



Title of Report:	Grant Funding Policy Annual Review 2021
Committee Report Submitted To:	The Leisure & Development Committee
Date of Meeting:	19 October 2021
For Decision or For Information	For Decision

Linkage to Council Strategy (2019-23)	
Strategic Theme	Leader & Champion Accelerating our Economy and Contributing to Prosperity Resilient, healthy & Engaged Communities
Outcome	Stable and Cohesive Communities
Lead Officer	Funding Unit Manager

Budgetary Considerations	
Cost of Proposal	N/A
Included in Current Year Estimates	YES/NO
Capital/Revenue	
Code	
Staffing Costs	

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	Yes	Date: 10.10.17
	EQIA Required and Completed:	No	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes	Date:
	RNA Required and Completed:	No	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes	Date:
	DPIA Required and Completed:	No	Date:

1.0 Purpose of Report

The purpose of this report is to inform members that Council's Grant Funding Policy has been reviewed for the incoming year and make recommendation on changes.

2.0 Background

Council is committed to distributing available grants fairly, efficiently and effectively. The purpose of Council's Grant Funding Policy is to outline the agreed approach to Grant Funding in relation to resourcing external bodies to assist in the delivery of its strategic objectives and priorities.

Council annually review and approve the Grant Funding Policy for the distribution of grants. The policy was reviewed and agreed in October 2016, November 2017, October 2018, October 2019 and September 2020.

The policy is attached as **Annex A** with proposed changes highlighted.

3.0 Grant Funding Policy

The policy sets out a framework for the processing of grants. The overall aim of the funding process outlined in the policy is:

"To have a consistent, customer focused process with relevant assessment and evaluation procedures with appropriate appeal and monitoring systems in place".

Principles

- Grant funding awards are at the sole discretion of Council but will be dependent on the Council's available and agreed level of funding which is determined in the annual budget.
- Activities grant funded must be fully consistent with the strategic aims and priorities of the strategies to be addressed.
- Due regard will be given to equality considerations in accordance with Section 75 and any other statutory duty.
- All funding applications will be determined on their objective merits. No organisation is entitled to funding because it may have been granted funding in the past or for any other reason.
- Council must ensure proper, prudent and effective use of Public Money.
- Contracted services must be tendered in adherence to the Council's Procurement Process.
- Eligibility for funding is enabled through the grant programmes with specified criteria. This allows Council to focus on supporting organisations to achieve their best and to meet clearly identified needs, which must all be bound by Council's strategic priorities.

4.0 Grant Funding Policy Changes / Amendments

4.1 Section 1: Introduction; updated to include:

The policy will operate in conjunction with the relevant grant programme guidance documents.

4.2 Section 3: Definitions; updated to include:

This policy is relevant to the definition of grant funding, which should not be confused with sponsorship, advertising or any supply of goods or services directly to Council. Sponsorship, advertising and direct benefits received by council are a payment for

which the sponsor receives something in return and therefore falls within the context of a Contract for Services.

4.3 **Section 4: Accountability and Responsibilities;** updated to include

4.4 The Council's Funding Unit is responsible for ensuring the agreed administration, verification, reporting and monitoring arrangements are implemented.

4.5 Council employees are required to adhere to this policy and to take appropriate action to ensure the policy aims and objectives, together with all Conflict of Interest procedures, are fulfilled.

4.6 The responsibilities of Grant Aid recipients are detailed within the Letter of Offer.

4.7 The Finance Team and the Funding Unit will consult on any VAT related payments provided to the Grantee.

4.8 The Grantee has responsibility for reviewing HMRC guidance to satisfy themselves that the application falls within a Grant and not a Supply of a Service. Guidance can be found: <https://www.gov.uk/hmrc-internal-manuals/vat-supply-and-consideration/vatsc06310>

4.4 **Section 5.4: Eligibility-Exclusions;**

Replace

"Costs that can be claimed back from elsewhere (e.g. VAT)"

with

"Costs that can be claimed back from elsewhere (e.g. VAT. If the applicant is VAT registered, and can claim back VAT, eligible grant will be calculated using the Net amount of eligible invoices provided using the net amount. If the applicant is not VAT registered, and cannot claim back VAT, eligible grant will be calculated using the Gross amount of eligible invoices provided.

The amount of grant awarded per the Letter of Offer is the maximum payment an applicant can receive).

The following link from HMRC is a useful point of reference in relation to VAT and grant-aid:

<https://www.gov.uk/hmrc-internal-manuals/vat-supply-and-consideration/vatsc06317>

4.5 **Section 5.5: Breach of Letter of Offer (Clawback)**

Updated to include: If funding is withdrawn the Grantee has no legal redress to have funding reinstated.

4.6 **Section 6: Fraud and Corruption** – At its meeting on 10 March 2021 the Audit Committee recommended that the Grants policy be updated to include a block of groups/organisations where they has been an attempt to obtained ineligible funds from Council. The policy has been updated as follows:

6.1 Causeway Coast and Glens Borough Council is committed to carrying out business fairly, honestly and openly and has a zero tolerance towards fraud, bribery and corruption. Causeway Coast and Glens Borough Council expects full compliance with the requirements of both the Fraud and Corruption Policy and Bribery Act 2010 from Groups or Individuals applying for, or in receipt of grant aid. This is also relevant to Councillors, Employees, Agents, Partners and Suppliers involved in your project/event. Causeway Coast and Glens Borough Council is committed to developing, implementing and maintaining effective procedures and controls to prevent any occurrence of fraud and corruption. The Fraud and Corruption Policy can be found on the Causeway Coast and Glens Borough Council website.

All cases of irregularities or anomalies involving attempted or suspected fraud will be reported to appropriate authorities, including the Northern Ireland Audit Office, PSNI and any other relevant funding body (if applicable) or departments within the Council (if applicable).

6.2 Causeway Coast and Glens Borough Council reserves the right to disallow any other grant applications and claims submitted by a group or an individual member of a group in respect of the financial year and to apply a moratorium on Council funding to any group or individual member of a group where fraudulent activity has been identified within the current financial year and for at least two forthcoming financial years. This also applies to individuals applying or claiming for bursaries.

6.3 Causeway Coast and Glens Borough Council will inform the group's Chairperson where attempted or suspected fraud has been identified.

4.7 **Section 7: Review of the Policy**; Updated as follows:

This policy will be reviewed every 12 months. *The Council will also monitor the implementation of the Policy at regular intervals and will respond to emerging issues and/or changing circumstance.*

5.0 **Recommendation**

It is recommended that Members agree the Grant Funding Policy to include the updates and amendments as detailed in section 4 of this report.



GRANT FUNDING POLICY

Policy Number	CCG/6/14/Dev
Version Number	7
Author	Patricia O'Brien
Date of Screening of Policy	10 th October 2017
EQIA Recommended?	NO
Date Adopted by Council	

INDEX

GRANT FUNDING POLICY

		<u>Page No</u>
1.	Introduction	3
2.	Policy Statement	3
3.	Definitions	5
4.	Accountability and Responsibilities	5
5.	Implementation Procedures	6
	5.1 Underpinning Principles	6
	5.2 Aims and Objectives	7
	5.3 Availability of Funding	7
	5.4 Eligibility	9
	5.5 Breach of letter of Offer (Clawback)	10
6.	Fraud and Corruption	11
7.	Review of the Policy	11
8.	Related Policies and Procedures	11
9.	Section 75 Equality and Good Relations	11
10.	Contact Details	12
 <u>Appendices:</u>		
I	The Process	13
II	Grant Categories	14
III	Potential Funding Programmes	15

1. INTRODUCTION

The Grant Funding Policy is built on a set of agreed principles and an understanding that:

- Grant funding awards are at the sole discretion of Council but will be dependent on the Council's available and agreed level of funding which is determined in the annual budget.
- Activities grant funded must be fully consistent with the strategic aims and priorities of the strategies to be addressed.
- Due regard will be given to equality considerations in accordance with Section 75 and any other statutory duty.
- All funding applications will be determined on their objective merits. No organisation is entitled to funding because it may have been granted funding in the past or for any other reason.
- A consistent, customer focused process is required in relation to grant applications with relevant assessment and evaluation procedures with appropriate appeal, monitoring and clawback systems in place.
- Council must ensure proper, prudent and effective use of Public Money.
- Contracted services must be tendered in adherence to the Council's Procurement Process.
- The policy will operate in conjunction with the relevant grant programme guidance documents.
- Eligibility for funding is enabled through the grant programmes with specified criteria. This allows Council to focus on supporting organisations to achieve their best and to meet clearly identified needs, which must all be bound by Council's strategic priorities.

2. POLICY STATEMENT

Council is committed to distributing available grants fairly, efficiently and effectively. The purpose of this policy is to outline the Council's agreed approach to Grant Funding in relation to resourcing external bodies to assist in the delivery of Council's strategic objectives and priorities.

This policy is written for Councillors and the Council's officers and any who enquire about our policy and procedures. It applies to all dealings, whether formal or informal, between potential applicants and officers.

Signed: _____ Date: _____
Mayor
Causeway Coast and Glens Council

Signed: _____ Date: _____
Chief Executive
Causeway Coast and Glens Council

3. DEFINITIONS

Three terms for funding are defined in this policy:

- **Donation.** Something that is given to a charity or deserving cause, without return consideration. This lack of return consideration means that, in common law, an agreement to make a donation is an "imperfect contract void for want of consideration.
- **Grant.** A grant is a financial transfer used to fund an activity that is in broad alignment with the funder's objectives. Grant-in-aid is a payment to finance the costs of a body operating at arm's length. HMRC definition is a useful reference <https://www.gov.uk/hmrc-internal-manuals/vat-supply-and-consideration/vat-sc06300>
- **Contract for Services.** Where a level of service is defined and commissioned by the funding body outside the grants regime, this forms a conventional trading relationship established through procurement. Procurement is defined as being the acquisition of goods and services from third party suppliers under legally binding contractual terms where all the conditions necessary to form a legally binding contract have been met. Such acquisitions are for the direct benefit of the contracting authority, necessary for the delivery of the services it provides or for the running of its own business.

This policy is relevant to the definition of grant funding, which should not be confused with sponsorship, advertising or any supply of goods or services directly to Council.

Sponsorship, advertising and direct benefits received by council are a payment for which the sponsor receives something in return and therefore falls within the context of a Contract for Services.

4. ACCOUNTABILITY AND RESPONSIBILITIES

This section outlines the role of elected members, officers and others as appropriate, in relation to the Policy:

4.1 *The Mayor and Elected Council Members are responsible for:*

- *Accountability to the electorate* to ensure proper, prudent and effective use of Public Money and Ensure Equality and the promotion of Good Relations are considered in all applications in line with section 75 of the Northern Ireland Act 1998.

4.2 *The Chief Executive is responsible for:*

- *Accountability to the Council* to ensure that activities that are grant funded are fully consistent with the strategic aims and priorities of the Causeway Coast & Glens Community Plan and the Council's Corporate Plan.

4.3 The Directors are responsible for:

- *Being accountable to the Chief Executive for the application of a consistent, customer focused process with relevant assessment and evaluation procedures with appropriate appeal and monitoring systems in place.*

In addition:

4.4 The Council's Funding Unit is responsible for ensuring the agreed administration, reporting and monitoring arrangements are implemented.

4.5 Council employees are required to adhere to this policy and to take appropriate action to ensure the policy aims and objectives, together with all Conflict of Interest procedures, are fulfilled.

4.6 The responsibilities of Grant Aid recipients are detailed within the Letter of Offer.

4.7 The Finance Team and the Funding Unit will consult on any VAT related payments provided to the Grantee.

4.8 The Grantee has responsibility for reviewing HMRC guidance to satisfy themselves that the application falls within a Grant and not a Supply of a Service. Guidance can be found: <https://www.gov.uk/hmrc-internal-manuals/vat-supply-and-consideration/vatsc06310>

5. IMPLEMENTATION PROCEDURES

5.1 Underpinning Principles

Regardless of the means by which grant funding is awarded to a third party or arm's length organisation, the following principles, aims and objectives will apply. The policy acknowledges the need for a transparent and fair means of dispersing grant funding, while maintaining due diligence in the management of public monies.

The underpinning principles that have been identified are:

a. The Basic Funding Requirement is Based on established need

The overarching principle is that of meeting local needs which have been identified and prioritised by Council or by others but acknowledged by Council. Any activity that cannot be shown to meet the following basic requirements should not be provided with funding:

- Have a clearly identified need and benefit, shaped solely around the needs of residents.
- Can deliver outcomes which meet this need.

- Deliver cost effective and quality service provision, fitting with the purpose and remit of that funding.
- Be delivered by a credible organisation with the capacity to deliver the project as stated.
- Reflect the statutory remit of Causeway Coast & Glens Borough Council, aligning with the Community Plan and the Council's Corporate Plan and relevant service plans of Council.

b. Accessibility

Information on all funding programmes will be available through the Council's website; and through other forms of media as required.

- Advice on completing the application forms will be available.
- Paper and electronic forms will be made available.
- Where required, Council will make information and application forms available in other formats in line with Equality legislation.

Clarity

- We will endeavour to keep the process straightforward, transparent and understandable.

c. Transparency, Equality and Accountability

- All decisions will adhere to this policy and criteria within programmes.
- In terms of decision-making and process, Council must be able to justify any decisions, which have been taken by Members, and any rationale for decisions taken must be used as a basis for clearly showing why organisations are funded at a particular level.
- The funding policy will make it possible for the Council to be transparent about the funding decisions taken and the process used to reach those decisions.
- A right of appeal is available to all applicants should an application be rejected.

5.2 Aims & Objectives

The overall aim of the funding process is:

'To have a consistent, customer focused process with relevant assessment and evaluation procedures with appropriate appeal and monitoring systems in place.'

The objectives of this policy are to ensure that all funding and grants allocated will:

- Further the objectives as outlined within the Community Plan and Council's Corporate Plan.
- Target resources to meet identified needs.
- Maximise leverage (for example in kind contributions or match funding).
- Maximise sustainability (economic, environmental and social).
- Achieve greater accountability and openness.
- Ensure Equality and the promotion of Good Relations are considered in all applications in line with section 75 of the Northern Ireland Act 1998.
- Provide guidance to officers, members and voluntary and community organisations on policy for funding and support of local groups.

Applications received will be measured against these criteria and any specific criteria relating to individual grant streams. Weighting and scoring systems will be developed to ensure that all applications are treated consistently and fairly.

5.3 Availability of Funding

This policy only relates to funding that adheres to the following definition:

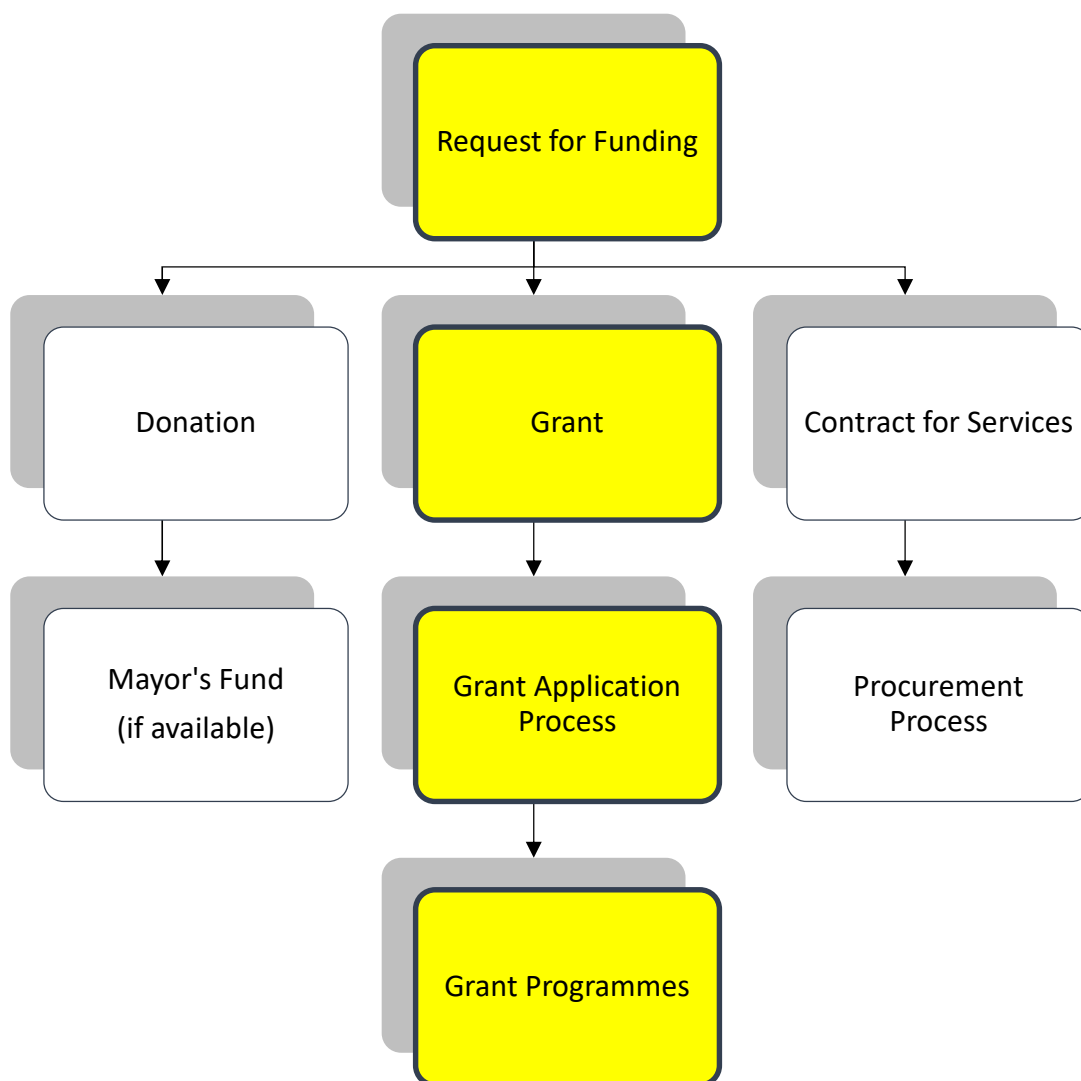
Grants - In line with the general note under Section 2, grants may be awarded through a variety of sources from within the Council.

This policy does not address the eligibility and process for:

Donations - Contributions to general appeals, charities and other one-off requests should be directed to the Mayor's Fund. These will be awarded at the discretion of the Mayor guided by specific terms and conditions.

Contract for Services - Allocations made for the provision of services undertaken on behalf of Council will be made after appropriate procurement. For all such instances, members and officers should refer to the Procurement Policy.

General Funding Sources:



Following the completion of the annual budget setting process, various campaigns will be launched each year seeking applications for grant funding. This will be done by way of the Council’s website. Other methods / formats may be used as required.

Details of how to apply, the level of grant aid available and the assessment criteria used will be reviewed annually (or as may be required) and information will be provided on the Council’s website, in the guidance notes or by contacting the relevant Council Officer.

The amounts available for grant funding will be determined by the annual rates setting process.

5.4 Eligibility

There will also be specific eligibility criteria applying to individual funding programmes and the list below only includes those elements which are common to all.

Eligible costs

- A proportion of core running costs (part payment of salaries, heat and light, insurance, rent or premises costs, office costs, etc.).
- Programme or activity costs which are directly relevant to the application.
- Travel and transport costs.
- Hire or purchase of equipment for meeting project needs
- Venue hire (excluding hire of groups own premises)
- Technical assistance.
- Training or facilitation costs.
- Festivals and events.
- Capital costs.
- Best practice visits.
- Publicity, marketing.
- Catering (a limit may be placed on the level of funding allowed towards hospitality and catering/ refreshments)

Exclusions

Some exclusions will initially apply, unless specifically allowed for within specific funding sources:

- Individuals, unless within a bursary framework.
- Businesses and for-profit organisations where funding would contravene local government, State Aid rules or other legislation. (Councils Enterprise Fund will grant-aid local businesses but state aid rules will apply).
- Projects or activities which are delivered outside of the Council area and DO NOT meet the needs within the area.
- Activities which are discriminatory, political, or are classed as proselytizing in nature.
- General appeals.
- Those organisations who have substantial, demonstrable, unrestricted reserves.
- Costs that can be claimed back from elsewhere e.g. VAT, (If the applicant is VAT registered, and can claim back VAT, grant will be calculated using the amount of eligible invoices provided using the net amount.

If the applicant is **not** VAT registered, and cannot claim back VAT, grant will be calculated using the gross amount of eligible invoices provided.

The amount of grant awarded per the Letter of Offer is the maximum payment an applicant can receive.

The following link from HMRC is a useful point of reference in relation to VAT and grant-aid:

<https://www.gov.uk/hmrc-internal-manuals/vat-supply-and-consideration/vatsc06317>

- Costs that are not auditable e.g. cash payments unsupported by an approved petty cash system.
- Costs towards banking charges and / or repayment of debt.
- Payments made to individual members of the applicant group or organisation who have a pecuniary interest.

- Retrospective costs e.g. activities completed or costs incurred before the agreement of funding.
- Programmes or activities which are considered the core activity of national or regional government, Government Departments or arms-length body, such as health or education.
- Gifts and prizes.
- Alcohol

5.5 Breach of Letter of Offer (Clawback)

If the Grant Purpose ceases to be carried on at any time during the Grant Period in consequence of any act, omission or default on the part of Project Promoter, including any breach of the Letter of Offer conditions the Grantee shall, on demand made by Causeway Coast and Glens Borough Council repay to Causeway Coast and Glens Borough Council all of or a proportion of the Grant aid.

The Grantee will be in breach if:

- They provide any significantly misleading or inaccurate information, whether deliberate or accidental, during the application process, or during the period of the Grant Agreement
- Members of the organisation, volunteers or staff act at any time during the project dishonestly or negligently or in any way, directly or indirectly, to the detriment of the project or to the detriment of our reputation.
- The organisation receives duplicate funding from any other source for the same or any part of the project.
- The organisation does not take positive steps to ensure equal opportunities in its employment practices and the delivery of and access to its services.
- The organisations does something that makes the facilities less inviting to all sections of the community
- There is significant change of purpose, benefit, ownership or recipient, either during the project or within a reasonable period after its completion

Any such breaches that cannot be rectified, will result in part or all of the grant being clawed back by Causeway Coast and Glens Borough Council.

If funding is withdrawn the Grantee has no legal redress to have funding reinstated.

6.0 Fraud and Corruption

6.1 Causeway Coast and Glens Borough Council is committed to carrying out business fairly, honestly and openly and has a zero tolerance towards fraud, bribery and corruption. Causeway Coast and Glens Borough Council expects full compliance with the requirements of both the Fraud and Corruption Policy and Bribery Act 2010 from Groups or Individuals applying for, or in receipt of grant aid. This is also relevant to Councillors, Employees, Agents, Partners and Suppliers involved in your project/event. Causeway Coast and Glens Borough Council is committed to developing, implementing and maintaining effective procedures and controls

to prevent any occurrence of fraud and corruption. The Fraud and Corruption Policy can be found on the Causeway Coast and Glens Borough Council website.

All cases of irregularities or anomalies involving attempted or suspected fraud will be reported to appropriate authorities, including the Northern Ireland Audit Office, PSNI and any other relevant funding body (if applicable) or departments within the Council (if applicable).

6.2 Causeway Coast and Glens Borough Council reserves the right to disallow any other grant applications and claims submitted by a group or an individual member of a group in respect of the financial year and to apply a moratorium on Council funding to any group or individual member of a group where fraudulent activity has been identified within the current financial year and for at least two forthcoming financial years. This also applies to individuals applying or claiming for bursaries.

6.3 Causeway Coast and Glens Borough Council will inform the group's Chairperson where attempted or suspected fraud has been identified.

7. REVIEW OF THE POLICY

This policy will be reviewed every 12 months. The Council will also monitor the implementation of the Policy at regular intervals and will respond to emerging issues and/or changing circumstance.

8. RELATED POLICIES AND PROCEDURES

This policy should be read in conjunction with any material relevant to the call for applications by individual grant streams.

9. SECTION 75 EQUALITY AND GOOD RELATIONS

Causeway Coast and Glens Council is fully committed to meeting its obligations in relation to Equality and Good Relations under Section 75 of the Northern Ireland Act. In this regard this policy will be screened using Section 75 guidelines and will be subject to an Equality Impact Assessment if found necessary as a result of the screening process.

10. CONTACT DETAILS

Any issues or queries relating to this policy should be addressed to:

Patricia O'Brien
Funding Unit Manager
Causeway Coast and Glens Borough Council
66 Portstewart Road
Coleraine
BT52 1EY

APPENDIX I**The Process**

While the criteria, target audience and purpose for each funding source will differ, all grants will be awarded after the following *broad* process has been undertaken:

Step	Actions	Remarks
1	Call for applications	Through media that may include; Council website, local media, email call, public advertising, community engagement or other methods.
2	Closing time and date for applications	This must be adhered to at all times – there are no exceptions for applications received after the closing time.
3	Eligibility Checks	Will be undertaken by staff in the Central Funding Unit
4	Assessment and initial award	The application will be assessed by a selection panel consisting of relevant Council officers. The panel will make recommendations as to whether or not the application is successful and level of funding which may be awarded. The outcomes of the assessment process will be presented to the relevant Council committee for consideration and recommendation to full Council for approval.
5	Final award	Agreed by full council meeting.
6	Notification of results	Ineligible applications will be notified immediately. All applicants which have been scored as either successful or unsuccessful should be notified of funding decisions at the same time.
7	Appeal / Review procedure	The purpose of the Review Procedure is to ensure that the decisions taken and procedures followed are applied fairly and consistently. The Review will provide an independent process through which an applicant will have the opportunity to demonstrate that either: <ul style="list-style-type: none"> • The outcome was unreasonable or • That the proper procedures were not followed. Appeals on any other ground will not be considered.
8	Letter of offer issue and conditions	Council may attach conditions to it's letters of offer to ensure protection of public funds and that objectives are met.
9	Financial Verification & Payments	In order to move to a risk-based verification process, Council will assess the internal financial controls & procedures within an organisation to determine the level of financial competence of an organisation.
10	Claims, monitoring and evaluation.	Claims, Monitoring and Evaluation is on an outcome based approach. The benefits to be gained from this approach are substantial both in terms of greater value for money in use of grants and in substantially reduced administrative burden for all concerned.

APPENDIX II

Grant Categories

GRANT CATEGORY	Nature of the Grant	Specific Grant Programmes
Major Events	Support for regionally-important events, which are promoted and supported by Council, but organised by third party organisations – for example, North West 200 and the Milk Cup.	<ul style="list-style-type: none"> • Tourism Event Fund Programmes.
Minor Events	Support for locally significant, community-focused events – for example, music and drama championships, town-based festivals, sector specific events.	<ul style="list-style-type: none"> • Community Festivals Grant Programme (DCAL). • Small Event Grant Programme. • Christmas Festive Fund
Community / Socio Economic Development	<ul style="list-style-type: none"> • Submissions from organisations who require matching funding for larger schemes or public sector buy-in – for example European Social Funds. • Applications from the community sector for core costs, general support. • Community Festivals. • Applications for one-off projects through programmes such as Good Relations, Community Safety Initiatives, and Economic Development. 	<ul style="list-style-type: none"> • Community Development Grant Programme (DSD). • PCSP Grant Programme (DOJ). • Building a United Community Fund Grant Programme (OFMDFM). • Social Inclusion Grants • Neighbourhood Renewal Grants (DSD) • Landfill Communities Fund • Enterprise Fund • Town Twinning Fund • Rural Business Support Programme
Capital Projects	Applications from sporting, community and other organisations which require matching funding for specific capital projects agreed for support by Council.	<ul style="list-style-type: none"> • Capital Project Grant Programme.
Cultural Development	Minor events, bursaries, small scale event support for those projects which fall predominantly under the sphere of Arts and Heritage.	<ul style="list-style-type: none"> • Culture, Arts and Heritage Grant Fund & Bursaries
Sports Development	Assistance towards development for teams and individuals who have been selected for representation for the town, district or region. Small scale assistance towards equipment and event support.	<ul style="list-style-type: none"> • Everybody Active Grant programme.

This list does not include instances where Council seeks service delivery from a third sector or arm's length organisation for which procurement is best-value option.