Financial Reporting Council

UK Taxonomy Suite

Technical Modelling Discussion Paper

November 2025

Contents

1. Foreword

The development of this discussion paper, is intended to support a dialogue with our stakeholders about the ongoing development and use of digital reporting and taxonomies. Digital reporting offers a way of accessing corporate information in a way that is cost effective, which supports the FRC's work in support of the government's call for regulators to work in a way that supports UK economic growth.

The FRC has a long-standing commitment to digital reporting – indeed our work has been critical in ensuring the provision of pragmatic and efficient solutions to support greater use of digital reporting through our work developing and maintaining the UK Taxonomy Suite.

The proposals set out in this paper, will help further the Strategy and Objectives of the FRC in the following ways:

- It proposes further options for using a digital standard to enhance the quality of corporate reporting, and supporting access to that information, in a way that supports decision making in financial markets and by wider stakeholders
- An enhanced focus on proportionality, and on continuous improvement of the Taxonomies in support of high quality reporting to meet the needs of our stakeholders
- Supported through collaborative working by an extensive network of cross-regulator and market relationships focussing on delivering the future of digital reporting. As a result the Taxonomies provide a cost effective way of supporting UK companies in meeting regulatory requirements
- Modern, continuously improving, open and responsive in a way that supports UK innovation and thought leadership.

This paper has been informed by our earlier discussion paper, Opportunities for future UK digital reporting, and extensive stakeholder outreach. At a time when government is focused on removing burdens on business, digital reporting offers one example of how this can be facilitated.

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Executive Director, Regulatory Standards

November 2025

2. Introduction

Background

The purpose of the FRC is to serve the public interest and support UK economic growth by upholding high standards of corporate governance, corporate reporting, audit and actuarial work.

Since 2011, UK regulators, agencies, and government departments[1] have increasingly required filers[2] to digitally report financial and non-financial information in the Extensible Business Reporting Language (XBRL)[3], and, later, iXBRL[4]. This began with HMRC's original mandate for companies to send their Company Tax Returns online using XBRL for accounts and computations, and, most recently, includes the Corporate Transparency and Register Reform white paper's comprehensive digital mandate for all submissions to Companies House and the Economic Crime and Corporate Transparency Act 2023 ("ECCT Act"). FCA Disclosure and Transparency Rules (originating in EU legislation) also now require IFRS consolidated financial statements within annual financial reports to be published in a structured digital format and filed in the FCA's National Storage Mechanism which is accessible to the public.

The FRC enables the creation of digital reports through the FRC's XBRL Taxonomies project. It is the collective group of technical and policy experts from regulators, agencies, arms-length bodies, software vendors, and professional services, who manage the process that turns laws and accounting standards into computer code, or taxonomies.

Last year, the FRC published a Discussion Paper on some of the policy considerations relating to the future of digital reporting to the FCA and Companies House. Although aspects of it were technical in nature, it was predominantly written to be accessible to a non-technical reader. The paper received feedback across multiple stakeholder groups, reflecting the diverse interests and needs of users of digital reports. By contrast, this discussion paper is aimed at technical readers, discussing issues relating to the purpose, structure and content of the various files that make up the UK Taxonomy Suite. The term 'UK Taxonomy Suite' in this paper refers collectively to the FRC Taxonomy Suite, the Irish Taxonomy, and the Charities Taxonomy; therefore, any technical modelling changes discussed will have implications across all three taxonomies.

1 From this point on, we use the word "regulators" to collectively cover those signed up to the FRC's Taxonomies project: Companies House, FCA, HMRC, the Charity Commission for England and Wales, the Irish Revenue.
2 For the sake of readability we use the word "filer" generically to cover the range of preparers of digital reports (i.e. listed and unlisted businesses, charities, banks, insurance companies etc.). Where further granularity is necessary, we describe the specific type of filer that would be affected.
3 XBRL is the open international standard for digital business reporting.
4 iXBRL is a hybrid format that combines both HTML (the language webpages are written in) and XBRL. It is designed to make XBRL data human-readable directly in a web browser while retaining the machine-readability of XBRL.

Executive summary

This paper outlines a set of proposed changes and areas for discussion that aim to improve the usability, scalability, and technical integrity of taxonomies, thereby making it easier for users to apply the taxonomies and reducing regulatory burden. Some proposals are well-defined and ready for implementation, while others are more exploratory, where we are seeking input from our stakeholders to help shape the best path forward.

This Discussion Paper is intended to give the market full transparency of proposals with more than a year to assess the impact on their products and services. We invite all stakeholders with knowledge and experience of using XBRL, including preparers, software vendors and data consumers, to review the proposals and provide feedback to the FRC ahead of any of the changes being introduced in future workplans subject to our due process. Your input will help ensure that the UK Taxonomy Suite continues to support high-quality digital reporting, reduces regulatory burden and remains fit for purpose in a rapidly evolving regulatory and technological landscape.

This Discussion Paper is presented in two parts:

1. A short, contextual section on accountancy and modelling financial reports. It is essential for technical members of the XBRL community to understand the fundamentals of accountancy and financial reporting[5]. This section describes how digital reporting fits into the bigger picture of accounting, explains what annual accounts are, why taxonomies have become the modelling tool of choice for business reporting, and some of the unique properties of the UK Taxonomy Suite and the FRC Taxonomies project.

2. A discussion of the technical changes we propose to make to the taxonomies and an assessment of the impact on the range of stakeholders, with discussion questions afterwards.

The topics covered in this paper include:

- The use of typed dimensions to replace explicit dimensions with large sets of domain members
- The addition of a formula linkbase to support automated validation and improve data quality
- The replacement of fixed item types with extensible enumerations to align with modern XBRL standards
- A review of entry point design and schema discovery, where we are seeking ideas and solutions to improve accuracy and usability

Adopting these changes will impact every software product in the market that creates digital reports for the purpose of filing to the regulators using Taxonomies developed under the FRC Taxonomies project, including FRC Taxonomy Suite, Charities Taxonomies and Irish Taxonomies. It will introduce foundational changes to how the UK Taxonomy Suite is structured and software

5 This is beyond the scope of this discussion paper. There are many high-quality, free resources available on the professional accounting bodies websites. UK accounting standards are freely available from the FRC website. Guidance supporting directors is available from the Companies House website.

vendors will need to make these changes if their products are to continue to meet the requirements for filing and/or consuming valid reports for HMRC,Companies House, FCA, the Charities Commission of England and Wales, and the Irish Revenue. These changes will also affect how preparers apply the list of mandatory tags (as currently described in the Companies House Technical Implementation Specification; these are subject to further changes and updates over the coming years). These changes will impact the Joint Filing Checks at both HMRC and Companies House's gateways and may impact the acceptability of older taxonomy versions for filing.

Context

Impact of the ECCT Act on Companies House Policy:

Following the passing of the ECCT Act 2023, Companies House is undergoing a significant transformation programme, which the UK Government describes as "the biggest change in the role of the Registrar since it was created in 1844"[6]. The ECCT Act provides Companies House with the power to mandate digital filing of company accounts via its Registrar's Rules so that it can check, reject, and improve the quality of data on the Register. Once Registrar's Rules are updated, and the filing of company accounts via software-only has been introduced, Companies House aims to require company accounts to be 'fully tagged'.

The ECCT Act introduced four new statutory objectives for the Registrars of Companies for England and Wales, Scotland, and Northern Ireland, who now have a new duty to seek to promote these objectives when performing their function. The two most relevant objectives to digital reporting are:

- to ensure that anyone who is required to deliver a document to the Registrar does so (and that the requirements for proper delivery are complied with); and
- to ensure information contained in the register is accurate and that the register contains everything it ought to contain.

The future requirements for accounts filings as set out in the ECCT Act and described in the White Paper on Corporate Transparency and Register Reform will be formalised through secondary legislation and the updating of Registrar's Rules. The requirements include:

- the Registrar to require all accounts to be filed digitally and fully tagged using iXBRL;
- the removal of a paper filing option for most companies; and
- the Registrar to require all component parts of a filing to be delivered together to facilitate the digital filing of more complex accounts.

The FRC enables the creation of digital reports through the XBRL Taxonomies project, operationalising digital reporting for the regulators that require it.

Technical: development of UK Taxonomies 2009-2026

Taxonomies make it possible to digitally disclose information in a standardised way. This is intended to reduce the burden and costs to businesses by creating a clearer and more user-friendly process for regulatory reporting; more efficient and effective regulation and regulators; and improving the accuracy, comparability, accessibility, and value of reported data for investors and other stakeholders. As the demands on the Taxonomies project have increased in scope, the FRC

6 https://www.gov.uk/government/publications/corporate-transparency-and-register-reform/corporate-transparency-and-register-reform-accessible-webpage

has been shaping these conversations and empowering the members of the Taxonomies project to achieve their digital reporting goals.
The UK Taxonomy Suite has evolved significantly over the past decade, reflecting the growing complexity of financial reporting and the increasing demand for high-quality, structured digital data. The development of the UK Taxonomies can be broken down into three phases:

1. **2009-2014**: pre-FRC taxonomies, primarily for the purpose of mandatory company tax returns, including accounts and computations, to HMRC. UK Taxonomies were hosted at www.xbrl.org/uk;

2. **2014-2026**: current FRC UK Taxonomy Suite, hosted at http://www.xbrl.frc.org.uk, and which enable digital reporting to Companies House, FCA, HMRC, the Charity Commission for England and Wales, and the Irish Revenue.

   During this phase we have retained the features of the 2009-2014 taxonomies that have stood the test of time and modernised when there was a clear reason to do so (for example, deprecating the tuple approach in favour of using dimensions). Changes to the taxonomies are reviewed and recommended by our due process committees and are always open to public consultation.

3. **2027 onwards**: Remodelled UK Taxonomy Suite.

As part of our ongoing commitment to maintaining a robust, future-ready Taxonomy Suite, the FRC is undertaking a series of architectural and design reviews to ensure the Taxonomy Suite remains aligned with international standards, supports accurate and efficient reporting, and meets the needs of all stakeholders. A number of features of the UK Taxonomy Suite pre-date the solutions now described in the XBRL Specifications. Adapting the architecture of the UK Taxonomy Suite to adopt those standards is in line with our Objectives and Principles to develop taxonomies which are in line with technology available in the marketplace and reduce the burden on companies, those that prepare digital reports, and Government (UK and Irish regulators).

3. On modelling business reports

This paper is about the technical modelling of business report data using XBRL. XBRL is not unique in attempting this; it is a process that humans have been involved in for thousands of years.

XBRL is technically complex so technical issues can be disproportionally represented in discussions on how accounts data should be modelled. However, in order to meet the Objectives and Principles of the Taxonomies Project (see below), the accounting meaning of concepts, including qualifying information and suitable disaggregations, must be fully understood before that modelling is specifically implemented in the form of a taxonomy.

This short introductory section gives technical readers some essential context to inform the technical discussions that follow. It is essential to have some understanding of the accounting and legal aspects that effect UK reporting when considering solutions availble using XBRL.

What are annual accounts?

An entity's annual report is a collection of information that combines statutory requirements with a wider narrative to describe an entity's financial performance, position, strategy, risks, and governance. In addition to their legal function, annual reports act as a communications tool, telling a story to stakeholders about how an entity creates and sustains value over time so they can make decisions with confidence.

An entity's financial statements, or 'accounts', are a component of an annual report. Accounts are required by legislation to give a true and fair view of:

a) the assets, liabilities and financial position of the company and, where relevant, the group at the end of the reporting period; and

b) the profit or loss of the company and, where relevant, the group for the reporting period[7].

Accounting standards provide for recognition, measurement, presentation and disclosure for specific aspects of financial reporting in a way that reflects economic reality and hence provides a true and fair view.

The FRC's overriding objective in setting accounting standards is to enable users of accounts to receive high-quality understandable financial reporting proportionate to the size and complexity of the entity and users' information needs. Financial reporting provides information about an entity that is useful for decision-making by a wide range of users who are not in a position to demand reports tailored to meet their particular information needs[8]. Such information includes information about the economic resources of the entity, claims against the entity, changes in those resources and claims, and how efficiently and effectively the entity's management has discharged its responsibilities to use the entity's economic resources. The individual pieces of data contained

7 Foreword to Accounting Standards, paragraph 3, p1
8 The objective of general purpose financial statements is defined in FRS 102, paragraphs 2.4-2.7.

within annual accounts are structured, nuanced, interrelated and require some specialist knowledge to understand and draw inferences from.

Although there are common elements in annual accounts, they vary substantially in terms of size, complexity and granularity, depending on the entity preparing them and the staus, regime and jurisdiction. As such, it is not possible to have a one-size-fits-all approach to the contents of annual accounts. Provisions in UK legislation and accounting standards recognise this and give directors some flexibility in how they choose to present financial information to provide a true and fair view[9].

Micro-entities[10] have their own financial reporting standard, FRS 105, to reflect their simpler nature and smaller size[11]. Financial statements drawn up in accordance with the micro-entity provisions of company law are presumed to give a true and fair view. However, a micro-entity may choose to include information additional to the micro-entity minimum accounting items[12].

Therefore, we cannot discuss the modelling of annual accounts (analogue or digital) with the expectation that they can be reduced to the simplest models: tables, templates or forms. Instead, they must be understood as knowledge graphs: individual pieces of data, contextualised by relevant information, connected to each other by meaningful relationships[13].

Why are taxonomies used to represent business reports?

Knowledge can be modelled along a spectrum that ranges from simple lists and dictionaries to detailed logical theories that encode associations, rules and constraints. Taxonomies are middleweight knowledge structures. They define formal concepts, like a dictionary, but also the associations and relationships between elements, while staying manageable.

Taxonomies are not specific to business reporting or digital reporting. They are commonly used in natural science, education and technology to model, classify and categorise information[14]. Taxonomies can be enriched by introducing formulae for data validation, adding additional relationships between elements to more accurately model their meaning.

Even simple taxonomies can be useful for meaningfully modelling nuanced, interrelated data; from a business reporting perspective, the definition of concepts and their relationships are the foundation of creating legally compliant, technically valid reports of value to users of digital reports.

9 Flexibility requires the application of professional judgement at all stages of preparation of the accounts, for example when selecting appropriate accounting policies, giving appropriate disclosures even where not specifically required by accounting standards, ensuring that significant information is not obscured by immaterial or irrelevant disclosures , and standing back at the end of the accounts preparation process and making sure the accounts overall do give a true and fair view (https://media.frc.org.uk/documents/True_and_Fair_-_June_2014.pdf)

10 Companies Act 2006 section 384A to 384B

11 FRS 105 is based on FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland, but its accounting requirements are adapted to satisfy the legal requirements applicable to micro-entities and to reflect the simpler nature and smaller size of micro-entities.

12 FRS 105 The Financial Reporting Standard applicable to the Micro-entities Regime, paragraph 1.3 p6, paragraph 4.2 p19, paragraph 5.2 p21, paragraph 6.1 p22

13 It is beyond the scope of this paper to explain graph data structures. High-quality, freely available information is available to help users understand what a knowledge graph is and how it applies to financial reporting.

14 For example, biological taxonomic rank, Bloom's Taxonomy, BBFC film certification

XBRL – the eXtensible Business Reporting Language – is used to create taxonomies that are well suited to support the needs of creators, receivers and users of business reports. They standardise common concepts between reports (e.g. revenue, equity, non-current asset etc.) and allow them to be qualified using dimensions to match the nuance or granularity of a specific entity's presentation of the disclosure (e.g. operating segments, geographic region, original or revised). They can also be extended to include idiosyncratic or unique disclosures or presentations of disclosures. This standardisation between reports supports easier validation of reported information and creation of high-quality data sets for further analysis.

The first three proposals in this paper – (1) the introduction of extensible enumerations, (2) the formula linkbase, and (3) expanding the use of typed dimensions – discuss XBRL taxonomy modelling options that support making complex disclosures easy and efficient to tag.

FRC Taxonomies project: Objectives and Principles

The over-arching objective of the FRC Taxonomies Project is to provide taxonomies which enable the efficient preparation of legally compliant corporate reports in XBRL. The content of the UK Taxonomy Suite is derived from current UK regulations. As such, they represent models of accounting standards and company law, and do not introduce new disclosure requirements. The fourth and fifth proposals both relate to this fact and discuss the tension between using taxonomies to reduce burden on preparers, receivers and software vendors and the need to accurately model the complexity of the policy and regulation that requires the reporting in the first place.

The final proposal considers enhancing the foundational design of the UK Taxonomy Suite with additional accounting semantics, bringing concepts and datapoints closer to modelling their actual meaning, increasing clarity and usability for preparers and users of digital reports.

All of the proposals described in this paper stem directly from the Objectives and Principles of the Taxonomies project, especially the following subset (presented in no particular order):

- Generate quality structured data.
- Clearly and accurately define the XBRL tags needed to identify specific information.
- Cover financial, non-financial and narrative elements within annual and other corporate reports which is useful for analysis, comparison, or review by existing and potential consumers of XBRL reports.
- Are easy and efficient to use.
- Provide clear and consistent tagged information which can be used effectively by consumers of XBRL information.
- Be in line with technology available in the marketplace and with relevant regulatory scope and remit.
- Reduce the burden on companies and those that prepare digital reports

- Reduce the burden on Government (UK and Irish regulators)
- Provide value for money in the public interest & better outcomes for all stakeholders
- Contribute to efforts to tackle economic crime
- To maintain high standards of digital reporting with emphasis on continuous improvement of quality.
- To assist preparers of digital reports in clearly understanding their reporting obligations.

4. Proposals for technical modelling changes to the UK Taxonomy Suite

1. Replacing fixedItemType data type with Extensible Enumerations

The FRC proposes to replace the use of fixedItemType in the UK Taxonomy Suite with the XBRL Extensible Enumerations 2.0 specification. We seek feedback on the scope, implementation and transition considerations of this proposal.

Background and Rationale

The UK Taxonomy Suite currently uses a custom implementation of enumerated values via fixedItemType data type, a solution that predates the formalisation of extensible enumerations in the XBRL specification. A small number of concepts have the data type as "types:fixedItemType". FixedItemType facts must be empty as these concepts are designed to be used in combination with an appropriate domain member of an applicable dimension which is responsible for supplying a fact value. An example is 'Country of formation or incorporation'. To represent country of incorporation, this concept should be used in combination with the appropriate domain member from the 'Countries and regions' dimension. This ensures unambiguous identification of the country concerned.

Extensible Enumerations specification allows the creation of XBRL concepts that take one or set of values from a hierarchy of taxonomy-defined list of values.

While the use of fixedItemType was innovative at the time and positioned the UK as a forerunner, it now requires UK-specific tooling and tagging practices and limits interoperability with international software. In line with the FRC Taxonomies Project's Objectives and Principles, we aim to adopt international specifications where they align with UK digital filing needs.

The affected concepts from this change are:

#	Concept	Dimension
1	Country of formation or incorporation	Countries and regions
2	Country in which parent of largest group is incorporated	Countries and regions
3	Country in which parent of smallest group is incorporated	Countries and regions
4	Country of incorporation or residence of associate	Countries and regions
5	Country of incorporation or residence of joint venture	Countries and regions
6	Country of incorporation or residence of subsidiary	Countries and regions
7	Director signing financial statements	Entity officers
8	Director signing Directors' Report	Entity officers

9	Principal currency used in business report	Currencies
10	Other currency used in business report	Currencies
11	Entity trading status	Entity trading status
12	Report period	Report period
13	Report principal language	Languages
14	Scope of accounts	Scope of accounts
15	Accounting standards applied	Accounting standards
16	Accounts status, audited or unaudited	Accounts status
17	Accounts type	Accounts type
18	Applicable legislation	Applicable legislation
19	Entity is under special legal status	Entity special legal status
20	Legal form of entity	Legal form of entity
21	Main industry sector	Main industry sector
22	SORPs applied	SORPs

Overview of Proposed Architecture

The FRC proposes to replace fixedItemType with extensible enumerations. From the perspective of taxonomy development, this change is technically straightforward because fixedItemType already behave as enumerations. However, each case will be considered individually to ensure correct modeling. For example, Director Signing is a complex case where a director's name is tagged via a dimension (i.e., Entity Officers). It is difficult to replace it by an enumeration because the tagging represents a relationship (e.g., “this director signed this report”) rather than a simple value so few cases may require a separate modeling approach.

This change will bring the Taxonomy Suite in line with the latest XBRL specifications. It also enhances interoperability by reducing the need for UK-specific software products, making it easier for vendors and preparers to work with the taxonomy using globally supported tools. However, this transition will require effort across the ecosystem. Software vendors, data collectors, and preparers will need to update systems, tagging practices. Additionally, many of the concepts affected by this change are also used in gateway validation, meaning the impact will be felt by all preparers submitting digital reports.

Impact on Stakeholders

- **Preparers**: should benefit from a wider range of available tagging solutions, but may need to adapt their tagging tools and processes.
- **Software Vendors**: need to update their software to support extensible enumerations 2.0 if not already.

- **Regulators**: gain an internationally aligned taxonomy but must update their validating software to ensure smooth adoption.

Questions for Public Feedback

1. Do you support replacing fixedItemType with extensible enumerations in the UK taxonomy suite?
2. Are there specific use cases where fixedItemType should be retained?
3. What support or documentation would help you transition to extensible enumerations?

2. Introducing the formula linkbase

The FRC proposes the introduction of formula linkbase to the UK Taxonomy Suite. XBRL Formula provides a standard mechanism for defining rules in a taxonomy that can be applied against instance documents (iXBRL report). This change aims to improve the accuracy and consistency of reported data by enabling validation rules within the taxonomy. While this represents a significant step forward in data quality assurance, it also raises important questions about the interpretation of accounting principles, the role of validation in the reporting pipeline, and the appropriate level of enforcement. We invite stakeholders to provide feedback on the scope, and implementation of this proposal.

Background and Rationale

Historically, the UK Taxonomy Suite did not introduce a formula linkbase. Instead, it published a set of Consistency Checks in spreadsheet format, which described expected summations and relationships between tagged data. These were intended as guidance, not enforceable rules, leaving it to software developers to interpret and implement these checks as they saw fit. However, with the increasing importance of data quality at source, we now believe there is a strong case for embedding formula validation rules directly into the taxonomy.

The purpose of a formula linkbase is to define rules and formula that are true across all entities and reporting scenarios. These rules help ensure that tagged data is consistent, mathematically accurate, and logically complete.

Overview of Proposed Architecture

The FRC proposes to introduce formulas in the taxonomy based on the XBRL Formula 1.0 specification and focus on introducing formulas for:

- Arithmetic checks (e.g., accounting equations);
- Comparisons (e.g., Verifying that a reporting period's start date is logically before its end date);
- Conditional presence rules (e.g. Specifying a mandatory concept that must be reported if another specific fact is also present in the document)

Adopting formula linkbase brings the UK Taxonomy Suite in line with taxonomies used in other jurisdiction such as ESEF and US GAAP, reinforcing the UK's commitment to international best practices. However, software vendors and preparers will need to update their tools and workflows to support formula-based validation. For users unfamiliar with formula linkbases, there may be a learning curve in understanding how rules are triggered and how to interpret validation messages. There is a risk that poorly designed rules could inadvertently misrepresent standards or introduce unintended requirements.

We plan to introduce the foundational rules first that are broadly accepted and proven to work across diverse data sets. These rules would be introduced gradually, tested publicly, and eventually enforced at the gateway validation. By embedding formula validation rules directly into the taxonomy, errors can be detected and corrected at the point of report preparation, reducing the likelihood of inconsistencies or rejections while submitting the tagged report, streamlining the reporting process while reducing costs and burdens for both preparers and regulators. A challenge with implementing formula rules in the taxonomy for filing rules, is that this can only be the common subset of filing rules for all data collectors, or alternatively all data collectors adopt the same filing rules. Additionally, not all of the filing rules implemented at a data collector's gateway might be able to be defined in the Taxonomy.

Impact on Stakeholders

- **Preparers**: will benefit from earlier error detection but may need to adjust internal validation processes.
- **Software Vendors**: must support formula linkbase processing and display validation messages clearly.
- **Regulators and Data users**: gain access to higher-quality, more reliable data. Regulators also need to update their XBRL Validating processor to support formula linkbase.

Questions for Public Feedback

1. Do you support the use of formula linkbase in the UK Taxonomy Suite?
2. What types of formulas would be most helpful to improve data quality?
3. How can we ensure validation messages are clear and useful?
4. What support or documentation would help you transition to formula linkbase?

3. Expanding use of typed dimensions

As part of our ongoing efforts to enhance the flexibility, scalability, and maintainability of the UK Taxonomy Suite, we propose to use typed dimensions in place of large sets of explicit dimension members, particularly for reporting subsidiaries, associates, joint-ventures, and unconsolidated structured entities. This change is intended to address the growing

complexity of reporting structures and to future-proof the taxonomy. We invite stakeholders to review this proposal and provide feedback on its scope and implementation.

Background and Rationale

In XBRL, dimensions are used to add contextual detail to reported data, for example, breaking down revenue by region or listing individual subsidiaries. There are two types of dimensions:

Explicit Dimensions: Use a predefined list of values (e.g., a fixed list of countries or subsidiaries).

Typed Dimensions: Allow preparers to define custom values within a structured format.

Historically, the UK Taxonomy Suite has used explicit dimensions to capture information about subsidiaries, with each subsidiary represented using a separate domain member. Initially, this approach was manageable with around 50 members. However, as reporting requirements have evolved and the number of subsidiaries reported has grown, the domain members have expanded to over 200 explicit members which is still not enough, making it increasingly difficult to maintain.

Overview of Proposed Architecture

To address these challenges, we propose the introduction of typed dimensions for reporting subsidiaries, associates and joint-ventures. This approach has already been adopted in the DSEP hypercube of the FRC Taxonomy Suite, and we plan to extend it across the UK Taxonomy Suite by eventually removing all explicit dimension members related to subsidiaries, associates and joint-ventures. Under this model, Preparers will define their own domain members (e.g., simple integer or a string of restricted characters for subsidiary identifiers) within a structured format.

By allowing preparers to define their own dimension members within a structured format, typed dimensions eliminate the need for maintaining extensive lists of predefined domain members and offers a scalable and future-ready solution that can accommodate evolving reporting needs. This not only reduces the maintenance burden but also gives preparers the flexibility to report unique or evolving structures without waiting for updates to the taxonomy. However, software vendors may need to update their products and processes. Additionally, preparers may face a learning curve, particularly if they are unfamiliar with how typed dimensions differ from explicit ones in terms of tagging and validation.

Impact on Stakeholders

- **Preparers**: gain flexibility in reporting but may need to adjust internal processes and tools.
- **Software Vendors**: will need to support typed dimensions in rendering, validation, and user interfaces.
- **Regulators**: will benefit from a cleaner, more adaptable taxonomy structure, though initial transition support may be required.

Questions for Public Feedback

1. Do you support the use of typed dimensions in the UK Taxonomy Suite?
2. Are there other areas where typed dimensions could be beneficial?
3. What implementation support would help you?

4. Prevent use of cross-entry point elements

The UK Taxonomy Suite has grown significantly in complexity over the past decade, with the number of entry points in the FRC Taxonomy Suite expanding from five to thirteen to support a broader range of digital reporting requirements. While this growth reflects the evolving needs of filers, it has introduced challenges in entry point integrity. We are seeking stakeholder input on how best to address these issues to ensure that digital reports remain accurate, consistent, and easy to prepare.

Background and Rationale

Between 2009 and 2014, the UK taxonomies were relatively compact, with only five discrete entry points, each tailored to a specific reporting standard or purpose. Since then, the taxonomy has expanded to accommodate:

- **DPL**: Supporting Detailed Profit and Loss.
- **UKSEF**: Supporting dual filing to the FCA and Companies House
- **CIC and DSEP**: New entry points introduced in 2025 for Community Interest Companies and Dormant Subsidiary Exempt Packages

Instead of defining elements multiple times within each entry point, the FRC Taxonomy Suite includes a ‘core’ along with other common schemas, which defines the XBRL elements that can be reused in multiple entry points across UK Taxonomy Suite. Each individual taxonomy and entry point extends the appropriate common schemas to reuse the elements. For example, the Charities entry point in the Charities Taxonomy extends the core schema from the FRC Taxonomy Suite, and uses the concept “Equity” (core:equity) in its presentation linkbase and ignores the irrelavent elements. While the entry point excludes irrelevant elements from the core schema in its presentation linkbase, these elements remain technically accessible by tagging software during report preparation, as they are included in the overall Discoverable Taxonomy Set (DTS). Regulators using the UK Taxonomy Suite have issued guidance advising against the use of elements not included in the presentation linkbase. However, this has led to misapplication of such elements, which undermines the integrity of the taxonomy.

Overview of Proposed Architecture

At this stage, we do not propose a specific technical solution. Instead, we welcome architecture suggesations for:

- Reducing the risk of cross-standard tagging errors by reducing the risk of using cross entry point elements
- Enhancing guidance and tooling for software developers and preparers

We are particularly interested in approaches that balance technical rigour with usability, and that can be implemented without introducing unnecessary complexity or overhead.

Questions for Public Feedback

1. What approaches could prevent use of cross entry point elements while preparing iXBRL report?
2. Would clearer documentation or tooling help preparers and vendors avoid misapplication of concepts?
3. Are there examples of best practices from other taxonomies or jurisdictions we should consider?
4. Should use of cross-entry point elements be validated at the gateway level?

5. A specific entry point to support micro-entity and small filings

Although the number of entry points has grown from five to thirteen, the UK Taxonomy Suite does not have specific entry points for micro-entity, small, or charitable filings not covered by the Charities Extension taoxnomy. The Taxonomies team has received feedback from software vendors that it would reduce the implementation burden if entry points for these regimes can be provided. We have also had discussion about how providing these entry points could support improving the data quality in digital reports and reduce burden on preparers.

Background and rationale

The 2014-2025 Taxonomy Suites moved from updates every three years (i.e. 2014 and 2018) to updating annually. This was a result of changes to endorsement processes for IFRS Accounting Standards in the UK, following the UK's exit from the EU. Annual updates are essential to reflect changes to UK-Adopted International Accounting Standards and UK GAAP in the taxonomies.

Companies House only accept the current and previous two years' taxonomies. HMRC maintains a six-year window, irrespective of the number of taxonomy versions released within that timeframe. Regardless, this means that, every year, the oldest taxonomy drops off and the newest rolls on requiring software vendors to implement a taxonomy suite every year.

The UK Taxonomy Suite uses a common core schema that defines shared accounting concepts. Each entry point extends the core-schema and defines elements specific to its reporting standard. The benefits of this are three-fold: firstly, it removes the need to duplicate common concepts shared between all entry points; secondly, it allows for unique implementation of common

concepts in specific entry points (for example, the labels for core elements will be different depending on which entry point has been used); and thirdly, it models the meaning of the accounting standards. For example, the entry point for FRS 102 shares many concepts with the IFRS entry point, but with different labels to reference the relevant paragraphs of FRS 102 rather than paragraphs of IFRS Accounting Standards.

Currently, preparers are meant to use the Accounting Standards dimension to qualify which Accounting Standard has been applied (cf. proposal 1, above). This is often used incorrectly, making it difficult to ascertain whether a filing is using the micro-entity or small entities regime. This has a fundamental impact on data quality and the verifiability and usability of the data.

Overview of proposed architecture

There are some potential benefits to establishing these new entry points, especially for micro-entities. It would offer more convenience for software vendors serving micro-entities; as the regime is not expected to change regularly it would allow them to simply update a namespace each year instead of implementing a new Taxonomy Suite. Additionally, it would support data quality by making validation more immediate: if a preparer picks the wrong entry point, it will be the first choice they make.

However, although micro-entity accounts may be simpler than other types of accounts, that does not necessarily make them simple accounts. As described above[15], micro-entities cannot be required to disclose more than the minimum but may choose to do so. If they do, they must have regard to FRS 102 and its requirements. For small entities, whilst accounting standards set out the minimum information that a small entity must provide, the financial statements of a small entity are required to give a true and fair view of the assets, liabilities, financial position and profit or loss of the small entity for the reporting period. A small entity may therefore need to comply with other disclosure requirements of FRS 102[16]. Therefore, both micro-entities and small entities may need to use concepts from the FRS 102 entry point if they wanted to tag those disclosures.

As discussed in the Opportunities for future UK digital reporting discussion paper, any decisions made must avoid the accidental introduction of a minimum tagging standard. If preparers were to use a micro-entity specific entry point and not find the concepts they needed, they may not know to use the FRS 102 entry point. This could erroneously imply that a micro-entity cannot tag any additional information, or discourage micro-entities from including additional information, if they choose to do so.

Although a fixed set of minimal concepts could be produced, there is no guarantee that the minimum set will stay fixed, and changes will inevitably be required at some point in the future. Although we do not expect such significant changes every year, it is not possible to say that there will be no changes every year just because a preparer is a micro-entity or small entity.

15 Pg 9
16 This is why paragraph 1.3 of FRS 105 is worded so differently to paragraph 1A.17 of FRS 102.

If micro-entity and small entry points were provided, they could be used erroneously by preparers who should not be preparing under those regimes. This creates the opposite issue to one described in the background and rational section above.

One proposal under consideration is to include micro-entity headings (extended link roles) and presentations of the income statement and balance sheet formats in the FRS 102 presentation as a compromise position.

Questions for Public Feedback

1. What approaches could reduce complexity and improve the experience for software vendors and preparers of micro-entity and small company accounts, given the requirements of laws and accounting standards on these topics?

6. Introducing Accounting Semantics Arcroles

Taxonomies can be enriched by adding more detailed information about the relationships between concepts. These additional relationships help to clarify the precise meaning of a concept, and can be used to better interrogate a set of disclosures, or to support better quality validations.

Background and rationale

The UK Taxonomy Suite supports the following relationships between concepts:

- Presentation (parent-child): this defines the ordering or concepts in a hierarchy. Although it is used to visually represent the concepts and their relationships, it can also be used to automatically understand the calculation and causal relationships between concepts. This is not its primary purpose, however, and presentation is primarily used to support users finding and selecting the create concepts for their disclosure;
- Definition (hypercube-dimension, dimension-domain, dimension-default, domain-member): this defines which dimensions can be used with which concepts, and whether they have a default value or not. Hypercubes group related concepts and dimensions together in a way which supports efficient and effective date modelling. They can be used to imply some accounting meaning but this is not their primary purpose.
- Custom UK relationships (inflow, outflow, cross-ref): the UK Taxonomy Suite uses three custom arcroles to add further meaning to concepts. Cash flow concepts may have an inflow or outflow relationship so preparers can better understand what a concept is meant to mean[17], and cross-references point users to other useful areas of the taxonomy (for example, a cross-reference following "net cash generated from operations" that points to the area of the Notes that model that disaggregation).

17 Cash flow statements reverse the ordinary meaning of credit and debit to show the flow of cash through an entity.

Custom arcroles can be used for these purposes but, to do so, increases requirements for UK-specific products. Additionally it is not essential to support these arcroles; the taxonomy can be still be used as intended but the information about concepts available to users will not be as complete as it could be.

While the use of custom inflow and outflow arcroles was innovative at the time and enhances the explicit accounting associations of a concept, it requires minimal UK-specific tooling to implement the custom arcroles. Since then, XBRL has standardised seven fundamental accounting semantics, including more mature modelling of cash inflows and outflows between concepts. The Financial Accounting Standards Board has made these available as the "Meta Model", which has been part the US GAAP Taxonomies since 2024. In line with the FRC Taxonomies Project's Objectives and Principles, we consider that there may be some benefit to introducing these relationships into the UK Taxonomy Suite.

Overview of proposed architecture

There are eight new arcroles proposed in Accounting Semantics 1.0:

- Instant/Accrual
- Instant/Contra
- Instant/Inflow
- Instant/Outflow
- Trait/Concept
- Trait Type/Domain
- Class/Subclass

The Requirements Document contains concise, clear explanations of what these accounting relationships are, why they are useful, and gives examples using the US GAAP taxonomy. It is a short, accessible document that does not benefit from paraphrasing here and readers and encouraged to engage with it to better understand the accounting meaning of these arcroles.

The key information for developers is that these are **additional arcroles** to the ones already included in the UK Taxonomy Suite**.** The pre-existing syntax, presentation and definition aspects of the taxonomies would not be affected by the inclusion of additional accounting relationships (subject to other proposals in this paper). It is precisely for this reason that the US refers to the additional relationships as a "meta model": it is a higher-level framework that defines relationships and metadata around existing taxonomy concepts.

Impact on Stakeholders

Introducing the Accounting Semantics Arcroles into the UK Taxonomy Suite would deliver on several Objectives and Principles of the Taxonomies Project and introduce benefits across the stakeholder groups.

Increasing the associations between concepts through clearer definition supports preparers to better find, select and consistently apply the correct concepts to the correct disclosures. Across a dataset this supports better quality analysis, comparison and review by receivers and users of digital reports. If the Accounting Semantics Arcroles are introduced in other jurisdictions, it helps to aid international comparability by focussing on the accounting meaning of a concept, rather than its position in a hierarchy or hypercube location.

With reference to the discussion points on introducing XBRL Formulae, introducing the Accounting Semantic Arcroles supports the creation of validation rules that can be automatically applied to a digital report, aiming to detect errors, discrepancies, or ambiguities in the modelling. This reduces the burden on preparers and users of reports because the expected report document is more clearly defined, and the accuracy of the data should be improved, thereby increasing data quality for users of digital reports. The Meta Model Taxonomy is already used to process data quality rules in the United States[18].

This also extends to analysis of the reported data. The association of accounting attributes to concepts allows more sophisticated analysis to be performed against the attributes of concepts rather than the concepts themselves. In practice in the United States, this has meant that as the taxonomy is updated and new concepts are added, existing rules and analytics will continue to work without the need to update for new concepts.

The primary burden will fall on software vendors as products will need to be updated to specifically make use of these new arcroles. Pre-existing implementation is likely to be sufficient for this; the accounting arcroles may be new but they are still arcroles, as defined in the Specification. A common implementation would be to return a data structure of all the arcroles associated with a concept and the "to" and "from" sides of the relationship. Displaying this information to the user will involve custom implementation for each software product.

18 The Data Quality Commission plays a role in supporting the validation and data quality of SEC filings and FASB taxonomies.

Questions for Public Feedback

1. What level of value do stakeholders (vendors, preparers and users) anticipate from the inclusion of the Accounting Semantics Arcroles in enhancing the clarity, comparability, and analytical utility of UK digital reports?

2. To what extent should the UK Taxonomy Suite prioritise alignment with international standards as compared to retaining UK-specific custom arcroles; how should coexistence or migration be handled?

3. What technical or operational challenges do software vendors foresee in implementing and maintaining support for the new accounting arcroles, and how might these be addressed or mitigated?

7. Digitisation of Charities Receipts and Payments accounts

Charities in England and Wales, with gross income exceeding £250,000 in a financial year, are required to prepare accruals accounts in accordance with the Charities (Accounts and Reports) Regulations 2008 and the applicable Statement of Recommended Practice (SORP), which is underpinned by FRS 102. Currently, the taxonomy includes an entry point for the Charities SORP to support the digital filing. To broaden the scope of digital reporting for charities, we are exploring market interest in digitizing receipts and payments accounts by introducing a new entry point within the Charities Taxonomy.

Background and Rationale

Non-company charities with a gross income of £250,000[19] or less can prepare receipts and payments accounts unless:

- the governing document
- any law or
- a decision of the trustees
- any third party requirements, for example a funder

requires the charity to prepare fully accrued accounts.

Eligible non-company charities can either prepare freeform accounts or they can use the accounting template available from the Charity Commission to prepare their trustees' annual report and receipts and payments accounts and convert the accounts to PDF and submit via online service. Receipts and Payments Accounts includes

19 Although Scotland and Northern Ireland have their own regulations (The Charities Accounts (Scotland) Regulations 2006 and The Charities (Accounts and Reports) Regulations (Northern Ireland) 2015), all UK jurisdictions currently have the same £250,000 threshold for receipts and payments accounts.

- Summary of cash received or paid during the year, irrespective of the year to which the receipt or payment relates, and
- Statement of assets and liabilities as at the year end

This will benefit non-company charities with gross income of £250,000 or less, who are able to prepare receipts and payments accounts in digital format.

Overview of Proposed Architecture

We propose introducing an additional entry point to the Charities Taxonomy to enable digital reporting of charities' receipts and payments accounts using XBRL. This would introduce more standardisation to the data than is currently the case, enabling better analysis for regulatory purposes. Existing concepts in the Taoxnomy Suite are used to represent accruals-based concepts whereas Receipts and Payments accounts are cash-based. We will review existing Taxonomy elements to assess whether it is appropriate to reuse them, otherwise new elements will be defined.

Questions for Public Feedback

1. Do you support the use of XBRL for digitizing receipts and payments accounts, or would you recommend an alternative approach that might be less burdensome for preparers?
2. Do you have any suggestions on how the exchange of structured data using XBRL can be done with minimal burden on preparers?

How to reply to this Discussion Paper

Please email your responses to XBRL@frc.org.uk by 11th Jan 2026.

Stakeholders are encouraged to answer the questions they feel most comfortable answering. We recognise that the topics covered have a range of technical complexity, and we welcome input from all perspectives. All responses will be acknowledged. Responses will not be made publicly available and are solely for the use of the FRC to inform future work on this topic. We will process any personal data in accordance with UK data protection legislation.

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