

UKEB Due Process Handbook

Executive Summary

Project Type
UKEB Governance
Project Scope
Moderate
Purpose of the paper
The purpose of this paper is to obtain the Board's feedback on the [Draft] Revised Due Process Handbook and to obtain approval for it to be published for consultation.
Summary of the Issue
The Due Process Handbook sets out the due process requirements which the UKEB follows when carrying out its statutory functions. The UKEB Terms of Reference set out the UKEB's role and responsibilities as they relate to the statutory functions. Paragraph 10.2(c) requires the UKEB to review its DPH at least once every five years, to ensure it is meeting the guiding principles and to make any revisions deemed appropriate. At the June 2026 meeting, the Board approved the proposed approach to revising the DPH, and the project timeline. A proposed [Draft] Revised Due Process Handbook and [Draft] Invitation to Comment (ITC) are provided for the Board's review. The Handbook will be published for a 90 day consultation.
Decisions for the Board
1. Does the Board have any comments on the content of the revised DPH? 2. Does the Board have any comments on the proposed ITC? 3. Subject to any required amendments, is the Board content for the [Draft] Revised DPH consultation package to be published for consultation?
Recommendation
The Secretariat recommend the Board approves the Consultation package for publication, subject to any amendments required by the Board.

Appendices

- Appendix A [DRAFT] Revised Due Process Handbook
Appendix B [Draft] Invitation to Comment

DPH Review Approach

Revised DPH

1. The Board is an independent body with delegated statutory powers. Its Terms of Reference require it to report to the Secretary of State on how it has carried out its statutory functions. Therefore, the proposed revised DPH will focus on the requirements in the legislation and the Board's Terms of Reference (see Appendix A).
2. It is essential that the Board's work is carried out in a clear and transparent manner and that stakeholders with an interest in the UK's capital markets are engaged throughout. The Board must also ensure that it continues to take a proportionate approach to its work.
3. As per the Board's focus on the UK long term public good, the revisions to the DPH are aimed at balancing the needs of investors and businesses, and supporting effective and efficient capital allocation and growth in the economy.
4. The [Draft] revised DPH also ensures the UKEB continues to provide stakeholders with opportunities to engage in its work and to provide comments and views on its priority projects.
5. The accompanying due process documents (e.g. the PIP and the Feedback Statement) will be reviewed with the aim for them to be clearer, more concise, and focused on the key issues. This should benefit both the Board and UKEB stakeholders. More accessible documentation could also help to increase engagement with the UKEB's work.
6. A high-level summary of proposed changes is set out in the table below:

Section	Item	Revised DPH
Introduction	Purpose	Statement added to clarify the UKEB will take a proportionate approach to its work.
Throughout document	Text clarifying the UKEB's adherence to its statutory functions	Text retained

Section	Item	Revised DPH
Throughout document	Operational procedures	Text removed
Throughout document	Overly detailed explanatory text	Text removed, including any repetition.
Project Types	Project milestones	Mandatory / non-mandatory milestones removed. Project steps to be proposed, together with rationale for their inclusion, in the Project Initiation Plan, and approved by the Board at a public meeting.
Project Types	Project milestones	Due Process Compliance Statement removed.

Invitation to Comment

7. The questions in the proposed Invitation to Comment (ITC) seek stakeholder views on:
- a) whether the proposed due process is clear and transparent;
 - b) whether there are sufficient opportunities for stakeholders to engage with the UKEB and input into its work;
 - c) the proposed removal of mandatory milestones; and,
 - d) the revised definition of a 'significant change in accounting practice'.

Project Timeline

8. The proposed project timeline is set out below.

Stage	Timing
(Draft) revised DPH for Consultation	September 2026
Stakeholder consultation (90 days)	Sept – Dec 2026
Public consideration of feedback	January 2027
Final revised DPH approved by the Board	February 2027
Publication of revised DPH	March 2027

17 September 2026
Agenda Paper 9

Questions for the Board

1. Does the Board have any comments on the content of the revised DPH?
2. Does the Board have any comments on the proposed ITC?
3. Subject to any required amendments, is the Board content for the [Draft] Revised DPH consultation package to be published for consultation?

[DRAFT Revised] Due Process Handbook

UK Endorsement Board

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I. Introduction

Purpose

- 1.1 The Secretary of State for the Department of Business, Energy and Industrial Strategy (BEIS)¹ (Secretary of State) delegated the functions relating to influencing, endorsing and adopting international accounting standards for application in the UK to the UK Endorsement Board (UKEB) in May 2021².
- 1.2 In August 2022, given the UKEB's responsibilities for endorsing and adopting international accounting standards, the Secretary of State also requested that the UKEB respond to the ISSB's projects from that viewpoint, including how the sustainability standards interact with accounting standards.³
- 1.3 This Due Process Handbook (Handbook) sets out the due process the UKEB follows in carrying out its statutory functions, in relation to international accounting standards.⁴ It also describes additional due process steps that the UKEB follows for:
 - a) carrying out its thought leadership activities and developing its own research programme;
 - b) performing its own post-implementation reviews;
 - c) setting up and operating advisory groups; and
 - d) ensuring it complies with the required due process steps in this Handbook.
- 1.4 The UKEB will continue to ensure that its work is carried out in a proportionate way, paying due regard to the significance of standards for the UK, including the prevalence of the issue(s) they relate to, their impact on the UK capital market, on UK stakeholders more broadly, and on the UK long term public good.
- 1.5 The Secretary of State maintains a regular review of the performance of the UKEB in exercising its functions. The UK Financial Reporting Council (FRC) oversees the effective governance of the UKEB and its adherence to the due process set out in this Handbook. It also provides operational support. The FRC does not have the

¹ The relevant government department is now the Department for Business, Innovation, Science and Trade (DBIST).

² The International Accounting Standards (Delegation of Functions) (EU Exit) Regulations 2021 No. 609 (SI 2021/609). <https://www.legislation.gov.uk/ukxi/2021/609/made/data.pdf>

³ Click [here](#) to access the letter.

⁴ This term has the meaning given in SI 2019/685 by referring to Article 2 of Regulation (EC) No 1606/2002 of the European Parliament and of the Council of 19 July 2002 on the application of international accounting standards: "...'international accounting standards' shall mean International Accounting Standards (IAS), International Financial Reporting Standards (IFRS) and related Interpretations (SIC-IFRIC interpretations), subsequent amendments to those standards and related interpretations, future standards and related interpretations issued or adopted by the International Accounting Standards Board (IASB)".

power to direct the UKEB in relation to the determination of its programme of work or the outcome of its technical decision-making⁵.

- 1.6 This Handbook is one of the key documents of the UKEB. A diagram illustrating the relationship between these documents can be found in Appendix A.

⁵ The respective responsibilities of the UKEB, the FRC and the Secretary of State are set out in this [Memorandum of Understanding](#).

2. Statutory functions of the UKEB

- 2.1 The statutory functions exercisable by the Secretary of State are set out in the Statutory Instrument 2019 No. 685 (SI 2019/685)⁶. These functions were subsequently delegated to the UKEB, which is the 'body' referred to in Regulation 17. The main statutory functions are set out below:

Regulation 5

Responsibility for adoption of international accounting standards

The Secretary of State is responsible for—

- a) the adoption of international accounting standards for use within the United Kingdom, with a view to harmonising the financial information presented by the companies required by section 403(1) of the Companies Act 2006 to prepare their accounts in accordance with UK-adopted international accounting standards, in order to ensure—
 - i. a high degree of transparency and international comparability of financial statements; and
 - ii. the efficient allocation of capital, including the smooth functioning of capital markets in the United Kingdom; and
- b) participating in and contributing to the development of a single set of international accounting standards.

Regulation 6

Power of the Secretary of State to adopt international accounting standards

- (1) The Secretary of State may adopt international accounting standards for use within the United Kingdom, in accordance with regulations 7 and 8.
- (2) In exceptional circumstances, the Secretary of State may exercise the power to adopt international accounting standards in accordance with paragraph (3) or (4).
- (3) Where the effect of regulation 7 is that an international accounting standard taken as a whole cannot be adopted, the Secretary of State may adopt an international accounting standard in part only, provided that—

⁶ The International Accounting Standards and European Public Limited-Liability Company (Amendment etc.) (EU Exit) Regulations 2019 (SI 2019/685). <https://www.legislation.gov.uk/ukxi/2019/685/made>

- a) those parts of the standard which are not adopted are—
 - i. severable from the standard so that the rest of the standard is operational;
 - ii. severed only to the extent necessary to enable adoption of the rest of the standard for use within the United Kingdom; and
 - b) adoption of that part of the standard would be in compliance with regulation 7.
- (4) Where there is an option available as part of the standard, the Secretary of State may—
- a) make provision in the standard to extend the scope of undertakings eligible to use that option; and
 - b) make such extension of scope subject to an undertaking meeting criteria specified by the Secretary of State.

Regulation 7

Basis for adoption of international accounting standards

- (1) The Secretary of State may only adopt an international accounting standard under regulation 6 if the Secretary of State is of the view that, in relation to the form of the standard the Secretary of State intends to adopt—
- a) the standard is not contrary to either of the following principles—
 - i. an undertaking's accounts must give a true and fair view of the undertaking's assets, liabilities, financial position and profit or loss;
 - ii. consolidated accounts must give a true and fair view of the assets, liabilities, financial position and profit or loss of the undertakings included in the accounts taken as a whole, so far as concerns members of the undertaking;
 - b) the use of the standard is likely to be conducive to the long term public good in the United Kingdom; and
 - c) the standard meets the criteria of understandability, relevance, reliability and comparability required of the financial information needed for making economic decisions and assessing the stewardship of management.

- (2) In deciding whether the use of a standard is likely to be conducive to the long term public good in the United Kingdom, the Secretary of State must have regard, in particular, to the following matters—
 - a) whether the use of the standard is likely to improve the quality of financial reporting;
 - b) the costs and benefits that are likely to result from the use of the standard; and
 - c) whether the use of the standard is likely to have an adverse effect on the economy of the United Kingdom, including on economic growth.
- (3) The Secretary of State may, by regulations made by statutory instrument, amend paragraph (2).
- (4) Regulations made under paragraph (3) are subject to annulment in pursuance of a resolution of either House of Parliament.

Regulation 8:**Adoption of standards: consultation**

Before adopting an international accounting standard under regulation 6, the Secretary of State must consult such persons as the Secretary of State considers to be representative of those with an interest in the quality and availability of accounts, including users and preparers of accounts.

Regulation 11:**Periodic review by Secretary of State of impact of adopted standard**

- (1) The Secretary of State must publish a statement setting out the Secretary of State's policy on what amounts to a significant change in accounting practice, and must keep this policy statement under review.
- (2) Paragraphs (3) and (4) apply in relation to the adoption of any standard by the Secretary of State under regulation 6 which the Secretary of State considers likely to lead to a significant change in accounting practice.
- (3) The Secretary of State must—
 - a) carry out a review of the impact of the adoption of the standard; and
 - b) publish a report setting out the conclusions of the review no later than 5 years after the date on which the standard takes effect (being the first day of the first financial year in respect of which it must be used).

- (4) The Secretary of State may carry out subsequent reviews from time to time, and in the event of doing so the Secretary of State must publish a report setting out the conclusions of any review conducted.

Regulation 17:**Reporting by the body**

- (1) The body must, at least once in each calendar year for which the delegation regulations are in force, make a report to the Secretary of State on—
- a) the discharge of the functions transferred to it, and
 - b) such other matters as the Secretary of State may by regulations require.
- (2) Delegation regulations may modify paragraph (1) as it has effect in relation to the calendar year in which the regulations come into force or are revoked
- (3) The Secretary of State must lay before Parliament copies of each report received under this paragraph.

3. Terms of Reference and Guiding Principles

Terms of Reference

- 3.1 The UKEB's Terms of Reference⁷ (ToR) further elaborate on its role and responsibilities as they relate to the statutory functions. The UKEB's key responsibilities include:
- a) Considering and deciding whether to endorse and adopt⁸ new or amended international accounting standards for application in the UK⁹. This includes a formal endorsement criteria assessment as set out in SI 2019/685.
 - b) Influencing the development of IFRS. The UKEB will:
 - i. follow, contribute to and monitor debates on IASB and IFRS Interpretations Committee (IFRIC) projects;
 - ii. consult with UK stakeholders to obtain their views;
 - iii. highlight any concerns to the IASB at different stages of their projects, including the development of the IASB's agenda; and
 - iv. respond to the IASB's draft proposals and consultations (including a request for information on an IASB post-implementation review).¹⁰
 - c) Ensuring that there is an open and transparent due process including a public consultation process with UK stakeholders on items such as draft comment letters to the IASB or draft endorsement criteria assessments.
 - d) Reporting to the Secretary of State in relation to the performance of the UKEB's statutory functions.
 - e) Reporting to the FRC Board in relation to the UKEB's, governance and adherence to the Handbook.

⁷ The UKEB Terms of Reference can be found [here](#).

⁸ While the relevant legislation uses only the term 'adoption' and does not refer to 'endorsement', for the purposes of this Handbook the term 'endorsement' is generally used when referring to the assessment of new (or amended) standards against the statutory adoption criteria, reflecting general usage. This is not intended to imply the existence of two distinct statutory functions or processes.

⁹ The process for endorsing new or amended standards is described in Section 6.

¹⁰ The process for influencing international accounting standards is described in Section 5. The process for influencing IASB post-implementation reviews is described in Section 8.

- f) Preparing, and submitting, a regulatory strategy each year, to the Secretary of State for approval.
- g) Reviewing, at least once every five years, the UKEB's Handbook to ensure that it meets the guiding principles set out in paragraph 3.3 of this Handbook, making recommendations for its revision following such consultation as is deemed appropriate by the UKEB.

3.2 The ToR are set by the Secretary of State and adopted by the UKEB.

Guiding Principles

3.3 The UKEB is required to act in accordance with the following guiding principles:

- a) Accountability—by:
 - i. consulting with UK stakeholders that are affected by financial reporting;
 - ii. undertaking activities and due process procedures in a timely and proportionate manner,
 - iii. paying due regard to the significance of standards for the UK, including the prevalence of the issue(s) they relate to, and their impact on the UK capital market, on UK stakeholders more broadly, and on the UK long term public good; and
 - iv. providing a rationale for the decisions it makes.
- b) Independence—to ensure that it acts in the UK's long term public good and is independent from other organisations or stakeholder groups, including the FRC and Government, in respect of the performance of its statutory functions, including its technical decision making.
- c) Transparency—to undertake its activities in a transparent manner so that stakeholders are aware of current projects and understand how decisions have been made (e.g. by making formal comment letters submitted to the UKEB publicly available,¹¹ on a timely basis).
- d) Thought leadership—to:
 - i. lead and represent the UK on international accounting standards and reporting;
 - ii. represent UK views in international fora with the aim of influencing debate;
 - iii. engage with accounting and reporting and endorsement and

¹¹ Where the respondent has not requested confidentiality.

adoption bodies in other jurisdictions, to influence and understand best practice; and

- iv. pro-actively participate in the development of new global accounting standards, for example by undertaking research.

4. Governance activities

Quorum of attendance

- 4.1 Paragraph 5.1 of the UKEB's ToR sets out the quorum for UKEB (Board) meetings. It requires that a minimum of sixty percent of the appointed Board members (Members) (including the UKEB Chair as an appointed Member) attend a meeting of the Board.

Transparency of meetings and stakeholder observers

- 4.2 The Board may hold meetings in person, virtually, or other similar means. In deciding the format of meeting, the UKEB Chair should take into consideration public access and attendance.
- 4.3 The meetings schedule for the calendar year is published on the UKEB website.
- 4.4 Public meetings are webcast live and recorded. The recordings are published on the UKEB website.
- 4.5 The Board may hold certain discussions in private or in the presence of invited observers with speaking rights only. For instance:
- a) meetings held to discuss administrative and strategic issues, and matters shared in confidence by a third party; or
 - b) education sessions, held before public Board meetings, to improve Members' understanding of new or complex proposals or standards.
- 4.6 Only Members and observers with speaking rights¹² have the right to speak at Board meetings. Other individuals may be invited by the UKEB Chair to speak at all or part of any meeting, as and when appropriate.

Minutes of public Board meetings

- 4.7 Minutes of UKEB public meetings shall record the names of those present and in attendance, and summarise the Board discussion and decisions reached. They shall be published on the UKEB website, following their approval by the UKEB at its next public meeting.
- 4.8 A summary of decisions reached by the Board at each UKEB public meeting is approved by the Chair for publication on the UKEB website, usually within 10 working days of the meeting.

¹² Paragraph 3.4(e) of the ToR states that observers with speaking rights should be appointed from relevant organisations, including Government Departments (including the Department) and Regulators, such as the FRC, HM Treasury, HM Revenue and Customs, the Financial Conduct Authority and the Bank of England.

Minutes of private Board meetings

- 4.9 The minutes for each UKEB private meeting are circulated to Members for approval at the next private meeting. Once approved, extracts of the minutes are published and made available on the UKEB website.

Agenda papers

- 4.10 The Board agenda and papers for each public meeting are usually made available on the UKEB website no later than five working days¹³ before they are scheduled for discussion at a Board meeting. In exceptional circumstances, and with the prior approval of the UKEB Chair, Secretariat papers may be distributed closer to the meeting date.
- 4.11 In exceptional circumstances, and taking into consideration the Guiding Principles, the UKEB Chair may, at their absolute discretion, decide that all or part of certain Secretariat papers used for discussion by the Board at public meetings should not be made publicly available. Such circumstances may be, for example, commercial confidentiality or a risk of prejudice to the conduct of public affairs.
- 4.12 Board papers for discussion at private Board meetings are not made publicly available.

Keeping stakeholders informed

- 4.13 The UKEB is committed to conducting its activities in a transparent manner. The principal means of communication, between the UKEB and its stakeholders, is through public meetings, and the posting of relevant information and documents on the UKEB website.
- 4.14 In particular, the UKEB publishes on its website:
- a) Its work plan, meeting schedules, agenda, papers for discussion at public Board meetings, and the minutes and recordings of those meetings;
 - b) Individual project information, including project initiation plans, the draft/final comment letters submitted to the IASB, draft/final Endorsement Criteria Assessments and project closure documents, such as stakeholder feedback and adoption statements.
 - c) Media and information releases relating to its activities.
 - d) Comment letters submitted to the UKEB, whether in response to consultation documents or unsolicited, unless the respondent has requested confidentiality.

¹³ Intervening bank holidays would be accounted for so that the agenda and papers for UKEB public meetings are published five working days before a meeting.

- e) Access to educational materials or webinars.

4.15 All public materials, including those related to the UKEB due process, are freely available on the website.

UKEB's work plan

4.16 The UKEB's work plan is mainly influenced by the IASB's work plan. The Board, in consultation with the Technical Director, prioritises individual projects and resource allocation.

4.17 The UKEB's work plan includes the projects mentioned below. This list does not indicate any priority.

- a) **Research projects** derived from the UKEB's thought leadership and research programme¹⁴.
- b) **Influencing projects**¹⁵ that include technical issues identified by the IASB and by the IFRS Interpretations Committee that give rise to:
 - i. proposals for new standards or major amendments to existing standards;
 - ii. proposals for minor or narrow-scope amendments to international accounting standards that meet the IASB's criteria for annual improvements or for narrow-scope amendments¹⁶;
 - iii. research proposals;
 - iv. requests for information (for example on the IASB's post-implementation reviews or on consultations on the IASB's work plan);
 - v. draft IFRIC Interpretations; and
 - vi. IFRIC tentative agenda decisions on which the Board has decided to respond to the IFRS Interpretations Committee¹⁷.
- c) **The UKEB's own post-implementation review projects**¹⁸.

¹⁴ Refer to Section 7 'Thought leadership and research programme'.

¹⁵ Refer to Section 5 'Influencing process'.

¹⁶ For 'Annual improvements' refer to the criteria in paragraphs 6.10–6.14 and for narrow-scope amendments refer to the criteria in paragraph 5.16, both in the [IASB and IFRS Interpretations Committee Due Process Handbook](#).

¹⁷ The Board considers the tentative agenda decisions (issued by the IFRS Interpretations Committee) to which it will respond and incorporates them into the work plan. The Board expects to respond to a limited number of tentative agenda decisions in line with paragraph 5.29 of this Handbook.

¹⁸ Refer to Section 8 'Post-implementation reviews'.

- d) **Endorsement projects**¹⁹, which include the endorsement and adoption of new or amended standards.
- e) **International Sustainability Standards Board (ISSB) projects** from the viewpoint of the UKEB being the body responsible for endorsing and adopting international accounting standards, in the UK, including how the sustainability standards interact with accounting standards.

Prioritising technical projects in the UKEB's work plan

- 4.18 In prioritising and allocating resources to individual projects, the Board shall consider whether the level of activities is proportionate to the importance, impact, and urgency of the issue being addressed, for users and preparers.
- 4.19 When assessing a project's significance to the UK the UKEB will consider, but is not limited to, using the IASB's assessment of the potential impact of a project.

Updating the UKEB's work plan

- 4.20 The UKEB's work plan is updated regularly to add or remove projects and to reflect the Board's decisions in relation to estimated project timelines. It is presented for approval at the Board's private meetings and, once approved, is uploaded onto the UKEB website.

Consulting on the UKEB's work plan

- 4.21 The UKEB consults on its work plan every year as part of its consultation on its regulatory strategy.²⁰

Voting process for endorsement decisions

- 4.22 A tentative vote on the endorsement and adoption of a standard²¹ must be taken at a quorate public Board meeting.²²
- 4.23 The formal written vote (in paper or electronic form) must be approved by at least two-thirds of appointed Members, including the Chair. Each member of the Board has one vote. In exceptional circumstances, if the Chair is not available, Members may elect another Member to act as an alternate Chair.
- 4.24 Following the conclusion of the written vote, the Chair shall publish the outcome of that vote within 3 working days. Where the result is to adopt a standard in whole or

¹⁹ Refer to Section 6 'Endorsement process'.

²⁰ Paragraph 3.2(j) of the UKEB's ToR requires the UKEB to prepare each year a regulatory strategy which must be submitted to the Secretary of State for approval. The regulatory strategy document is subject to public consultation and includes a draft of the UKEB's work plan.

²¹ A 'standard' includes amendments and IFRIC interpretations, as per the definition set out in footnote 4.

²² A meeting attended by sixty percent of the appointed Members.

in part, the date of the Adoption Statement constitutes the date of the adoption of that standard by the UKEB.

- 4.25 Where the vote to adopt a standard does not reach the required majority, the Chair may, after consultation with external parties including DBIST, choose to ask the Board to return to the vote. This may include asking the Board to vote on part of the standard, amendment or interpretation if it appears that this will have the required support. A subsequent decision to adopt a standard, in whole or in part, must be made by at least two-thirds of the appointed Members.
- 4.26 Where a vote by the UKEB to adopt a standard, in whole or in part, has failed to reach the required majority and, in the opinion of the Chair there is no prospect of such majority being reached, the UKEB Chair must provide a written explanation of circumstances to the Secretary of State within 10 working days of the failure to adopt. The Secretary of State may require further evidence. The Chair must inform Members of any recommendations made by the Secretary of State.

Voting process for all other decisions

- 4.27 Other decisions made at public meetings do not require a formal written vote by the Board. They require the support of a simple majority of the Members present at a quorate public meeting.

Reviewing the Due Process Handbook

- 4.28 The Handbook will, under normal circumstances, be reviewed every five years. Any revisions require discussion and approval at a public Board meeting. Following this approval, the revised Handbook will be published on the UKEB website.

Complaints process

- 4.29 The UKEB's complaints policy is accessible on its website.²³ The UKEB reviews complaints on its standard of service, the behaviour of its personnel and on any action or lack of action by personnel affecting an individual or group when exercising or failing to exercise the UKEB's functions.

²³ The link to this policy can be found [here](#).

5. Influencing process

Influencing objective

- 5.1 The UKEB shares a common objective with other national standard-setters: that of influencing the development and maintenance of high-quality, understandable, enforceable and globally accepted international accounting standards, after consulting²⁴ with the public and gathering stakeholder feedback.

Influencing projects

- 5.2 The UKEB's influencing activities include the proactive monitoring by the Secretariat of a range of projects being undertaken by the IASB and IFRS Interpretations Committee. The Board discussions may result in the identification of specific concerns or areas of focus for future work by the UKEB²⁵ and, where appropriate, the UKEB may consider communicating this feedback to the IASB, to the IFRS Interpretations Committee²⁶ or to the ISSB.
- 5.3 In undertaking influencing activities, the UKEB will agree its proportionate approach to the project at a public Board meeting. This will be set out in a project initiation plan, which can be revised, as necessary, as the project progresses.²⁷

UK stakeholder input

- 5.4 The UKEB will undertake outreach activities, that are relevant and proportionate to the nature and impact of the project, in order to obtain input from a representative range of UK stakeholders.
- 5.5 For projects undertaken to develop a response to an IASB Exposure Draft, the UKEB will publish a Draft Comment Letter (DCL) on the UKEB website, usually accompanied by an Invitation to Comment (ITC). The consultation will usually be open for a period of 30 days, at the Board's discretion. All responses to the consultation will be published on the website, unless a respondent has requested confidentiality.
- 5.6 The UKEB will reflect stakeholder feedback to the consultation into its Final Comment Letter (FCL), as appropriate. A summary of the formal consultation

²⁴ Consultation is also a crucial step before endorsing and adopting an international accounting standard in the UK according to Regulation 8 of SI 2019/685.

²⁵ For example, the Secretariat may consider undertaking outreach activities ahead of the IASB or the IFRS Interpretations Committee issuing proposals in a due process document.

²⁶ Such matters could include in accordance with paragraph 5.15 of the [IASB and IFRS Interpretations Committee Due Process Handbook](#) "cases of doubt about the required accounting for a particular circumstance or transaction, or concerns expressed by investors about the application of specified disclosure requirements".

²⁷ If the Board decides that a project does not require a PIP, a broad timeline will be included in papers taken to the public Board meetings.

feedback, and evidence derived from other outreach activities, will be published on the UKEB website project page.

Influencing tentative agenda decisions (TADs)

- 5.7 The IFRS Interpretations Committee (IFRIC) publishes tentative agenda decisions to explain why a standard-setting project should not be added to the IASB's work plan to address a question submitted. The comment period for a tentative agenda decision is normally 60 days²⁸.
- 5.8 The UKEB expects to respond to a limited number of tentative IFRIC agenda decisions. The Board may consider the degree of impact on UK companies; disagreement with the IFRIC analysis; or the usefulness of the explanations and clarifications included in the tentative agenda decision.
- 5.9 The Board might also choose to respond to provide public support for a tentative agenda decision, where others have expressed disagreement with the tentative agenda decision's analysis.
- 5.10 If an issue discussed by IFRIC arises outside the usual Board meeting cycle, the UKEB Chair can approve initiation of work on the tentative agenda decision.

Influencing TAD projects

- 5.11 Given that the shorter consultation period for a tentative agenda decision, the UKEB may consult with a representative group of stakeholders and/or with members of the UKEB's standing and/or ad-hoc advisory groups.
- 5.12 After considering comments from UK stakeholders on tentative agenda decisions, the UKEB may decide to recommend that the IFRS Interpretations Committee:
 - a) finalises a tentative agenda decision²⁹;
 - b) revises (or abandons) a tentative agenda decision; or
 - c) refers the matter to the IASB to consider adding a standard-setting project to the IASB's work plan.

²⁸ Refer to paragraph 8.2 in the [IASB and IFRS Interpretations Committee Due Process Handbook](#).

²⁹ As explained in paragraph 8.4 of the [IASB and IFRS Interpretations Committee Due Process Handbook](#), agenda decisions (including any explanatory material contained within them) "cannot add or change requirements in IFRS Standards. Instead, explanatory material explains how the applicable principles and requirements in IFRS Standards apply to the transaction or fact pattern described in the agenda decision".

6. Endorsement process

Endorsement objective

- 6.1 New or amended standards issued by the IASB are not part of UK-adopted international accounting standards unless or until the UKEB has endorsed and adopted those standards³⁰.
- 6.2 The primary objective of endorsing and adopting international accounting standards for use in the UK as set out in SI 2019/685³¹ is to harmonise the financial information presented by relevant companies.
- 6.3 This is to ensure:
 - a) a high degree of transparency and international comparability of financial statements; and
 - b) the efficient allocation of capital, including the smooth functioning of capital markets in the United Kingdom.
- 6.4 The regulatory power embodied in the UKEB's endorsement and adoption function lends weight and authority to the UKEB's influencing activity.

Endorsement projects

- 6.5 The UKEB applies its own process before it decides whether to endorse and adopt a new or amended international accounting standard, to ensure the Board fulfils its statutory responsibility. This process may commence either in advance of a new or amended standard being issued by the IASB, or after it has been issued by the IASB, but before the standard is effective.
- 6.6 In undertaking endorsement activities, the UKEB will agree its proportionate approach at a public Board meeting. This will be set out in a project initiation plan, which can be revised, as necessary, as the project progresses.

³⁰ In May 2021, the Secretary of State delegated statutory powers to the UKEB. One of the UKEB's delegated functions is the responsibility for the adoption of IFRS for use by UK companies. Refer to the International Accounting Standards (Delegation of Functions) (EU Exit) Regulations 2021 No. 609 (SI 2021/609). <https://www.legislation.gov.uk/ukxi/2021/609/made/data.pdf>

³¹ Refer to Section 2 in this Handbook.

UK stakeholder input

- 6.7 The UKEB will undertake outreach activities, relevant and proportionate to the nature and impact of the amendment or international accounting standard³² being assessed, to obtain input from a representative range of UK stakeholders.
- 6.8 For all endorsement projects, the UKEB will publish a Draft Endorsement Criteria Assessment [Draft] ECA on the UKEB website. The consultation will usually be open for a period of 90 days, at the Board's discretion. All responses to the consultation will be published on the website, unless a respondent has requested confidentiality.
- 6.9 The UKEB will reflect stakeholder feedback to the consultation into the Final Endorsement Criteria Assessment (ECA), as appropriate. A summary of the consultation feedback and evidence derived from other outreach activities will be published on the UKEB website project page.

[Draft] Endorsement Criteria Assessment

- 6.10 In general, a [Draft] ECA considers and addresses the following:
- a) Introduction: legislative framework and approach to the assessment.
 - b) Rationale for the new or amended international accounting standard.
 - c) Whether or not the standard is not contrary to the principle that an entity's accounts or consolidated accounts must give a true and fair view (SI 2019/685 Regulation 7(1)(a)).
 - d) Whether or not use of the new or amended standard is likely to be conducive to the long term public good in the UK (SI 2019/685 Regulation 7(1)(b)).
 - e) Whether or not the standard meets the criteria of relevance, reliability, comparability and understandability required of the financial information needed for making economic decisions and assessing the stewardship of management (SI 2019/685 Regulation 7(1)(c)).
 - f) Whether or not the new or amended standard is likely to lead to a significant change in accounting practice (refer to paragraph 8.3 of this Handbook) and, therefore, whether it meets the criteria for a post-implementation review.
- 6.11 If a Member has significant concerns about a new or amended standard, and is concerned they may be unable to support the endorsement and adoption of a new or amended standard, and this is apparent during the drafting of the [Draft] ECA,

³² As per footnote 1, the term 'standard' has the meaning given in SI 2019/685, which includes new standards, amendments to existing UK-adopted international accounting standards, and IFRIC Interpretations.

the relevant matter(s) and concern(s) of the Member should be reflected in the [Draft] ECA, so that it is included in the public consultation.

Adoption package

- 6.12 The 'adoption package' consists of the: Final Endorsement Criteria Assessment (ECA); a summary of the consultation feedback and evidence derived from other outreach activities; an adoption statement; and the text of the UK-adopted international accounting standard that is the subject of the endorsement decision.

Adoption statement

- 6.13 The adoption statement includes:
- a) a statement that the new or amended standard has been:
 - i. adopted for use within the UK, in compliance with the requirements in Regulations 7 and 8 of SI 2019/685 and the reasons for this decision; or
 - ii. partially adopted in accordance with paragraph (3) of Regulation 6 of SI 2019/685 and the reasons for this decision;
 - b) when applicable, reasons for extending the scope of undertakings eligible to use an option in the standard in accordance with paragraph (4) of Regulation 6, setting out the full details;
 - c) a description of the financial years in respect of which that standard must be used;
 - d) the wording of the adopted standard (in a separate document);
 - e) a list of the Members that approved the adoption of the new or amended standard by written vote; and
 - f) in the event a Member dissents from voting to adopt a standard, a link to their written dissenting opinion.
- 6.14 On an annual basis, the UKEB updates the new or amended international accounting standards that have been adopted during the year into a consolidated text of UK-adopted international accounting standards³³.

³³ This is consistent with Regulation 9(3) of SI 2019/685.

Publication of the Board's decision

- 6.15 The adoption statement and the text of the UK-adopted international accounting standard (that is the subject to the endorsement decision) are published on the UKEB website within 3 working days of completion of the written vote.³⁴

³⁴ If the formal written vote is not to adopt, then only the outcome of the vote will be published.

7. Thought leadership and research programme

Thought leadership objective

7.1 In applying the principle of thought leadership, the UKEB will:

- a) Lead the UK debate on international accounting standards and reporting.
- b) Represent UK views in international fora with the aim of influencing debate.
- c) Engage with accounting and reporting and endorsement and adoption bodies in other jurisdictions, in order to improve influence and understand best practice.
- d) Pro-actively participate in the development of new global accounting standards for example by undertaking research.

Leading the UK debate

7.2 The UKEB leads the UK debate on international accounting standards and reporting by:

- a) Actively engaging and collaborating with UK stakeholders, where appropriate, during the process of developing its own views, with the aim of building robust and evidence-based recommendations.
- b) Developing and presenting the UKEB's own thought leadership material to promote UK views and lead the accounting debate at relevant international fora.

Participating proactively in the development of global standards

7.3 The UKEB proactively participates in the development of new global accounting standards by:

- a) engaging with UK stakeholders and collecting evidence on relevant technical issues and communicating such evidence to the IASB and to other national standard-setters or regional organisations;
- b) developing potential ways to improve or remedy deficiencies in international accounting standards; and
- c) working proactively with others to stimulate debate on financial reporting matters on the IASB agenda at an early stage in the standard-setting process.

Representing UK views with the aim of influencing debate

- 7.4 The UKEB directly influences the IASB Board and maintains a global presence on the international financial reporting stage by:
- a) Identifying and promoting the appointment of UK representatives to the IASB's consultative groups.
 - b) Maintaining effective relationships, communication and presence with the IASB and other national standard-setters or regional organisations, to increase the understanding, awareness and support for UK views, thereby allowing the UKEB to lead on the accounting debate.
 - c) Communicating outcomes from international engagements to UK stakeholders, to assist in identifying concerns with international proposals.
 - d) Stimulating debate on a particular matter or technical issue by issuing articles, podcasts or videos.
 - e) Obtaining input from, and engaging with, stakeholders.

Research programme objective

- 7.5 Research is generally directed to identify specific issues associated with projects that are on the UKEB's work plan. As such, research may be expected to have a problem-solving orientation,³⁵ by collecting evidence on the nature and extent of the perceived shortcomings of, and assessing potential ways to improve or to remedy a deficiency in, international accounting standards.
- 7.6 Other more explorative research may also be performed by the UKEB to include the consideration of broader financial reporting matters, such as how financial reporting is evolving, and to encourage international debate on financial reporting matters. This type of research may be formally added to the UKEB's technical agenda.
- 7.7 Research may be undertaken by the UKEB on its own or collectively with others (such as national standard-setters or regional organisations, regulators, academics and other interested parties). In all cases, the independence of the UKEB will be maintained.

Research project

- 7.8 A research project may give rise to a single output or multiple outputs. The common categories of research outputs derived from the UKEB's research programme include discussion papers, consultations or requests for information, research papers, bulletins and research studies.

³⁵ This is not intended to lead to the UKEB issuing technical advice and/or interpretations of the standards.

- 7.9 The UKEB will identify issues for research and discussion and agree its proportionate approach at a public Board meeting. The UKEB approach will specify the nature of the project to be undertaken and whether the resulting research document will include the Board's preliminary views. It will also confirm whether the document will be issued for public consultation with an invitation to comment (ITC). This will be set out in a project initiation plan, which can be revised, as necessary, as the project progresses.

UK stakeholder input

- 7.10 The UKEB will undertake outreach activities, relevant and proportionate to the nature and scope of the project, to obtain input from a representative range of UK stakeholders.
- 7.11 For research documents published on the UKEB website, with an Invitation to Comment (ITC), the consultation will usually be open for a period of 90 days, at the Board's discretion. All responses to the consultation will be published on the website, unless a respondent has requested confidentiality.
- 7.12 The UKEB will reflect stakeholder feedback to the consultation into its final research document, as appropriate. A summary of the consultation feedback and evidence derived from other outreach activities will be published on the UKEB website project page.

8. Post-implementation reviews

Purpose

- 8.1 A standard adopted under **Regulation 6** that is likely to lead to a 'significant change in practice', is subject to paragraph 3 of Regulation 11 which requires the UKEB to:
- a) carry out a review of the impact of the adoption of the standard; and
 - b) publish a report setting out the conclusions of the review no later than 5 years after the date on which the standard takes effect (being the first day of the first financial year in respect of which it must be used).
- 8.2 The UKEB may also decide to initiate **subsequent reviews** of standards where there are significant unexpected changes to financial reporting or unexpected costs or challenges arising from their application. By exception, the UKEB may initiate proportionate subsequent reviews where this supports the UKEB in fulfilling its purpose.

Meaning of 'significant change in accounting practice'

- 8.3 Whether or not a standard adopted under **Regulation 6** is likely to lead to a 'significant change in accounting practice' will usually depend on the expected impact on UK entities of the standard and will require judgement. The UKEB will take the following indicators into account when developing its view on this matter:
- a) The scale and nature of the change to recognition and measurement;
 - b) The population of UK companies affected and their economic significance;
 - c) The population of UK companies affected which are required to prepare their accounts using UK-adopted international accounting standards.
- 8.4 The UKEB is required to explain in the [Draft] ECA/ECA whether or not the new or amended standard meets the criteria for a post-implementation review (PIR) and, if so, the likely timing of that review, in line with the requirements in this section.

IASB PIR influencing projects

- 8.5 The IASB conducts PIRs to assess the effect of a new or amended standard³⁶. This review begins after the new requirements have been applied internationally for some time, normally within five years of the effective date of the new requirements³⁷. The IASB commences its PIR with an RFI which sets out the initial identification and assessment of the matters to be examined.
- 8.6 In undertaking PIR influencing activities, the UKEB will agree its proportionate approach at a public Board meeting. This will be set out in a project initiation plan, which can be revised, as necessary, as the project progresses.

UK stakeholder input

- 8.7 The UKEB will undertake outreach activities, relevant and proportionate to the nature and impact of the project, to obtain input from a representative range of UK stakeholders.
- 8.8 The UKEB will promote awareness of the IASB PIR on its website and publish a Draft Comment Letter (DCL) on the UKEB website, which may be accompanied by an Invitation to Comment (ITC). The consultation will usually be open for a period of 30 days, at the Board's discretion. All responses to the consultation will be published on the website, unless a respondent has requested confidentiality.
- 8.9 The UKEB will reflect stakeholder feedback to the consultation into its Final Comment Letter (FCL), as appropriate. A summary of the consultation feedback and evidence derived from other outreach activities will be published on the UKEB website project page.

Statutory reporting requirements

- 8.10 Once the IASB has completed its PIR for a standard that the UKEB determined was likely to lead to a 'significant change in accounting practice', the UKEB explains in a separate report³⁸ how the UKEB feedback has been addressed by the IASB, as well as any additional UK-specific impacts of adoption of that standard by the UKEB. This report will include:
- a) an overview of the IASB PIR and of the UKEB's influencing process and its timeline;
 - b) background information to the standard under review;

³⁶ In the [IFRS Foundation Due Process Handbook](#), paragraph 6.57 states that the IASB "is required to conduct a post-implementation review of every new Standard or major amendment to a Standard". Paragraph 6.52 states that the objective of an IASB PIR is "to assess whether the effects of applying the requirements of a new Standard or major amendment to a Standard on users of general purpose financial reports, preparers, auditors and securities regulators are as intended when the new requirements were developed".

³⁷ Refer to paragraphs 6.58 in the [IFRS Foundation Due Process Handbook](#).

³⁸ This report ensures that the UKEB fulfils its obligations in Regulation 11(3)(a)–(b) of reviewing the impact of the adoption of the Standard and of setting out the conclusions of that review.

- c) a summary of the evidence gathered and findings;
- d) the UKEB's conclusions from the review; and
- e) recommendations or steps it plans to take, if any, as a result of the review.

8.11 If the IASB has commenced but not finalised its PIR in time for the UKEB to comply with its PIR obligations, (i.e. no later than 5 years after the date on which the standard takes effect), the UKEB will, within that timeframe, issue a report describing the impact of the adoption of the standard and its preliminary conclusions on the review³⁹. Once the IASB has completed its PIR, the UKEB will consider issuing an updated report.

8.12 In the case of a standard that the UKEB determined was likely to lead to a 'significant change in accounting practice', if the IASB does not undertake a PIR, the UKEB is nonetheless required to undertake its own review. That review must be completed no later than 5 years after the date on which the international accounting standard took effect in the UK.

8.13 If the IASB undertakes a PIR of a standard that the UKEB had determined was not likely to lead to a 'significant change in accounting practice', the UKEB is not required to carry out its own PIR but may decide to influence the IASB's PIR.

UKEB PIR project

8.14 In undertaking a UKEB PIR, the UKEB will set out the scope of the review and agree its proportionate approach at a public Board meeting. This will be set out in a project initiation plan, which can be revised, as necessary, as the project progresses.

UK stakeholder input

8.15 The UKEB will undertake targeted outreach activities, relevant and proportionate to the nature and impact of the project, to obtain input from a representative range of UK stakeholders, and to help the UKEB establish the scope and potential areas for consultation during the review that may be included in its public Request for Information (Rfi).

8.16 When the UKEB is satisfied that it has sufficient information to establish the scope of the review it will issue an Rfi on the PIR of the UK-adopted international accounting standard. The consultation will usually be open for a period of 90 days, at the Board's discretion. All responses to the consultation will be published on the website, unless a respondent has requested confidentiality.

8.17 The UKEB will reflect stakeholder feedback to the consultation into its final report, as appropriate. The content of the final report will generally include:

³⁹ This in line with the approach taken by the Better Regulation Framework guidance in the UK.

- a) an overview of the UKEB post-implementation review process and its timeline;
- b) background information to the UK-adopted international accounting standard under review;
- c) a summary of the evidence gathered and findings;
- d) a summary of the outreach activities and sources of stakeholder comments (after publication of the request for information); and
- e) the UKEB's conclusions from the review.

9. Advisory and working groups

Purpose

- 9.1 The UKEB can appoint its own standing or ad-hoc advisory groups and working groups to provide expert, specialist technical advice and other input on UKEB projects or other technical matters (e.g. UK-specific implementation issues).
- 9.2 Advisory groups are established to enable the Board to hear directly from stakeholders on key matters, and either have an ongoing life or are dedicated to particularly significant projects. Working groups provide specialised technical input from stakeholders into the work of the Secretariat, which will provide updates to the Board on the input it receives.
- 9.3 The groups are not decision-making bodies. The groups comprise experts who can:
 - a) provide advice and recommendations on specific agenda projects for example by sharing:
 - i. knowledge and understanding of financial reporting issues and/or concerns raised by UK stakeholders; and
 - ii. up-to-date insight into developments and market sentiment on financial reporting matters, helping develop a timely understanding of any concern areas;
 - b) deliver best practice, practical experience and expertise as well as potential solutions that can improve the quality of information; and
 - c) help to amplify the UKEB's views across the UK reporting community and drive the debate of contemporary issues.
- 9.4 In carrying out their work, groups have regard to the UKEB's Terms of Reference and Guiding Principles (refer to Section 3 of this Handbook).

Approval for the creation of an advisory or working group

- 9.5 The establishment of an advisory or working group is approved at a Board meeting.

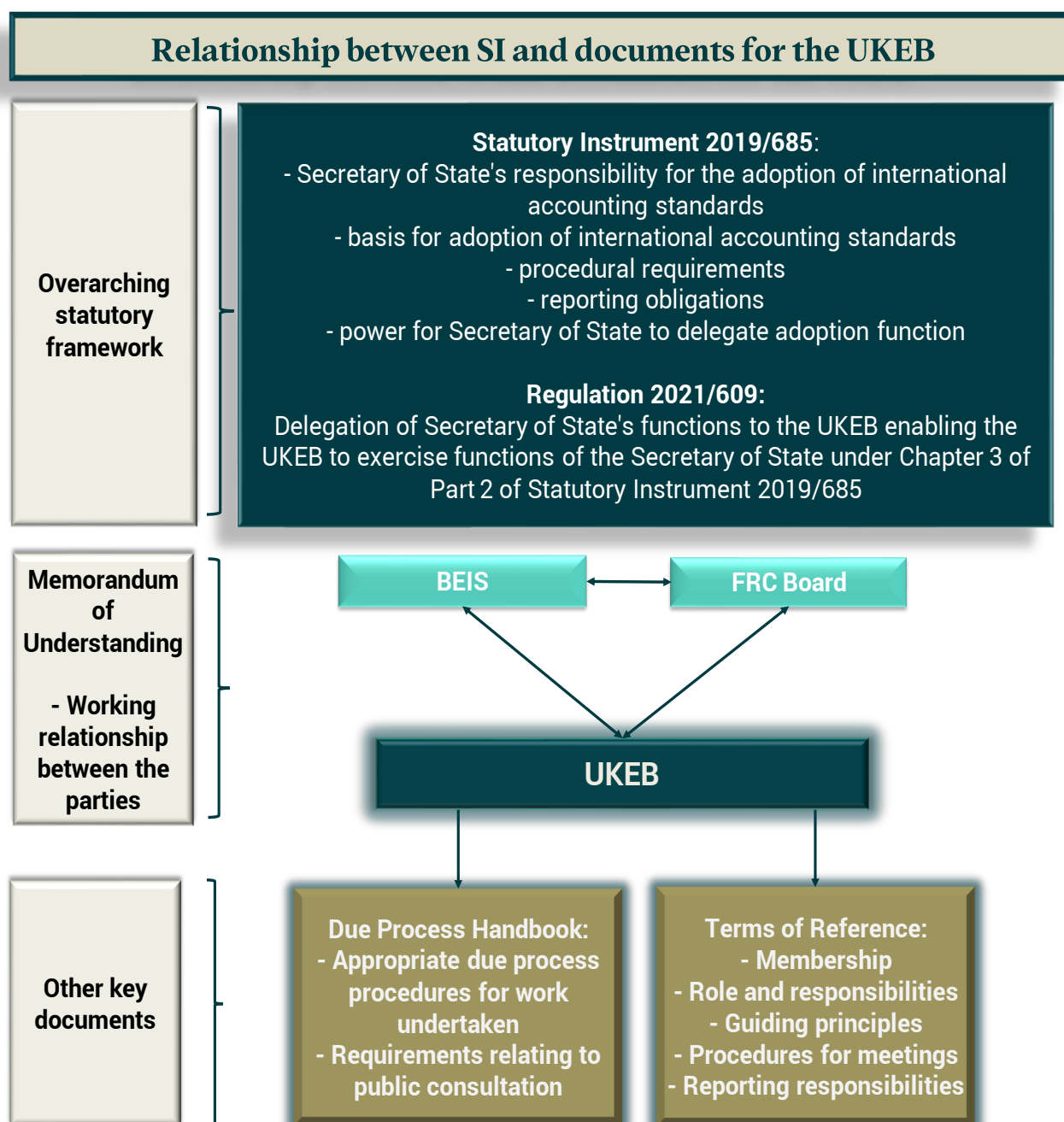
Terms of reference

- 9.6 Each advisory group has its own Terms of Reference, setting out the group's purpose, rules, arrangements for meetings and papers, and the most recent date of approval of the group's ToR. Amendments to a group's ToR must be approved at a Board meeting.

Recruitment

- 9.7 Recruitment is via a public advertisement, inviting applications. Appointments are based on interviews. The Board retains the option to make the occasional direct appointment; however, this would generally be in exceptional circumstances, for example when there are few experts in a particular area or no other expert is forthcoming.
- 9.8 The UKEB seeks to ensure that each groups' membership is diverse in terms of skills, experience, background, race and other characteristics, and achieves a gender balance.

Appendix A: Relationship between Statutory Instruments (SI) and other governance documents for the UK Endorsement Board



Contact Us
UK Endorsement Board
1 Victoria Street | London | SW1H 0ET | United Kingdom
www.endorsement-board.uk

17 September 2026
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Appendix B: Invitation to Comment

Call for comments on the:

[Draft] Revised UKEB Due Process Handbook

Deadline for completion of this Invitation to Comment:

Close of business, XX December 2026

Please submit to:

UKEndorsementBoard@endorsement-board.uk

Introduction

The objective of this Invitation to Comment is to obtain input from stakeholders on the [draft] revised UKEB Due Process Handbook. The current [Due Process Handbook](#) was published in December 2022. It consolidates the requirements set out in legislation, and in the UKEB's Terms of Reference, to set out the due process the UKEB follows in carrying out its statutory functions.

The proposed revised Handbook focuses on the requirements in legislation and the Board's ToR. The revised text aligns with the UKEB's guiding principles of transparency, accountability, independence and thought leadership, and aims to ensure that it continues to take a proportionate approach to carrying out all of its work, including its delegated statutory functions.

The information collected from this Invitation to Comment is intended to help the Board to streamline its due process to ensure it continues to take a proportionate approach to its work.

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UKEB Statutory Responsibilities

The International Accounting Standards (Delegation of Functions) (EU Exit) Regulations 2021 (2021/609) confers upon the UKEB the functions set out in Chapter 3 of Part 2 of The International Accounting Standards and European Public Limited-Liability Company (Amendment etc.) (EU Exit) Regulations 2019 (2019/685).

The UKEB adopted its Terms of Reference (ToR), set by the Secretary of State, when it was established, on 26 March 2021. The ToR provide further detail on the UKEB's role and responsibilities as they relate to the statutory functions. Paragraph 10.2(c) requires the UKEB to review its DPH at least once every five years, to ensure that it is meeting the guiding principles and to make any revisions deemed appropriate.

Who should respond to this Invitation to Comment?

Stakeholders with an interest in the quality of accounts prepared in accordance with IFRS Accounting Standards.

How to respond to this Invitation to Comment

Please download this document, answer any questions on which you would like to provide views, and return it to UKEndorsementBoard@endorsement-board.uk by close of business on **XX December 2026**.

Brief responses to individual questions are welcome, as well as comprehensive responses to all questions.

Privacy and other policies

The data collected, through submitting this document, will be stored and processed by the UKEB. By submitting this document, you consent to the UKEB processing your data for the purposes of influencing the development of and adopting IFRS for use in the UK. For further information, please see our Privacy Statements and Notices and other Policies (e.g. Consultation Responses Policy and Data Protection Policy).¹

The UKEB's policy is to publish on its website all responses to formal consultations issued by the UKEB unless the respondent explicitly requests otherwise. A standard confidentiality statement in an e-mail message will not be regarded as a request for non-disclosure. If you do not wish your signature to be published, please provide the UKEB with an unsigned version of your submission. The UKEB prefers to publish responses that do not include a personal signature. Other than the name of the organisation/individual responding, information contained in the "Your Details" document will not be published. The UKEB does not edit personal information (such as telephone numbers, postal or e-mail addresses) from any other response document submitted; therefore, only information that you wish to be published should be submitted in such responses.

¹ These policies can be accessed from the footer in the UKEB website: <https://www.endorsement-board.uk>

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Your details

1. Name: Click or tap here to enter text.

2. Email address: Click or tap here to enter text.

3. Are you responding:

On behalf of an organisation	☐
As an individual	☐

4. If responding on behalf of an organisation,

Name of organisation: Click or tap here to enter text.

5. Please select what best describes the organisation:

An organisation applying IFRS Accounting Standards	☐
A user of company accounts prepared under IFRS	☐
An accounting firm / auditor	☐
A regulator	☐
Other	☐

If your response was 'Other', please describe: Click or tap here to enter text.

6. Is your organisation a listed entity?

UK listed	☐
UK AIM listed	☐
Other listed	☐
Unlisted	☐

7. Would you be happy for UKEB to contact you if needed to discuss your responses?

Yes	☐
No	☐

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[Draft] Revised UKEB Due Process Handbook

The Due Process Handbook

The DPH consolidates the requirements in the Regulations and the UKEB's ToR, to set out the due process the UKEB follows in carrying out its statutory functions, and the additional due process steps it follows for:

- a) carrying out its thought leadership activities and developing its own research programme;
- b) performing its own post-implementation reviews;
- c) setting up and operating advisory groups; and
- d) ensuring it complies with the required due process steps in the Handbook.

Revised Due Process Handbook

The Board is an independent body with delegated powers. Its terms of reference require it to report to the Secretary of State on how it has carried out its statutory functions. Therefore, the proposed revised DPH focuses on the requirements in the legislation and the Board's ToR.

It is essential that the Board's work is carried out in a clear and transparent manner and that stakeholders with an interest in the UK's capital markets are engaged throughout. The Board must also ensure that it continues to take a proportionate approach that reflects the prevalence and impact, in the UK, of the issue under consideration.

The Board focuses on the UK long term public good, as per the statutory requirement, which also require it to ensure the international accounting standards it adopts enable the efficient allocation of capital, including the smooth functioning of capital markets in the UK. Therefore, the revisions to the DPH are aimed at balancing the needs of investors and businesses, with supporting effective and efficient capital allocation and growth in the economy.

The [Draft] revised DPH also ensures that, in line with requirements in legislation, the UKEB continues to provide stakeholders with opportunities to engage in its work and to provide comments and views on its projects, while ensuring that it takes a proportionate approach to undertaking its statutory duties and other activities.

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Summary of changes

A high-level summary of proposed changes is set out in the table below:

Section	Item	Revised DPH
Introduction	Purpose	Statement added to clarify the UKEB takes a proportionate approach to its work.
Throughout document	Text clarifying the UKEB's adherence to its statutory functions	Retained so that the UKEB's adherence to its statutory functions is clear throughout the DPH.
Sections 5, 6, 7 & 8 (Influencing, Endorsement, Thought Leadership & PIRs)	Operational procedures	Removed to streamline the processes set out in the DPH and focus on the due process steps to be undertaken by the Board, rather than the work undertaken by the Secretariat.
Throughout document	Overly detailed explanatory text	Removed, including removal of any repetition to streamline the DPH content.
Project Types	Project milestones	References to mandatory / non-mandatory milestones removed. Project steps to be proposed, with rationale, in the Project Initiation Plan, and approved by the Board at a public meeting.
Project Types	Project milestones	Due Process Compliance Statement removed as due process steps are set out in the relevant documentation provided at each stage of a project.
Section 9 (Advisory Groups)	Description of types of participants, meetings etc.	Removed as the details are set out in the ToRs of the various groups, which are published on the UKEB website and updated by the Board, as required.

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Questions

1. Do you agree that the proposed due process the UKEB intends to follow for its projects is clear and transparent?

Yes	☐	No	☐
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If you disagree, please give the rationale for your answer to question 1.

Click or tap here to enter text.

2. Are there sufficient opportunities for stakeholders to engage with the UKEB and provide input into its work?

Yes	☐	No	☐
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If you disagree, please give the rationale for your answer to question 2.

Click or tap here to enter text.

3. The proposed due process no longer sets out mandatory milestones. However, the Board continues to consider desk-based research and stakeholder engagement as key components of its work. As such, project steps will be proposed and approved at the start of each project and published on the UKEB website.

Do you have any concerns about the revised approach to the due process in relation to project initiation?

Yes	☐	No	☐
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If so, please give the rationale for your answer to question 3.

Click or tap here to enter text.

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4. Since its establishment in 2022, the Board has considered a wide range of new and amended standard for endorsement and has been required to consider whether they are likely to lead to a 'significant change in accounting practice'. This experience has led to the Board proposing an expanded definition of a 'significant change in accounting practice' which it is statutorily required to provide.

Do you agree with the following description of a 'significant change in accounting practice' (included in paragraph 8.3)?

Whether or not a standard adopted under **Regulation 6** is likely to lead to a 'significant change in accounting practice' will usually depend on the expected impact on UK entities of the standard and will require judgement. The UKEB will take the following indicators into account when developing its view on this matter:

- a) The scale and nature of the change to recognition and measurement;
- b) The population of UK companies affected and their economic significance;
- c) The population of UK companies affected which are required to prepare their accounts using UK-adopted international accounting standards.

Yes	☐	No	☐
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If you disagree, please give the rationale for your answer to question 4.

Click or tap here to enter text.

Other comments

5. Do you have any **other comments** on the [Draft] revised Due Process Handbook you would like to add?

Click or tap here to enter text.

Response generation

6. Did you/your organisation use a large language model (e.g. Chat GPT, Microsoft Copilot) to create any part of your/its response (response to this Invitation to Comment or a comment letter you are submitting as part of your response)?

Yes	☐	No	☐
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If you answered yes to Question 6, please specify which model and what prompt(s) you used for the large language model.

Click or tap here to enter text.

Thank you for completing this Invitation to Comment

Please submit this document

by close of business on XX December 2026 to:

UKEndorsementBoard@endorsement-board.uk