



Government Grants Management Function

(GGMF) Functional Blueprint

Scope

1. To set out a Blueprint for the functional structure in government Grant Making Organisations (GMOs), providing a description of key requirements, roles and responsibilities, taking account of guidance including:
 - [Standard for Government Functions](#) (GovS 001);
 - [Grants Functional Standard](#) (GovS 015); and
 - [Managing Public Money](#).

Background

1. This document should be read in conjunction with the grants [Functional Standard](#) (GovS 015).
2. The mandatory elements of the grants Functional Standard are included for ease at **Annex A**, organised by minimum requirement, with cross-references to the Functional Standard document included.

Using this Document

3. This document provides a baseline for organisations, to act as a consolidated source of information, setting clear expectations for the structure of the grants Function in government grant making organisations and signposting to sources of applicable guidance and support.
4. The intention is for this document to be used as a reference tool for organisations in assessing the requirements for their organisation in developing a compliant and proportionate Functional Structure, which meets the organisation's business needs and priorities.
5. The Blueprint focuses on *what* organisations need to consider and implement, from the perspective of a range of existing guidance and requirements. It is for organisations themselves to take decisions on what is appropriate and proportionate within their organisation's context, and *how* to best comply with the various requirements outlined. This document is not intended to be used as a one size fits all, prescriptive list of requirements.

Grants Functional Blueprint

1. Vision, Strategy, Leadership and Location

This category relates to the overall structure of the Function and its leadership and management chain. This includes setting a vision and strategy for the Function in an organisation - aligned to the GGMF's vision and strategy - and ensuring that the *Senior Officer Accountable for Grants* (known as the *Senior Functional Lead*) in an organisation has oversight of the organisation's grant funding arrangements and access to regular reporting of management information on, for example, risks, issues, investments and approvals. It also includes consideration of the location of the Grants Function and its interaction with other Functions, in particular Policy, Commercial, Counter-Fraud, Legal and Finance. Systematic joint-working – sharing information, collaboration and potentially resources – across Grants, Policy, Finance and Commercial teams, should be the default position.

Whatever the structure in place, it should enable the systematic capture, collation and reporting of grants data from across the organisation, in line with the *Grants Pipeline Control and Data Standard* (see Guidance and References section below and Table 3, Data, Reporting and Digital).

Decisions on leadership, structure and location are for central departments and grant making organisations, taken within the parameters of the guidance listed below. The Functional model should be designed to fit within existing, wider arrangements within the organisation, and set-up to best reflect the organisation's grants landscape, culture and expertise.

Due regard shall be given to the efficiency and effectiveness of grants administration, including reducing risk, countering fraud and maximising value for money.

Key Considerations

Senior Leader

The *Senior Officer Accountable for Grants* should generally be at director level with responsibility for the overall leadership and management of the Grants Function in line with Cabinet Office Guidance – suggestions for filling this post include:

- A single existing Director: from one of the Policy, Finance or Commercial functions;
- A Joint-Directorship: shared between Policy and/ or Finance and/ or Commercial; or
- A New stand-alone post: Grants Director.

Senior Officer Responsible (SOR)

Also known as SRO

All schemes require a named SOR, who has clearly defined responsibilities throughout the lifetime of the grant – this is best defined within an SOR letter, issued to SORs on appointment. A sample SOR letter is available on the grants Centre of Excellence.

Grants Champion	<p>The Grants Function in Central Departments should include a <i>Grants Champion</i>, who acts as the single point of contact with the central Grants Management Function in the Cabinet Office.</p> <p>The role should be graded at Grade 7 as a minimum and should be held by someone with experience in either grant making, finance and/ or commercial.</p>
Location	<p>Options for the location of the Grants Function in Grant Making Organisations are many and varied, including, for example:</p>

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	<ul style="list-style-type: none"> • Centralised Function, with clear links to Policy, Finance, Legal and Commercial; • Devolved Function, with some central coordination, oversight and reporting; • Central Grants Function co-located within Policy, Finance or Commercial Functions; or • Joint Function with a Central Grants Function spanning the Finance and Commercial Functions. <p>Note: the list above may be more applicable to central departments, ALBs will develop an appropriate model, in line with the agreement with their sponsor department(s).</p> <p>Wherever and however the Function is located and structured, there should be arrangements in place to ensure regular two way communications and collaboration with both the Finance and Commercial Functions on the development of grants schemes, in particular those that are high-risk, high-value, novel, contentious or repercussive, and to share information, knowledge and awareness of activity, investments and issues.</p>
Outsourcing	<p>Grant making organisations may seek to outsource certain parts of their grant making, where additional capacity is needed, this may be most applicable to high volume, low value schemes, although not exclusively. The GGMF recommends that organisations consider using the CCS Dynamic Purchasing System (DPS) for this purpose (RM6172, see below for details).</p>
Guidance and References	
GGMF Information	<p>https://www.gov.uk/government/collections/grants-management-function.</p>
Guide to	<p>https://www.gov.uk/government/publications/guide-to-function</p>

Functional Standards	al standards.
Continuous Improvement Against Functional Standards	https://www.gov.uk/government/publications/guide-to-continuous-improvement-against-functional-standards.
Grants Functional Standard	https://www.gov.uk/government/publications/grants-standards.
Minimum Requirement One - SOR	Minimum Requirement 1.
Grants Pipeline Control	The Grants Pipeline Control Process Guidance can be accessed on the grants Centre of Excellence, here: https://grantshub.civilservice.gov.uk/s/ .
Government Grants Data Standard	The Government Grants Data Standard provides government departments with a complete picture of the data that they are expected to hold on their grant making for submission onto the GGIS. It outlines each table and field required, and explains how each should be specified. A copy of the Standard can be downloaded from the <i>Analysis & Insights</i> page on the grants Centre of Excellence: https://grantshub.civilservice.gov.uk/s/ .
Role of the Grants Champion	A role description for the Grants Champion can be accessed on the grants Centre of Excellence: https://grantshub.civilservice.gov.uk/s/ .
Outsourcing – DPS RM6172	RM6172 is offers all public sector bodies including central government departments, arms-length bodies, local authorities,

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	blue light services and charities, the opportunity to access a variety of grant administration services – the DPS is open and new suppliers can be approved and added at any time – further details are published here, including how to contact CCS for further information: https://www.crowncommercial.gov.uk/agreements/RM6172 .
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2. Governance & Management Framework and Approvals

This category relates to the process of scrutiny and approval for grant funded investments, via existing governance structures in organisations. The level of scrutiny afforded to individual business cases in an organisation - from *Options Analysis* to *Full Business Case* - will be designed to fit within the organisation's existing governance structure, and will be in line with agreements on financial approval with HMT.

Functional Standards are the primary reference documents for implementing consistent ways of functional working in government. Their associated practices and guidance form governance and management frameworks. The Functional Standard for grants introduces governance as follows:

*“4.1.1 Governance comprises prioritising, authorising, directing, empowering and overseeing management, and assuring and reviewing performance for grants. A **governance and management framework** shall be defined and established for the management of grants across government as a whole, and in government organisations, and comply with government and organisational policies and directives. The governance and management framework should include the authority limits, roles and rules for making business decisions, degrees of autonomy, assurance needs, reporting structure, and accountabilities and responsibilities, together with the appropriate management practices, processes and associated documentation needed to meet this standard. GovS 006, Finance shall be followed.”*

This Blueprint acts as the governance and management framework for the *Government Grants Function*, providing a coherent package of information to support ways of working, including the requirements and guidance that people should follow

In developing a governance model in organisations, particular attention should be paid to the *Grants Pipeline Control*, to ensure compliance with Cabinet Office requirements regarding governance and approvals (see Guidance and References section below and Table 3, Data, Reporting and Digital). Departments should ensure appropriate sign-off processes are in place to allow the publication of grants data, including taking appropriate steps to ensure data is accurate and complete.

The *Senior Officer Accountable for Grants* should ensure that the arrangements put in place for grants are fit for purpose, offering a proportionate and appropriate level of scrutiny and challenge of business cases related to investment proposals presented for approval for funding via *general grants*, ensuring that the Investment Committee/ Board, includes people with appropriate knowledge and expertise in grant making, to ensure the right level of understanding.

For lower value investments, the *Senior Officer Responsible* (SOR) for the grant scheme is usually responsible for ensuring scrutiny of the Business Case, and approval by a person with appropriate delegated financial authority, however, this should be

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administered in line with internal, Functional Standard compliant policy and process within organisations.

Business cases for investments via general grants should be compliant with minimum requirement 4 (see below) and particular consideration should be given to whether the scheme would benefit from referral to the Complex Grants Advice Panel (CGAP) – mandatory for government priorities, such as schemes referenced in the manifesto and the Prime Minister’s priorities (see below).

A key consideration for general grants is the mechanism for awarding the grant – the default should be via a competitive process, with direct awards made by exception, only where a clear rationale is developed, which is signed off via the appropriate governance process.

A model has been developed, based on experiences during the COVID-19 pandemic and other scenarios, such as flooding, to enable the smooth administration of funding to areas of need, at pace. The model covers pre and post-award assurance, data requirements and tools and templates. Details can be found on the grants Centre of Excellence.

Arrangements for Grant-In-Aid and Formula grants will be decided by sponsor departments and grant making organisations, in line with Managing Public Money, the Grants Functional Standard and existing bespoke internal guidance available within organisations.

Key Considerations

<p>Investment Committee/ Board and Out of Committee Approvals</p>	<p>All general grant schemes should be supported by a business case, which is scrutinised via a proportionate and appropriate governance and approvals route, in line with <i>minimum requirement two</i> (see below).</p> <p>Arrangements should be in place to ensure that all grant funding <i>approvals</i> are systematically reported to the central <i>GGMF</i> via the <i>GGIS</i>, as set out in the Grants Pipeline Control Process Guidance.</p>
<p>Challenge Panels</p>	<p>Consideration should be given to implementing a version of the MoJ <i>Challenge Panel</i> approach (see minimum requirement 2, page 11), as a systematic way of interrogating an organisation’s general grants pipeline, including new and rollover/ repeat schemes and investments, to ensure they remain fit for purpose and, for example, that a grant remains the appropriate mechanism.</p>

Guidance and References

<p>Managing Public Money</p>	<p>https://www.gov.uk/government/publications/managing-public-money.</p>
<p>Minimum Requirement One - SOR</p>	<p>Minimum Requirement 1.</p>
<p>Minimum Requirement Two - Governance</p>	<p>Minimum Requirement 2.</p>
<p>Minimum</p>	<p>Minimum Requirement 3.</p>

Requirement Three – CGAP	
Minimum Requirement Four – Business Cases	Minimum Requirement 4.
Minimum Requirement Five - Competition	Minimum Requirement 5.

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Grants Pipeline Control	The Grants Pipeline Control Process Guidance can be accessed on the grants Centre of Excellence, here: https://grantshub.civilservice.gov.uk/s/ .
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3. Data, Reporting and Digital

This category is focused on data capture, analysis, reporting and publication – reconcilable grants data are captured via the Government Grants Information System (GGIS) - and the consideration of digital capability, for example, the use of existing products such as the Spotlight online due diligence tool, as well as investments in digital capability such as grants administration systems, to help increase the efficiency and effectiveness of grants administration and to support compliance with the Functional Standard.

Data requirements also relate to the evaluation of grant schemes and awards, i.e. ensuring that measurable objectives are defined at the outset and data sources are identified and/ or created, to ensure that the impact can be assessed, using proportionate and recognised methodologies.

Key Considerations

<p>Government Grants Information System (GGIS)</p>	<p>Ensuring compliance on data capture and reporting via the GGIS, in line with the Government Grants Data Standard and the requirement set out in funding settlement letters:</p> <p><i>“From 1 April 2021 departments and their Arm’s Length Bodies are required to provide and maintain complete, accurate and timely data on grant schemes and awards, from pipeline to completion.”</i></p> <p>Organisations should ensure that they have systems in place, required to meet the Grants Data Standard including providing data via the bi-monthly pipeline, and annually, for schemes and awards.</p> <p>Grant making organisations should ensure that they make available appropriate management information and/ or reporting products - to ministers and senior officials - for use internally, to enable the effective management of the organisation’s schemes, and for external use, using approved, published data.</p> <p>In developing the structure of the Grants Function in grant making organisations, consideration should be given to data capture, for example, whether it is administered centrally, or devolved to individual SORs and policy teams. Whatever the structure put in place, the organisation should ensure it has sufficient licences to cover its GGIS user base.</p>
<p>Grants Data Pipeline</p>	<p>Provision of new and repeat grant scheme and award data, via the <i>grants data pipeline</i>, at intervals set by the Cabinet Office GGMF, in line with the <i>Government Grants Data Standard</i> (see below).</p>
<p>Grant Scheme Readiness Assessment (GSRA)</p>	<p>The GSRA is a tool, provided online via the GGIS, to enable the assessment of progress and to provide reporting dashboards, throughout the design phase of individual grant schemes. The GSRA is linked to the six-step grant making lifecycle and the requirements of the Grants Functional Standard. Use of the</p>

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	<p>GRSA is mandatory for Business Partner supported schemes (see Table 6, Expert Support). A copy of the GSRA can be provided in Excel, where preferred, although use of the GGIS is recommended.</p>
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<p>Complying with the UK's obligations on subsidy control</p>	<p>As set out in the Trade and Cooperation Agreement (TCA) with the European Union, public authorities have a legal obligation to declare subsidies, within 6 months, that they have granted through a scheme, relying on £325,000 Special Drawing Rights limit: https://www.gov.uk/government/publications/complying-with-the-uks-international-obligations-on-subsidy-control-guidance-for-public-authorities.</p>
<p>Data Publication</p>	<p>Grant making organisations should contribute to the annual grants data publication exercise, including securing appropriate approval to publish - organised within the structure of the Grants Function in individual organisations - to help meet the Government's commitment in the <i>UK Open Government, National Action Plan</i>, to publish data on government grants each year, to 360Giving standards. Data is published on gov.uk here: https://www.gov.uk/government/collections/government-grants-data-and-statistics.</p>
<p>Spotlight Licences</p>	<p>Spotlight is an online due diligence tool, which enables initial automated due diligence checks and data led decisions without having to perform costly, time-consuming manual checks – the tool flags potential issues for follow-up. Licences are required to access the Spotlight tool; further information can be requested via email: mailto:grants-management.function@cabinetoffice.gov.uk.</p>
<p>Guidance and References</p>	
<p>Minimum Requirement Two – Governance, Approvals & Data Capture</p>	<p>Minimum Requirement 2.</p>
<p>Government Grants Data Standard</p>	<p>The Government Grants Data Standard provides government departments with a complete picture of the data that they are expected to hold on their grant making for submission onto the GGIS. It outlines each table and field required, and explains how each should be specified. A copy of the Standard can be downloaded from the <i>Analysis & Insights</i> page on the grants Centre of Excellence: https://grantshub.civilservice.gov.uk/s/.</p>
<p>Grants Pipeline Control</p>	<p>The Grants Pipeline Control Process Guidance can be accessed on the grants Centre of Excellence, including a timetable of upcoming data collection deadlines, here: https://grantshub.civilservice.gov.uk/s/.</p>
<p>Grant Scheme Readiness Assessment Toolkit</p>	<p>A toolkit on how to use the GSRA is available to download from the <i>Analysis & Insights</i> page on the grants Centre of Excellence: https://grantshub.civilservice.gov.uk/s/.</p>

4. Standards and Compliance

This category relates to compliance with the suite of Government Functional Standards, and in particular *GovS 015: Grants*, and its associated *minimum requirements* for general grants – the key mandatory elements of the Functional Standard and minimum requirements are reproduced at **Annex A** for ease of reference.

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Compliance with the suite of Government Functional Standards was made mandatory via a *Dear Accounting Officer Letter* (DAO 05/21 – link below) in May 2021, specifically:

“By the end of March 2022, all central government departments and their arm’s length bodies should have a plan in place to comply with each functional standard in a way that meets its business needs and priorities. Use of the standards should be embedded into each organisation’s business plans for 2022-23 onwards. Statements about use of functional standards should be included in annual reports and, where relevant, Accounting Officer system statements.”

The leadership team in grant making organisations should satisfy itself that the Grants Function’s structure, policies and processes are fully compliant with the requirements of *GovS 015* - including interactions with related Functional Standards, for example, Finance (*GovS 006*), Commercial (*GovS 008*), Counter-Fraud (*GovS 013*) and Debt (*GovS 014*) - encompassing the structure of the Grants Function in the organisation and processes and guidance covering the design, justification, approvals and administration of individual grant schemes and awards.

All government grant making organisations are required to participate in the GGMF’s periodic maturity assessment exercise - this is linked to Cabinet Office guidance on continuous improvement against Functional Standards - see below for details.

Note: the *minimum requirements for general grants* operate on a *comply or explain* basis. In practice this means the organisation developing the grant scheme will demonstrate compliance with the minimum requirements or where that is not possible for specific elements of the requirements, provide a supporting rationale providing justification for any areas of non-compliance, as part of the scheme’s business case, signed off at an appropriate level within the organisation.

Key Considerations

<p>Continuous Improvement:</p> <ul style="list-style-type: none"> • Self-Assessment • Validation; and • Deep Dives 	<p>The GGMF undertakes a periodic exercise to assess the maturity and integrity of the functional structures, policies and processes in grant making organisations. This involves a self assessment by organisations, validation via audit teams, and a deep dive check of key documentation via the GGMF. Grant making organisations are required to participate fully in this exercise, working to the guidance, templates and terms of reference provided by the GGMF Policy, Standards and Oversight team.</p> <p>Each exercise will be scheduled and commissioned to provide sufficient time, with findings and recommendations reported at the organisation and functional level. Organisations should be prepared to undertake this work, including providing an action plan to address recommendations and areas for improvement.</p>
<p>Functional Standards Collection</p>	<p>https://www.gov.uk/government/collections/functional-standards#guide-to-continuous-improvement-against-functional-standards.</p>
<p>Continuous Improvement Against Functional Standards</p>	<p>https://www.gov.uk/government/publications/guide-to-continuous-improvement-against-functional-standards.</p>
<p>Guidance and References</p>	
<p>Dear Accounting Officer (DAO) Letter 05/21 – Mandating Functional Standards</p>	<p>https://www.gov.uk/government/publications/dao-0521-mandating-functional-standards-from-end-september-2021.</p>

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<p>Cabinet Office Guide to Continuous Improvement Against Functional Standards</p>	<p>https://www.gov.uk/government/publications/guide-to-continuous-improvement-against-functional-standards.</p>
<p>Grants Functional Standard - GovS 015</p>	<p>https://www.gov.uk/government/publications/grants-standards.</p>
<p>Guidance for General Grants</p>	<p>Guidance for General Grants.</p>

<p>Complying with the UK's obligations on subsidy control</p>	<p>Guidance on the detail of and compliance with the UK's obligations, set out in the Trade and Cooperation Agreement (TCA) with the European Union, including:</p> <ul style="list-style-type: none"> • the Northern Ireland Protocol; • respecting the UK's international obligations; and • the publication of grant awards on the UK Transparency Database. <p>Public authorities have a legal obligation to declare subsidies, within 6 months, that they have granted through a scheme, relying on £325,000 Special Drawing Rights limit:</p> <p>https://www.gov.uk/government/publications/complying-with-the-uks-international-obligations-on-subsidy-control-guidance-for-public-authorities.</p>
<p>Continuous Improvement Guidance</p>	<p>Documents pertaining to the periodic maturity assessment exercise can be found on the grants Centre of Excellence:</p> <p>https://grantshub.civilservice.gov.uk/s/.</p>
<p>Centre of Excellence Functional Standard Page</p>	<p>The <i>Functional Standard</i> page on the grants Centre of Excellence provides information on the Standard, the associated maturity assessment process and core documents and information products can be accessed here:</p> <p>https://grantshub.civilservice.gov.uk/s/.</p>

<p>5. Cross-Functional Coordination and Communications</p>	
<p>This category relates to the effective coordination, oversight and networks, to ensure that the Function is able to respond effectively to requests, both internally within the organisation and from the GGMF and keeps abreast of developments in policy, process and practice, as well as sharing information, ideas and best practice across government.</p> <p>Functions in organisation should have in place a communications plan to ensure that all people involved in grant making with the organisation are provided with the information they need to carry out their role effectively, from providing information on developments and opportunities (for learning and collaboration), to sharing MI and work plans, to ensure key objectives, tasks and deadlines are clear and monitored and coordinated across the function.</p> <p>Central Departments and ALBs are encouraged to consider developing networks across organisational boundaries, to share information and ideas and to coordinate on related areas of delivery.</p>	
<p>Key Considerations</p>	
<p>Oversight of the Pipeline</p>	<p>The grants function in an organisation should ensure that it has a firm grip on the pipeline and GGIS data – provision of accurate and complete data - and that information is available/ shared within the organisation to enable strategic planning and</p>



	compliance activity, i.e., periodic sample checking of processes and returns to ensure compliance with internal policies and the wider Functional Standard and Pipeline Control. Pipeline data is provided via the GGIS.
Networks	The GGMF coordinates networks of Stakeholders, Grants Champions, SORs and ALBs – these networks are cross functionals and open to all – their purpose is to share updates, signal future developments and to enable cross-functional discussion and networking. Organisations should consider their engagement with these networks and provide appropriate delegates for each. Details can be requested via the Centre of Excellence: grantscentreofexcellence@cabinetoffice.gov.uk .
Engagement with ALBs	<p>The Grants Function in sponsor departments should ensure that they have in place robust arrangements with their Arm's Length Bodies (ALBs) to enable the setting of clear expectations and facilitates financial and performance monitoring, compliance checking and data capture and reporting, in line with central data requirements and transparency commitments. Requirements for Framework Documents - agreed between sponsor departments and ALBs - is set-down in Managing Public Money.</p> <p>ALBs that administer grant funding to deliver policy objectives on behalf of government sponsor departments are required to comply with the Functional Standard, Pipeline Control and Data Standard, and to participate in the GGMF's periodic maturity assessment exercise. All grant making ALBs have the opportunity to join the GGMF's ALB working group (see above).</p>
Guidance and References	
Managing Public Money	https://www.gov.uk/government/publications/managing-public-money .
Grants Centre of Excellence	The grants Centre of Excellence includes a range of information, guidance, templates, toolkits and training, as well as information and news updates on the work of the GGMF: https://grantshub.civilservice.gov.uk/s/ .

6. Expert Support

The GGMF provides a range of expert support to grant making organisations. Central departments should ensure that their organisation and people are well placed to take full advantage of the support available to its people, both within the organisation and via the GGMF.

The access point for expert support via the GGMF is the grants data pipeline – the GGMF’s triage process works to identify high-risk schemes for which an offer of Business Partner support is appropriate – following each triage exercise, the scheme Senior Officer Responsible (SOR) will be contacted with an offer of support, based on the results of the exercise.

The Centre of Excellence (link below) offers everyone in government who works on the design, development and administration of grant schemes and awards, with access to guidance, templates and toolkits and well as the gateway to the Government Grants Academy, which provides access to training and development opportunities.

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The Grants Function in organisations should ensure that it actively promotes and raises awareness of the Centre of Excellence and ensures its people are registered for access, so they are able to take full advantage of the available support.

Minimum Requirement 10 under the Grants Functional Standard requires that all those involved in the design and development and administration of grant schemes and awards should undertake core training in grants management. Training products to assist organisations with compliance with this requirement is available through the *Grants Academy* on the Centre of Excellence. This includes and *Introduction to Government General Grant Making* (see below).

Key Considerations

Business Partners

The GGMF operates a team of business partners whose role is to support central departments (and in some cases ALBs) with the design and development of new grant schemes, which are high-value and high-risk - this includes providing direct practical advice on policy, as well as putting the SOR in touch with subject matter experts such as counter-fraud specialists, audit and arranging referral to the Complex Grants Advice Panel (see below).

<p>Complex Grants Advice Panel (CGAP)</p>	<p>The CGAP is an independent, cross-government expert panel, co-ordinated by the Cabinet Office GGMF. The Panel aims to ensure that there is expert scrutiny and challenge, where required, applied to the development of grant schemes, in particular as early as possible during the design and development stage.</p> <p>Schemes that are referenced in the Government's election manifesto, and those which come under the Prime Minister's priorities, are subject to <i>mandatory referral</i>, follow-up and reporting against the Panel's recommendations. For non manifesto commitments, referral to the Panel is <i>strongly recommended</i> for all new schemes that are high-risk, novel, contentious, or repercussive, and for non-routine schemes undergoing a step change in scope or funding, which impacts the level of risk.</p> <p>Referral to Panel is applicable to all government grant making organisations and, as part of compliance with the Grants Pipeline Control, Functions in organisations should systematically identify schemes that are mandatory or otherwise suitable for referral to the Panel, and ensure that the scheme SOR ensures referrals are made in line with minimum requirement three (see below).</p>
<p>Fraud Risk Assessment</p>	<p>During the design and development phase, all grant schemes should include a proportionate assessment of fraud risk and mitigations, in the form of a Fraud Risk Assessment (see table 7, Counter-Fraud, Risk, Controls and Assurance for further information).</p>
<p>Guidance</p>	
<p>Minimum Requirement Three – CGAP</p>	<p>Minimum Requirement 3.</p>
<p>Minimum Requirement Ten – Training</p>	<p>Minimum Requirement 10.</p>

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<p>Grants Centre of Excellence</p> <p>Expert Services Page</p>	<p>The <i>Expert Services</i> page on the grants Centre of Excellence includes a range of information, guidance, templates, toolkits and training, as well as information and news updates on the work of the GGMF, including how to access to the Expert Services team – an <i>expert services brochure</i> is available to download, which provides details of the available services</p>
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and how to access them:
<https://grantshub.civilservice.gov.uk/s/>.

7. Counter Fraud, Risk Management, Controls and Assurance

Risk management is critical to the efficiency and effectiveness of grant funding. The systems and processes designed to manage and deliver grant schemes should be reviewed in the context of wider risks, before counter-fraud measures and the assessment of fraud risk is undertaken – this assessment of broader risk (and mitigation strategies) will impact on the interventions departments put in place as counter measures.

The Function should take account of the vision and objectives set out in the *Government Grants Counter Fraud Strategy* (available on the grants Centre of Excellence), and ensure that its people are trained in fraud awareness and know where they can access expert advice and support.

The leadership in Grants Function within organisations should ensure that they have in place an appropriate assurance and counter-fraud capability, with specific expertise in grants fraud risk and mitigations – depending on the organisation this could include a team located within a central Grants Function, or alternatively, clear guidance and supporting products that are accessible to all, together with signposting to sources of expert support in both the GGMF and GCFF.

The Function should further ensure that it has appropriate and proportionate processes in place regarding the assurance of grant expenditure, related to the *three lines of defence*, details of which are visible and accessible to all people working on the design and development and administration of grants in the organisation.

Key Considerations

Government Counter Fraud Function – GCFF

Including the Counter-Fraud Profession

The GCFF encompasses a central Function in the Cabinet Office, the Government Counter Fraud Profession and the Government Counter-Fraud Standard (GovS 013):
<https://www.gov.uk/government/groups/counter-fraud-standards-and-profession>.

Fraud Awareness Training

Fraud awareness training aimed at non-practitioners is available via the grants Centre of Excellence, *all* non-fraud practitioners who are involved in the design and development and administration of government grants should undertake awareness training, to help dispel misconceptions, to understand risk and potential mitigations and critically, to understand how to access expert advice and support in the development of Fraud Risk Assessments and in dealing with reports of potential fraudulent activity related to grant funding.

Fraud Risk Assessment

During the design and development phase, all grant schemes should include a proportionate assessment of fraud risk and mitigations, in the form of a Fraud Risk Assessment. Support with the assessment is available on the grants Centre of Excellence, counter-fraud page, and also bespoke guidance and support via the GGMF Expert Services team, for high value, high-risk schemes (see below).



GGMF Expert Services	A <i>brochure</i> with details of the support available from the GGMF Expert Services team is available to download from the Expert Services page on the grants Centre of Excellence (see below).
Guidance and References	
GovS 013: Counter Fraud	https://www.gov.uk/government/publications/government-functional-standard-govs-013-counter-fraud .
Minimum Requirement Seven – Risk, Controls and Assurance	Minimum Requirement 7
Grants Centre of Excellence Counter Fraud Page	The grants Centre of Excellence includes a range of information, guidance, templates, toolkits and training, including what support is available from and how to access <i>Expert Services</i> , and counter-fraud content via the <i>Grants Counter Fraud</i> page: https://grantshub.civilservice.gov.uk/s/ .

8. Finance

The Grants Function should maintain strong links with the Finance Function, to ensure there is joint-working on grants investment, from design and development, through administration and reconciliation and evaluation, to ensure value for money is considered systematically.

Finance are key stakeholders in the development and approval of business cases and the design of the financial elements of individual schemes, such as developing an appropriate payment model, and designing a proportionate regime for financial monitoring and reporting, review and reconciliation and assurance.

The impact of government grant funding should be evaluated, to test whether objectives were delivered, what worked, what didn't work and to assess value for money. The impact evaluation should be proportionate and developed at the business case stage, to ensure it is embedded within delivery and reflected in the requirements of the grant agreement. The design of any impact evaluation should be jointly developed between policy, finance and analytical professionals, as a minimum.

The Function should also work with the Finance Function to ensure compliance with the Global Process Design Principles for grants (see below).

The Grants Function leadership should ensure that all schemes have access to advice from Finance colleagues and that the Finance Function and applicable guidance on finance processes are embedded within the policies and processes of the Grants Function.

Key Considerations	
GovS 006: Finance	https://www.gov.uk/government/publications/government-finance-standards-page .
Global Process Design Principles	Finance Global Design Principles have been developed for twelve areas of the finance taxonomy, including grants, to promote convergence and best practice across government. The principles are a set of common processes and procedures, which are used by core government departments and their arm's length bodies, (ALBs), to ensure consistency across government and facilitate greater sharing of expertise. Details: https://www.gov.uk/government/publications/finance-global-design-principles .

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OneFinance Centres of Excellence: • Grants • Debt • Tax	Finance practitioners can register on OneFinance to access guidance and support, including details of Centres of Excellence in government: https://gff.civilservice.gov.uk/global-design-principles-1/finance-processes/ .
Guidance and References	
Managing Public Money	https://www.gov.uk/government/publications/managing-public-money .
HMT Magenta Book Evaluation Guidance	The Magenta Book provides guidance on evaluation in government: its scoping, design, conduct, use and dissemination as well as the capabilities required of government evaluators. It provides guidance on how to incorporate evaluation through the design, implementation, delivery and review stages of policy making. It also explains how results can be interpreted and presented, and what should be considered in this process. https://www.gov.uk/government/publications/the-magenta-book .
Minimum Requirement Eight – Performance Monitoring	Minimum Requirement 8.
Minimum Requirement Nine – Annual Review and Reconciliation	Minimum Requirement 9.

9. Legal

The Grants Function should maintain strong links with its legal advisers, to ensure that legal advisers provide routine input to ensure that the design of grant schemes and awards are compliant with applicable legal requirements, including ensuring that general grants are administered under appropriate empowering legislation.

Input from legal should include an assessment of the legal risks associated with a grant scheme and enable any medium/ high risks that are identified to be communicated to ministers and senior officials in the business case and any relevant briefings and/ or submissions.

Legal advisers across government should work with the Grants Legal Centre of Excellence, to ensure they are kept abreast of developments in grants, and should maintain links with grants policy teams, as required.

Key Considerations

Business Cases

Grant scheme SORs should ensure that their legal advisers are appropriately sighted on the development of business cases related to grant funding, to ensure expert input, in line with internal policies

Grant Funding Agreements

Grant scheme SORs should ensure that the grant agreements drawn-up to make awards under the schemes for which they are responsible, have been subject to appropriate legal scrutiny and sign-off, in line with internal policies.

Guidance and References

Minimum Requirement Six – Grant Agreements

[Minimum Requirement 6.](#)

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Grants Centre of Excellence

Model Grant Funding Agreement

The latest version of the Cabinet Office Model Grant Funding Agreement is available to download from the grants Centre of Excellence – the document is updated periodically and in response to significant changes in government and policy - the document is fully compliant with minimum requirement six and is designed to be used for all types of grant scheme – the template also includes detailed notes for use in its completion: <https://grantshub.civilservice.gov.uk/s/>.

10.Capability and People

The Grants Function should have in place a strategy to ensure that its people have access to development and training, to ensure that the Function has the capability it needs to function efficiently and effectively and to ensure compliance with minimum requirement ten (see below).

The grants Centre of Excellence in the GGMF is the key source of information, products, guidance, templates, toolkits and training. The Function should decide whether to provide its people with direct access to the Centre of Excellence – the preferred approach – or to offer an equivalent within the organisation, which is based on the content on the GGMF Centre of Excellence.

Due to the commonalities between contracting and general grants, all people involved in the design and development and administration of government general grants should be encouraged to undertake commercial awareness training and to consider undertaking foundation level accreditation in Contract Management – to broaden their knowledge and provide a clearer view of procurement process, which can be used to inform individuals’ work in grants, for example, employing commercial knowledge and practice, where that is appropriate and applicable to grant making. This should be supported by individuals undertaking the eLearning module on the differences between contracts and grants, to prevent inappropriate commercial process being inadvertently used in the grants context.

It is recommended that organisations undertake periodic capability and training needs analysis, to baseline their position and to identify and monitor gaps, and identify opportunities to upskill its people as required.

The Function should maintain links with the GGMF’s capability team, to keep its people up-to-date with developments and to take advantage of opportunities to collaborate, share knowledge and contribute to the development of the grants capability strategy for government.

Key Considerations

<p>Foundation Learning</p>	<p>The GGMF makes available a foundation training package for government grant makers – Grants Functions in organisations should ensure that they keep abreast of developments and provide access for their people, as required.</p>
<p>SOR Letter</p>	<p>The GGMF provides an example Grants SOR letter, setting out the key responsibilities for the role, in the grants context. The template can be downloaded from the grants Centre of Excellence.</p>
<p>Licence to Practice</p>	<p>The GGMF has developed a licence to practice, for all people in an organisation that are involved in the design and development and administration of government grants, in particular the SOR and grants managers. Details can be found on the grants Centre of Excellence.</p>

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Guidance and References	
Minimum Requirement Ten - Training	Minimum Requirement 10.
Commercial Awareness Training	An eLearning module is available via the grants Centre of Excellence, which covers the commonalities and differences between the contracting and general grants processes – delivered through the Commercial College website (see below).
Commercial College - Foundation Level Accreditation	Foundation level commercial accreditation can be accessed via the commercial college – see link for details: https://www.gov.uk/government/publications/civil-service-helping-you-with-managing-suppliers-and-contracts/civil-service-helping-you-with-managing-suppliers-and-contracts .
Grants Centre of Excellence	The grants Centre of Excellence includes a range of information, guidance, templates, toolkits and training, as well as information and news updates on the work of the GGMF: https://grantshub.civilservice.gov.uk/s/ .
eLearning	The effective design and management of government grants requires a diverse set of skills and knowledge. This training course will support you in developing a foundation level understanding of the skills and knowledge required to manage government grants including: an overview of the six-step process, fraud in grants and managing grants risks, controls and assurance: Introduction to Managing Government Grants . <i>You need to be logged into Civil Service Learning before clicking this link to go directly to the course page.</i>
eLearning	This module provides an overview of the types of grant fraud and how to manage and mitigate fraud risk: Fraud in Grants . <i>You need to be logged into Civil Service Learning before clicking this link to go directly to the course page.</i>
eLearning	This module provides an understanding how risk, controls and assurance apply to the six-step grant-making process: Grants Risks, Controls and Assurance . <i>You need to be logged into Civil Service Learning before clicking this link to go directly to the course page.</i>

11.Resources
The <i>Senior Officer Accountable for Grants</i> (known as the <i>Senior Functional Lead</i>) in an organisation should ensure - subject to financial settlements and internal funding decisions - that the Grants Function has sufficient resources at its disposal to ensure that business needs and priorities are met, and to ensure that the requirements set out in this Blueprint, with particular attention to mandatory requirements, are fully met through a proportionate functional strategy.
Key Considerations

Resources should be considered in the following areas:

- Senior Officer Accountable for an Organisation's Grants;
- Governance and approvals;
- Grants Champion role;
- Central Resource – size and scope of the central oversight team;
- Links to the Commercial Function – expert resource required;
- Links to the Finance Function – expert resource required;
- Standards Compliance;

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- Data Capture, Analysis and Reporting and Transparency;
- Counter-Fraud Capability; and
- Coordination and Communications.

These areas will be considered in the round, as part of the organisation's resource allocations.

The following tables are extracts from the minimum requirements for general grants published on gov.uk. The numbers quoted refer to paragraphs in the source documents.

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Minimum Requirement One: Senior Officer Responsible for a Grant

2	Those engaged in managing grants at scheme and award level shall ensure that the 6 principles in the Functional Standard are followed to ensure grants are made correctly, transparently and in the public's interest.	2 Principles
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4.4	<p>Organisations shall have (at a minimum) the roles outlined in the grants Functional Standard.</p> <ol style="list-style-type: none"> 1. Senior officer accountable for grants across government; 2. Accounting officer; 3. Senior officer accountable for finance in an organisation; 4. Senior officer accountable for an organisation's grants; 5. Senior officer responsible for a grant; 6. Grants champion; 7. Grant manager; 8. Specialist roles. 	4.4 Roles and accountabilities.
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Minimum Requirement Two: Governance, Approvals & Data Capture

4.1	A governance and management framework shall be correctly established for the management of grants which complies with organisational policies and the grants Functional Standard and defines the management of activities.	4.1 Governance and management framework.
4.1	Each organisation shall have a senior officer accountable for its grant funding.	4.1 Governance and management framework.
4.2.2	Grant activity shall be justified and documented throughout the grant life cycle.	4.2.2 Justification of grants.
4.2.2	If required, subsequent approval shall be obtained in accordance with HM Treasury, Cabinet Office policy and spend controls and GovS 006, Finance shall be followed.	4.2.2 Justification of grants.
4.1	GovS 006, Finance shall be followed, and those accountable for the management of grants shall comply with the following documents: 'Managing Public Money' and Global Design Principles'.	4.1 Governance and management framework.
5.2.1	<p>Details of the grant shall be entered on to the Government Grants Information System as soon as approval to develop the proposal has been given.</p> <p>A robust business case (or equivalent document), proportionate to the level of expenditure and risk shall be developed.</p> <p>A proportionate assessment of fraud risk shall be undertaken, including an assessment of mitigating actions.</p> <p>Once a business case has been developed, it shall be approved, where it meets the requirements of the organisation's governance and approvals process (see</p>	5.2.1 Design and development



	4.2.2), and details of the approval shall be entered into the Government Grants Information System.	
6.6	Information shall be retained to meet statutory and government requirements.	6.6 Document management and record keeping.
6.8	Key data on government grants shall be recorded in the grants information system and shall include the following data as a minimum: value, delivery period, brief description of purpose, owning department, intermediary body and recipient name.	6.8 Reporting and information.

Minimum Requirement Three: Complex Grants Advice Panel (CGAP)

4.3.2	<p><i>It is recommended that new grants, which are high-value, high-risk, novel, contentious or repercussive, should be considered by an independent panel (the Complex Grants Advice Panel, see 4.4.6).</i></p> <p>Referral to the panel is mandatory for new grant schemes that are referenced in the government's manifesto commitments. Advice from the panel shall not detract from the accountabilities of those being advised.</p>	4.3.2 New general grants.
4.4	<p>Organisations shall have (at a minimum) the roles outlined in the grants Functional Standard.</p> <ol style="list-style-type: none"> 1. Senior responsible officer accountable for grants across government*; 2. Accounting Officer; 3. Senior responsible officer for finance in an organisation; 4. Senior officer accountable for an organisation's grants; 5. Senior officer responsible for a grant; 6. Grants champion; 7. Grant manager; 8. Specialist roles. <p>*Central roles within the Cabinet Office</p>	4.4 Roles and accountabilities.

Minimum Requirement Four: Business Case Development

2	Those engaged in managing grants at scheme and award level shall ensure that the 6 principles in the Functional Standard are followed to ensure grants are made correctly, transparently and in the public's interest.	2 Principles
4.2.2	Grant activity shall be justified and documented throughout the grant life cycle.	4.2.2 Justification of grants

5.2.1	When developing general grant models and criteria for assessing individuals and organisations for a grant award, consideration shall be given to risk indicators.	5.2.1 Design and development
5.2.1	A robust business case (or equivalent document), proportionate to the level of expenditure and risk shall be developed.	5.2.1 Design and development

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5.2.1	Once a business case has been developed, it shall be approved where it meets the requirements of the organisation's governance and approvals process.	5.2.1 Design and development
4.3.2	Referral to the panel (CGAP) is mandatory for new grant schemes that are referenced in the government's manifesto commitments.	4.3.2 New general grants.
6.1	Organisations shall ensure effective risk management is established in their assurance and governance processes.	6.1 Risk and issue management
6.2	An assessment of fraud risk shall be undertaken for every scheme proportionate to the value, sector and required activity of the scheme, and supported by mitigating actions appropriate to the identified risks.	6.2 Counter fraud
6.6	Information shall be retained to meet statutory and government requirements.	6.6 Document management and record keeping

Minimum Requirement Five: Competition for Funding

5.2.1	When developing general grant models and criteria for assessing individuals and organisations for a grant award, consideration shall be given to risk indicators and mitigating action considered.	5.2.1 Design and development
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Minimum Requirement Six: Grant Agreements

5.2.4	Authorised representatives of the funding organisation and the grant recipient shall sign a copy of the grant agreement, identifying the named accountable individual for the recipient organisation.	5.2.4 General grant award
6.4	General grants shall be covered by a grant agreement.	6.4 Agreements

6.4.1	Each general grant award shall be subject to a defined agreement between the grant making body and the recipient. It should be proportionate to the value of the grant being awarded and shall be underpinned by appropriate legislation.	6.4.1 Grant agreement (general grants)
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Minimum Requirement Seven: Risk, Controls and Assurance

5.2.1	Consideration shall be given to risk and fraud risk indicators.	5.2.1 Design and development
6.1	Organisations shall ensure effective risk management is established in their assurance and governance processes.	6.1 Risk and issue management
6.2	An assessment of fraud risk shall be undertaken for every scheme proportionate to the value, sector and required activity of the scheme, and supported by mitigating actions appropriate to the identified risks. GovS 013, Counter Fraud shall be followed.	6.2 Counter fraud

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Minimum Requirement Eight: Performance and Monitoring

6.8	Grant recipients shall report on their grants in accordance with their grant or framework document, as appropriate.	6.8 Reporting and information
6.8	Organisations shall report the status of grants as part of their annual report and resource account. GovS 006, Finance shall be followed.	6.8 Reporting and information

Minimum Requirement Nine: Annual Review and Reconciliation

4.2.2	Grant activity shall be justified and documented throughout the grant life cycle.	4.2.2 Justification of grants
6.8	Key data on government grants shall be recorded in the grants information system and shall include the following data as a minimum: value, delivery period, brief description of purpose, owning department and intermediary body. Organisations shall report the status of grants as part of their annual report and resource account, in accordance with GovS006, Finance.	6.8 Reporting and information

Minimum Requirement Ten: Training

6.7	Those undertaking grant management shall have completed basic training to perform their role effectively.	6.7 Training
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