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International Auditing and Assurance Standards Board
International Federation of Accountants
529 Fifth Avenue
New York, NY 10017

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Dear Board Members and Staff,

Social Value International¹ (SVI) appreciates the opportunity to provide input on the International Auditing and Assurance Standard Board's (IAASB) Extended External Reporting (EER) Assurance Consultation Paper. The mission of SVI is to *change the way the world accounts for value* and therefore we are supportive of the IAASB's project to publish guidance on EER and welcome the opportunity to comment on the first phase of that project.

Request for Comments: Overall we are supportive of the draft. The guidance is structured in a way that is easy for practitioners to understand and use (Q2). In relation to Q1 and the challenges for practitioners we just have the following two comments regarding the sections on 'Intended users' and 'Considering Impact' Paragraphs 232-255:

Paragraph 233: The guidance recognises the challenge in impact where those affected are often not intended users. The proposed solution is that their interests can be taken into account by other parties who are intended users. SVI would propose two alternatives in order of preference; a) That the assurance process is designed as if they were intended users; b) That it is recommended that one of the intended users acts in their interests.

Paragraph 250: The guidance recognises the challenge of identifying impact and the need for open dialogue with stakeholders. Social impacts are often intangible aspects of wellbeing and this requires careful attention and dialogue with stakeholders. This is an area SVI has expertise in and would be keen to share experiences.

Offer of support: We would like to bring to your attention that SVI have an assurance standard relating to social impact which is highly relevant to the issues raised in the EER draft guidance. The SVI Report Assurance Standard (attached as appendix) has evolved over the last ten years and has been applied by practitioners from a variety of sectors from across the world.

Social Value International, via our Reporting and Assurance Technical Committee² would like to work with IAASB to demonstrate how the SVI Report Assurance Standard is complementary to ISAE3000 and the EER guidance and would support assurance providers when they are assessing the suitability and availability of criteria in relation to assurance of social impact.

Please contact Catherine Manning, Assurance Manager (Catherine.manning@socialvalueint.org) for a further discussion on this offer.

¹ <https://socialvalueint.org/about/>

² <https://socialvalueint.org/social-value/governance/reporting-and-assurance-technical-committee/>

Yours Sincerely,



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ASSURANCE STANDARD

Recommendation Form

Please circle: Report Assurance / Accredited Practitioner Status

Report title	
Application Number	
Report type – Delete as applicable	SROI Report/Social Impact Report
Assessed as forecast/evaluative – please state	
Assessor Name	
Date of recommendation	
DOES THE REPORT COMPLY? Delete as applicable	Yes/No/No but might after an amendment period

Adopted statement for successful applications:

“This report has been assured by Social Value UK. The report shows a good understanding of, and is consistent with, the Social Value process and principles. Assurance here does not include verification of stakeholder engagement, data and calculations.”

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Principle	Meets the criteria? <i>Please delete</i>	Can recommendations be implemented within a 5 week amendment period?	Commentary <i>Please copy and paste your summary statements from each principle</i>
Stakeholder involvement	All, Majority, Minority, None	Y/N	
Understand change	All, Majority, Minority, None		
Value what matters	All, Majority, Minority, None		
Only include what is material	All, Majority, Minority, None		
Do not overclaim	All, Majority, Minority, None		
Be transparent	All, Majority, Minority, None		
Verify the result	All, Majority, Minority, None		

These criteria are based upon the technical guidance found in the following publications:
 The Guide to SROI, Supplementary Guidance on Stakeholder Involvement, Materiality & Understanding Change.
 All available for download: <http://www.socialvalueuk.org/resources/sroi-guide/>

Principle 1: Involve stakeholders

Stakeholders are those people or organisations that experience change as a result of the activity and they will be best placed to describe the change. This principle means that stakeholders need to be identified and then involved in consultation throughout the analysis.

The important issues are:

- identification of stakeholders and a rationale for those that have been included and excluded from involvement in the process;
- evidence of involvement of the included stakeholders in the application of the other principles.

1.1	Identification of stakeholder groups	Y/N	Specific Actions
1.1.1	Does the report include a range of stakeholder groups (not just intended 'beneficiaries')?		
1.1.2	Does the report identify any subgroups (or potential subgroups) of stakeholders?		
1.1.3	Does the report describe how subgroups have been considered based upon evidence of materially different outcomes?		
1.1.4	<p>Does the report provide a description and analysis of how stakeholders were involved in identifying other stakeholders, addressing the extent to which it provides a fair representation of the whole stakeholder group?</p> <p>Stating:</p> <ul style="list-style-type: none"> • the process for selecting representative stakeholders; • the method chosen for involving stakeholders (e.g. focus group, semi structured interviews); • the numbers involved. 		

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1.1.5	Where representatives of a stakeholder group (identified as likely to experience material outcomes) have not been involved in identifying other stakeholder groups, does the report include a rationale to explain why they were not involved and how their perspective is represented in the analysis (if another group has been used as a proxy, an explanation should be provided justifying why they are an appropriate group)?		
1.2	Stakeholders involved in defining outcomes (qualitative phase)	Y/N	Specific Actions
1.2.1	<p>Does the report provide a description and analysis of how stakeholders were involved in defining outcomes (and, where necessary, identifying the relevant outcome within a chain of events) addressing the extent to which it provides a fair representation of the whole stakeholder group?</p> <p>Stating:</p> <ul style="list-style-type: none"> • the process for selecting representative stakeholders; • the method chosen for involving stakeholders (e.g. focus group, semi structured interviews); • the numbers involved. 		
1.2.2	Does the report include a list of the questions presented to stakeholders in the process of identifying outcomes (and, where necessary, identifying the relevant outcome within a chain of events)?		
1.2.3	Do the questions reflect an open approach to identifying outcomes (i.e. including options to identify unintended and negative outcomes)?		
1.2.4	Where representatives of a stakeholder group (identified as likely to experience material outcomes) have not been involved in defining the outcomes, does the report include a rationale to explain why they were not involved and how their perspective is represented in the analysis (if another group has been used as a		

	proxy, an explanation should be provided justifying why they are an appropriate group)?		
1.3	Stakeholder involvement in establishing the levels of attribution, drop off, deadweight and displacement of outcomes	Y/N	Specific Actions
1.3.1	<p>Does the report provide a description and analysis of how stakeholders were involved in establishing the levels of attribution, drop off, deadweight and displacement of outcomes, addressing the extent to which it provides a fair representation of the whole stakeholder group?</p> <p>Stating:</p> <ul style="list-style-type: none"> • the process for selecting representative stakeholders; • the method chosen for involving stakeholders (e.g. focus group, semi structured interviews); • the numbers involved. 		
1.3.2	Does the report include the questions that were asked to stakeholders about how they might establish the levels of attribution, drop off, deadweight and displacement of outcomes?		
1.3.3	Where representatives of a stakeholder group <i>have not</i> been involved in establishing the levels of attribution, drop off, deadweight and displacement of outcomes, does the report include a rationale to explain why they were not involved?		

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1.4	Future stakeholder involvement	Y/N	Specific Actions
1.4.1	Does the forecast report include recommendations on how stakeholders should continue to be involved in the analysis so that actual information can be compared with the forecast?		

1.5	Summary	Y/N	Specific Actions
1.5.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle one; 'Involve stakeholders'?		

Principle 2: Understand what changes

The important issues for this principle are:

- inclusion of a clear explanation of the overall theory of change and chains of events for included stakeholders;
- statement of which outcome in each chain of events will be valued and why;
- evidence to support causality in the chain of events;
- the experience of all stakeholders in stakeholder groups is included.

2.1	Scope	Y/N	Specific Actions
2.1.1	Does the report make clear whether the analysis is a forecast or an evaluation?		
2.1.2	Does the report make clear the activities that are being analysed?		
2.1.3	Does the report make clear the period over which the activities occur?		

2.2	Defining Outcomes	Y/N	Specific Actions
2.2.1	Are the outcomes disclosed in the report linked to a stakeholder group that have (or will) experienced that outcome?		
2.2.2	Does the report include evidence of how the process of defining outcomes was designed to capture any unintended (and negative) outcomes? This may include reference to similar research.		
2.2.3	Are the outcomes disclosed in the report consistent with the outcomes in the value map?		

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2.3	Context of outcomes	Y/N	Specific Actions
2.3.1	Does the report outline how each outcome is linked to inputs and outputs?		
2.3.2	Are all of the outcomes in the report given context with a 'chain of events'? e.g. other outcomes that lead to this outcome.		
2.3.3	Does the report identify an outcome from the chain of events that is then taken forward to test for materiality?		
2.3.4	Does the report provide a rationale for why each outcome has been selected (from the chains) to be tested for materiality? (see supplementary guidance on well-defined outcomes).		
2.3.5	Does the report explain how the chain of events was created? (e.g. the causality between outcomes in the chain of events is based upon stakeholder involvement, suitable third-party research and the experience of the author)		

2.4	Defining Indicators	Y/N	Specific Actions
2.4.1	Does the report contain indicators that can demonstrate that the outcome has occurred and where the outcome is non-binary, how much change has occurred?		
2.4.2	Where necessary, have a combination of indicators been identified in order to increase the confidence in the amount of change that has occurred?		

2.5	Measuring the amounts (quantities) of change	Y/N	Specific Actions
2.5.1	Does the report state the number of stakeholders that were involved in measuring how much change occurred?		
2.5.2	Does the report include a rationale for the number involved in measuring how much change?		

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2.5.3	Is the amount of change based on the difference between a baseline situation for the stakeholder group at the start of the activity and the position at the end of the activity?		
2.5.4	In a forecast report is the quantity of expected change supported by proposals for how actual data should be collected to compare against the forecast?		

2.6	Completeness of the information	Y/N	Specific Actions
2.6.1	Does the report make it clear what happens to all members of a stakeholder group? (e.g. if 80% of a stakeholder group are experiencing an intended outcome, what is happening to the remaining 20%? Maybe nothing changes for them or maybe they experience a different outcome?)		
2.6.2	If the report uses average figures on a scale to establish whether outcomes have been experienced and/or the amount of change experienced, has the risk of significant different experiences within the group been identified and addressed?		

2.7	Forecast quantities	Y/N	Specific Actions
2.7.1	In a forecast report is there evidence that explains the basis for the quantities of change forecasted? (this can include results from previous years, from other similar activities of a similar scale, from market research with people who share characteristics of expected future stakeholders)		

2.8	Summary	Y/N	Specific Actions
2.8.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle two; 'Understand what changes'?		

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 All available for download: <http://www.socialvalueuk.org/resources/sroi-guide/>

Principle 3: Value the things that matter (for SROI reports)

The important issue is that the values should reflect the value of the outcomes to the stakeholder group.

3.1	Valuing the inputs	Y/N	Specific Actions
3.1.1	Does the report include all of the inputs made by each stakeholder group?		
3.1.2	Does the report and value map include valuations of each input?		
3.1.3	Does the report include a rationale for any inputs that have not been valued?		
3.1.4	Does the report accurately calculate the total value of the inputs?		

3.2	Valuing the outcomes	Y/N	Specific Actions
3.2.1	Does the report include a valuation for each outcome?		
3.2.2	Does the report contain valuations (financial proxies) that represent the value of the specific outcome to the specific stakeholder?		
3.2.3	Does the report include a rationale that justifies the choice of valuation technique and explains why the valuations represent the value of each outcome to the stakeholders?		

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3.3	Calculating the SROI	Y/N	Specific Actions
3.3.1	Is the calculation of the total value of each outcome accurate (based upon the quantities of the outcome multiplied by the value of the outcome)?		
3.3.2	Is the calculation of the total value of all outcomes calculated correctly?		

3.4	Summary	Y/N	Specific Actions
3.4.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle three; 'Value the things that matter'?		

Principle 3: Value the things that matter (for Social Impact reports)

The important issue is that the values should reflect the value of the outcomes to the stakeholder group.

3.1	Considering the relative importance of outcomes	Y/N	Specific Actions
3.1.1	Does the report consider the relative importance of outcomes?		
3.1.2	Does the report explain how the relative importance of outcomes has been established e.g. through ranking the importance of each outcome or weighting them in some way		
3.1.3	Does the report include a rationale that justifies the method of establishing the relative importance of outcomes and explain why it represents the views of each stakeholder?		

3.4	Summary	Y/N	Specific Actions
3.2	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle three; 'Value the things that matter'?		

Principle 4: Only include what is material

The important issues are:

- is there evidence to support decisions to exclude outcomes identified from stakeholder involvement and other research?
- if the outcomes had been included is there evidence that the stakeholder may have made the same decision?

4.1	Inclusion or exclusion of stakeholder groups	Y/N	Specific Actions
4.1.1	Does the report provide a rationale exploring the materiality of outcomes for each stakeholder group?		
4.1.2	Is the decision to exclude stakeholder groups without involving them based upon evidence from third party research (consistent with these criteria) that there are no likely material outcomes?		
4.2	Materiality of outcomes	Y/N	Specific Actions
4.2.1	Is the rationale and ultimate decision to include or exclude outcomes based upon any of the following; <ul style="list-style-type: none"> • The relevance of outcomes (emerging from the qualitative stage of stakeholder) • The significance of outcomes (emerging from the quantitative stage) based upon the <i>quantity, duration, value</i> and <i>causality</i>. 		
4.3	Sector specific or 'relevant' outcomes	Y/N	Specific Actions
4.3.1	Is there any reason, in the experience of the assessor, that the activity would have other material outcomes that have not been included in the report?		

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4.4	Summary	Y/N	Specific Actions
4.4.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle four; 'Only include what is material'?		

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Principle 5: Do not over claim

The important issue is that the analysis does not overstate the value caused by the activity.

5.1	Counterfactual (Deadweight)	Y/N	Specific Actions
5.1.1	Does the report describe the approach used to assess the level of deadweight for each outcome?		
5.1.2	Does the report contain evidence to support the level of deadweight for each outcome?		

5.2	Attribution	Y/N	Specific Actions
5.2.1	Does the report describe the approach used to assess the level of attribution for each outcome?		
5.2.2	Does the report contain evidence to support the level of attribution for each outcome?		

5.3	Displacement	Y/N	Specific Actions
5.3.1	Does the report describe the approach used to assess the level of displacement for each outcome?		
5.3.2	Does the report contain evidence to support the level of attribution for each outcome?		

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5.4	Drop off and Duration	Y/N	Specific Actions
5.4.1	Does the report describe the approach used to assess the duration and level of drop off for each outcome?		
5.4.2	Does the report contain evidence to support the duration and level of drop off for each outcome?		

5.5	Risk factors	Y/N	Specific Actions
5.5.1	Does the report consider the risks of over claiming in all of the above approaches?		
5.5.2	Does the report use financial proxies that relate to the same duration as the outcomes.		
5.5.3	Does the report address potential double counting of outcomes.		

5.6	Summary	Y/N	Specific Actions
5.6.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle five; ‘Do not over claim’?		

Principle 6: Be transparent

The important issue is that all decisions relating to stakeholders, outcomes, indicators, values, and counterfactual; the sources and methods of information collection; the difference scenarios considered and the involvement and communication of the results to stakeholders should be explained and documented.

6.1	Consistency of Information	Y/N	Specific Actions
6.1.1	Does the report and any appendices or attachments (e.g. Value Map) contain consistent information?		
6.2	Sensitivity Analysis	Y/N	Specific Actions
6.2.1	Does the report contain a sensitivity analysis that tests for sensitivities around the following aspects of each outcome; <ul style="list-style-type: none"> • values, • levels of: <ul style="list-style-type: none"> ➤ deadweight (counterfactual) ➤ attribution, ➤ displacement ➤ drop off 		
6.3	Referencing	Y/N	Specific Actions
6.3.1	Does the report contain accurate references?		
6.4	Replicability	Y/N	Specific Actions
6.4.1	Is the Value Map presented in a way that makes it possible for the analysis to be replicated?		

6.5	Transparency	Y/N	Specific Actions
6.5.1	Does the report discuss the potential risk of errors in any of the data or findings?		
6.5.2	Does the report explain the professional judgements that support the report's findings and conclusions?		

6.6	Forecast recommendations	Y/N	Specific Actions
6.6.1	For a forecast report are there recommendations included for the assessment of actual results against the forecast?		

6.7	Summary	Y/N	Specific Actions
6.7.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle six; 'Be transparent'?		

Principle 7: Verify the result

The important issue is that stakeholders have had an opportunity to review the information in the report

7.1	Stakeholder involvement in reviewing and verifying the result	Y/N	Specific Actions
7.1.1	Does the report describe how stakeholders have been involved in reviewing and verifying: <ul style="list-style-type: none"> the theory of change the range of outcomes the relative value/importance of outcomes 		
7.1.2	Does the report describe how stakeholders have been, or will be, involved in reviewing and verifying the final analysis?		

7.2	Summary	Y/N	Specific Actions
7.2.1	Overall, in the opinion of the assessor, does the report contain professional judgements that demonstrate a good understanding of principle seven; 'Verify the result'?		