Developing a disclosure plan that meets the IFRS Sustainability Disclosure Standards

Homework assignment for participants of the ISSB training workshop
This homework assignment has been designed to be used alongside the SSE’s training program on the ISSB’s Standards. While a reporting strategy is not a requirement of these standards it can help a company to plan its activities and ensure effective application of the standards. This assignment aims to help workshop participants think through the various components of a disclosure strategy.
Your Assignment

This document provides you with a set of steps that can help you to start to develop your organization’s sustainability-related reporting plan that we will jointly discuss in the training program. Upon completion of the training program you will have the tools to start to develop your own disclosure plan to meet the ISSB’s Disclosure Standard.

You are encouraged to take a minimum of 1.5 hours to pull together the activities we have worked together on during the workshop, to put on paper an initial draft for your disclosure plan.

This plan can be used to initiate a conversation with your board or team and be used as a starting point to develop a more comprehensive strategy to enhance your company’s disclosure.

You are not required to and will not be asked to share this homework activity with the training team.
A reporting plan can:

- Help the company to **balance opinions** and conclusions based on a **variety of information sources**.
- Support **collaboration, knowledge sharing** and **cross-functional, interdisciplinary team** discussions and/or regular meetings with professionals from finance, risk management, controls and planning, investor relations, legal, sustainability and communications departments.
- Act as a **reference point** for documenting, explaining and managing the process of preparing disclosures, including where and how judgements have been made.
Together in the training program, we will discuss four steps to effective communication on sustainability-related financial disclosures. In each of the four steps, you will have the opportunity to think through key questions that will help you to develop a draft reporting plan.
Together, we will discuss how you will build collective capacity and identify the responsible individuals for your disclosure.

Consider:

1. **Tone from the top:** Identify who in your organization’s board and C-suite will be responsible for oversight of sustainability-related financial disclosures.

2. **Integration:** Identify what teams are already familiar with the evaluation and management of sustainability-related risks and opportunities and what teams will need additional capacity building.

3. **Negotiate:** Working with colleagues and partners to build consensus on how, when and by whom any necessary actions will be taken, monitored and maintained.
After the workshop, take time to consider the following:

- How will data be sourced? Which existing systems and internal controls will need updating and what capacity building requirements does that entail?
- What are the sign-off procedures for sustainability-related information?
- Who will be involved in developing disclosures?
- How will those individuals and departments be organised and what will individual and collective responsibilities be?
Together, we will discuss how you can evaluate your existing disclosures to determine where you are now and where you want to be.

**Consider:**

1. **Conducting a gap analysis** to determine what areas your organization is not yet communicating to investors on.

2. **Identifying additional reporting requirements** your organization needs/wants to consider when setting a goal for sustainability-related disclosure outcomes.

*You can make use of the [SSE Gap Analysis Checklist](#)*
After the workshop, take time to consider the following:

- What are the gaps in your current disclosure?
- What is required of your organization and what are your organization’s ambitions for its sustainability-related reporting practices?
- What information do you already have and where does it appear in your public reports? Can you leverage what you already have?
- Are there any communication rules in your jurisdiction?
Together, we will discuss how to identify which of the gaps identified in the previous step would require new processes or systems in place to achieve your disclosure objectives.

Consider:

1. **Data collection**: Identify how you can collect the data that is not being collected but is required by IFRS

2. **Data management**: Identify what teams are responsible for managing this data and what synergies can be capitalized on
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After the workshop, take time to consider the following:

- Which standards, methodologies, measurement techniques, definition and processes will the entity use to develop sustainability-related information?
- What existing systems and processes can be used?
- What new systems and processes need to be developed?
- What are the circumstances in which the entity will seek external assurance and on what terms?
- What is the process for monitoring progress towards achievement of the reporting strategy goals and objectives?
Companies use various methods to include sustainability-related financial information in their general-purpose reporting. These methods may include integrating sustainability-related information throughout the report or separating it out into a separate chapter. In both instances, it's important to ensure that report users can navigate the information and find connected information. Together, we will discuss various techniques to do this.

Consider:

1. **Presentation approach**: identify whether your company should present information in an integrated format (in one report), an autonomous format (a sustainability section in the report) or a combination, and why.

2. **Navigation techniques**: make use of navigation techniques to ensure information is easy to identify. Consider for example: icons, indexes, highlight connections between information, or put similar pieces of information together.
After the workshop, take time to consider the following:

- Which audience(s) does your entity have to/want to communicate with?
- How can you best organize the sustainability-related financial information in relation to financial information?
- What tools can be used to synthesize information with clarity?
- Is information complete and traceable?
- Does the information provided make sense on its own?
Now, start drafting!

Develop a draft ISSB-aligned disclosure plan for your company, using what you’ve learned in this training program and the activities we have completed together. You can use the questions in each section to guide you as well as the final tips in the next slide.
This plan is not the final version – but it will help you start a conversation within your organization.

Enlist the input of colleagues, where you get most stuck, ask your team, your leadership or the most directly impacted department.

Use the resources provided in the training to help you.

Re-watch the training workshop if you need a refresher or review the slides for reminders.

If you get stuck, get ideas from other companies! You can find examples of climate-related disclosures using the TCFD Recommendations here and you can find additional guidance and resources on the ISSB Knowledge Hub.

Don’t forget to make use of the SSE’s ISSB Toolkit.

www.SSEinitiative.org/disclosure-toolkit/