.uk/government/publications/streamlined-energy-and-carbon-reporting-secr-regulations-evaluation>



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