

**Assurance
Framework
January 2020**

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Coast to Capital website: <http://www.coast2capital.org.uk>

Version Control

Version	Reason for update	Publication date
V7	Updated to respond to annual review of Assurance Framework	January 2020
V6.3 - 2019	Compliant with 'National Local Growth Assurance Framework' (January 2019) – Signed off by Accountable Body and Board	March 2019
V6.2 - 2019	Draft version shared with Board members and updated with feedback	-
V6.1 - 2019	Draft version reviewed by Accountable Body	-
V6 – 2019	Updated to comply with 'National Local Growth Assurance Framework' (January 2019) – Draft for Board consideration	-
V5 – 2018	Updated to comply with 'Local Enterprise Partnership governance and transparency: best practice guidance' (January 2018)	February 2018
V4 – 2017	Final version 2017	February 2017
V3 – 2016	Draft version produced to comply with 'Local Enterprise Partnership National Assurance Framework' (November 2016)	November 2016
V2.1 - 2016	Updated for 2016	March 2016
V2 – 2015	Final version 2015	March 2015
V1 – 2015	Draft version produced for Growth Deal 2015	January 2015

1. Introduction

1.1 Coast to Capital Local Enterprise Partnership

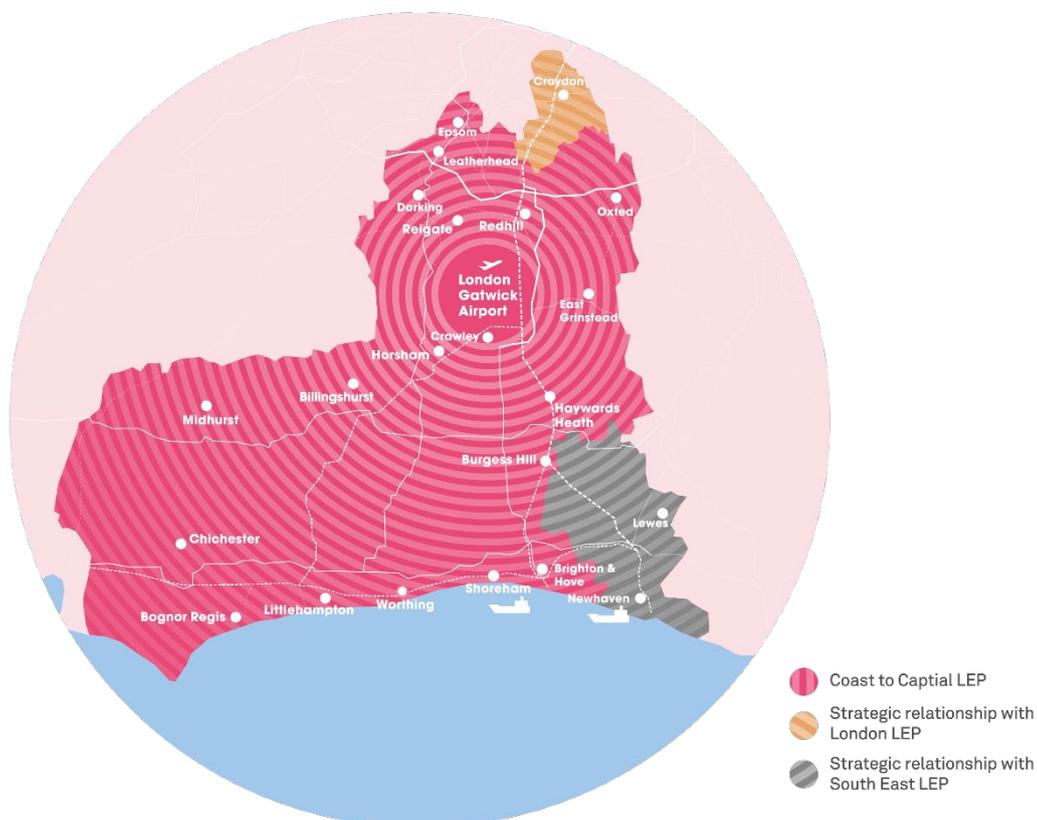
Coast to Capital is one of 38 Local Enterprise Partnerships (LEPs) across England – but the only one lucky enough to be responsible for driving the economic growth and sustainable success of this beautiful, vibrant and exceptionally well connected region.

As a LEP, we are here to provide strategic leadership, connect business with support and act as a catalyst for transformational change. As an ambitious and professional business-led collaboration between the private, public and education sectors, we work in partnership to deliver a successful strategy for economic growth.

1.2 Our Area

The Coast to Capital area does not fit the template. Rather than a single identifiable city region, it is a network of functional economic hubs around Gatwick airport which is the most important asset in our area.

The economic hubs of Greater Brighton, West Sussex and East Surrey each have their own distinct sense of identity, offering a powerful draw for businesses, entrepreneurs and visitors from London, across the UK and the rest of the world.



We have a formal strategic relationship with the London LEP in relation to Croydon as it is fundamental to the economic success of the growth corridor from Gatwick airport to London. Our agreement with the London Economic Action Partnership (LEAP) on activity in relation to Croydon can be found in Annex A.

We also have a formal relationship with the South East LEP in relation to Lewes as it is a vital part of the economy of Greater Brighton. Our agreement with the South East LEP on activity in relation to Lewes can be found in Annex B.

1.3 Our Funding

We prepare our annual budget so that there is transparency to our funders, partners and the public about how we use our funding. Our budget is published in our Business Plan each year which is available on our [website](#). Our activities and expenditure fall into four categories which includes core, investment, contracted and discretionary expenditure.

- **Core** - includes provision for our corporate affairs function including the Chief Executive, Governance, Board and Accountable Body services. It also includes the administration of the office and corporate overheads, and our business engagement and communication function. This is funded by our Core Grant from Government and contributions from our Local Authority partners.
- **Investment** - includes provision for the costs of administering and scrutinising the Local Growth Fund (LGF), Growing Places Fund (GPF) and the Growth Grant Programme (GGP). LGF and Growth Grants are fully capitalised and we receive commercial revenue from our Growing Places Fund.
- **Contracted** - includes provision for delivering services for Government such as the Growth Hub, Enterprise Advisor Network and our European Structural Funds. We receive grants to fully fund the Growth Hub and part fund the Enterprise Adviser Network (50%) and our European work (around 50%).
- **Discretionary** - includes provision for delivering our Policy & Strategy work including the Strategic Economic Plan (SEP) and Local Industrial Strategy (LIS).

Coast to Capital is a company limited by guarantee (company number 08166412) and our accounts are published on Companies House and our website. We also include a financial statement each year in our Annual Report which is published on our [website](#) and includes the total:

- amount of funds within the LEP's direction or control at the start and end of the financial year¹;
- amounts committed by the LEP to external organisations through grants and risk finance (loans, equity, guarantees and quasi-equity);
- amounts committed to suppliers to purchase goods, works or services; and

¹ This shall include money committed to the LEP but paid into the Accountable Body's bank account to be invested at the LEP's direction, any commercial funds which it has generated and legacy funds generated from investments, but not including the value of any assets which it holds. It shall also not include funds which the LEP has a role in allocating but does not currently commit such as European Structural and Investment Funds.

- amounts incurred in running the LEP (for example salary costs, lease payments and expenses).

The financial statement includes a link to our accounts on the Companies House website. We also provide a link to the Accountable Body accounts on our website.

1.4 Our Assurance Framework

This Assurance Framework sets out clearly how Coast to Capital operates. It ensures that Government, our partners, stakeholders and members of the public have confidence in the way that we conduct our business and that we have high quality governance arrangements in place. Governance means the way we operate our organisation and the way we make decisions, as well as our scrutiny, audit, transparency, probity and professionalism in the way that we conduct business.

Coast to Capital's governance and assurance mechanisms have been designed to be compliant with the Government's National Local Growth Assurance Framework and follows its guidance in relation to best practice in the way we run our organisation and make our decisions. This demonstrates our absolute commitment to public accountability. Coast to Capital is predominantly publicly funded and therefore we have a legal duty to be transparent and accountable for the public money we spend. Our commitment is to demonstrating that a transparent and robust decision making process is at the heart of everything we do.

Our Assurance Framework is published on the Governance page of our [website](#) and reviewed annually. It is updated in line with any changes to the National Local Growth Assurance Framework. We notify the Ministry of Housing Communities and Local Government (MHCLG) if we are considering any significant changes to our Assurance Framework.

This document focuses on 'how' Coast to Capital operates rather than what it does. The Coast to Capital website www.coast2capital.org.uk contains full and up to date details on our activities.

1.5 Our Principles

Transparency and accountability is at the heart of everything we do and fundamental to our culture as an organisation. This section details our commitment to transparency.

Transparency

We hold ourselves to operating to the highest standards of public accountability and transparency. In our governance framework there is a presumption on decision making being transparent and in the public domain unless there is very good reason for it to not be (for example because of commercial confidentiality or legal privilege).

To this end we have adopted specific measures within this Assurance Framework to ensure that when we make decisions regarding the deployment of public funding, we allow members of the public to express their views in advance of those decisions being taken; and that when we make decisions, they are published in an open and transparent manner.

However, as we are a private company we need to be able to conduct business in an entrepreneurial style, as is common place within the private sector and also adopt an associated private sector risk appetite for investment. It is essential that we operate a risk appetite in line with best in class private sector organisations bringing innovation and entrepreneurship to the work we do, whilst simultaneously ensuring the highest standards of transparency and governance when spending public funds.

Therefore, papers and minutes for the Board and any Committees which involve discussions, recommendations or decisions about public money will be published; however, commercially sensitive information may be redacted. We are committed to meeting the timelines below:

- meeting agendas and papers to be published 5 clear working days before the meeting takes place; and
- minutes of Board meetings to be published within 10 clear working days of the meeting taking place. This may be in draft if internal LEP processes require clearance before the minutes are finalised. The final minutes of Board meetings must be published within 10 clear working days of being approved.

The Board and Committees will make decisions on merit having taken into account all of the relevant information available at the time of evaluation. Any decision is that is made in contravention of the processes set out in the Assurance Framework will be invalid on the basis of non-compliance unless the Board has given prior approval for variation in the decision making process.

Commitments

Our Board Members and Officers demonstrate the highest standards of conduct when carrying out their responsibilities and have regard to the following principles in their work. Our Board Members and Officers are committed to:

- Acting solely in the public interest in line with the Nolan principles; making decisions purely on merit, in accordance with agreed LEP processes and act with regularity and propriety when managing public money;
- Keeping records which demonstrate they meet all their legal obligations and all other compliance requirements placed upon them ensuring these are accessible if requested;
- Actively cooperating with stakeholders and other regeneration organisations, including other LEPs. This involves engaging deliberately and constructively with all stakeholders and partners in order to collect information which can be factored into decisions;

- Ensuring partnership working and engagement on projects or decisions which are likely to have an effect across LEP borders or significantly affect the plans of another LEP;
- Championing successes within their communities, including bringing to the attention of Government local growth projects which should be recognised as innovative or examples of best practice and ensuring that stakeholders are able to make informed decisions on local growth matters;
- Championing diversity and operating in line with our Diversity Statement, including reporting to the Board on progress and how improvements can be made at each Board meeting and nominating a Diversity Champion; and
- Working with LEP Network.

2. Our Strategy

Coast to Capital produces an economic strategy for the region which we call the Strategic Economic Plan (SEP). We published our ambitious new SEP, Gatwick 360, in July 2018 which is available to download on our [website](#).

2.1 Our Vision

Our vision by 2030 is for our towns and cities to be known around the world as fantastic places to live, to grow and to succeed. We will become the most dynamic non-city region in England, centred around a highly successful Gatwick airport.

2.2 Our Priorities

Our SEP identifies eight economic priorities:

- Deliver prosperous urban centres;
- Develop business infrastructure and support;
- Invest in sustainable growth;
- Create skills for the future;
- Pioneer innovation in core strengths;
- Promote better transport and mobility;
- Improve digital network capability; and
- Build a strong national and international identity.

The implementation of Gatwick 360 is overseen by a Programme Group alongside the negotiation of our Local Industrial Strategy (see below). The Local Industrial Strategy Programme Group Terms of Reference can be found in Annex C.

Coast to Capital produces an annual Business Plan which explains what we aim to do in order to deliver our vision and priorities. Our Business Plan is published at the start of each financial year on our [website](#).

2.3 Our Local Industrial Strategy

Coast to Capital is in Wave 3 of the development of Local Industrial Strategies which began in December 2018. Through extensive local consultation with businesses, public partners and civil society, we will build on the unique local strengths identified in Gatwick 360 to ensure our area reaches its economic potential through increased productivity.

Our Local Industrial Strategy will promote the coordination of local economic policy and national funding streams and establish new ways of working between national and local government, and the public and private sectors.

Government has confirmed that LEPs should focus their activities on the following four activities to support the development and delivery of their Local Industrial Strategy:

- **Strategy:** Developing an evidence-based Local Industrial Strategy that identifies local strengths and challenges, future opportunities and the action needed to boost productivity, earning power and competitiveness across their area.
- **Allocation of funds:** Identifying and developing investment opportunities; prioritising the award of local growth funding; and monitoring and evaluating the impacts of its activities to improve productivity across the local economy.
- **Co-ordination:** Using their convening power, for example to co-ordinate responses to economic shocks; and bringing together partners from the private, public and third sectors.
- **Advocacy:** Collaborating with a wide-range of local partners to act as an informed and independent voice for their area.

2.4 Our Engagement with Local Partners and the Public

Strategy development is led by our Strategy & Policy team. We are committed to consulting and deliberately and constructively engaging with key stakeholders on everything that we do, in particular strategy development. This includes:

- Our Board
- Area Partnerships
- Private sector stakeholders
- County and Local Authorities
- Government departments
- Subnational bodies
- Third sector representatives
- Community interest groups
- Universities and research institutions
- Further education stakeholders
- Other LEPs
- Task and Finish groups as required
- Public consultation (via our website)

Our Communications Framework guides the work we do to communicate our work to local partners and the public which also includes how we inform them of future strategy development. This Framework is available on request and includes:

- Up to date website information;
- Monthly newsletters;
- Social media campaigns; and
- Press releases.

2.5 Our Collaboration with other LEPs

Our economic interests are served by identifying as part of the wider South East region, across Local Enterprise Partnership boundaries. We value our relationships

with our LEP partners and are currently working successfully as part of Innovation South, Transport for the South East and developing a Local Energy Strategy with the Greater South East Energy Hub.

We engage bilaterally with our partner LEPs and are also part of the 'Southern LEPs' group which brings together LEPs across the wider South East to identify areas for collaboration and to maximise the impact of our engagement with Government. The following LEPs make up the 'Southern LEPs':

- Coast to Capital;
- Enterprise M3;
- Hertfordshire;
- Solent;
- South East; and
- Thames Valley Berkshire.

Innovation South

A consortium of more than 100 organisations spanning six LEPs and eight counties, including businesses, industry and partners from across the private and public sectors, promoting opportunities for investment in the South of England. The principal remit of Innovation South was to deliver a Science and Innovation Audit. This audit identified the Innovation South area's strengths in particular digital enabling technologies applied in four key sectors; Connected Digital, Advanced Engineering, Biosciences and Marine & Maritime.

The following LEPs make up the Innovation South area:

- Coast to Capital;
- Dorset;
- Enterprise M3;
- Thames Valley Berkshire;
- South East LEP; and
- Solent.

Innovation South is currently not undertaking any live projects.

Transport for the South East

A partnership of local Highways Authorities and LEPs working closely with national Government to secure future prioritisation of and investment in the South East region's transport needs and ambition. Transport for the South East intends to become a statutory body.

The following LEPs make up the Transport for the South East area:

- Coast to Capital;

- Enterprise M3;
- Thames Valley Berkshire;
- South East LEP; and
- Solent.

The LEPs have two voting seats on the Shadow Partnership Board through which they represent the five LEPs. A Coast to Capital Board Member currently holds one of two LEP voting seats. Full details of the Shadow Partnership Board Members can be found on the Transport for the South East website.

Greater South East Energy Hub

Coast to Capital, Enterprise M3 and South East Local Enterprise Partnership have published a local energy strategy that will help to identify a pipeline of energy projects across the area for potential investment through the Greater South East Energy Hub. A tri-LEP Strategic Energy Delivery Group will be established as local governance to oversee delivery of the strategy. This group will feed into the respective LEP Boards and engage with the Energy Hub.

The Energy Hub is a wider sub-regional body comprising 11 LEPs with the Department for Business, Energy and Industrial Strategy (BEIS). Coast to Capital has a seat on the Energy Hub Partnership Board.

Collaborative Working

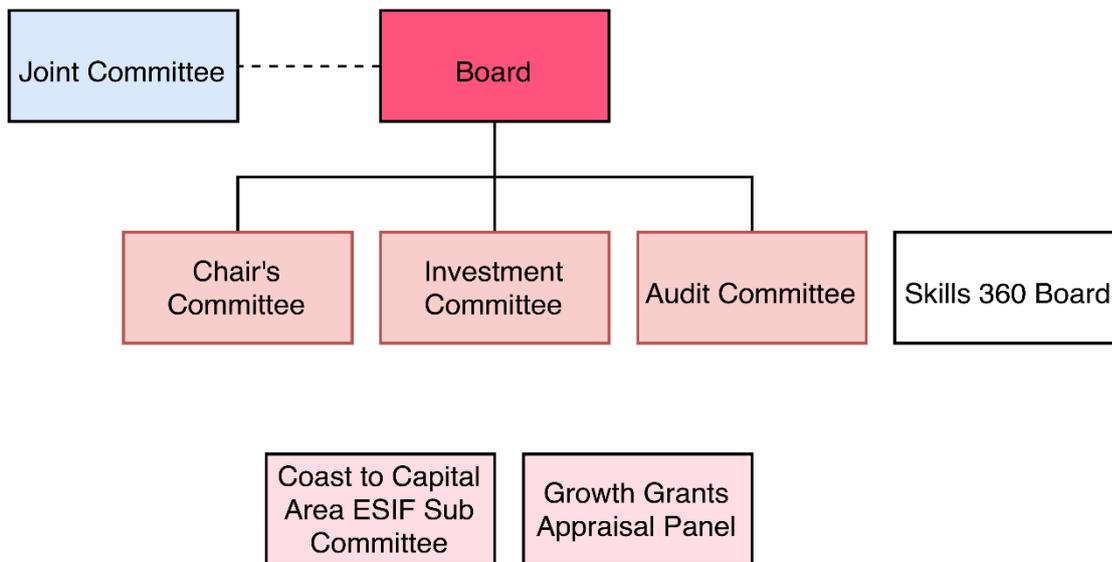
In addition to our formal collaborative arrangements in relation to Croydon and Lewes, we are committed to working with other LEPs to maximise the impact of our strategy and investment across local geographies. We engage with other LEPs on projects and decisions which are likely to have an effect across our boundaries. Our collaborative activity and opportunities for collaboration is reported to the Board as appropriate at each meeting as part of the Chief Executive report.

Coast to Capital is also committed to working with the LEP Network to discuss issues of shared importance as a sector, engage with Government, and share knowledge and good practice.

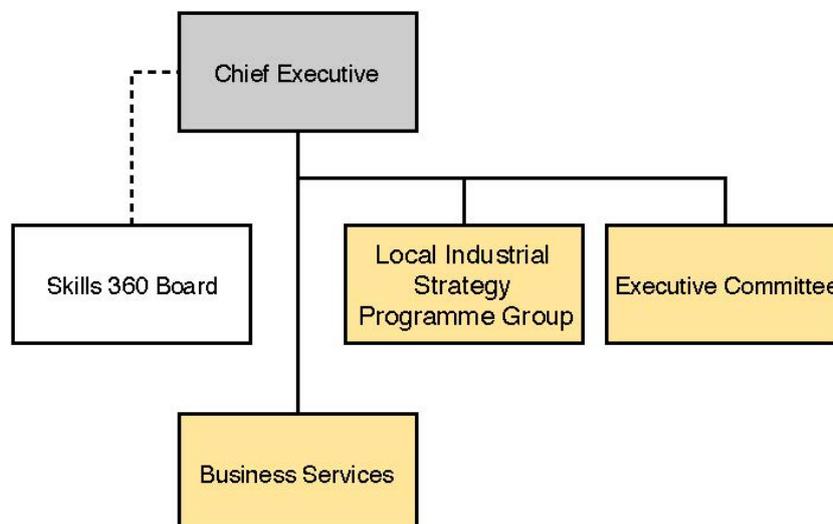
3. Our Governance

3.1 Our Governance at a Glance

The Board governs our organisation and takes the key strategic decisions to determine our strategic direction and our region's strategic economic plan. The Board delegates certain responsibilities and authority to its Committees. These report back into the Board and operate at a more operational level ensuring that there is oversight and governance around the day to day running of the LEP.



The day to day operation of the LEP is in turn managed through the Executive Committee which is chaired by the Chief Executive and attended by the senior leadership team. Operational teams are organised around three separate areas of work, Strategy & Policy, Investments and Services which are all supported by the Communication & Corporate Affairs team. We are now structuring our work around the eight priorities identified in our Strategic Economic Plan and the work required to negotiate a Local Industrial Strategy.



3.2 Our Board

Coast to Capital has a Board of Directors (the Board) comprising:

- the Chair who is drawn from the private sector;
- the Vice Chair who is drawn from the private sector;
- the Chief Executive;
- eight Directors drawn from the private sector;
- three Directors drawn from local authorities;
- two District Council Directors;
- a Director from further education; and
- a Director from higher education.

We also have a Local Authority Board Member for Croydon and a Business representative Board member for Croydon in line with our strategic relationship with the London Economic Action Partnership (LEAP). The Local Authority Member is the Leader of Croydon Council and the business representative is recruited in the same way as Board Directors with a term of two years. These two Members have the same rights as other Board members and will be reviewed at the end of the boundary change transition period (April 2021).

The composition of the Board is in accordance with the Government guidance that the maximum number of Directors should be 20. We are also able to appoint up to three persons as co-opted Directors for their specific skills and expertise and to bring diversity to the Board for a term length of one year. Any persons so co-opted will be required to adhere to the same standards as Business Board Directors.

A named Board Member represents and engages with the Small and Medium Enterprise (SME) business community as our SME Champion. Details of Board Members and their specific roles, including our SME Champion and Diversity Champion within Coast to Capital, are set out on our website.

A representative of the Accountable Body, which ensures that Board decisions are consistent with best practice on public expenditure also attends Board meetings in an advisory capacity.

All Board Director roles as described above, but with the exception of the Chief Executive are non-remunerated. The Chief Executive is paid a salary which reflects market rate for the role. This is set in consultation with recruitment advisors, reflecting market rates for equivalent roles including in Local Government. The pay rate is reviewed periodically, most recently in January 2018. The Chief Executive is not eligible for a bonus. The salary is adjusted annually in line with the Coast to Capital pay settlement, which is agreed by the Chair's Committee.

The Chair will become a paid role from July 2020 and as such, our Board Director Remuneration Policy is under review.

Excluding the two Croydon representatives, Board Members must live and/or work in the Coast to Capital area or have strong connections to the area.

Diversity Statement

Coast to Capital is an inclusive organisation that values and promotes diversity. We work across a diverse and vibrant region and believe that our impact is enhanced through championing inclusion and reflecting the dynamic businesses and communities that we support. Diversity fosters growth and innovation and is integral to the delivery of our strategy.

We meet the current requirement that at least one third of our Board Members are women. We are also committed to equal representation of men and women on our Board by the end of the 2022-2023 financial year. A named Member of the Board is our Diversity Champion which is set out on our website.

Coast to Capital is committed to diversity on all its Committees and when recruiting to these and the Board, we look to ensure diverse representation which is reflective of the local population as a key requirement of filling vacant posts. Diversity considerations are an integral part of our Board and Committee recruitment processes, from advertisement to interview and subsequent appointment. Our Committees will be reviewed annually to ensure they are reflective of the local population with guidance from our Diversity Champion.

A report on diversity will be provided in the Chief Executive Report at every Board meeting. This will include a progress update and recommendations about how improvements can be made.

Our Board papers consider diversity implications across all our projects and programmes. Ensuring diversity in our engagement with local communities and businesses is a key part of our engagement plans in relation to our Local Industrial Strategy. Our approach to engagement will be kept under review and reported to the Board.

We publish an Equality and Diversity policy which can be found on our [website](#) and includes more detail on how we operate in line with the commitments above.

Our Chair

Our Chair's responsibilities are to:

- Provide leadership in setting the strategic direction of Coast to Capital and being a champion at a national level through the LEP Network and Ministerial engagement;
- Chair the Board of Directors meetings and the Chair's Committee;
- Take a leading role in determining the structure of the Board and leading the appointment of Board Members and the Vice Chair;

- Work collaboratively with the Board to build a strong organisation based on best practice from the Private Sector, fostering positive relationships with the Board and ensuring that Coast to Capital is run in a transparent and accountable way, in line with the Assurance Framework and adhering to the seven Nolan Principles of public life; and
- Provide support, advice and challenge to the Chief Executive and ensure that relevant, accurate, timely and clear information is provided to the Board through the executive team in order to make sound decisions, monitor issues and provide advice.

Our Vice Chair

Our Vice Chair's responsibilities are to:

- Support the Chair to deliver their duties and deputise for the Chair at Board and other meetings as required as a proxy, also in instances when the Chair is conflicted;
- Attend Coast to Capital Board and Chair's Committee meetings and provide support to Board members and Committees as required;
- Foster positive working relationships amongst Board members and exemplify Board member behaviour and input;
- Act as an ambassador and champion for Coast to Capital, engaging in projects which require Board member leadership;
- Advise the Coast to Capital Chief Executive and support strategy development; and
- Ensure that the LEP acts in a transparent, efficient and effective way.

Our Business Directors

As a business-led organisation our success depends on the strength of our Business Directors and we are committed to promoting strong business sector representation on the Board. Through our recruitment processes and succession planning we ensure that we have business representation which is reflective of the culture and diversity of our area and businesses.

At least two-thirds of the Board must be representatives from the private sector. A Private Sector Director must be or have been employed by an organisation not including Central Government, Local Government or a public corporation as defined for the UK National Accounts Sector Classification. Those from Higher Education or Further Educational Institutions are not classified as public sector organisations for this purpose.

Our Local Authority Directors

The Board is directly accountable to the public through the four democratically elected directors drawn from local authorities. Our Local Authority Directors are the Leaders of Surrey County Council, West Sussex County Council, Brighton and Hove City Council and Croydon Council.

There are two District Council Directors on the Board. One representing the District and Boroughs of the area around Gatwick and one representing the Districts and Boroughs across the coastal strip. The role of these representatives is to promote the voice of the Districts and Boroughs and support the delivery of the Coast to Capital mission. Both Directors are appointed by the Chair following a nomination by the Districts and Boroughs they represent. Unless they cease to be the nominated members of their respective authorities prior to the end of the term/s, they will serve a term of two-years with the possibility of serving a further one-year term following approval by the Districts and Boroughs they represent and the Chair. The District Council representatives are also the Chair and Vice Chair of the Joint Committee to ensure continuity and consistency of engagement.

Our FE and HE Directors

There is one Further Education Director and one Higher Education Director on the Board. The role of these Directors is to promote the voice of the education sector to support the delivery of the Coast to Capital mission.

The Further Education Director is appointed by the Coast to Capital Board following a nomination by the Principals in the Coast to Capital area.

The Higher Education Director is appointed by the Coast to Capital Board following a nomination by the Chancellors / Vice Chancellors of the Universities in the Coast to Capital area.

Board appointment process

Board members drawn from the private sector are appointed through public advertisement against a role profile and person specification and are interviewed by the Chair's Committee with appointment recommendations being made to the full Board. Appointments to the Board are made by decision of the Board.

Co-opted Board Directors are chosen for their unique and specific experience and are appointed in the same way as a private sector Board Director.

The Chair of the Board is appointed by recommendation of the Nominations Committee following open advertisement and consultation with business, to the Board which makes the final decision. The Nominations Committee is drawn from the Board membership with at least four Members. The Nominations Committee (an ad hoc Committee established from time to time tasked with a specific purpose as directed by the Board) is appointed by the Board to form a balanced representation from the public and private sectors represented on the Board. The Nominations Committee is held in private.

The Vice Chair is appointed by recommendation of the Nominations Committee following open advertisement and consultation with business, to the Board which makes the final decision.

The appointment of any new director to the Board must be by a majority vote in favour.

Director Due Diligence Checks

Prior to the Board considering the appointment of a new Director a full director check will be undertaken by an appointed external reference agency. The check will include but not be limited to:

- Reference checks from two suitable referees;
- Director disqualification and bankruptcy checks;
- Other Directorships checks; and
- A press check.

Where we are legally permitted to do so we will undertake Disclosure and Barring Service checks for unspent criminal records as required.

The results of these checks will be provided to Board Members before consideration of the new director's appointment to the Board.

Board Resignation

The arrangements for the resignation of Board Members is set out in our Articles which can be found on our website.

Board Member Duties and Capability

Every Board Member is bound by the legal duties of Directorship under the Companies Act 2006. These include acting in the interest of the LEP as a company and avoid conflicts of interest in conducting LEP company business. Board Members have to adhere to the seven principles of public life, also known as the Nolan Principles. All Board Members are required to sign an undertaking to abide by the Nolan Principles as part of our Code of Conduct.

Board Members are appointed on the basis of their skills / knowledge and their ability. On this basis they have a duty to share knowledge of that sector and in taking decisions to put forward the collective views of that sector to aid the Board in making high quality decisions. In discharging this duty, Board Members are expected to consult and canvas as relevant their respective sectors to inform Board discussions and decisions.

Terms of office

The period of appointment of a Private Sector Director is three years. On expiry a Private Sector Director shall be eligible for re-election for up to two further three-year periods subject to the recommendation of the Chair's Committee and approval of the Board.

The Chair and Vice Chair's terms of office will run for three years from their appointment with the potential to renew for one further term of a maximum of three years in exceptional circumstances and upon a recommendation from the Nominations Committee to the Board for the Chair and upon a recommendation from the Chair's Committee to the Board for the Vice Chair. Final agreement to renew must be from a Board majority.

The period of appointment of a co-opted Director shall be one year in line with Government guidance.

Unless they cease to be employed by one of the nominating organisations prior to the end of the term, the Further Education Director and Higher Education Director will serve a maximum term of three-years with no option for re-appointment.

Deputies

Local Authority Directors (excluding District Council Directors) and Higher Education Directors are able to nominate a named Deputy to attend a Board meeting if they are unable to attend. Such nominations shall be notified by the Director to the Chief Executive and Governance Officer in advance. On nomination and prior to attending any meeting in the role of Deputy, the their Deputy must complete a Declaration of Interest Form and submit the completed form to the Chief Executive in accordance with Coast to Capital requirements. When acting in the role of Deputy, the Deputy so nominated shall comply with all duties and have the same rights as the Director that they are deputising for. The interests declared by the named Deputy and any expenses incurred by the Deputy in performance of the role on Coast to Capital shall be included on the register/s maintained and published by Coast to Capital for these purposes.

Decision making on the Board

The Board is responsible for making key strategic decisions, for providing strategic direction and for setting priorities for the Executive team. In terms of delivering the Growth Deal with Government, the Board has the following specific responsibilities:

- Approval of the Strategic Economic Plan;
- Approval of any submissions made to Government for subsequent funding;
- Approval of Local Growth Fund investments of more than £2m (or lesser amounts in exceptional circumstances); and
- Accountable to HM Government for full delivery of the Growth Deal.

In the absence of a formal Board meeting the process for allowing decision by exception will be for the Executive to request approval via email. Board approval will be confirmed by the executive receiving a majority of positive responses to the proposal via email. These emails will be recorded and saved centrally. Exceptions include decisions which need to be taken urgently outside of the formal meeting

timetable, however decisions on the award of funding will not be taken outside the formal meeting arrangements.

Frequency of meetings and Quorum

Board meetings are held at least four times a year. The quorum for Board meetings is seven Directors the majority of whom shall be Private Sector Directors.

Publication of meeting papers and agendas

The Board meeting agenda and papers will be published no later than five clear working days before the meeting. Agenda items will be marked either Part A or Part B.

- a) Part A items are those which are not subject to restriction under Part B. Papers accompanying Part A agenda items will be published on the website.
- b) Part B items are those items which include confidential information under The Local Authorities (Executive Arrangements) (Meeting and Access to Information) (England) Regulations 2012 (where applicable) which includes:
 - Information provided by a Government department on terms which forbid the disclosure of the information to the public;
 - Where disclosure to the public is prohibited by a court;
 - Where the LEP holds “exempt information” under Schedule 12A of the Local Government Act 1972. This includes information relating to an individual, relating to the financial or business affairs of a particular person, negotiations, labour relations, legal professional privilege and in connection to the investigation or prosecution of a crime. or
 - As included in Schedule 12A, commercially sensitive information to either Coast to Capital or another party.

Papers accompanying Part B agenda items will be clearly marked “Confidential” and will not be published or discussed in the public domain.

The Chief Executive in discussion with the Chair, and partners if relevant, will determine how agenda items are marked.

Any member of the public can submit a comment or view on any agenda item; however we reserve the right to not consider any vexatious, repetitive or malicious comments. Comments must be sent so that they reach Coast to Capital no later than 36 hours before the meeting. Public comments will be considered by the Board at the time of the agenda item being discussed. In this way the Board can take into account public comments before making decisions. Public comments will be shared in full on the website after the meeting when the minutes are published.

Minutes of Board meetings are to be published within 10 clear working days of the meeting taking place. At the Board’s discretion, decisions reached about items marked Part B may be published in the public domain with or without redaction. The Board reserves the right not to publish Part B decisions if those decisions are in

themselves commercially sensitive, confidential or not to be placed in the public domain, including any decisions that have legal confidentiality issues, or those which are legally privileged.

Any declaration of interest made at the meeting will be included in the minutes unless agreed with the Chief Executive that the declaration is a 'sensitive interest' as described in the Localism Act 2011 and should be kept confidential. A new declaration of interest will be updated on the relevant Member's register of interest.

Where the Board delegates under the 'Scheme of Delegation' decision making powers to Committees, these have their own transparency arrangements that are detailed later in this document, however are also bound by the requirements of the National Assurance Framework.

Board Secretariat

Coast to Capital provides strong support to the Board through the Chief Executive and the Senior Management Team who are always available to Board Members and the main point of contact.

We also employ a Governance Officer who provides additional support and an independent Secretariat service to the Board. It functions as a bespoke and specific role with responsibilities to deliver our Board meetings, support Board Members in addition to help deliver the Governance requirements of Coast to Capital.

We also work in close collaboration with our Accountable Body to support the Board.

Board Performance

On joining the Coast to Capital Board, Members are given a full induction within the first quarter that they are in post. This, along with continuous training, will ensure that Board Members are adequately supported to provide challenge and direction to the organisation and understand how best to work with Government. Coast to Capital will utilise the induction and training offer from Government once this is available.

Annually the performance of the Board is reviewed by the Chair and individual feedback is provided to all members. An annual Board development programme is agreed based on a skills analysis and feedback from the Board.

Along with the organisational strategy, this process informs Board succession planning and underpins the specific role profile and person specification for planned upcoming Board Member vacancies. Our succession planning includes continually monitoring Board term end dates and forward planning for recruitment of upcoming vacancies in line with current organisational priorities. This is kept under review by Chair's Committee.

3.3 Policies

Conflicts of Interest Policy

Coast to Capital has a Conflicts of Interest Policy that applies to the Directors of the Board (Directors) of Coast to Capital, Members of Committees of the Board (Members) and all employees. The policy sets out guidelines and procedures for identifying, declaring, monitoring, reporting and managing commercial, actual and potential conflicts of interest and can be found in Annex D.

Coast to Capital recognises that Directors, members and employees will have legitimate interests that arise out of their private capacity and that there are situations in which the private interests and affiliations appear to or have the potential to conflict with the proper performance of official duties within Coast to Capital.

Coast to Capital further recognises that conflicts of interest are a matter of public interest and that when situations are not properly identified and managed, they can seriously endanger the integrity of the organisation and decision making.

The main elements include:

- Full disclosure of interests;
- Clear procedure for identifying conflicts;
- Clear procedure for the Board and Committees to ensure that its decisions are not affected by any conflicts which may exist; and
- Full disclosure of material facts which may impact holding of office.

Prior to appointment as a Director or acting as a nominated Deputy, a Declaration of Interests form must be completed and once appointed/nominated this will be published on our website. Declarations of interest of our Committee Members will also be published on our website. Declarations of interests should be formally reviewed every six months and prior to each meeting. A Declaration of Interest form must be updated within 28 days of a change occurring. Further detail on the operation of our Conflicts of Interest Policy can be found in Annex D.

Gifts and Hospitality Policy

The Coast to Capital Gift & Hospitality policy will be to decline gifts or hospitality exceeding £50. However, Coast to Capital will accept offers of free venues to deliver our Board meetings, Stakeholder events and team away days provided that these venues reflects the values and ethos of the organisation. Our Gift and Hospitality Policy can be found in Annex E.

Expenses

Board Members are entitled to claim reasonable travel, subsistence and associated expenses in accordance with their Coast to Capital related duties. The Board

Expenses Policy is currently under review. These should be submitted to the Head of Finance on a monthly basis. Chief Executive expenses are approved by the Chair and other Board Members expenses are approved by the Head of Finance. Expense claim forms are kept on file for audit and budget monitoring purposes.

Coast to Capital employees are entitled to claim reasonable travel, subsistence and associated expenses in accordance with the Coast to Capital Travel and Subsistence Policy. These should be submitted to the Head of Finance on a monthly basis. Expense claim forms are kept on file for audit and budget monitoring purposes.

Complaints and Whistleblowing

Coast to Capital operates a complaints policy including confidential reporting of complaints and full details are set out in Annex S. Our Whistleblowing Policy can be found in Annex T.

Anti-Fraud and Anti-Bribery Policy

Coast to Capital will not tolerate any level of fraud, bribery or corruption. We are committed to protecting our assets and are committed to promoting honesty and integrity in all of our activities. Coast to Capital is determined to prevent, deter and detect all forms of fraud, bribery and corruption in relation to the work of Coast to Capital whether committed by internal or external parties. Our Anti-Fraud and Anti-Bribery Policy can be found in Annex U.

3.4 Our Committees

The matrix below shows how decisions are taken within the LEP governance structure working from the bottom up. It shows the role that is played by our Committees in discharging the responsibilities of the organisation.

Activity	Award of Local Growth Fund Grants	Award of Growing Places Loans	Day to day company operations incl. Risk Management	Strategy & Policy	Services
Assurance & Audit by :	<i>Audit Committee</i>	<i>Audit Committee</i>	<i>Audit Committee</i>	<i>Audit Committee</i>	<i>Audit Committee</i>
Reporting to & Oversight by :	<i>Board</i>	<i>Board</i>	<i>Chair's Committee</i>	<i>N/A</i>	<i>Board</i>
Decisions by :	<i>Investment Committee</i>	<i>Growing Places Committee</i>	<i>Executive Committee</i>	<i>Board</i>	<i>Chair's Committee</i>
Refinement & validation of Recommendations by:	<i>Executive Team</i>	<i>N/A</i>	<i>Executive Committee</i>	<i>Executive Team</i>	<i>Executive Team</i>
Recommendations by:	<i>Investment Committee</i>	<i>Executive Team</i>	<i>LEP Lead Officer</i>	<i>LEP Lead Officer</i>	<i>LEP Lead Officer</i>
Initiation request by :	<i>Grant applicant</i>	<i>Loan Applicant</i>	<i>LEP Officer</i>	<i>Consultation</i>	<i>Consultation</i>

The Board oversees the work of the Chief Executive and their executive team. The executive team work streams are divided into teams and each of these is governed through a number of Committees which comprise LEP officers and other stakeholders as appropriate.

The Board delegates to a number of Committees responsibility for certain tasks. The following sections explain the constitution, membership and role of each Committee.

In line with our Articles at least two Directors must be on a Committee.

Chair's Committee

This Committee is responsible for the oversight and accountability of the Chief Executive, in their capacity as the LEP's head of paid service. It is also responsible for the company's commercial strategy, financial performance and risk management. The Chair's Committee is chaired by the Chair of the Board with membership comprising the Vice Chair and two other Board Directors. Directors are appointed to the Committee by the Chair.

The terms of reference of the Committee are set out in Annex F.

Audit Committee

This Committee is responsible for oversight and reporting on the LEP's compliance with this Assurance Framework. It is responsible for scrutinising decisions of the LEP Board, its Committees and executive Committees and reporting to the Board on compliance with this assurance framework and the company's statutory duties.

The terms of reference of the Committee are set out in Annex G.

Joint Committee

This Committee consists of the Leaders of all the local authorities within the Coast to Capital area, together with the Chief Executive of the LEP.

It considers business as set by the LEP Board and is convened as required by the Board. The Joint Committee has a key role in reviewing and agreeing the Strategic Economic Plan and the priorities for growth across the LEP area.

The terms of reference of the Committee are set out in Annex H.

Investment Committee

The Investment Committee has delegated powers on behalf of the Board up to £2 million to approve all LEP investment decisions relating to the public funding streams that the LEP stewards. These include the Local Growth Fund and Legacy Funding issues.

The terms of reference of the Committee are at Annex I.

Growing Places Committee

The Growing Places Committee has delegated powers up to £2 million on behalf of the Board to approve all LEP investment decisions relating to the Growing Places Fund. The Growing Places Fund is a revolving business loan fund which provides loan finance and /or equity investment to growth businesses where banks have not been willing to lend. The fund lends only to items that are considered capital

investment and which can be capitalised under standard accounting practice. All investment decisions must be consistent with the Coast to Capital investment strategy. The terms of reference of this Committee are set out in Annex J.

Skills 360 Board

The Skills 360 Board will focus on building the evidence base, establishing local priorities, developing local solutions and policy and identifying the investment needs in relation to skills which will inform Coast to Capital's development of its Local Industrial Strategy with Government.

The terms of reference of this Committee are set out in Annex K.

Business Services Committee

The Business Services Committee has a focus on the successful and efficient delivery of services to businesses delivered by Coast to Capital. Its purpose is to ensure the successful implementation and day to day management of the service portfolio. It involves clients from different parts of Government to meet our aspiration of being the best in class in delivery of these services

The terms of reference of this Committee are set out in Annex L.

Growth Grant Appraisal Panel

The Growth Grant Appraisal Panel has delegated powers to award individual growth grants for businesses up to a maximum of £500,000. The businesses must demonstrate they have a gap in funding in their application. The Growth Grant funding relates to the Business Finance Project funded from the Local Growth Fund. This is an independent panel chaired by a Board Member that approves each Growth Grant. The terms of reference of this Panel are set out in Annex M which also includes the Scoring Methodology of the Growth Grant Programme.

EU Structural and Investment Funds Committee

Coast to Capital are representative members of the ESIF Committee which has an advisory role to the managing authority on the implementation of EU structural funds in our region.

The terms of reference of this Committee are set out in Annex N.

3.5 The Operation of our Executive team

The LEP maintains a permanent team led by a Chief Executive and their senior team.

Staff are organised around three separate work areas: Strategy and Policy, Investments and Services. In addition, the Chief Executive has other direct reports covering cross cutting corporate support functions e.g. Finance, and

Communications and Corporate Affairs. The commercial function sits under the Chief Operating Officer as this role also covers management of the Growing Places Fund.

Details of staff employed by Coast to Capital and the roles that they fulfil within the company are set out on our website. In line with public sector best practice, details of the number of staff paid more than £50,000 per year is also set out on the website.

On joining Coast to Capital all staff are given a full induction on the operation of the organisation within the first quarter they are in post. We are committed to the training and development of our workforce. All staff also have to sign the Coast to Capital Employee Code of Conduct.

All Senior Officers and anyone in the organisation involved in a funding decision making process, including Growth Grants, must complete a Declaration of Interest form which will form part of the register published on the website.

Our Chief Executive

The Chief Executive is fully accountable within the Governance structure of the company and works closely with the Chair to deliver the Business Plan. The Chief Executive is an independent and impartial advisor working under the direction of the LEP Board and is employed by Coast to Capital.

Our Chief Executive's responsibilities are to:

- provide high quality leadership for the LEP, so that we are a strong partner making a positive difference in economic performance across our region;
- make Coast to Capital amongst the strongest LEPs in the country, influential within the LEP network and with Government;
- maximise the impact of the Board, with highly engaged Board Members adding value to our business and exemplifying the role of the LEP;
- lead a highly effective and professional executive team, benchmarked against best practice from public and private sector comparators;
- build understanding and engagement across the region in the work of the LEP, from business, public sector and education sectors;
- achieve outstanding delivery of projects which builds our national reputation as an excellent place for public investment;
- broaden the scope and impact of our business services in order to maximise our influence and engagement with business in the region;
- develop clearly prioritised and well-articulated positions on the most important strategic issues facing the region, which influence national policy and decision making.

The Executive Committee

Governance and management of the executive staff functions and work stream structure of the LEP is through an Executive Committee, chaired by the Chief Executive.

The terms of reference of the Executive Committee are set out in Annex O.

Scheme of Delegation

Coast to Capital operates to a clear scheme of delegation, as set out on the following page, which details who in the organisation takes decisions and their authority limits to do so.

All decisions can only be made at quorate meetings, and it is the responsibility of the executive officer responsible for organising the relevant meeting to ensure quorate attendance of members.

Scheme of Delegation

Action	Chief Executive	Internal Heads	Board	Investment Committee	Growing Places Committee	Chair's Committee	Executive Committee	Audit Committee
Operational day to day expenditure that exceeds overall gross LEP budget	Recommends		Board Decision					Audits & reports to Board
Award of Funding under LGF			Approves above £2m	Approves up to £2m				Audits & reports to Board
Award of Growth Grants			Approves over £2m	Approves up to £2m and gives powers to Growth Grant Appraisal Panel				Audits & reports to Board
Operational budget setting & approval			Approves unlimited				Recommends	Audits & reports to Board
Agreement of Policy & Strategy			Approves					
Recruitment Decisions	Approves	Recommends						

Remuneration decisions	Recommends					Approves unlimited		Audits & reports to Board
Award of Growing Places fund loans			Approves above £2m		Approves up to £2m			Audits & reports to Board
Temporary virements of funding on LGF projects		Recommends		Approves unlimited				
Permanent virements of funding on LGF projects				Approves unlimited				Audits & reports to Board
Operational day to day management decisions within financial delegation limits	Approves	Approves					Approves	Audits & reports to Board
Initiation of debt recovery action on loan defaults						Approves Unlimited to discuss	Recommends	Audits & reports to Board
Governance Changes			Approves				Recommends	Recommends to Board
Calls for bids for grants or loans			Approves	Recommends	Recommends			

Corporate Functions

As a private company, Coast to Capital runs its own corporate functions including office management, administration, procurement, human resources and communications. This work is led by the Head of Communications and Corporate Affairs.

We are committed to meeting the Government branding guidelines for projects and ensuring that our website includes the information specified by Government.

Stakeholder Relations and Engagement

As a unique partnership between key business and political stakeholders in our region, Coast to Capital puts a premium on high quality and informative engagement with external partners.

Our communications framework and stakeholder strategy sets out the core principles for how we do this, with a particular focus on:

- **Engagement events with business:** we hold regular engagement events with business including our AGM and Annual Partnership event. This is how we engage with area partnerships, statutory bodies and business representative organisations from across the region. These events allow partners to voice their opinions on and feed into the work of the LEP. It also provides an opportunity for stakeholders and partners to update the forum on their work and to collaborate. We will continue to run consultation events for partners to engage on the Local Industrial Strategy.
- **Engagement with business:** the Chief Executive, Senior Officers and other staff meet regularly with businesses in the region, including speaking at business conferences and events.
- **Engagement with local authorities, FE colleges and Universities:** open and honest dialogue with all local authorities, Higher Education and Further Education providers in the Coast to Capital area is a key part of delivering our businesses. We engage regularly at senior and working level with local politicians and officers across the region.
- **Press engagement:** we highlight our successes and the issues we are working on and engage with regional media to bring attention to this.
- **Website and social media:** we maintain a high quality website with up to date information on all our activity and have an active social media presence.

We evidence our engagement:

- through our new CRM system which will log our interaction with businesses and stakeholders;
- by reporting on our press activity; and
- providing minutes and reports on our meetings and consultation events on our website.

This will be kept under review as our stakeholder function matures.

The Board also identifies key issues within the Coast to Capital business plan on which it wants to form **Task Groups**. Led by a private sector Board Member, Task Groups focus on a specific challenge for the organisation and include input from informed and influential partners from across the region. This is a way of maximising the diverse leadership that LEPs bring to addressing problems in our regional economy and give space for innovation and bringing new approaches to solving complex issues.

Our relationship with area partnerships helps develop our Strategic Economic Plan and negotiation of our Local Industrial Strategy. These groups are also useful in disseminating information in two directions to businesses and local partners. The four area partnerships in the Coast to Capital region are autonomous groupings which represent business and other stakeholders in different parts of the region:

- The **Gatwick Diamond Partnership** is a business-led group whose aim is to grow the region's existing jobs base, attract new jobs and secure investments from companies that most closely match our industry strengths.
- The **Greater Brighton Economic Board** brings together political and business leaders to focus on issues around economic growth as identified in the 2014 City Deal for Greater Brighton.
- The **Rural West Sussex Partnership** brings together the key organisations that develop strategy and policy in West Sussex to ensure the best use of resources across the County to deliver projects and services in rural areas.
- The **Coastal West Sussex Partnership** brings together leaders from business, education and the public sector to work collectively on economic issues that affect the coast.

Freedom of Information Requests (FOIs)

Coast to Capital is not subject to the provisions of the Freedom of Information Act; however, our Accountable Body, public sector partners and Joint Committee are subject to the provisions in the Act. Coast to Capital will respond to all information requests in line with the spirit of the Act. In the first instance, FOIs should be directed to Coast to Capital via its website and Croydon Council, as Accountable Body, will provide advisory support to ensure FOI requests are appropriately dealt with. Any requests that involve our public sector partners will be forwarded to them to lead the response with our support as necessary.

General Data Protection Regulation (GDPR) and Data Protection

We have fully adopted the requirements of General Data Protection Regulation (GDPR) and comply with the provisions of the Data Protection Act 2018. Internal processes, procedures, data systems and documentation are compliant and will continue to be reviewed to ensure ongoing compliance. We process and handle data in line with our Privacy Notice which can be found on our [website](#).

Monitoring our performance

We publish an annual report, financial statement and accounts at the end of our financial year. Our annual report, financial statement and accounts are published on our [website](#).

We hold an Annual General Meeting once a year which the public and stakeholders can attend. Public questions are invited in advance of the meeting.

Each year we take part in an Annual Review with Government where our performance is reviewed.

Scrutiny and Audit

We have agreed the following appropriate scrutiny and audit arrangements with our Accountable Body as set out in the next two sections.

Scrutiny

We are happy to participate in any Local Authority Overview and Scrutiny Committee. We will respond positively to requests to share information to ensure that the Committee is in possession of the necessary information to provide robust scrutiny and advice. Our attendance and the information and outcomes from our participation will be published on the governance page of our [website](#).

We may also commission an optional annual independent scrutiny report on an aspect of the governance of Coast to Capital at the discretion of the Audit Committee. This independently assesses our performance and compliance with this framework on a targeted basis. Reports from these reviews can be found on the governance page of our [website](#).

We are also able to call on Croydon Council's internal audit function to undertake further scrutiny if required based on an assessment of risk.

As part of our Annual Review with Government we provide an annual assurance statement from the Chief Executive and Chair on the governance and transparency of Coast to Capital which includes an update on the scrutiny arrangement described above and is published on our [website](#).

Audit

Each year we agree an audit plan with our Accountable Body following the Annual Review with Government. Our Accountable Body also completes an annual internal audit using their internal auditors.

All feedback in relation to scrutiny or audit is considered by the Audit Committee and reported to the Board.

Record Keeping

Coast to Capital keeps both hard copy and electronic records for a minimum of six years in a secure environment subject to The General Data Protection Regulation 2016/679, the Data Protection Act 2018, National and Local Assurance Framework, Government funding requirements and in line with our legal and data retention policies. Appropriate personnel will also be made available, with reasonable notice, to answer any questions arising from any monitoring process in connection with these records.

Office Manual and Day to Day Operating Procedures

Our employee handbook sets out our processes and procedures around human resource management and office practice from expense management through to sickness absence and holiday information. A copy is available for all Board Members to inspect.

3.6 Our Accountable Body

Our Accountable Body

Coast to Capital has a single Accountable Body, Croydon Council, which is responsible for overseeing the proper administration of the governance and financial affairs within Coast to Capital. Croydon Council commenced the role of Accountable Body on 1 October 2018. The Service Level Agreement with Croydon Council can be found on our website which defines the remit of the Accountable Body up to April 2021. This also ensures that the usual Local Authority checks and balances apply to the awards of funding directed by the LEP Board.

The Accountable Body is actively involved in all key Coast to Capital Committees including the Board, Investment Committee and Audit Committee. The Accountable Body also attends the Annual Review with Government and the Section 151 Officer has regular meetings with senior Coast to Capital staff.

Our Accountable Body is responsible for:

- Providing a finance function which involves holding funds under managed investment paid by Government on behalf of the LEP, administering and processing Government funds and delivering our operational finance requirements;
- An oversight function ensuring funds are handled with the relevant procedures and grant conditions and that funds are used with propriety, regularity and deliver value for money including:
 - Ensuring decisions and activities conform with all relevant law including state aid and public procurement and ensuring that records are maintained so this can be evidenced.

- Ensuring that the funds are used in accordance with the conditions placed on each grant.
- Oversight of LEP governance and transparency arrangements and ensuring that this assurance framework is adhered to.
- Ensuring compliance with the National Assurance Framework and agreement on scrutiny arrangements.
- Ensuring that there are arrangements for local audit of funding allocated by the LEP equivalent to those of local authorities.
- Monitoring arrangements as set out in the Accountable Body agreement detailed on the Coast to Capital website.
- A support function providing technical advice on the relevant law, discussing risks, in particular:
 - The issue of funding agreements and terms and conditions precedent to those as detailed within the Coast to Capital model funding agreement available on our website.

With regards to the expenditure of public funds, the ultimate deployment of funds reside with the Section 151 Officer of the Accountable Body, and only takes place with their approval, following decisions made by the relevant Coast to Capital Board or Committee.

The accounts through which the Local Growth Fund passes will be published and available for public inspection. Our Accountable Body will publish its accounts in accordance with the provisions of The Accounts and Audit Regulations 2015; full details can be found on their [website](#).

Our Accountable Body will not comply with a decision of Coast to Capital if any one, or more, of the following circumstances arose:

1. Evidence of non-compliance with applicable laws including State Aid and Procurement laws;
2. Evidence of non-compliance with grant conditions as set out under section 31 of the Local Government Act 2003;
3. Material departure from provisions of the Assurance Framework.

The process for resolving issues of this nature will initially be through collaborative working, advice and support. If not resolved, it would be put to the agreed dispute resolution procedure (as set out in the Accountable Body agreement). It is, however, anticipated that such an event will be avoided by the Accountable Bodies presence at all decision making meetings, including the Growth Grant Appraisal Panel, and at the Coast to Capital Board.

The Head of Finance, employed by Croydon Council and appointed jointly by the Accountable Body and Coast to Capital, liaises with Coast to Capital teams and delivery bodies to ensure data is correctly received and approved. There are close links with the Section 151 Officer at Croydon Council and the Accountable Body's accounts payable team.

Our Section 151 Officer

The role of our Section 151 Officer in our Accountable Body is to oversee the proper administration of the governance and financial affairs within Coast to Capital.

The particular responsibilities of the Section 151 Officer are as follows:

- ensure the oversight of the proper administration of financial affairs within the LEP;
- Attend Board meetings;
- Attend Investment Committee meetings;
- Provide an Assurance Statement as part of the Annual Performance Review;
- Submit a letter to MHCLG's Accounting Officer by 28 February each year which:
 - Details the checks that the Section 151 officer has taken to assure themselves that the LEP has in place the processes that ensure proper administration of financial affairs in the LEP
 - A statement whether, having considered all the relevant information, the Section 151 Officer is of the opinion that the affairs of the LEP are being properly administered in line with the National Assurance Framework and this Assurance Framework
 - If not, information about the main concerns and recommendations about the arrangements which need to be implemented in order to get the LEP to be properly administered

Coast to Capital will ensure that the Section 151 Officer is given sufficient access to information in order to carry out their role. All relevant documentation is provided to the Section 151 Officer, including agenda and papers of Board, Committee and Panel meetings, where decisions are being made. The Section 151 Officer has the opportunity to comment on all such relevant documentation.

The Section 151 Officer should exercise their duties in line with the CIPFA guidance and the National Assurance Framework.

Accountable Body arrangements for funding received from Government

The Accountable Body receives Coast to Capital's funding and holds this separately for draw down by Coast to Capital. The Accountable Body will be able to invest funds in the same way as Croydon Council monies are invested when the LEP provide a cashflow.

Arrangements are currently being put in place to ensure funding from Government from Coast to Capital is invested in accordance with the cash flow requirements of Coast to Capital.

4. Our Investments

Government chooses to administer regional investment funding in England through Local Enterprise Partnerships. Coast to Capital therefore takes responsibility for the correct administration of public funding streams in our area and commit to ensuring that public resources are managed appropriately. We seek to achieve accountability, transparency and value for the money in the work that we do to deliver these.

Coast to Capital funding is overseen by Croydon Council as the Accountable Body. A Head of Finance is in post who reports to both the Coast to Capital Chief Executive and Croydon Council's Section 151 Officer. The Section 151 Officer approves all payments and is a Member of the Board, Investment and Audit Committee to ensure appropriate use of resources.

4.1 Our Funding, Programmes and Schemes

Local Growth Fund

Government has distributed the Local Growth Fund to LEPs in order to support delivery of the Growth Deal. This is an investment fund that we govern, deploy and monitor on behalf of Government. The LGF supports the delivery of a range of different infrastructure investments, which we agree with Government are important in order to support economic growth in the region. All investment decisions using public funds will be made with reference to statutory requirements and in addition with reference to conditions of funding and local transport objectives where applicable. The condition of Local Growth Funding is that it is capital funding only. The LEP is fully involved, engaging with all relevant groups and stakeholders.

We are accountable to Government, and through them to Parliament, for the administration of this fund and the value for money and core outputs that it delivers. We make information available to the public through the mechanisms set out in this framework.

In line with the Growth Deal, Coast to Capital is fully responsible for ensuring the Local Growth Fund is correctly deployed and administrated within our region. In some circumstances, funds will become available – for example because certain projects cannot be carried forward, or funding is unallocated. Coast to Capital then has discretion subject to discussions with BEIS to award or re-allocate this funding through the governance structures as detailed within this document.

If and when we have unallocated and / or returned funds, we may issue Gatwick 360 Strategic Economic Plan related targeted commissioning calls. We reserve the right to commission any single Delivery Body subject to public procurement and our procurement policy requirements provided the Investment Committee is satisfied that is the most suitable Body to deliver the project and that no other body would be equally equipped. All calls for bids are advertised openly by being published on the Coast to Capital [website](#) and notifications being sent out to our stakeholders and partners. The selection criteria and selection processes are transparent. Both private

and public sector organisations can apply for funding on the basis of a matched contribution. Within the “bid call” guidance we list the key criteria upon which we are inviting bids, based upon the strategic themes and priorities identified within our Strategic Economic Plan.

Applications for Local Growth Funds are assessed and an award is made through a formal agreement. Once a project has been approved, it will then be monitored robustly through the lifetime of the project and a robust audit trail is kept to demonstrate compliance. All potential applicants for this funding will complete a business case template. This will be independently evaluated by Investment Committee Members and experts if relevant and scrutinised in line with the LEP processes. The Investment Committee then makes either a decision (to note) or recommendation for approval to the Board on funding awards through a single consent paper presented at each Board meeting. This will include a summary of the relevant information, and the relevant documents and information to support decisions and recommendations will be made available to the Board in advance of its meeting via the Board Portal as set out in Annex Q. The Board will be asked to note decisions made by the Investment Committee up to £2million, and will be asked to approve recommendations to include funding awards over £2million.

Board members have the opportunity to raise questions against any of the items included within the consent paper, but the Board cannot overturn decisions made by the Investment Committee and can only ask for their re-consideration.

Questions must formally be raised to the Chair of the Investment Committee (copied to the Chief Executive Officer) ideally no later than 5 working days in advance of the next Board meeting. Where comments are raised, the Board will formally discuss that particular item in the paper at the Board meeting.

When an investment decision is approved by the Investment Committee or Board, Croydon Council, in its role as Accountable Body to the Local Growth Fund, will work with Coast to Capital and the successful Delivery Body to enter into a tripartite agreement detailing the roles and responsibilities of the parties and setting out how the Local Growth Fund will be released to the delivery body.

Any decision that is made in contravention of the process set out here will be invalid on the basis of non-compliance unless the Board has given prior approval for variation in the decision making process.

The Coast to Capital Investment Committee is updated with project progress through a suite of documents to include a high risk report, dashboard, and financial update. Following each Investment Committee meeting, a consent paper will be presented to the Board detailing all decisions (to note) and recommendations for approval made by the Investment Committee.

In the event of non-compliance, misrepresentation or underperformance by a delivery body the LEP will take the appropriate steps to recover any funding. This starts with a risk assessment of the project which is developed by the Investments team. The

risk assessment includes a description of the project where concerns have been raised, relevant details including the amount of funding awarded and the sum at risk due to the concerns and where recovery of funds is considered. If required, a legal opinion from the Accountable Body can be sought to set out the legal basis for recovery and likelihood of success. The risk assessment is then presented to the Investment Committee who will then make a recommendation under the High Risk Monitoring Protocol which consists of; watch and wait, write to Government to request a funding carry forward, apply sanctions or withdrawal of funding. These will be considered by the Investment Committee who will then make decisions, or recommendations to the Board accordingly. Then if necessary the Board can decide to withdraw funding as part of the consent item. See Annex Q for full details of the process.

Our Output Accountabilities to Government

In line with our Gatwick 360 SEP, we are accountable to Government for delivery of a range of core outputs relating to economic growth. These are set out in our Growth Deal with Government. We report on the delivery of these outputs via our upstream reporting to Government every quarter. The Investment Committee are also made aware of output progress via the Investment Dashboard.

Core outputs and metrics

Core Output /Outcome Accountabilities to Government	Metric
Employment- created and/or safeguarded	Number of jobs
Businesses assisted- financial and non- financial	Number of businesses
Skills- new learners and/or apprentices created	Number of apprenticeships or new students
New housing unit completions	Number of new homes built
New floor space constructed/refurbished- learning	Square metres of space
New floor space constructed/Refurbished- Commercial & take up of that space	Square metres of space
Length of new/resurfaced roads/cycle ways	Kilometres of new surface
Improvement to journey times	Minutes per mile
Carbon reduction	Tonnes of CO2 saved

Growing Places Fund

This is a revolving business loan fund which provides loan finance and /or equity investment to growth businesses where banks have not been willing to lend. £23m

was available through the Growing Places Fund. The fund is currently fully committed but if any further loan capital is made available, application details will be published on our website.

The Growing Places Committee is charged with monitoring the £23m deployed via the Growing Places Fund and reporting to the Board.

Growth Hub

This is funding provided by Government, explicitly for the provision of a range of business support services provided through a team of staff known as Account Managers. Core public funding is provided to cover employment costs of the team and the operation of their service.

Enterprise Advisor Network

We receive match funding from the Careers and Enterprise Company, which was established and is funded by Government since 2015, for the provision of Enterprise Co-ordinators in the Coast to Capital area. Enterprise Co-ordinators work with volunteer business leaders to develop and implement careers strategies for young people in schools and colleges across the region.

Escalator Programme

Launched on 29 October 2018, the Escalator Pilot is a six month programme of expertly facilitated monthly meetings focused on a key topic of interest identified by the members themselves. This model of peer-to-peer roundtables is a professionally delivered programme. Each peer-to-peer group will be limited to no more than 8 businesses.

Growth Champions

The Growth Champion Network is a collection of consultants, all carefully curated as experts in their respected field. The Champions are specialists across a broad range of industries and business practices. The Growth Champions work closely with the Coast to Capital Growth Hub's team of Account Managers to provide specialist areas of support for business to unlock further growth.

Growth Grant Programme

The Coast to Capital Growth Grant Programme is a capital equipment (capex) grant. The grants part-fund projects undertaken by innovative, high growth small and medium sized enterprises (SMEs) and social enterprises in the Coast to Capital LEP area. Eligible projects will result in an increased turnover of at least 20% per annum and improved productivity in the company and wider economy.

Calls for applications and successful applications are published on our website. A Growth Grant Appraisal Panel makes decisions on grant applications and comprises

of a specialist group of members with experience in business finance. Feedback from the panel members provides input into the strategic delivery of the programme.

Applications that are approved by the Growth Grant Appraisal Panel will sign a Grant Agreement with Coast to Capital. The agreement will detail the conditions that must be met by the grant recipient before they can receive grant funding. The Grant Agreement also includes details on the monitoring and claims processes.

Successful applicants will submit claims in arrears for their approved expenditure. These claims are subject to approval from our Accountable Body. Once approved, our Accountable Body will facilitate payment to Coast to Capital, after which Coast to Capital will pay the recipients directly.

European Union Funding

Decisions on the administration of European Union Structural Funds are taken in line with the geography of Local Enterprise Partnerships. Coast to Capital supports the Government in the delivery of this work and aims to ensure that EU funds are fully administered in support of their objectives.

Enterprise Zone

Newhaven Enterprise Zone is a formal partnership between Coast to Capital, Lewes District Council and the Department for Business, Energy & Industrial Strategy (BEIS). An enterprise zone is a designated area that provides tax breaks and Government support for growth. Businesses locating to Enterprise Zones benefit from up to 100% business rate relief over a five-year period and simplified local authority planning for certain developments within the Enterprise Zone area.

Newhaven Enterprise Zone is formed of eight sites in and around the centre of the town, including key areas of the port. More information, including the Newhaven Enterprise Zone Strategic Framework, can be found on the Newhaven Enterprise Zone website.

The Newhaven Enterprise Zone Strategy Board is responsible for taking formal decisions regarding Newhaven Enterprise Zone. Representation on the Board consists of:

- Coast to Capital
- Lewes District Council
- East Sussex County Council
- Newhaven Town Council
- BEIS

The Newhaven Enterprise Zone Community Fund supports charities and not-for-profit organisations which benefit the Newhaven area, in particular, those which help to encourage a sense of place and to build on the thriving community in the town.

The Community Fund is managed and administered by Sussex Community Foundation.

Work is ongoing to determine how Newhaven Enterprise Zone should best be constituted in the longer term, to ensure the strategic investment of income from business rate relief to promote and secure business growth in the area, including infrastructure issues. More information on future Enterprise Zone arrangements and investment will be made available on the website as it is agreed.

A two year transition period is currently underway to handover responsibility for the Newhaven Enterprise Zone to the South East LEP by April 2021.

Revenue Grant from Government

In recognition of the role that we play in administering public funds and in support of the delivery of the Government's objectives, Ministers choose to give Coast to Capital (along with other LEPs) an annual funding allocation to help cover our operational costs.

Contributions from local authorities in the region

In recognition of the role that we play in promoting economic growth and prosperity in the region, Local Authorities in the Coast to Capital area make an annual funding allocation to help cover our operational costs.

4.2 Our Accountability for Public Funding

It is vital that Coast to Capital fully conforms with the expectations on the good use of public funds. These are the key obligations on us and include:

- Ensuring that we obtain best value for money from our investments
- Ensuring we take transparent decisions on the way we spend public money
- Engaging and consulting our stakeholders when we update our SEP
- Ensuring we regularly engage and update our stakeholders on our activities
- Discharging duties required of us by the Department of Transport specifically in relation to funding of transport projects.

4.3 How we make Decisions on Grant Distribution and Loan Distribution

We make decisions to award grants and loans based on a robust and thorough process in line with our commitment to transparency. Annex Q summarises the decision making processes accordingly.

4.4 Project Monitoring

The Investments team conduct thorough monitoring and regular communication with all Local Growth Fund and Growing Places funded projects throughout their

lifetime, to ensure that conditions and clauses within funding agreements are being adhered to. The monitoring process includes but is not limited to;

- Quarterly downstream reporting. Delivery Bodies complete and submit quarterly claim forms, along with risk registers and highlight reports. Financial claims provide sufficient invoice evidence to allow sign off by the LEP and Accountable Body, to enable payment of LGF funds. Monitoring is conducted up until project completion, to include full reporting of LEP funds, matched funding, outputs and milestones.
- Quarterly upstream reporting. The Investment team submit monitoring forms to BEIS in order to update Government on project delivery, finances, outcomes, and risks. This data is used to track the LEP's performance against our Growth Deal targets.
- Site Visits and Project Reviews. The Investment Programme Managers conduct regular site visits and project meetings with Delivery Bodies to ensure delivery is progressing to the anticipated timescale, to get updates around outcomes, risks, and to see physical progress on site. These are conducted at various stages of the project through start to completion.
- High Risk reporting. As part of the High Risk Monitoring Protocol that the Investment Committee have been tasked with, the Investments Programme and Risk Manager regularly updates both Investment Committee and Board with a suite of documents in relation to project delivery and financial risk. These documents include the High Risk Report, Risk Register, Individual Risk Sheets, Financial updates, Dashboard, and Output Delivery.
- Audit Reviews. The Investments Committee, Board and Investment Programme and Risk Manager have the ability to commission an audit by our Investments Audit and Compliance Officer, or to commission a 'deep dive' audit review on any of our funded projects. Audit reviews will be conducted to assess both high risk projects, and to ensure project delivery and outcome delivery is on track. Reports will be sent around to a circulation list, or by request of Board members. The reviews will enable the Investment Programme and Risk Manager to effectively risk assess projects as part of the Investment Committee reporting.

More detail of these processes can be found in Annex Q.

4.5 Action to Recover Funds

Coast to Capital, through its Investment and/or Growing Places Committees, will take steps to recover either grant or loan funding, where conditions precedent to the award of that funding are not complied with. Breaches of conditions within funding

or loan agreements are brought to the attention of the relevant Committee, which will then decide upon the steps to be taken to either require remediation of defaults or to immediately initiate recovery of funds. This includes where there is non-compliance, misrepresentation or underperformance. The relevant Committee will receive reports providing information on projects which have received funding including:

- a. A description of projects where concerns have been identified;
- b. Relevant details including the amount of funding awarded and the sum at risk due to concerns; and
- c. Where recovery of funds is considered, a legal opinion from the Accountable Body which sets out the legal basis for recovery and the likelihood of success.

Where a decision is taken not to pursue recovering where non-compliance and there are legal grounds to do so this will be clearly justified in the record of the decision.

Where a delivery body also sets out plans to draw down funding within a particular year and those plans have been presented to a relevant Committee or represented to the LEP in written correspondence, the LEP will if required, in order to achieve overall expenditure draw down commitments that have been made to Government, withdraw such funding permanently from projects, to be redeployed to new schemes. Such decisions will be taken by the relevant Committee by recommendation to the Board. Decisions to withdraw funding will be also taken in accordance with our High Risk Projects Monitoring Protocol, through recommendations to the Board.

4.6 Achieving Value for Money

Coast to Capital strives to achieve the best value for money in its operation and expenditure of public funds through the below measures. The Chief Executive is the named officer responsible for ensuring value for money and the identification and management of risk associated with the same:

- i. Procurement Policy for our own purchases

The Coast to Capital Financial Controls Policy is in Annex R. It sets out the standards by which we undertake procurement of goods and services to ensure we obtain best value for money and operate in a fair and transparent way.

- ii. Conditions applied to funding agreements

We expect all of our delivery bodies to which we make funding grants, to operate to best practice in relation to the procurement of goods, services and contracts. Our funding conditions impose these requirements and we will audit through our reviews to ensure that delivery partners adhere to these standards. We will require evidence prior to issuing funding agreements that delivery bodies will operate best practice procurement regimes; in most instances this will be by ensuring compliance with the Public Contract regulations 2015.

These standards include the delivery body demonstrating robust procurement procedures that follow best practice for the goods, services and contracts that they intend to purchase with Coast to Capital funding. This would include the delivery body demonstrating an appropriate written procurement procedure before funding awards are made, which details a robust and competitive approach to procurement through competitive quotations or tendering, with appropriate pre-qualified providers. We will also seek to ensure that delivery bodies operate fair and open tendering procedures, including pre-qualification of providers.

iii. Monitoring outputs from projects that we fund

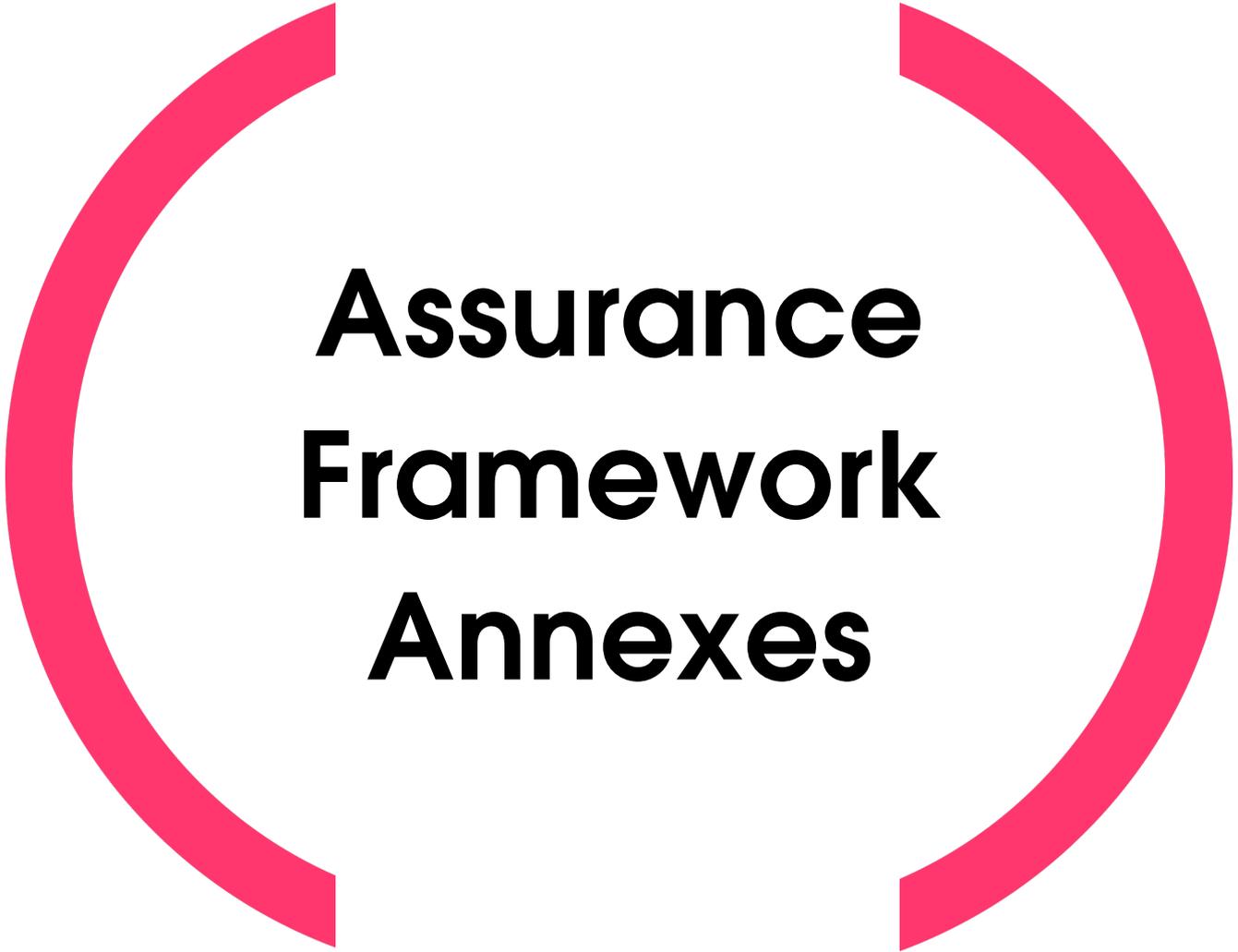
We monitor projects that we fund, across their whole life cycle and use an audit process, based upon the Government's Gateway review system. Those staff undertaking these review audits will all be gateway trained via the Government's accredited Gateway training provider – Local Partnerships.

The gateway process is a comprehensive best practice approach to project monitoring and is an established methodology to ensure robust standards of project delivery. Unless each key gateway stage is satisfied by delivery bodies, staged funding payments will not be released. On the basis of these findings, project delivery bodies will be called to account including by being asked to attend Investment Committee meetings. Funding may be withdrawn on the recommendations of the Investment Committee if evidence of adequate performance is not provided. In general, funding payments are released by Coast to Capital on a quarterly basis through completion of a quarterly claim application form.

iv. Risk Management

Corporate risk management is governed through the Executive Committee in line with its responsibilities. The Chief Executive is responsible for sharing his assessment of the residual level of risk facing the organisation with the Chair's Committee, who will report on this to the Board at least twice a year. Any Board Member can view the risk register at any time.

The projects risk register is published and reviewed by the Investment Committee at each meeting, upon advice from the Investments Team. The risk assessment process follows the MHCLG protocol as specified for LEPs. A specific High Risk Monitoring Protocol is operated by the Investment Committee and Board and is detailed in Annex Q.



**Assurance
Framework
Annexes**

Annex A

Agreement between Coast to Capital and London LEP in relation to the London Borough of Croydon

1. The Gatwick Airport to Croydon corridor (“the corridor”) is a key area of economic development for both LEAP and C2C. The Mayor of London’s draft London Plan identifies it as a priority area for London’s economic growth and it is central to C2C’s strategy for economic growth, Gatwick 360.
2. LEAP and C2C are committed to working in collaborative partnership to deliver economic growth for the corridor, particularly on transport, digital and university facilities.
3. LEAP and C2C are clear that Government requires there to be no geographical overlaps between LEPs. LEAP and C2C agree that, as a London Borough, LB Croydon must remain in LEAP and it must therefore leave C2C on a date to be agreed with Government.
4. LEAP and C2C will propose a two-year transitional arrangement to Government for C2C to see through its Growth Deal commitments in LB Croydon. This will not delay the adoption of the new geographical arrangements, which in turn will enable the development of a Local Industrial Strategy for each area.
5. LEAP and C2C are each committed to developing their individual Local Industrial Strategy in collaboration with the other, sharing knowledge and analysis to develop complementary evidence-based content for the corridor. LEAP will include an evidence-based appendix on the Gatwick to Victoria corridor in its Local Industrial Strategy, focussing on transport, digital and higher education.
6. LEAP and C2C will design and implement a governance arrangement to ensure the transparent delivery of the collaborative approach outlined above and that any LEP decisions concerning the corridor are made in full view of both LEPs. In the interest of efficiency and to avoid duplication, it is proposed that a prominent member of the Croydon business sector shall sit on both LEAP and C2C boards. This member would be appointed to LEAP as part of the recruitment process for four additional LEAP Business Members following the December LEAP Board meeting (subject to final Mayoral decision). LEAP and C2C are agreed that continued close collaboration and partnership with business and political leaders in LB Croydon will be essential for C2C’s future engagement in the delivery of its work.
7. LB Croydon has been the accountable body of C2C since 2017 and this arrangement is working very well. C2C will work with Government to consider its accountable body arrangement moving forward.

Annex B

Agreement between Coast to Capital and South East LEP in relation to Lewes District

1. Lewes District is a key part of the economy of East Sussex and also of the Greater Brighton economic area, which brings together districts and boroughs

whose economies interact closely with the City of Brighton and Hove. The importance of this is confirmed in the [2016] City Deal for Greater Brighton.

2. Reflecting this, Lewes has always been part of both the South East LEP (SELEP) - which includes East Sussex - and the Coast to Capital LEP which contains Greater Brighton. However, the Government has asked that LEPs across England eliminate such overlaps in order to ensure clarity on how local industrial strategies will be delivered. Future working arrangements
3. SELEP and Coast to Capital are committed to resolving this overlap in order to support the development of Local Industrial Strategies (LIS) in both LEP areas. We confirm that Lewes will be part of SELEP going forward. Four areas of extensive cooperation between the two LEPs will be incorporated in the formalisation of that transition and withdrawal of Coast to Capital.
4. Firstly, both LEPs will collaborate in the preparation of LIS's for their separate areas. This will ensure that evidence on the economic performance of Lewes is addressed in both LISs, as appropriate and in a fully consistent way. This will include issues relating to the interaction between Lewes and the rest of East Sussex, and the interaction between Lewes and the rest of Greater Brighton.
5. Secondly, it is agreed that projects arising from the LIS process will be considered for future funding by SELEP in line with their corporate processes and without prejudice to the changing status of Lewes within the LEP.
6. Thirdly, both LEPs agree that continued development and investment in Newhaven is essential to ensure the long-term economic growth of Lewes District. Successful medium-term delivery of the Newhaven Enterprise Zone is central to this. The EZ contains eight important development sites in Newhaven, and has been led by Coast to Capital since 2015. Both LEPs agree that close collaboration is needed to support the development of the EZ over the coming years, and to ensure a managed handover from Coast to Capital to SELEP.
7. Fourthly, a separate Collaboration Agreement for Newhaven EZ will be agreed and implemented. This will be based on the creation of a special purpose vehicle to lead delivery of the EZ. This will be independently chaired, and will bring together both LEPs and all relevant Local Authorities and businesses from the town. It will continue with and develop the existing long-term strategy for the town's future, bringing together public and private funds to ensure that Newhaven can meet its economic potential. The EZ's governance and the SPV will be reviewed by SELEP after two years, with the expectation that Coast to Capital will withdraw from these arrangements at this point. The Collaboration Agreement will be included in assurance arrangements for the two LEPs in line with Government requirements.
8. The Accountable Body function for this SPV will remain with the London Borough of Croydon until April 2020 when it will transfer to SELEP's extant Accountable Body arrangements.
9. Both LEPs agree to long-term collaboration and cooperation in line with the spirit of this agreement and the intentions of the Government's Industrial Strategy.

Annex C

Local Industrial Strategy Programme Group

Summary

The Chief Executive (referred to here as the Senior Responsible Owner or SRO) has been delegated authority by the Coast to Capital Board to oversee the successful delivery of Gatwick 360° and the LEP's Local Industrial Strategy negotiation with Government.

Commitments were made in Gatwick 360° to deliver a range of actions (in the short and longer term) that will meet the eight priorities and the overall vision.

These priorities are interdependent and it has been approved by the SRO that they be delivered as a coordinated Gatwick 360° Delivery Programme, to ensure the best outcomes and use of resources.

The Gatwick 360° Programme Group will oversee all aspects of the programme internally, as described in these Terms of Reference (ToR).

The ToR are valid for the current phase of the programme – project set-up and evidence test (Stages 1 and 2).

The LIS negotiation is a closely related piece of work to the Gatwick 360° Delivery Programme, which is reflected within the Gatwick 360° document itself. The negotiation will draw directly from the programme, and its component projects, but will be delivered separately to the Local Industrial Strategy (LIS) Programme Group.

Functions

To ensure internal prioritisation and progress within the organisation on the Gatwick 360° Delivery Programme.

To oversee all live stages of the Programme and the eight component projects.

Oversee resource allocation and /or internal resources to for any corporate spend for specialist consultancy to be commissioned for Programme delivery.

Carry out all Programme functions, including risk management, communications plans and stakeholder engagement.

To ensure appropriate linkages between Gatwick 360° delivery and related analysis, prioritisation and negotiation mechanisms for the LIS.

Reporting and Accountability

The LIS Programme Group will report via the SRO to the Coast to Capital Board. The purpose of this will be oversight and influence, rather formal decision making on specific aspects of Gatwick 360° delivery.

Project Teams will be asked to completed standard templates for reporting. This will be coordinated into a single update by the Programme Manager and coordinated with reporting on the Local Industrial Strategy by the Strategy and Policy team.

Membership

Membership of the LIS Programme Group comprises members of the Senior Management Team (SMT) with support from other Coast to Capital staff, as shown below.

The Chief Executive will act SRO for the Programme. Other SMT members have been assigned as the project lead for specific priorities.

A lead for Priority 5 will be confirmed to sit on the Group. This individual may not be from within the organisation but will bring relevant experience to the role.

Programme Team Members	Designated Project Lead
Jonathan Sharrock, SRO (Chief Executive)	-
Tony Middleton, Chief Operating Officer	Priority 1
Malcolm Brabon, Head of Services	Priority 2,8
Kirsten Trussell, Head of Strategy & Policy	Priority 3, 4, 5, 7
Katie Nurcombe, Head of Communications & Corporate Affairs	Priority 6
Matthew Wragg, Strategy & Policy Manager	Support to Programme Board
Marsha Robert, Programme Manager	Support to Programme Board

Chair

The SRO will Chair the LIS Programme Group.

The Head of Strategy & Policy will deputise as Chair for the SRO.

Substitution

Members of the LIS Programme Group will nominate substitutions as required, according to planned agenda items.

Time and Venue of Meetings

Meetings are intended to be monthly, lasting two hours within Coast to Capital offices as a minimum.

Timings will be planned initially for a 9 month period to mirror the expected negotiation period of the LIS. Meetings will also be planned to coincide with specific stages and milestones within the LIS, as these become known.

Administrative, financial and legal support

The Programme Manager with the Strategy & Policy Manager will provide guidance and administrative support to the LIS Programme Board.

Financial support and agreement provided by Accountable Body with the Chief Executive.

Annex D

Coast to Capital Conflicts of Interest Policy

1. Introduction

- 1.1 Coast to Capital is committed to ensuring that all Members and Officers act in line with the Nolan Principles of public life. This policy applies to any/all involvement with the work of Coast to Capital and provides detail of how Coast to Capital Members and employees should consider conflicts and the requirements to declare any interests in line with Coast to Capital processes.
- 1.2 A conflict of interest is any situation in which Coast to Capital Board Member's, Committee Member's (including Co-opted Members and Independent Committee Members) or employee's personal interests, or interests that they owe to another body, may (or may appear to) influence or affect their decision making.
- 1.3 This policy explains the how Coast to Capital Board Members, Committee Members and employees involved in decision making should declare and manage commercial, actual, and potential conflicts of interest. Board Members, Committee Members and employees are personally responsible for declaring interests and avoiding perception of bias that may or may not affect Coast to Capital's reputation in the public eye. Board Members, Committee Members, Senior Officers and anyone in the organisation involved in a funding decision making process, including Growth Grants should read this policy in conjunction with the Code of Conduct (Assurance Framework Annex V).
- 1.4 To demonstrate this commitment all Board Members, Committee Members, Senior Officers and decision making staff complete and sign a register of interests (Assurance Framework Annex W).
- 1.5 The Register of Interests for Board Members and Committee Members is published on our [website](#) which is reviewed every six months and updated as required.
- 1.6 The Register of interests for all Senior Officers and anyone in the organisation involved in a funding decision making process, including Growth Grants, is published on our [website](#) which is reviewed every six months and updated as required.
- 1.7 Entries to the Register will be removed when they cease to be interests or if the Director, Member or Officer in question leaves Coast to Capital or ceases their work on the relevant Committee.
- 1.8 Declaration of interests are not a resolution of the conflict but assists Coast to Capital with managing the conflict. All declarations will be formally

reviewed every 6 months and all Board Members, Committee Members and employees are to declare any interests as they arise.

2. Identifying conflicts of interest

- 2.1 A conflict of interest is a set of circumstances that creates a risk that an individual's ability to apply judgement or act in one role is, or could be, impaired or influenced by a secondary interest. It can occur in any situation where an individual or organisation can exploit a professional or official role for personal or other benefit. Conflicts may be commercial, actual or potential and may inhibit open discussion, influence decisions or actions made that are not in the interests of Coast to Capital or risk creating the impression that Coast to Capital has acted improperly.
- 2.2 Conflicts can exist if the circumstances create a risk that decisions *may* be influenced, regardless of whether the individual actually benefits. The perception of competing interests, impaired judgement or undue influence can also be a conflict of interest.
- 2.3 Conflicts might occur if individuals have, for example:
- a direct or indirect financial interest;
 - non-financial or personal interests; or
 - conflicts of loyalty where decision-makers have competing loyalties between an organisation they owe a primary duty to and some other person or entity.
- 2.4 Conflicts of interest exist on a spectrum of severity. In public/publicly funded services, they can take many forms, for example:
- accepting hospitality or gifts from companies during a procurement exercise;
 - providing policy advice to government while also working, or consulting, for industry;
 - awarding contracts to suppliers in which the decision-maker has a personal or financial interest; and
 - in the delivery of public or publicly funded services, where individuals or organisations assess service needs as well as providing the services.
- 2.5 Any interest of which a Member or employee has no knowledge and which is unreasonable to expect them to have knowledge shall not be treated as a conflict.

3. Registering and declaring pecuniary and non-pecuniary interests

- 3.1 As a Board Member or staff member of Coast to Capital, you must:

- 3.2 Within 28 days of taking office, notify the Chief Executive of any disclosable pecuniary interest, where the pecuniary interest is yours, your spouse's or civil partner's, or is the pecuniary interest of somebody with whom you are living with as a spouse, or as if you were civil partners.
- 3.3 Within 28 days of taking office, notify the Chief Executive of any non-pecuniary interest which Coast to Capital has decided should be included in the register or which you consider should be included if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life. These non-pecuniary interests will necessarily include your membership of any Trade Union.
- 3.4 Review your individual register of interest before each board meeting and decision making committee meeting and declare any relevant interest(s) at the start of the meeting.
- 3.5 If an interest has not been entered onto the Coast to Capital register, then the you must disclose the interest at any meeting of Coast to Capital where you are present, where you have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'. For these purposes a 'sensitive interest' is described as a member or co-opted member of Coast to Capital having an interest, and the nature of the interest being such that the member or co-opted member, and the Chief Executive, consider that disclosure of the details of the interest could lead to the member or co-opted member, or a person connected with the member or co-opted member, being subject to violence or intimidation.
- 3.6 Following any disclosure of an interest not on the Coast to Capital register or the subject of pending notification, you must notify the Coast to Capital Chief Executive of the interest within 28 days beginning with the date of disclosure.
- 3.7 Unless dispensation has been granted, you may not participate in any discussion of, vote on, or discharge any function related to any matter in which you have a pecuniary interest. Additionally, you must observe the restrictions Coast to Capital places on your involvement in matters where you have a pecuniary or non-pecuniary interest as defined in this policy.
- 3.8 Categories of disclosable interest are stated in the Coast to Capital register of interest.

4. Procedure for managing conflicts

- 4.1 At the start of each meeting the following statement will be read by the Chair:

Should any Member or employee consider themselves or another present to have a conflict of interest, this must be declared at this point. Should you become aware of an interest during the course of the meeting, this shall be declared at that point within the meeting. Any interests not already on the register need to be included in an updated register within 28 days of you becoming aware of the interest.

4.2 Non-conflicted Members will consider, with legal advice where necessary, what the nature of the conflict is, what the risk or threat is to decision making, if a conflicted Members interest is trivial or non-trivial and then what steps need to be taken to avoid or manage the conflict. Should the interest be deemed non-trivial, the non-conflicted Members will determine what action is appropriate in light of the nature and extent of the conflict. A number of steps can be taken to deal with the conflict and may include:

- excluding the conflicted member from discussions in relation to the matter to avoid inadvertently influencing the non-conflicted members and should be asked to leave the room at this point ;
- excluding the conflicted members from decision-making in relation to the matter while the conflict exists;
- considering an authorisation under Article 14.6 of the Articles of Association (or any successor article thereto)
- delegating the matter to a Committee of non-conflicted members;
- seeking independent advice to help with a decision;
- appointing alternative, non-conflicted member/s;
- resignation of the conflicted member where the conflict is acute or pervasive.

4.3 Should the conflicted Member be the Chair, the Deputy Chair will act as Chair or if no Deputy Chair is elected for that body, a Vice Chair should be selected.

4.4 In either circumstance the Chair will inform the conflicted member of the non-conflicted members' decision. The secretary of the Board/Committee will note in the minutes of the meeting the conflict declared, an outline of the discussion and the actions taken to manage the conflict so that a clear record is made within the meeting minutes.

4.5 In the case of a conflict of interest that is of a sensitive nature, any information deemed as sensitive will be redacted from all publicised minutes which is a matter for the Chief Executive to determine.

5. Non-compliance

5.1 Non-compliance of this policy is a breach of the Coast to Capital Code of Conduct, and contrary to the Coast to Capital Anti-Fraud and Anti-Bribery Policy and may lead to disciplinary proceedings.

Annex E

Gifts & Hospitality Policy

Introduction

The Coast to Capital Gift & Hospitality policy will be to decline gifts or hospitality exceeding £50. However, Coast to Capital will accept offers of free venues to deliver our Board meetings, Stakeholder events and team away days which is the only benefit in-kind we receive from partners.

Gifts and Hospitality Registers

We manage four separate Gifts and Hospitality Registers:

- one for Board Members including the Chair which is managed by the Governance Officer
- one for the Chief Executive which is managed by the PA to the Chief Executive
- one for Officers which is the responsibility of the team to ensure is kept up to date with the Governance Officer as a central contact point
- one Corporate Register which details the event spaces we are provided free of charge and is managed by the Governance Officer

These registers are updated monthly and published on our website.

Process

Any gift declined over the £50 threshold should be noted in the individual's register of interest and included in the relevant Gifts and Hospitality register. Any gift below the £50 threshold does not need to be included in the registers.

The Gifts and Hospitality registers will start from 1 January of each year and a new one saved each year. Previous year's registers are kept for reference

The process for Board members will be on declining a gift or hospitality over the threshold to update their individual register of interest and share with the Governance Officer who will update the relevant Gifts and Hospitality register.

The process for the Chief Executive will be on declining a gift or hospitality over the threshold for the PA to the Chief Executive to update the Chief Executive register of interest and relevant Gifts and Hospitality register.

The process for staff will be to inform their Line Manager and Governance Officer of any gift or hospitality over the threshold declined who will update the relevant Gifts and Hospitality register and provide guidance on updating their individual register of interest if they have one.

The process for updating registers of interest should follow the agreed process. Only the current year's gifts or hospitality declined are recorded on the individual's declaration of interest forms.

It may be the case that the value of the gift or hospitality needs to be estimated. For ease, it is assumed that an invitation to an evening three course dinner with drinks is below the £50 threshold and can be accepted if appropriate.

Annex F

Chair's Committee Terms of Reference

1.0 The Chair's Committee is responsible for the oversight and accountability of the Chief Executive in their capacity as the LEP's head of paid service. It is also responsible for the company's commercial strategy, financial performance and risk management. The Committee is chaired by the Chair of the Board with membership comprising the Vice Chair and two other Board Directors. The Chief Executive is also a member of the Committee.

2.0 Specific Responsibilities :

2.1 General

2.1.1 Exercising the powers and duties of the Board in respect of the financial administration of the company, except for those items specifically reserved for the Board and those delegated to the Chief Executive and other staff.

2.1.2 Reporting on decisions taken under delegated powers to the next Board meeting.

2.2 Budgets/Budgetary Control

2.2.1 Reviewing the annual budget prior to the start of each financial year and recommending its acceptance, or otherwise to the Board.

2.2.2 Ensuring there is proper and complete separation between decisions to purchase and the payment of suppliers.

2.2.3 Considering budgetary control reports on the company's financial position, taking appropriate action to contain expenditure within the budget and report to the Board.

2.2.4 Review all in year changes to the budget up to 10% of the budget agreed by the Board and as authorised by the Chief Executive, which are to be formally notified to the Committee who shall minute the notification.

2.2.5 Approval of changes to the Company bank mandate.

2.3 Insurances

2.3.1 Ensuring that arrangements for insurance cover are in place and adequate.

2.4 Security of assets

2.4.1 Ensuring that there are annual independent checks of assets and the asset register.

2.4.2 Authorising the disposal of individual items of equipment and materials that have become surplus to requirements, unusable or obsolete with an original purchase value of up to £5,000 and reporting such authorisations to the Board.

2.5 Personnel

2.5.1 Authorising permanent changes to the company's establishment and determining conditions of employment for all Coast to Capital employees.

2.6 Accounts and audit

2.6.1 Reviewing the draft financial statements and highlighting any significant issues to the Board, prior to the submission to Companies House within nine months of the financial year end.

2.7 Risk Management

2.7.1 To oversee the corporate risk register and report to the Board 'key' RED rated risks. To decide on remediation of risks and implementation of control measures.

3.0 Appointment process

Appointment to the Committee is limited to the Chair and Vice Chair of the Board, with the other two Directors being appointed by the Board, upon recommendation from the Chair's Committee. The Chief Executive is also a member of the Committee.

4.0 Quorum

No business shall be transacted at any meeting of the Chair's Committee unless at least three of the members are present including the Chair, or in their absence, the Vice Chair.

5.0 Term of office

The term of office of Committee members runs concurrent with the term of office of the Chair and Vice Chair. The term of office for the other Board Directors is at the discretion of the Chair. The term of membership of the Chief Executive is concurrent with his / her term of office.

6.0 Declarations, Disclosure and Conflicts of Interest Procedure

Prior to each Committee meeting and initially prior to appointment to the Committee, the declaration of interests, disclosure and conflicts register must be completed by all members of the Committee. This will be consistent with Coast to Capital policies.

7.0 Frequency of meetings

Committee meetings are held five times a year, on alternate months to full Board meetings.

8.0 Transparency of Chair's Committee decision making

The minutes and action points from Chair's Committee meetings are provided to the Board at each of its meetings under the Part B agenda.

Annex G

Audit Committee Terms of Reference

- 1.0** The Audit Committee is responsible for overseeing compliance of the company with its agreed assurance and governance framework, together with commissioning local audit interventions across the range of activities of the LEP including receiving copies of independent project audits carried out on the LEP investments projects portfolio. The Audit Committee is accountable to the Coast to Capital Board. The Chair of the Committee is a Board member appointed by the Board. Other members of the Audit Committee are drawn from the Board based on their skills and experience in assurance monitoring and will also include independent members.

The objectives of the Committee are:

- 1.1 To devise for Board endorsement, the overall Audit strategy for Coast to Capital, contributing to, and fitting within the overall Strategic Economic Plan and assurance framework.
- 1.2 To ensure all Audit related issues have been considered by the Committee before they are presented to the Coast to Capital Board.
- 1.3 To influence national and local policy decisions relevant to the Audit strategy.
- 1.4 To drive and steer implementation of the Audit strategy.
- 1.5 To create and oversee a coherent programme of research, development, collaborative projects and other activities, that reflect, where appropriate, the activities of the Area Partnerships and other partners.
- 1.6 To recommend to the Board and Chief Executive, the annual budget for Audit activities and to oversee how it is deployed, including appointment of auditors.
- 1.7 To oversee the assurance and governance framework of the LEP.

2.0 Duty to Collaborate

The Audit Committee will have due regard for the work and activities of the other sub-committees of the Board, to recognise there will be some cross-over in objectives and activities.

3.0 Decision making

Decision making will be by consensus. Where it is not possible to achieve a consensus, the Chair will refer the decision to the Coast to Capital Board.

4.0 Frequency of meetings

The Committee will meet twice a year. Further meetings may be added at the Committee's discretion.

5.0 Sub Groups

The Audit Committee may establish such Working Groups and Task and Finish Groups as it deems necessary. However, overall accountability to the Board will remain with the Audit Committee.

6.0 Member Appointment process

The Chair of the Committee is appointed by the Board upon nomination of a Board member with suitable background and experience. The Board has responsibility for identifying a suitably qualified candidate to fulfil the position.

Members of the Audit Committee are appointed by the Board and will include at least two independent members reflecting business and local government perspectives within the region. Membership of the Committee will include the Chair, two independent members identified and appointed by the Board and at least three other Board members.

7.0 Independent Members of Audit Committee Due Diligence Checks

The independent members of the committee are subject to the same reference and due diligence checks as Board members, through the use of an appointed external reference agency. The check will include but not be limited to:

- a) Reference checks from suitable referees
- b) Director disqualification and bankruptcy checks
- c) Other Directorships check
- d) Disclosure and Barring Service checks for unspent criminal records

The results of these checks will be provided to the Chair of the Audit Committee before members are appointed.

8.0 Audit Committee Member induction

Specific induction is given to Audit Committee members in relation to statutory accounting duties and the financial accounting requirements of Limited Companies, together with an explanation of the audit function.

9.0 Term of office

The Chair of the Committee is appointed for a term of three years and can by agreement of a Board majority be appointed to serve two further three year terms, with each term being individually approved.

Audit Committee members are appointed for a term of office of three years and can serve a maximum of three terms of office, with re-appointment to each term being a board decision.

10.0 Declarations, Disclosure and Conflicts of Interest Procedure

Prior to each Committee meeting and initially prior to appointment to the Committee, the declaration of interests, disclosure and conflicts register must be completed by all members of the Committee.

11.0 Transparency of Audit Committee decision making

Audit Committee minutes and reports are published with recommendations to the Board for either consideration in Part A or Part B of Board meetings. The release of reports will therefore follow the Board transparency protocols as detailed earlier within this document.

12.0 Quorum

At least three members of the Committee plus the Chair will constitute a quorate meeting.

Annex H

Joint Committee Terms of Reference

1. The over-arching purpose of the Joint Committee is to promote and support sustainable economic development and growth across the area served by the Coast to Capital Local Enterprise Partnership (“the LEP”). To achieve this, the Joint Committee will agree the Strategic Economic Plan as developed by the Board of the LEP (“the Board”) and also may advise the Board from time to time on the economic development and growth priorities of the area. The Committee is also responsible for ensuring the democratic accountability of the LEP to all local authorities within its area.
 - 1.1. The Joint Committee is a joint committee appointed by two or more local authorities represented on the Joint Committee in accordance with section 102(1) (b) of the Local Government Act 1972.
 - 1.2. The Joint Committee may appoint one or more sub-committees.
 - 1.3. The lead authority for the Joint Committee is Croydon Council as the Accountable Body, whose functions in that capacity shall include financial, administrative and legal support (see paragraph 10)

2.0 Functions

- 2.1 The functions of the Joint Committee are specified in paragraph 2.2 below, and may be exercised only in respect of the LEP Area.
- 2.2 The functions referred to in paragraph 2.1 are as follows:
 - (i) To agree the Strategic Economic Plan and its revisions and amendments as proposed to the Joint Committee by the Board.
 - (ii) To provide strategic advice to the Board from time to time on the economic development and growth priorities for the LEP Area.
 - (iii) To nominate on request from the Board representatives from the district and borough local authorities who are members of the Joint Committee to serve as Directors on the Board.

3.0 Reporting and Accountability

The Joint Committee shall submit an annual report to each of the bodies represented on the Joint Committee.

4.0 Membership

- 4.1 The following bodies shall be members of the Joint Committee:

County/Unitary Authorities

Brighton & Hove City Council
London Borough of Croydon
Surrey County Council
West Sussex County Council

District and Borough Authorities

Adur District Council
Worthing Borough Council
Lewes District Council
Mid-Sussex District Council
Horsham District Council
Crawley District Council
Arun District Council
Chichester District Council
Epsom and Ewell District Council
Tandridge District Council
Mole Valley District Council
Reigate and Banstead District Council

South Downs National Park Authority

- 4.2 Each of the bodies listed in paragraph 4.1 shall be represented at the Joint Committee by one person.
- 4.3 Each local authority member shall be represented at the Joint Committee by an elected Member nominated annually or a nominated substitute (see paragraph 7).
- 4.4 The South Downs National Park Authority shall be represented at the Joint Committee by its Chair

5.0 Chair of the Joint Committee

- 5.1 The Chair and Vice Chair of the Joint Committee shall be the District Council representatives on the Board as agreed by the Coast to Capital Chair.

6.0 Voting

- 6.1 Decisions will be made on a simple majority of votes cast by members represented at a meeting.
- 6.2 Where voting at a meeting results in an equal number of votes cast in favour and against, the Chair of the Joint Committee shall have a casting vote.

7.0 Substitution

- 7.1 Where a representative of a member of the Joint Committee is unable to attend a Joint Committee meeting, a substitute representative of that member (if approved by it) may attend, speak and vote, in their place for that meeting.
- 7.2 A substitute member must be appointed from a list of approved substitutes submitted by the respective member to the Joint Committee at the start of each municipal year.

8.0 Quorum

- 8.1 No business shall be transacted at any meeting of the Joint Committee unless at least eleven of the whole number of voting members are present.
- 8.2 In no case shall any business of the Joint Committee be transacted unless at least two voting representatives from the County/Unitary Authorities are present.

9.0 Time and Venue of Meetings

- 9.1 The Joint Committee will meet annually.
- 9.2 The Chair of the Joint Committee may call a special meeting of the Joint Committee at any time, subject to providing members with minimum notice of ten working days.

10.0 Administrative and legal support

- 10.1 Administrative and legal support to the Joint Committee shall be provided by the lead authority, such legal support to include Monitoring Officer and Proper Officer functions in relation to the Joint Committee meetings.
- 10.2 Other members of the Joint Committee shall contribute to the costs incurred by the lead authority in connection with the activities of the Joint Committee where such costs are incurred by the lead authority.

11.0 Observer status

- 11.1 The LEP shall have the right to attend meetings of the Joint Committee as an observer and to provide information and advice as requested by the Joint Committee, but will not have any role in voting or decision making.

12.0 Review and Variation of Heads of Terms

- 12.1 These Heads of Terms may be varied only by complete agreement of all the members of the Joint Committee and in consultation with the LEP Board.

13.0 Procedure at meetings

13.1. The standing orders of the lead authority will apply to meetings of the Joint Committee.

14.0 Withdrawal

14.1 Any member of the Joint Committee may give six months' notice in writing of intention to withdraw from membership of the Joint Committee and involvement in the Strategic Economic Plan.

15.0 Declarations, Disclosure and Conflicts of Interest Procedure

15.1 Prior to each Committee meeting and initially prior to appointment to the Committee, the Coast to Capital declaration of interests, disclosure and conflicts register must be completed by all members of the Committee.

16.0 Transparency of Joint Committee decision making

16.1 Joint Committee meeting agendas are published in advance of each meeting in two parts. Part A of the Agenda is published on our website in the public domain and any member of the public can submit a comment or view on any Part A agenda item. Public comments will be considered by the Committee at the time of the agenda item being discussed. In this way the Committee can take into account public comments before making decisions on Part A agenda items. Any items that are commercially confidential are covered under Part B of the Committee agenda. Due to the nature of these items these are not published in advance.

16.2 All Part A Committee papers are also published on our website in advance of meetings. Any member of the public wishing to comment on any Part A agenda item must send their comments to reach the Committee secretary no later than 24 hours before the meeting.

16.3 Part A agenda item minutes and decisions are published on our website following Committee meetings.

16.4 Part B agendas are not published in advance of Committee meetings, but where the Committee decides, decisions reached under Part B will be published in the public domain with or without redaction. The Committee reserves the right not to publish Part B decisions if those decisions are in themselves commercially sensitive or confidential, including any decisions that have legal confidentiality issues, or those which are legally privileged.

Annex I

Investment Committee Terms of Reference

The Investment Committee is a formal sub-committee of the Coast to Capital Board with delegated authority and accountability as set out in these Terms of Reference.

The Committee is responsible for the administration of grant funding streams, and is accountable for the oversight of investments, project and output delivery across both Local Growth Fund (LGF), to include risk management. The Committee has delegated powers on behalf of the Coast to Capital Board to make investment decisions up to £2million, and recommendations on investments over £2million.

The Investment Committee also have delegated authority to make decisions on all approved projects (approved by Board, or Investment Committee) in relation to allocating risk ratings, business case scrutiny, project delivery scrutiny, output creation, and approval to issue funding agreements.

1.0 Functions

1.1 The functions of the Investment Committee are:

- (i) To decide funding and investment awards under the Local Growth Fund and other LEP investment initiatives, following receipt of recommendations from the Investment Team.
- (ii) The Committee has the ultimate authority to make or recommended as relevant a full or part award to a grant applicant and to decide the terms under which this award is made.
- (iii) Where awards are above £2million in value, the Investment Committee will recommend funding decisions to the Coast to Capital Board for formal approval. Funding awards under £2million in value taken by the Investment Committee will be presented to the Board as a decision to note. Whilst these decisions are subject to the usual checks and balances in line with the Assurance Framework, the Board cannot overturn funding decisions made by the Investment Committee but can only ask for their re-consideration, after which the decision becomes final.
- (iv) To decide the criteria for targeting commission calls in line with the Gatwick 360 Strategic Economic Plan (SEP), in order to allocate remaining or future funding. The Committee has full delegated authority on behalf of the Board to decide the investment themes and criteria for evaluation and evaluation method / approach accordingly and in line with the Assurance Framework. The Committee reserves the right to commission any single Delivery Body provided the Committee is satisfied

that it is the most suitable Body to deliver the project and that no other body would be equally equipped.

- (i) To decide the approach to be taken for selecting successful growth funding bids to be recommended for funding or awarded funding within Committee delegated powers.
- (ii) To receive full business cases from LGF projects already approved by the Board, following successful expressions of interest, or outline business cases under previous bid calls, where funding awards have been made by the Board or Investment Committee. The Investment Committee is then responsible for deciding whether to approve the award of a funding agreement.
- (iii) To monitor on behalf of the Board, the delivery of projects that have had funding allocated within the LGF. This monitoring will include regular reporting from the Investment Team in relation to project risk, project reviews, financial updates, and project delivery. Projects that reach a high risk rating (RED or RED/AMBER) in line with the MHCLG RAG rating guidance, will follow the High Risk Monitoring Protocol. The Investment Committee will be invited to formally agree one or more of the below actions;
 - 1. Decide that the project can proceed under close monitoring
 - 2. Agree a 'watch and wait' period based upon suitable delivery body assurances
 - 3. Write to Government requesting an extension of time for draw down of funding and then following the Government response, choose either action 1, 2 or 4.
 - 4. Recommend to the Board to withdraw and re-allocate funding to other SEP priority projects

As part of this monitoring, the Investment Committee have the authority to call Delivery bodies into account at the Investment Committee meeting accordingly.

- (iv) To evaluate and approve project monitoring information to include; Dashboard, High Risk Project Report, Full Risk Register, and Individual Risk Profile Sheets.
- (v) To discharge the responsibilities listed within the Coast to Capital Assurance Framework as relevant to this Committee.
- (vi) To instruct or to give recommendations to the Board as required to ensure that the Coast to Capital Assurance Framework is discharged in relation to projects under the Local Growth Fund (LGF). This could include but not be limited to funding awards, setting funding conditions, imposing sanctions

on delivery bodies and / or withdrawing funding in accordance with the provisions under the funding agreement, or any action as appropriate to ensure compliance with the Assurance Framework.

- (vii) To discharge the responsibilities of the decision making element of the Coast to Capital Transport Assurance Framework as required by the Department of Transport and as set out within the Coast to Capital Assurance Framework.
- (viii) To ensure there is effective communication with and engagement of stakeholders, partners and the business sector.

2.0 Reporting and Accountability

- 2.1 The Investment Committee shall report to the Board on all LGF investments decisions to note and recommendations for approval by the Board through a single consent paper presented at each meeting.
- 2.2 The Board will be asked to note decisions made by the Investment Committee on funding awards up to £2million, risk ratings, and decisions around business case scrutiny on already approved projects.
- 2.3 The Board will be asked to approve recommendations to funding awards over £2million, or in relation to potential funding withdrawals as part of the High Risk Monitoring Protocol.
- 2.4 The Consent paper along with necessary supporting information will be circulated to all Board Members following each Investment Committee, and Board Members have the opportunity to raise questions against any of the items included within the consent paper. The Board cannot overturn decisions made by the Investment Committee but can only ask for their re-consideration. Questions must formally be raised to the Chair of the Investment Committee (copied to the Chief Operating Officer) ideally no later than 5 working days in advance of the next Board meeting. Where comments are raised, the Board will formally discuss that particular item in the paper at the Board meeting.
- 2.5 Items approved or recommended by the Investment Committee that have had no previous approval by the Board will be held until the consent paper is considered at the next Board meeting.
- 2.6 Each Committee member is required to complete the declarations, disclosure and conflicts of interest register prior to each meeting. The Chair of the Committee will decide based upon these returns whether any individual members will be excluded from receiving specific individual project papers, taking part in any discussion on

any particular project, and will be asked to leave the room during that discussion. If any Committee member has any project from their own organisation under consideration by the Committee, they will automatically be barred in receiving individual papers relating to that project, from taking part in discussion on that project or any associated decision vote relating to it and will also be asked to leave the meeting during that discussion.

3.0 Membership

- 3.1 All Board members excluding the Chair of the Coast to Capital Board will be Investment Committee voting members.
- 3.2 The LEP Chair will not have voting rights at the Investment Committee, but can attend as an observer. The LEP Chair will preside over matters of contention if the Board request the Investment Committee to re-consider a decision and / or disagree with any decision taken. The LEP Chair holding observer status of the Investment Committee, ensures that when the Board is remitted decisions from the Committee, he/she will not be fettered in leading Board discussion on them.
- 3.3 The S151 Officer or their delegate from the Accountable Body, and Coast to Capital Officers will provide advice to the Investment Committee.
- 3.4 A BEIS representative will attend the Investment Committee as an observer and a DfT representative will attend the Investment Committee as an observer when transport projects are on the agenda.
- 3.5 With the exception of the Chair, Board members are appointed to the Investment Committee by virtue of their appointment to the Board.

4.0 Chair and Deputy Chair of the Investment Committee

- 4.1 The Chair and Deputy Chair of the Investment Committee shall be nominated by the Coast to Capital Board.

5.0 Voting

- 5.1 Decisions will be made on a simple majority of votes cast by members represented at a meeting.
- 5.2 Where voting at a meeting, results in an equal number of votes cast in favour and against, the Chair or Deputy Chair in the Chair's absence, shall have a casting vote.

6.0 Substitution

- 6.1 Leaders of Local Authorities may be allowed to send a Deputy in their place at the Investment Committee subject to advance approval from the Chair or Deputy Chair in the Chair's absence.

7.0 Quorum

- 7.1 No business shall be transacted at any meeting of the Committee unless at least five of the total number of voting members, with a minimum of one of those voting members being Local Authority representatives, are present and voting.

8.0 Time and Venue of Meetings

- 8.1 The Investment Committee will meet quarterly in advance of the Coast to Capital Board, and as required.
- 8.2 The Chair of the Committee may call a special meeting of the Committee at any time, subject to providing members with minimum notice of ten working days.

9.0 Administrative and legal support

- 9.1 Support to the Investment Committee shall be provided by Coast to Capital. The Accountable Body will offer administrative, financial and / or legal support to the Investment Committee insofar as that advice relates directly to the administration and management of the Local Growth Fund (LGF).

10.0 Adviser status

- 10.1 A number of adviser roles are in attendance at the Committee. Advisers are permitted to speak at meetings and to request advice to be recorded in Committee meeting minutes.

11.0 Declarations, Disclosure and Conflicts of Interest Procedure

- 11.1 Prior to each Committee meeting and initially prior to appointment to the Board, the Coast to Capital declaration of interests, disclosure and conflicts register must be completed, and updated regularly by all Members of the Committee. Members must keep the register updated as required by the Coast to Capital Conflicts of Interest Policy and this includes notification and registration of gifts and hospitality.

12.0 Transparency of Investment Committee decision making

- 12.1 Investment Committee meetings to cover LGF funded projects are held in private (Part B) due to the commercially sensitive/confidential nature of the Investments.

12.2 Decisions reached by this committee will be published in the public domain via the minutes with or without redaction.

12.3 Transport schemes coming forward for funding should be held in public (Part A of the Agenda) and commercially sensitive/confidential agenda items are held in private (Part B).

13.0 Review and Variation of Terms of Reference

13.1 These Terms of Reference may be varied only by agreement of the Board.

Annex J

Growing Places Fund Committee Terms of Reference

The Growing Places Committee (GPFC) is a formal Committee of the Coast to Capital Board. The Coast to Capital Board has delegated decision making to the Growing Places Committee as detailed in the Coast to Capital Assurance Framework. This includes awards of funding, recovery action, re-statement of loans and general management of the loan portfolio to a maximum level of £2 million.

1.0 Functions

1.1 The functions of the GPFC are:

- (v) To devise, steer, direct & implement the GPF activities of Coast to Capital LEP, as set out in the Strategic Economic Plan Gatwick 360, in the annual Business Plan & in the Local Industrial Strategy.
- (vi) To review and approve GPF proposals in line to GPF criteria.
- (vii) To drive and steer implementation of the GPF objectives in line with strategic objectives set out by the Coast to Capital Board.
- (viii) To ensure there is effective communication with & engagement of stakeholders, partners & the business sector.
- (ix) To ensure revenue is generated to be able to assist in the delivery of objectives of Coast to Capital by commercial opportunities of the GPF loan portfolio.

2.0 Reporting and Accountability

- 2.1 The GPFC is accountable to the Coast to Capital Board for delivery of the Board's investment interventions and progress against the targets and performance indicators, agreed with the Board and which are set out in the Annual Business Plan.
- 2.2 The GPFC should have due regard for the work & activities of other Committees of the Board to recognise there will be some cross over in objectives. If a decision spans a number of Committees then it should be presented to the Board for approval.

- 2.3 The Board will be asked to approve recommendations to funding awards over £2 million as per the Assurance Framework.

3.0 Membership

- 3.1 The standing membership will be a maximum of 8 Board members including at least one Local Authority Board Member. Unless Board Membership ceases for any of the reasons detailed in the Assurance Framework, the term of office on the Committee will be as per the term of office of their Board membership.
- 3.2 The S151 Officer or their delegate from the Accountable Body, and Coast to Capital Officers will provide advice to the GPFC.
- 3.3 Board members will be invited to join the Committee by the Growing Places Committee and their nomination will be approved by the Board
- 3.4 Where possible the Committee membership will reflect the diverse demographics of the Coast to Capital area.
- 3.5 The Committee may invite further people to attend meetings if a particular piece of expertise/advice is required and any such attendees may, depending on the nature of the expertise/advice, be subject to confidentiality requirements if necessary.

4.0 Chair and Deputy Chair of the GPFC

- 4.1 The Chair will be one of the Private Sector Board Members and shall be nominated by the Coast to Capital Board. The Deputy Chair is nominated and agreed by the Committee.

5.0 Voting

- 5.1 Decision making will be by consensus. Where it is not possible to achieve consensus by Committee will refer the decision to the Coast to Capital Board.
- 5.2 All award of funding decisions shall be made at a formal GPFC meeting and it shall be possible for Members to dial in to attend via conference call. Other decisions can be made in person at the GPFC meeting or by correspondence if a meeting cannot be arranged.
- 5.3 To ensure democratic accountability all decisions must involve a Local Authority Board Member of the Committee.

6.0 Substitution

6.1 Deputies are not permitted on the GPFC.

7.0 Quorum

7.1 The meeting of the Committee will only take place if it is quorate. The quorum comprises four members of the Committee. If the meeting is inquorate, the business/meeting should be postponed.

8.0 Time and Venue of Meetings

8.1 The GPFC will meet four times a year. Further meetings may be added at the Committee's discretion particularly if a required decision is time critical.

9.0 Declarations, Disclosure and Conflicts of Interest Procedure

9.1 Committee members will be expected to abide by Coast to Capital Code of Conduct and Conflicts of Interest Policy. This will include the requirement of all Committee Members to complete and keep up to date their register of interests as required by Coast to Capital. Members will be fully aware of this process through their participation of the Coast to Capital Board.

10.0 Transparency of Investment Committee decision making

10.1 GPFC meetings are held in private (Part B) due to the commercially sensitive/confidential nature of the Investments.

11.0 Review and Variation of Terms of Reference

11.1 These Terms of Reference may be varied only by agreement of the GPFC and with approval of the Coast to Capital Board.

Annex K

Coast to Capital Skills 360 Board Terms of Reference

Agreed in principle by the Skills 360 Board at their meeting in February 2019 – priorities to be confirmed.

Context

Coast to Capital's Strategic Economic Plan, Gatwick 360°, identifies the importance of skills to improving the productivity of our economy. Our area has one of the most highly skilled populations in the UK, with 44.6% of people holding a degree-level qualification. However, there are significant disparities between our towns and cities. We must address these if people across the area are to secure and maintain high quality jobs and earn an income that allows them to remain living within the area.

At the same time, our economy is evolving, shaped by new technology, the growth of new business sectors and an ageing population. Our area is typical of many, in needing to participate and invest in a strategy to change attitudes and approaches to skills development among employers, workers and parents.

Opportunity

Government's Industrial Strategy announced the introduction of Skills Advisory Panels, to be integrated into Local Enterprise Partnerships, to inform the analysis that feeds into Local Industrial Strategies. The Skills 360° Board has been established in line with the remit of a Skills Advisory Panel as set out by Government.

Being a member of the Skills 360° Board offers the opportunity to influence the way in which we create skills for the future in the Coast to Capital area. We are at a time of significant change in the UK as we move towards our exit of the European Union. This along with an ageing population and rapid advances in technology mean the skills debate is urgent and requires an innovative approach more so than ever before.

Your membership of the Skills 360 Board will involve you in policy and decision making at a regional level, helping to shape our negotiation of a Local Industrial Strategy with Government. You will support us to identify the major skills and recruitment challenges we currently face and to be a part of the solution. Your networks and influence will bring us the recognition and investment we need to deliver high quality skills education and training in the Coast to Capital area.

Purpose

Over the next 18 months, the Skills 360° Board will focus on building the evidence base and business cases which will inform Coast to Capital's development of its Local Industrial Strategy with Government.

Responsibilities

The Skills 360 Board will act as the Skills Advisory Panel for the Coast to Capital area, adhering to the full remit and responsibilities set out by Department for Education in the [Skills Advisory Panels – Guidance on the Role and Governance](#) document at Appendix 1.

In brief the responsibilities include:

- Providing a strong leadership role on skills in the local area, engaging with employers and providers and providing skills advice to the Coast to Capital Board.
- Developing a clear understanding of current and future local skills needs and local labour market as well as the present skills and employment support provision in the local area
- Building on this high quality analysis to develop a clear approach to addressing skills and employment challenges within the local area, including by looking ahead to likely skills priorities in the coming decade
- Understanding the wider dependencies in the local area and working together with other parts of the LEP
- Acting as co-ordinator of local skills providers fostering cooperation between providers in mix of provision, planning for how skills needs are met and planning for T-level implementation and delivery
- Working closely with careers advisory services (National Careers Service and Careers Enterprise Company) to ensure that potential learners are informed about potential career routes within a local area, and that all careers information and guidance is informed by up-to-date local labour market information
- Raising the profile of apprenticeships with local employers and providers.
- Advising where skills and labour market resource should be directed to support local employers and residents, using its understanding of existing employment support provision in the local area and the needs of the local labour market.
- Sharing analysis and best practice, as widely and transparently as possible, with central government and other Skills Advisory Panels to learn from each other and tackle wider skills challenges

The Skills 360° Board will provide regular progress reports to the Coast to Capital Board.

Membership

Board structure

The Coast to Capital Skills 360° Board will be formed of up to 15 members including the Chair. Two thirds of members will be drawn from local private sector businesses.

Members will be from organisations within the Coast to Capital LEP area and comprise of:

- The Skills Priority Lead from the Coast to Capital Board who will be the Chair
- Nine senior representatives from private/public business sector
- One senior representative from the Higher Education (HE) sector
- One senior representative from the Further Education (FE) college sector
- One senior representative from an Independent Training Provider
- One senior representative from a community and voluntary sector organisation
- The Coast to Capital Chief Executive or nominated member of the executive team

The Skills 360 Board will report into the Coast to Capital Board via the Skills 360° Board Chair.

See Appendix 2 for the Skills 360 Board Structure.

Board member recruitment

Recruitment of Skills 360° Board members will be through an open and transparent application process

Board member roles

The role of business sector members is to represent the views and interest of private businesses, as well as to support understanding of the skills needs of businesses and identify where investment is needed to create the skills for the future of the Coast to Capital area.

The role of the education sector members is to represent the views and interests of the further and higher education sector and to bring a comprehensive knowledge of the education policy and funding landscape.

The role of the community and voluntary sector member is to represent the views and interests of their clients and communities and to bring a comprehensive knowledge of the community and voluntary sector landscape.

Members of the Coast to Capital Skills 360° Board will be of sufficient seniority to make decisions on behalf of their organisations and to influence the actions and decisions of other organisations and senior government officials.

Members of the Coast to Capital Skills 360° Board will:

- Make impartial decisions that progress the priorities within the Strategic Economic Plan leading to the agreement of a Local Industrial Strategy for the Coast to Capital area
- Promote the work and priorities of the Coast to Capital Skills 360° Board within their organisations, communities and partnerships
- Be the main link between Coast to Capital Skills 360° Board and those that they represent

The Coast to Capital Skills 360° Board Chair will:

- Chair the Coast to Capital Skills 360° Board meetings, and provide the casting vote where necessary.
- Ensure that all representatives have a fair and equal opportunity to contribute to debate without censor.
- Report on the progress of the Skills 360° Board to the Coast to Capital Board.
- Act as the key spokesperson for the Coast to Capital Skills 360° Board, where necessary.
- Make sure that conflicts of interest are properly managed or avoided.

Relevant local members of government organisations such as Education and Skills Funding Agency and Local Growth Unit will be invited to attend meetings as observers.

Other experts may be invited to present and to report on specific agenda items on an ad hoc basis.

Tenure

The remit, role and membership of the Skills 360° Board will be reviewed after two years as we move from negotiation to delivery of the Coast to Capital Local Industrial Strategy.

Board attendance

Members are expected to attend all meetings. In exceptional circumstances, with the written consent of the Chair, members may send a previously nominated substitute. Requests to send substitutes should be made to the Secretariat at least three days before the meeting.

Secretariat

The Secretariat for Coast to Capital Skills 360° Board will be provided by Coast to Capital LEP. Its main responsibilities will be to:

- Organise Skills 360° Board meetings, agreeing dates and venues, and providing agendas and background papers a week in advance

- Produce the minutes of meetings and ensure that these are circulated to Coast to Capital Skills 360° Board members
- Convene and facilitate Expert Groups and support the implementation and delivery of other actions, in accordance with decisions made by Coast to Capital Skills 360° Board
- Liaise with the Coast to Capital Skills 360° Board Chair and members on other matters as required

Meeting frequency and decision-making

The Coast to Capital Skills 360° Board will meet quarterly during the development of the Local Industrial Strategy. Meeting frequency will be reviewed after 18 months.

Half of the members of Coast to Capital Skills 360° Board will constitute a quorum. Decisions will be made by a majority of the number of members present and voting at meetings. In the event of a drawn vote, the Chair will make the casting vote.

Where decisions are required outside meetings, these can be made via written procedure (email) with the agreement of the Chair, co-ordinated by the Secretariat (Coast to Capital LEP). Five working days will be allowed for a response; a nil response will be taken as an abstention.

Conflict of Interest

The Coast to Capital Skills 360° Board will often be involved with commenting on or advising on investment decisions and/or significant policy recommendations.

A Register of Interests shall be held by the Coast to Capital Skills 360° Board Secretariat. All members are required to complete a Declaration of Interest form, recording details of any relationship or other financial or personal interest which might conflict with their duties to Skills 360° Board. Copies of all declarations are retained by the Secretariat of Skills 360° Board.

If any members, through personal interests, employment, relatives or close personal friendship, have any interest at all, these should be declared through the Chair at the beginning of each meeting and this will be recorded in the minutes.

Equality and Diversity

Coast to Capital is committed to achieving diversity and equality of opportunity. Members of the Coast to Capital Skills 360° Board are required to adhere to the Coast to Capital Equality & Diversity Policy and to maintain high standards in the way they undertake their duties. All members are de-facto representatives of Coast to Capital LEP, and therefore their actions impact on the way in which the Coast to Capital LEP is viewed by the public.

Transparency

Meetings are not public meetings but will endeavour to operate in an open and transparent manner at all times.

Approved minutes and other relevant documents such as Term of Reference and Board membership shall be made publically available via the Coast to Capital LEP website in line with the agreed process and timescales for the publication of agendas, papers and minutes.

Annex L

Coast to Capital Business Services Committee Terms of Reference

1. Status

- 1.1. The Business Services Committee is a management group that is appointed by and reports to the Coast to Capital Chief Executive. The Business Services Committee has delegated authority and accountability as set out in these terms of reference.

2. Purpose

- 2.1. The Business Services Committee has a focus on the successful and efficient delivery of services to businesses delivered by Coast to Capital. Its purpose is to ensure the successful implementation and day to day management of the service portfolio. It involves clients from different parts of Government to meet our aspiration of being the best in class in delivery of these services.

3. Objectives

- 3.1. The Business Services Board shall:
 - 3.1.1. Monitor the service portfolio
 - 3.1.2. Ensure that all terms and conditions attached to the funding streams are adhered to
 - 3.1.3. Recommend strategic priorities related to the delivery of services
 - 3.1.4. Approve any changes to service project delivery and priorities
 - 3.1.5. Review service project delivery on a quarterly basis against spend, outputs and risks and review any issues and recommend any remedial action.
 - 3.1.6. Carry out appropriate arrangements to ensure that full information of the Business Services is made available to the Chief Executive and executive committee.
 - 3.1.7. Identify other service delivery opportunities that can attract funding from a variety of sources.
 - 3.1.8. Regularly review its operation and ensure it remains fit for purpose.

4. Accountability

- 4.1. The Business Services Committee is accountable to the Coast to Capital Executive Committee for the delivery of the service portfolio and for progress against the targets in which Coast to capital has committed to delivering.

5. Membership

- 5.1. The standing membership will be a maximum of 12 people. Initial membership is as follows:
- Coast to Capital Chief Executive
 - Coast to Capital Head of Services
 - Coast to Capital Growth Hub Manager
 - Coast to Capital Growth Manager
 - Coast to Capital Senior Enterprise Coordinator
 - BEIS Assistant Director, Local Business Support (Growth Hubs) Policy and Delivery
- 5.2. The Committee will co-opt specialists or local partners when additional expertise is required to inform discussions or support decision making. This will be determined by the agenda and agreed in advance. Those co-opted will not have any role in decision making.

6. Chair of the Business Services Committee

- 6.1. The Chair of the Business Services Committee is the Coast to Capital Chief Executive. If for any reason the Chair cannot be present at a meeting, another Business Services Committee member will act as Chair for the meeting.

7. Substitution

- 7.1. Where a representative of a member of the Business Services Committee is unable to attend a Business Services Committee meeting, a substitute representative of that member (if approved by it) may attend, speak and vote, in their place for that meeting.
- 7.2. A suitably senior substitute member must be appointed from a list of approved substitutes submitted by the respective member to the Business Services Committee at the start of each calendar year.

8. Quorum

- 8.1. No business shall be transacted at any meeting of the Business Services Committee unless at least 4 of the members are present.

9. Time and Venue of Meetings

- 9.1. The Business Services Committee will meet five times a year in advance of the Board meetings.
- 9.2. The Chair of the Business Services Committee may call a special meeting of the Business Services Committee at any time, subject to providing members with minimum notice of ten working days.

10. Administrative and legal support

- 10.1. Administrative support to the Business Services Committee shall be provided by the Coast to Capital LEP.

11. Review and Variation of Terms of Reference

- 11.1. The Business Services Committee shall keep these Terms of Reference under review.
- 11.2. These Terms of Reference may be varied only by complete agreement of all the members of the Business Services Committee and in consultation with the Chief Executive.

12. Withdrawal

- 12.1. Any member of the Business Services Committee may give 1 months' notice in writing of intention to withdraw from membership of the Business Services Committee.

Annex M

Coast to Capital Growth Grant Programme 2019-2020 Growth Grant Appraisal Panel (GGAP) Terms of Reference

Coast to Capital has set up a Growth Grant Appraisal Panel (GGAP) to review grant applications from companies that have passed a pre-qualification stage and make recommendations as to whether the grants should be awarded.

GGAP members are drawn from Coast to Capital, the private sector (particularly those with financial expertise), professional membership organisations and supporting Universities. Coast to Capital will manage the GGAP recruitment process, ensuring the panel contains an appropriate spread of competence and experience.

Scope

This document sets out the Terms of Reference for the GGAP established to make investment recommendations.

Introduction

The Coast to Capital Growth Grant Programme 2019-2020 is a grant fund run by Coast to Capital. The funding for the Grant Programme, which comes from Central Government, is part of the Coast to Capital LEP area Local Growth Fund (LGF).

The main aim of the Programme is to provide capital grants to part-fund projects undertaken by innovative, high growth, Small and Medium Enterprises (SMEs) and Social Enterprises in the Coast to Capital area. The geographic area includes the local authority areas of:

Adur & Worthing Borough	Horsham District
Arun District	Lewes District
Brighton & Hove	Mid Sussex District
Chichester District	Mole Valley District
Crawley District	Reigate & Banstead Borough
Croydon	Tandridge District
Epsom and Ewell Borough	

Grants of between £40,000 and £170,000 (subject to *de minimis*) towards capital expenditure (capex) project costs will be available to eligible businesses.

Although applications from all sectors will be considered, the programme is keen to target the key sectors in the area.

These include (but are not limited to):

- Manufacturing & Engineering
- Software Development
- Food Production
- Business Services
- Horticulture

The aim of the Coast to Capital LEP Area Growth Grant Programme is to:

- Provide funding to high growth SMEs towards capex costs supporting a business's growth, innovation or productivity plans.

And supporting this, it has the following objectives:

- To attract high quality proposals from businesses in terms of deliverability and impact.
- To increase the number of SMEs employing highly qualified workers to boost productivity and growth.
- To prevent blockages in the path from innovation to commercialisation.
- Where possible to identify and support those businesses that not only have demonstrable high growth potential, but also align with LEP sector prioritisation plans.
- To create an environment for businesses where new high quality jobs and safeguard existing jobs will be created in the future.

Role of the GGAP

The role of the GGAP is to review proposals for grant investment, making recommendations as to whether the proposal should be funded.

Membership of the GGAP

Each GGAP will be formed from at least four and up to six panel members drawn from a pool of agreed individuals.

The Chair will comprise of one of the following:

- Tim Wates, Wates Construction (Coast to Capital Board Chair)
- Julie Kapsalis, Chichester Colleges Group (Coast to Capital Board Vice Chair)
- Jonathan Sharrock, Coast to Capital (CEO & Coast to Capital Board Member)

The remaining panel members will comprise of at least four of the following:

- Steve Meynell, RBS
- Richard Spofforth, Spofforths Chartered Accountants
- Geoff Wightwick, Baker Tilly
- Andrew Steer, HSBC
- Peter Lane, Sussex Innovation Centre
- Daren Rose, Lloyds Bank
- Caroline Wood, Coastal West Sussex Partnership
- Gemma Warrenne, Metro Bank
- Michele Augoustini, Institute of Directors (Sussex)
- Louise Perkins, Natwest
- Zoe Rudling, RSM UK
- Rebecca Hill, HHC

For each panel of four to six members, at least three will be from the private sector.

Terms of Reference for the GGAP

The GGAP will comprise between four and six members drawn from a pool of volunteers from public and private sectors. At least four members must be present for the GGAP to be quorate. Investment recommendations will be based on scoring against the criteria set out in the 'Scoring Methodology' manual by each individual member of the panel, then discussed with fellow panel members if appropriate and then creating an average score for the whole panel. Those that meet the minimum threshold will be approved. The approval may be subject to agreed conditions.

Each GGAP will be attended by additional observers from Coast to Capital's Investments Team and the Accountable Body.

No liability will attach to the GGAP, either collectively or individually, for their recommendations made in good faith.

The Growth Grant Management Team will act as secretariat and will attend GGAP meetings and minute the full proceedings. Additional panel dates may be added depending on the volume of applications we receive. Redacted minutes will be published on the Coast to Capital website when agreed by the Chair.

Conflicts of Interest and General Code of Conduct

In order to ensure all decisions are made in an impartial and objective manner, the following conflict of interest procedure and general code of conduct will be followed.

- *Conflicts of Interest* should be a standing agenda item for all GGAP meetings and any other such meetings of *ad hoc* groupings where decisions, material to the progress, process and investments arising from the Coast to Capital Growth Grant Programme are made;
- Where members may have conflicts of interest they should first declare this, and second and if agreed to represent a conflict of interest by *any one member* of the GGAP, withdraw from the discussion about any decision related to that conflict.

Any member with a direct interest¹ in an individual proposal under consideration will not be permitted to score any recommendations relating to that proposal *and*, will not take part in any discussions contributing to the decision-making process. They will be asked to sit out of the entire panel in which the individual proposal is to be discussed.

¹ Interests might be financial (eg, they might be a shareholder in the subject SME) or non-financial (eg, the member may have family or close friends in the subject SME).

Annex N

EU Structural and Investment Funds (ESIF) Committee

- 1.0 The Coast to Capital ESIF Committee supervises the development and administration of the LEP's European Structural and Investment Funding Programme ("ESIF"). It is a local sub-committee of the national Growth Programme Board for ESIF. The ESIF Committee is not a sub-group of the LEP Board, however its geographical coverage is contiguous with that of Coast to Capital.
- 2.0 The ESIF committee will undertake a range of functions around the ESIF programme but is not a decision-making body, rather it will provide recommendations on strategic fit and value for money to the Managing Authorities for ESIF. The LEP has responsibility for recruitment to the ESIF committee.
- 3.0 The membership of the ESIF committee is subject to European regulations and includes a wide range of representation from across the public, private and not-for-profit sectors. The LEP supports the appointment of a Chair for the ESIF committee from amongst its network of partners. Other members have been appointed through nomination by their sector.
- 4.0 The membership of the ESIF committee comprises representatives from the following sectors:
- Coast to Capital
 - Local authorities
 - Private sector
 - Not-for-profit sector
 - Environmental
 - Trade unions
 - Higher education
 - Further education
 - Wider education and skills sectors
 - Rural
 - Equality and diversity; and
 - ESIF Managing Authorities for European Structural Fund (ESF), European Regional Development Fund (ERDF) and European Agricultural Fund for Regional Development (EAFRD)

Annex O

Executive Committee Terms of Reference

1.0 The Executive Committee takes responsibility for all actions carried out by the Executive team of Coast to Capital. It addresses the delivery of the business plan, as well as operational day to day management of the LEP and is the forum where cross cutting areas such as human resources, communications, finance, commercial and office management issues are discussed.

This is an executive management committee and is not held in the public domain. Any Board member has the right to access the minutes of Executive Committee.

Responsibilities include:

- 1.1 Oversight and delivery of the annual business plan.
- 1.2 Corporate and staff management and appraisal.
- 1.3 Execution of Board set strategy.
- 1.4 Oversight and management of the operational budget.
- 1.5 Marketing and communications.
- 1.6 Delivery of the Strategic Economic Plan.
- 1.7 Corporate risk management together with pillar risk management.
- 1.8 Cross cutting working.

2.0 Executive Committee Membership:

- Chief Executive
- Chief Operating Officer
- Head of Communications & Corporate Affairs
- Head of Finance
- Head of Strategy & Policy
- Head of Services
- Commercial Manager
- Office Manager
- and any other LEP staff member as invited by the Chief Executive

3.0 Term of office

3.1 The term of office of members of the Executive Committee is contiguous with their individual employment term of office with the LEP.

4.0 Frequency of meetings

4.1 The Executive Committee meets monthly.

5.0 Quorum

5.1 No business shall be transacted at any meeting of the Executive Committee unless at least four of the members are present.

6.0 Transparency of decision making

- 5.1 Board members have full access to the minutes of Executive Committee meeting minutes.

Annex P

The Transport Assurance Framework

- 1.0** This annex sets out the Coast to Capital approach for the assessment and administration of transport projects under the Local Growth Fund in line with the detailed framework prescribed by the Department for Transport and the National Assurance Framework 2019.
- 2.0** The Investment Committee shall discharge the duties as required by the Department for Transport for making decisions or recommendations to the Board on the distribution of funding for Transport Schemes. This section of the LEP Assurance Framework details the Transport Assurance Framework that the LEP will operate through this Committee.

3.0 Transparency of decision making

Publication of meeting papers and agendas in relation to Transport and Resilience schemes coming forward for funding shall take place in accordance with Section 3 and the time frames in section 1.5 of the Assurance Framework. For the purposes of Transport Schemes, the publication of meeting papers will include the publication of business cases to publicise these and to allow for external comment prior to a decisions being taken as to whether or not to approve funding.

All funding applications and business cases, approved by the Investment Committee or Board along with any recommendations will be published on the Coast to Capital website.

Members of the public can comment on funding applications before the Investment Committee conducts its evaluation of bids. Opinions expressed by the public and stakeholders shall be available to decision makers when decisions are taken. The minutes of the Investment Committee will record the consideration of public comments taken by the Committee.

Coast to Capital will respond to all requests for information in regard to transport and resilience schemes in line with our Freedom of Information policy described in the Assurance Framework.

- 4.0** The Investment Committee or Board will be advised by an expert Transport Advisor on transport and resilience funding applications, to include Value for Money assessment.

The LEP will ensure that the Highways Agency and Network Rail are fully sighted on any strategic road or rail schemes that are to be considered for funding so that their views on deliverability and impact on the wider network can be considered and taken into account in the initial prioritisation exercise. In cases where schemes have any impact on train services, the Train Operating Company and DfT (rail) will also be consulted.

5.0 Transport Scheme Eligibility

Only well-defined and thoroughly researched schemes with a minimum of 15% match funding from the scheme applicant will be considered for funding. Letters of support from the geographic local authorities in which the scheme will be delivered are mandatory.

6.0 Before any scheme is comes forward to the Investment Committee or Board, an independent scheme assessment will be received from an Independent Transport Advisor along with recommendations.

Funding applications will all be considered by the Investment Committee, who have delegated authority to make decisions up to £2million. For applications over £2million, the Investment Committee will make recommendations to the Board for final approval within the consent paper.

Upon approval the Investments team will issue a funding agreement, which will contain a range of legal conditions that must be satisfied by delivery bodies in order to draw funding down.

Individual scheme business cases submitted by delivery bodies will be checked for compliance against the requirements of the DfT Business Case guidance as detailed more fully below.

7.0 Specific Transport Business Case Requirements

Major transport projects will be required to submit Business cases in accordance with the guidance published in WebTAG. Central case assessments must be based on forecasts which are consistent with the definitive version of NTEM which is the DfT's planning data set. This National Assurance Framework requirement shall not preclude Coast to Capital from considering alternative planning assumptions as sensitivity tests and considering the results of these in coming to a decision about whether to approve a scheme. For schemes with low costs (below £5million) it is expected that a more proportionate approach will be taken.

Scheme promoters are encouraged to consult with an independent Transport Advisor that can be recommended by the LEP prior to submitting scheme applications. The independent transport advisor will assess the modelling and appraisal of schemes to ensure it has been developed in accordance with the WebTAG and DfT advice on assessing Value for Money (VfM)

The appraisal and modelling will be scrutinised by an Independent Transport Advisor commissioned by Coast to Capital to ensure it has been developed in accordance with the WebTAG. This will be undertaken independent of the management unit or authority promoting the scheme.

All business cases should contain a value for money statement in line with published DfT WebTAG guidance, and schemes will have an individual value for money assessment in accordance with DfT advice on assessing VfM, by the Coast to Capital's Independent Transport Advisor. This information will be presented for consideration by Coast to Capital at each approval stage as required by the National Assurance Framework. The VfM assessment shall be signed off as true and accurate by the Independent Transport Advisor commissioned by Coast to Capital. The Independent Transport advisor that is commissioned by Coast to Capital will also provide an assessment for consideration by Coast to Capital to enable a determination as to whether the scheme is fit for purpose in terms of modelling and social and distributional impacts. Coast to Capital's Independent Transport Advisor will be different from any Transport Advisor used by scheme promoters.

Only schemes that offer 'high' or 'very high' value for money as assessed using DfT guidance will be recommended for funding support.

8.0 Release of funding, approval conditions, evaluation and monitoring of outcomes

Funding contributions for transport schemes are capped at the award level with funding agreements specifying that the delivery body is contractually responsible for making up any shortfall in funding and contractually obliged to discharge the scheme fully in line with the committed outputs.

Each funding agreement will have a range of standard and scheme specific conditions. The agreement will be signed as a deed, therefore signalling full acceptance of the conditions by the promoting authority including their Section 151 Officer.

Evaluation and monitoring requirements for transport and resilience schemes will be set as per the funding agreements and specified by the LEP Investments Team. This will include a condition for an agreed evaluation plan.

The drawdown of funding on each scheme is through the submission of quarterly funding returns. Funding will only be paid in arrears subject to evidenced expenditure and match funding contributions from the delivery body. Quarterly funding claims must complete the form as provided by Coast to Capital from time to time which will further guidance about funding release. Funding release occurs only upon the LEP making recommendations to the accountable body to release payments.

The LEP monitoring processes will require regular provision of project delivery and financial information in addition to quarterly financial returns. This approach will also involve the conducting of projects audits by LEP trained gateway reviewers at key delivery stages.

Transport projects are evaluated and monitored under the processes set out in Annex P.

Annex Q

How funding decisions are made and how we monitor project

1.0 We have a bespoke decision making process for all Investment activity included within our governance structures. This includes how investment decisions are monitored until project completion. The following sections explore these in turn:

2.0 Local Growth Fund

2.1 Decision Making Process

LGF grants can be of any value and are awarded from within the Growth Deal funding pot that Coast to Capital distributes on behalf of Government.

Application criteria will align with the Gatwick 360 SEP, and the Investment Committee have the Authority to made decisions on eligibility for grants, criteria and guidance.

We publish our **targeting commission calls** and any funding opportunities on our website, and we also notify our partners and stakeholders too.

All documentation and guidance for applicants is published on the [website](#), together with the necessary templates to be completed. Frequently asked questions (FAQ's) are published anonymously on the website to provide further information that may not necessarily be covered in the standard guidance.

Funding applications are time limited and bids received after the closure date and time will not be accepted. Where this occurs applicants will be advised accordingly.

In terms of **application validation**, these are initially checked against guidance as published on the website for completeness and compliance by the Investment team, and Investments Auditor. Any non-compliant applications will be rejected and not considered as part of the round in question. Applicants will be notified by letter of non-compliant applications. The initial compliance check also includes a review by our Accountable Body in relation to the funding and state aid checks to ensure that if the application was funded, the grant would comply with state aid legislation. If the application would not be compliant, it will be rejected and the applicant notified by letter accordingly.

With regard to **application evaluation**, applications will be initially reviewed by the Investment Committee and expert parties if required. Each member of the Investment Committee will be sent all applications subject to no declarations of interest, and will evaluate and score each application against a set of criteria which would have been published on the website. The applications will be checked against the members' Declaration of Interest form by the Investment team to identify conflicts. The position in relation to conflicted members is approved by the Chief Operation Officer before sending.

A formal meeting of the Investment Committee will then take place, and the first agenda item is to run through declarations, disclosure and conflicts. Following this, committee members will have the opportunity to listen to presentations given by each applicant in relation to their business case submission. Upon hearing detail around each application, committee members are able to re-evaluate and amend their scores against the published criteria. There will be no formal discussion of individual scores, and members must submit scores to the Investment Team at the close of the meeting. The Accountable Body attend each Investment Committee meeting and therefore are fully aware of all decisions made / recommended in their presence. All decisions can only be made at quorate meetings.

The Investment Committee will make decisions on merit having taken into account all of the relevant information available at the time of evaluation.

Depending on the commissioning call, The Investment Committee may request that applications are formally sent to our area partnerships to ensure support is given. Where specialist knowledge is needed to enable the Investment Committee to successfully evaluate applications, Coast to Capital can call in experts to help advise committee members.

As detailed in Annex O, any transport applications coming forward for funding, will be reviewed in public (Part A), and there will be the opportunity for members of the public to submit comments in relation to these applications in advance of the meeting.

The Investment Team then compile the average score for each application based on the total of all members scores, divided by the number of score sheets.

The highest scores will determine the priority for funding, and the Investment Committee will determine the awards to ensure they fit within the available funding envelope. The Committee will also decide whether a recommendation for full or part funding of applications is made.

Funding awards and recommendations shall be reported to the LEP Board through a single consent paper presented at each Board meeting. This will include a summary of the relevant information, with the relevant documents and information to support decisions and recommendations made available to Board members in advance of the meeting via the Board Portal to include but not limited to;

- The application made for funding or business case
- An appraisal of the application
- A view by a legal expert if required (from our Accountable Body)
- A recommendation from the Investment Committee as to whether to fund the proposal (within consent paper)
- A recommendation about conditions deemed necessary which should be attached to the proposal (within consent paper).

The Board will be asked to note decisions made by the Investment Committee on funding awards up to £2million, and to approve recommendations to funding awards over £2million.

Board members have the opportunity to raise questions against any of the items included within the consent paper, but the Board cannot overturn decisions made by the Investment Committee and can only ask for their re-consideration. Questions must formally be raised to the Chair of the Investment Committee (copied to the COO) no later than 5 working days in advance of the next Board meeting. Where comments are raised, the Board will formally discuss that particular item in the paper at the Board meeting.

The Investment Committee is also responsible for deciding / recommending the terms and conditions attached to the funding in accordance with the above, together with the magnitude of funding.

Funding decisions and/or recommendations taken by the Investment Committee are formally noted within the meeting minutes, and distributed to all Investment Committee members for approval, prior to being published on our website. The Accountable Body also receives the minutes at this stage.

2.2 Value for Money

The selection of projects to ensure best value for money is derived from the required discounted cash flow and options appraisal analysis contained within the application criteria. With regard to challenge, the Investment Committee will be provided with suitable advice on specific economic analysis and financial appraisal expertise as required to allow challenge on value for money aspects. Selection of projects is through scoring and value for money is a key weighted scoring criteria. In addition the accountable body finance team is commissioned to undertake a detailed appraisal of the financial and value for money aspects of each business case with regard to the requirements of Treasury Green Book appraisal and Annex D of the National Local Growth Assurance Framework for future bidding rounds.

2.3 Monitoring Process

General Project Monitoring

Local Growth Fund projects are monitored using a suite of tools developed from the Local Partnerships Internal Assurance toolkit. Coast to Capital is now a fully accredited and trained operator of this toolkit, able to conduct various levels of project assurance review. All Local Growth Fund projects within the Coast to Capital portfolio will receive a number of reviews during their delivery lifecycle, and details of the various types of project review (drawn from the toolkit) are listed below.

Initial Project Review	On allocating funding to new projects, and when a funding agreement has been approved, an Initial Project Review will take place. This will allow Coast to Capital to gain insight into the project delivery plan prior to commencement on site.	Undertaken on new projects awarded funding in receipt of funding agreement
Level 1 Project Review	Every project within the Local Growth Fund portfolio will have a Level 1 Project Review throughout the duration of its lifecycle. This is equivalent to the Local Partnerships 'Swift Sure Review' and will highlight whether the scope of the project has changed, current project progress, any risks, delays or challenges, and an overview of financials/ project budget, including a detailed risk assessment. Coast to Capital will incorporate site visits with this review in order to help monitor key outputs as promised within the funding agreement. The review would usually take up to Half a Day on site with the delivery body.	Undertaken on all live projects once a year, or more frequent if required. Level 1 Report will be signed off by the Growth Deal Programme and Risk Manager, and information will feed into RAG assessment that will be signed off at the Investment Committee.
Level 2 Project Review	Projects that flag up areas of concern as a result of the Level 1 Review determining a project risk rating of RED or RED/AMBER, will undergo a Level 2 Project Review. This will be a more in depth review of the project, to get a clearer understanding of the area's which are seen as higher risk. This Review will lead to recommendations being made to the Delivery Body to attempt to get the project back on track, and prevent it from needing a further Deep Dive Review. Coast to Capital may ask Local Partnerships to assist with this type of review, along with a member of the Investment team. This review would take between half a day to a full day.	Undertaken on projects that have had a Level 1 review but more information is required to validate risk rating. Level 2 Report will be signed off by the COO, and information will feed into RAG assessment that will be signed off at the Investment Committee.
Level 3 Project Review	If the Level 2 project review is unable to resolve or get an in-depth understanding around the risk areas, then a further Level 3 Project Review will be undertaken. This will be similar to a full Gateway Audit, and Coast to Capital would ask Local Partnerships to	Undertaken after Level 1 & 2 reviews, where in depth validation of information is required to accurately assess risk rating, or undertaken if circumstances arise to warrant urgent

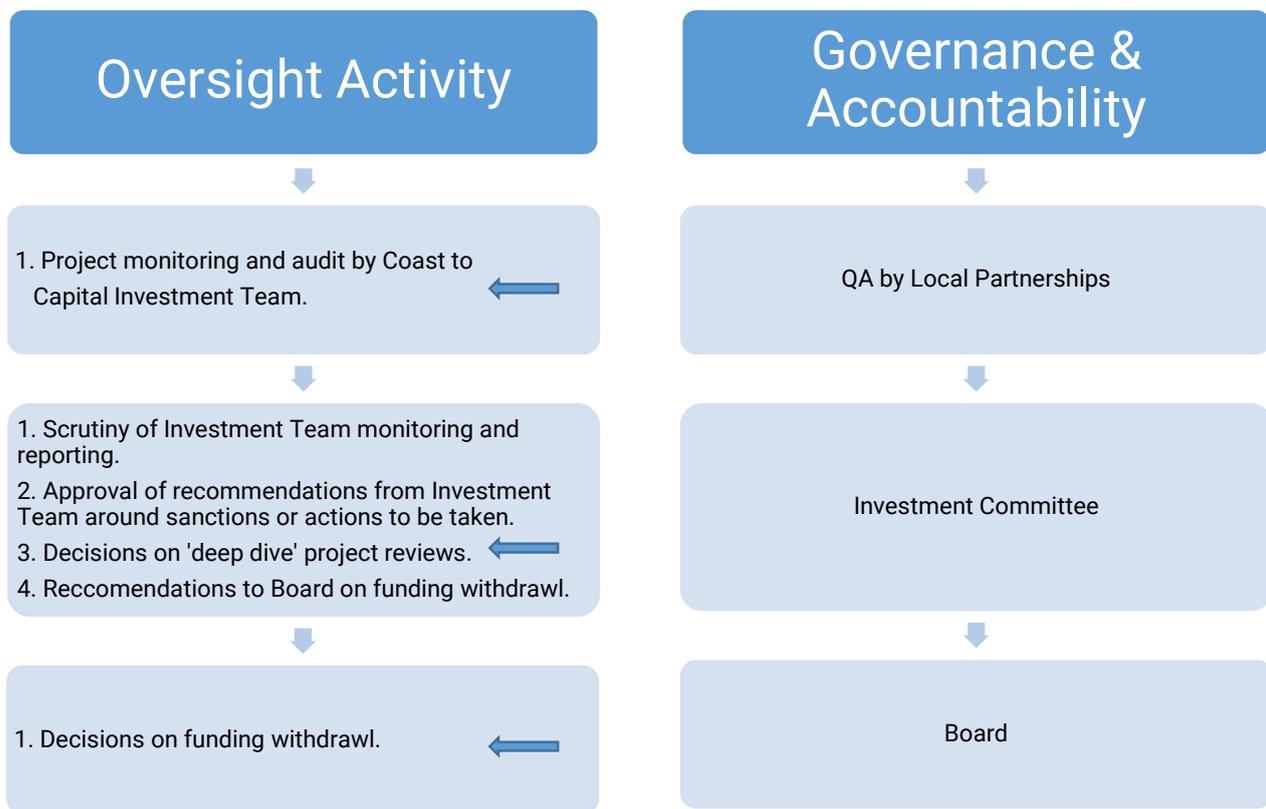
	independently lead on this review. Such a review would normally take between 2-3 days, and would involve a series of meetings/interviews with key stakeholders from the Delivery Body who has involvement in the Project. Level 3 Project Reviews will be commissioned by agreement of the Coast to Capital CEO or Investment Committee.	detailed review. Undertaken by order of CEO or Investment Committee. Information will feed into RAG assessment and recommendation that would be signed off by the Investment Committee.
Closure Project Review	On Project completion, Coast to Capital will undergo one final project review, to ensure that the scope of the project as per the original Business Case and Funding agreement has been fully delivered. This will include checking outputs and ensuring that LGF and Match funding have been fully reported. If all areas have been satisfied, the project will be reported to MHCLG as completed.	Undertaken on all projects at their completion by Investment Team

Project Oversight Governance

Once a project has been awarded funding and a funding agreement has been signed, the project then moves into the delivery and monitoring phase. The Coast to Capital Investment Committee has the executive responsibility for overseeing project delivery including; considering project and programme status, monitoring and project risk assessment. It will also establish deep dive working groups if necessary and decide any sanctions to be applied (see below).

The Board receive recommendations from the Investment Committee through the consent paper around High Risk Projects that require their funding to be withdrawn and make decisions on this sanction.

The diagram below shows the process by which project oversight activity is developed and the respective governance and oversight structure for this:



Project Management Risk Assessment Reporting & Scrutiny

The project risk assessment process follows the RAG rating guidance for LEPs that was distributed by MHCLG. The Investment Committee scrutinises and validates risk ratings and reviews project progress, before approving recommendations on actions to be taken.

Projects Dashboard

A project dashboard is produced and updated quarterly for the Board which provides overall programme oversight in a simple visual representation of progress across all projects regardless of risk rating. This is based upon a number of data feeds:

1. Routine quarterly delivery body data returns and claim forms.
2. Results of routine project monitoring exercises and Level 1 & 2 reviews by the Coast to Capital team.
3. New information on project progress or delivery becoming available.
4. Project data sheets.

High Risk Projects Reporting

High risk projects are reported to the Investment Committee through the High Risk Projects Report, including details of the basis for risk assessment calculation. High risk projects are so deemed if their aggregate risk rating is either RED or RED/AMBER, as determined through the use of the MHCLG risk assessment system.

When a project reaches this status the Investment Committee will be invited to formally agree actions and recommendations. The Committee can take a range of actions in such situations:

Either:

1. Decide that project can proceed under close monitoring.
2. Agree a 'watch and wait' period based upon suitable delivery body assurances.
3. Write to Government requesting an extension of time for draw down of funding and then choose either action 1, 2 or 4.
4. Recommend to the Board to withdraw and re-allocate funding to other SEP priority projects.

In relation to action four above, the Chair of the Investment Committee will notify the Chair and all Board members in writing when a project reaches this stage, seeking Board approval to proceed. Board members will have fourteen days to scrutinise the evidence which has been gathered by Investment Committee to support this recommendation. Consent will be sought from Board members in writing prior to proceeding to implement this decision.

Before deciding to take any of the above actions the Investment Committee will gain sufficient evidence to be able to confidently answer three 'key' lines of enquiry (KLOEs) questions, which are detailed within the decision making protocol below. In order to answer these questions the Investment Committee may choose to:

- 1 Decide that it has sufficient information to answer the KLOEs and take a decision.
- 2 Commission a 'deep dive' working group to report back.

The results of (2) above would then be reported back to the Investment Committee to allow one of the four actions listed earlier to be agreed.

The Coast to Capital Investment team will always work with delivery bodies to assist them to reduce project risks and to continue to support approved schemes, through providing any assistance. However, where such assistance cannot be confirmed, Coast to Capital has a duty to deliver value for money, approved outputs and overall programme expenditure in accordance with its commitment to Government.

Where projects are at risk of undermining this duty, Coast to Capital's risk assessment ratings will trigger the Investment Committee to examine what steps can be taken to assist delivery bodies to bring projects back on track. However, in the event that this cannot be achieved and the Investment Committee determines that the 'key' lines of enquiry below cannot be satisfied, it will recommend to the Board withdrawal of funding from projects and re-allocate it in accordance with the latest Strategic Economic Plan priorities.

'Deep dive' working groups will specifically focus on what assistance Coast to Capital can give to reduce project risk ratings and this may include recommendations that the Investment Committee write formally to Government to request specific dispensations to allow projects to continue. Where such assistance cannot be confirmed and all options have been exhausted to remediate the 'key' lines of enquiry detailed below, the Investment Committee may recommend to the Board to withdraw funding on projects. The decision making protocol below outlines the steps that the Coast to Capital will follow when projects are risk rated RED or RED/AMBER.

Prior to any decision to recommend withdrawal of funding on a project, the delivery body concerned will be invited to make representation to the Investment Committee.

In relation to funding withdrawal, the Board has the ultimate authority to take any decision that it wishes in relation to high risk projects.

**High Risk, Local Growth Fund Projects, Decision Making Protocol –
Applies to all Projects with or without Business Cases.**

Investment Committee undertakes initial review of RED and RED/AMBER rated projects based upon the quarterly Local Growth Fund High Risk projects report with accompanying detail.
Investment Committee then follows the below listed 'key' lines of enquiry.



The Investment Committee may choose to establish a specific 'deep dive' project working group to enable it to be informed sufficiently to make a decision, if it feels that it does not initially have sufficient information to answer the 'key' lines of enquiry detailed below.

INVESTMENT COMMITTEE or 'DEEP DIVE' REVIEW GROUP ESTABLISHES ANSWERS TO THE FOLLOWING 'KEY' LINES OF ENQUIRY AS RELEVANT:

KLOE. QUESTION 1 (For Approved Projects without Business Cases):

Will, in the view of the Investment Committee or 'deep dive' review group, the Business Case for the project be forthcoming for approval, allowing sufficient subsequent time for the project to draw down funding before March 2021 ?

YES – Investment Committee decides project can proceed under close monitoring with suitable delivery body assurances. Investment Committee may choose to 'watch & wait' with further report back.

No – Investment Committee recommends to the Board to withdraw and re-allocate funding to other projects in accordance with SEP priorities.

NB. Prior to taking the above decision, the Investment Committee may choose to write to Government requesting carry forward of funding beyond 2021. If Government agree this, funding will not be withdrawn and the project will be closely monitored and continue. If Government do not agree – funding will be withdrawn.

KLOE. QUESTION 2:

Are the project outputs and/or value for money expected to be materially different in a negative direction from those stated within the original Strategic Economic Plan, Business Case or funding application?

No – Investment Committee decides project can proceed under close monitoring with suitable delivery body assurances. Investment Committee may choose to 'watch & wait' with further report back.

Yes – Investment Committee recommends to the Board to withdraw and re-allocate funding to other projects in accordance with SEP priorities.

KLOE. QUESTION 3:

Is the project expenditure draw down profile deemed to be highly likely to drift into the next spending period even if flexibility funding has been provided?

Yes – Specific dispensation from Government will be sought and if this cannot be obtained and remediation applied to draw down funding, the Investment Committee will recommend to the Board to withdraw funding or part funding.

No – Investment Committee decides project can proceed under close monitoring with suitable delivery body assurances. Investment Committee may choose to 'watch & wait' with further report back.

If at any stage the Investment Committee are unable to agree a conclusion on any of the above KLOEs they will defer decision making to a forthcoming meeting.

2.4 Local Growth Fund Audit Process

Purpose

An Audit Review will complement Coast to Capital's monitoring procedures and will provide independent and objective assurance of how Delivery Bodies are adhering to clauses laid out in their Funding Agreement, and that draw-down of Local Growth Funding will be met within the LEP's required timescales.

An Audit Review will assess projects delivery and timescale, to include governance processes and Local Growth Funding.

An Audit Review can be instructed by the Coast to Capital Investment Committee and the Investment Programme & Risk Manager for any of the following reasons;

- A project is deemed high risk (rated Amber / Red or Red, based on MHCLG guidance) as part of the high risk monitoring protocol.
- The delivery of key milestones and / or outputs is not within the expected timescale detailed in the Funding Agreement and / or Business Case.
- When Coast to Capital require further evidence of outputs to gain sufficient assurance that the delivery body has met their obligations as detailed in the Funding Agreement and / or Business Case.
- When changes have been made to the scope of the project and / or the delivery of expected outputs.
- When quarterly reporting and claims, or the Delivery Body identifies potential delay or risk in meeting expected Local Growth Fund draw-down.
- A project requires review to gain understanding of scope, delivery and status.

Structure

Audit Reviews will be conducted by the Investment Team Auditor who will work with the Delivery Body to gain a thorough insight into the projects delivery to include completed and forecasted works and the draw-down and use of Local Growth Funds.

On occasion, Coast to Capital may commission Local Partnership to perform a 'Deep Dive' review on a project that requires a more in depth appraisal to include any necessary industry specialists.

The Audit Review will consist of the following components;

- Review of Funding Agreement and Business Case.
- Review of current documents and quarterly reporting.
- A pre-audit questionnaire that must be completed by the Delivery Body and returned at least 5 working days prior to the date of the Audit Review.
- A site-visit and interviews with key personnel.

Following the Audit Review, a report is drafted detailing findings and issued to the Investment Programme & Risk Manager within 5 working days to assist project risk rating.

The report will be finalised to include an updated risk rating and recommendations within 15 working days.

The report is circulated to the CEO, COO, Vice Chair, Chair of the Investment Committee, Chair of the Audit Committee and the Accountable Body. The report summary, recommendations and risk rating is shared with the Delivery Body within 5 working days of the report being finalised.

Local Growth Fund Audit Review reports are available to Board Members and Investment Committee members upon request and where no Conflict of Interest is present.

3.0 Growing Places Fund

This is revolving business loan fund which provides loan finance and /or equity investment to growth businesses where banks have not been willing to lend. Applications for this fund are advertised on our website and are open to all small businesses that can provide demonstrable evidence that they cannot access any other finance to grow their operations. The fund is currently fully committed.

Any future applications in response to a call will be reviewed by the Investment Committee.

Full application criteria and documentation across all of our funds and schemes can be downloaded from our website <http://www.coast2capital.org.uk>

Annex R

Coast to Capital Financial Controls Policy

Budget setting and financial monitoring

The annual budget is approved by the Board in Q4; prior to the start of the new financial year.

A monthly report showing actual income and expenditure against the budget is prepared and presented to the Executive Committee each month. In addition monthly meetings are held with individual budget holders to review expenditure in detail and discuss any variances to budget.

The Chief Executive* can authorise a virement of up to 10% of the allocated budget between different departments. Note: virements from programmes with ring-fenced funding should not be undertaken (e.g. Growth Hub, Local Growth Fund).

Virements exceeding 10% require Board approval.

Procurement

Any decision to procure goods or services is subject to the following process:

- | | |
|----------------------------|--|
| • Up to £5,000 | Budget holder discretion and approval |
| • £5,001 - £10,000 | Three written quotations with Chief Executive* approval |
| • £10,001 - £25,000 | Full tender process with Chief Executive* involved in award |
| • £25,001 - £50,000 | Full tender process with one Board Director involved in award |
| • Over £50,000 | Full tender process with two Board Directors involved in award |

Purchases require business justification / business case, this will state business benefits, including financial benefits where applicable

Circumstances may arise where it is not possible to follow the above process, for example when procuring highly specialist services or when there is a level of urgency. Any deviation from this policy must be discussed and approved by the Chief Executive* and Head of Finance before making any commitments to purchase. If approval is granted then the rationale for the departure from the policy needs to be documented and retained by the Head of Finance.

Credit Card

All Company Credit Card purchases are to follow the principals of the Procurement policy and are for business purchases only.

The Credit card can be used only by the Office Manager. Any requests for Credit Card Purchases are to be sent to the Office Manager in a timely manner, once approved, to allow for processing and have a clear business justification to support the purchase.

Purchase approvals

Up to £1,000 budget holder approval

Above £1,000 Head of Finance approval is required prior to purchase

Above £5,000 Procurement process should be adhered.

Invoice approval

All invoices must be approved by the budget holder either by email or signing the invoice. Invoices over £5k must be supported by evidence (quotes/tender documents) that the procurement process has been followed and appropriate approval has been obtained from the Chief Executive* and Board Directors as outlined above.

Budget Holders:

- COO – Local Growth Fund, Growing Places Fund, LIS
- Head of Corporate Affairs – Administration, Business Engagement & Communications, Corporate Affairs, LIS
- Head of Services – Growth Hub, Growth Support, Growth Grants, LIS
- Skills Manager – Enterprise Advisor Network
- Head of Strategy & Policy – Strategy & Policy, LIS

Employee expense claims

Employees should send their expense claims together with appropriate supporting documentation to their line manager for approval. The line manager is responsible for ensuring all supporting documentation is included and business travel is in line with company Travel Subsistence Policy. Once this check has been completed, the claim will then forward approved expense claims to accounts@coast2capital.org.uk. Further checks will be undertaken by the Head of Finance, before expense claims are passed on for payment.

All expense claims should be made within 3 months of the date incurred. Any claims after this date may not be settled.

The Head of Finance will review and approve expense claims for the Senior Management Team.

Director expense claims

The Head of Finance will review and approve expense claims for the Board of Directors. Expenses should be incurred and claimed in line with the Travel Subsistence Policy.

Directors should send their expense claims together with appropriate supporting documentation to the Head of Finance for review, via accounts@coast2capital.org.uk. The Head of Finance is responsible for ensuring all supporting documentation is included and business travel is in line with company policy. Once this check has been completed satisfactorily, the claim will be passed on for payment.

All expense claims should be made within 3 months of the date incurred. Any claims after this date may not be settled.

Payment of invoices and expense claims

The Head of Finance will prepare the invoices and expense claims for payment once approval has been obtained.

Payments are processed either by the Investment Manager or the Office Manager in accordance with the following process and the bank mandate:

- **Individual payments up to £10,000** – must be authorised by 1 nominated approver
- **Individual payments over £10,000** – must be authorised by 1 nominated approver and 1 nominated board approver

Nominated approvers:

- Head of Services
- Head of Corporate Affairs

Nominated board approvers:

- Chair
- Vice-Chair

Payroll

The Office Manager will notify the Head of Finance on or around the 15th of each month with any changes required for payroll such as new starters, leavers, season ticket loans, bonuses, change in salary, etc. The Office Manager will provide appropriate supporting documentation such as new starter forms, resignation letters, season ticket agreements, etc.

The Head of Finance will send the changes required to the outsourced payroll provider (Knill James) via a secure client portal. Payroll reports will be prepared and sent back to the Head of Finance who checks that all changes have been processed. An analysis is also performed comparing the current month payroll to the previous month to ensure everything is in line with expectation. Any variances are investigated and explanatory notes are added.

The Head of Finance will confirm that payroll has been checked and is ready for payment. The Chief Executive* signs off the payroll report each month.

The payroll payments to employees and HMRC will be processed by the Investment Manager or Office Manager and must be authorised by 1 nominated approver and 1 nominated board approver for payments

Nominated approvers:

- Head of Services
- Head of Corporate Affairs

Nominated board approvers:

- Chair
- Vice-Chair

Month end process

The external bookkeeper visits the Coast to Capital offices once per month to record the transactional data in Sage 50 this includes posting all invoices and expense claims, journal entries such as payroll, prepayments and accruals and reconciling the bank accounts.

The Head of Finance works closely with the external bookkeeper to ensure the following:

- everything is recorded completely and accurately
- any issues are resolved
- the creditors ledger, accruals and prepayments are reviewed

After the bookkeeper has finished recording the transactions, the Head of Finance checks the bank reconciliations in Sage and conducts a review of the data and makes any corrections prior to preparing the monthly management reporting.

The Head of Finance prepares balance sheet reconciliations on a quarterly basis.

Cash Flow forecasting

The Investment Manager monitors cash flow on a weekly basis and prepares a three month cash flow forecast with input from the Head of Finance and budget holders.

Document retention

All documentation is retained either electronically on the Finance shared drive, with restricted access managed by Finance, or stored in the locked finance cupboard.

* Prior to the Chief Executive going on planned leave they will nominate one of the SMT to take their delegated authority regarding financial matters.

* In a situation where the Chief Executive is not in a position to nominate one of the SMT, the Head of Finance will contact the Chair for them to nominate the delegated authority regarding financial matters.

Annex S

Complaints Policy

Coast to Capital views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person or organisation that has made the complaint.

Our policy is:

1. To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
2. To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
3. To make sure everyone at Coast to Capital knows what to do if a complaint is received
4. To make sure all complaints are investigated fairly and in a timely way
5. To make sure that complaints are, wherever possible, resolved and that relationships are repaired
6. To gather information which helps us to improve what we do.

Definition of a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of Coast to Capital activities.

Where Complaints Come From

Complaints may come from any person or organisation who has a legitimate interest in Coast to Capital.

A complaint can be received by email or in writing.

This policy does not cover complaints from members of the Coast to Capital Team who should use the Discipline and Grievance policy as laid out in the Team Manual.

Confidentiality

All complaint information will be handled sensitively, informing only those who need to know and following any relevant data protection requirements. Our arrangements to enable third parties and the public to confidentially report concerns about LEP processes and decisions can be found under our Confidential Complaints Procedure.

Responsibility

Overall responsibility for this policy lies with the Board of Coast to Capital and its implementation is one of the responsibilities of the Chief Executive.

Review

This policy is reviewed regularly and updated as required.

Complaints Procedure

Publicised Contact Details for Complaints:

Written complaints should be sent to Coast to Capital at Pacific House (Second Floor), Hazelwick Avenue, Three Bridges, Crawley, RH10 1EX or by e-mail at contact@coast2capital.org.uk. Complainants should provide any information or evidence that may be relevant to the complaint, including names, dates or documentation in this correspondence.

Stage One

In many cases, a complaint is best resolved by the person responsible for the issue that is being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate.

Whether or not the complaint has been resolved, all information regarding the complaint should be passed to the Chief Executive within five working days. We may request additional information relevant to the complaint.

On receiving the complaint, the Chief Executive records it in the Coast to Capital Complaints Log. If it has not already been resolved, the Chief Executive will delegate to an appropriate person to investigate and to take the appropriate actions.

If the complaint relates to a specific person, they should be informed and given a fair opportunity to respond.

Complaints should be acknowledged by the person handling the complaint within five working days. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply. A copy of this complaints procedure should be attached.

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

Stage Two

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Board level. At this stage, the complaint will be passed to the Coast to Capital Chair's Committee.

The request for Board level review should be acknowledged within five working days of receiving it. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

The Coast to Capital Chair's Committee may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve reviewing the paperwork of the case and speaking with the person who dealt with the complaint at Stage One.

If the complaint relates to a specific person, they should be informed and given a further opportunity to respond.

The person who dealt with the original complaint at Stage One should be kept informed of what is happening.

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

The decision taken at this stage is final.

Stage Three

If the complainant is not satisfied with the outcome of the complaint the complainant can approach the Accountable Body. The Accountable Body will, in investigating complaint liaise with Coast to Capital to ensure that the matter is properly investigated and responded to. The Accountable Body will consider whether the LEP has followed its complaints procedure correctly.

Failing adequate resolution by the Accountable Body the complainant can report it directly to the Cities and Local Growth Unit in the Ministry of Housing, Communities and Local Government in the Ministry of Housing, Communities and Local Government and the Department for Business, Energy and Industrial Strategy, at the following email address:

localgrowthassurance@communities.gov.uk or by writing to: LEP Compliance Deputy Director, Cities and Local Growth Unit, Fry Block. 2 Marsham Street, London, SW1P 4DF. You should clearly mark your email or letter as 'Official – complaints'.

If you would like help making a complaint, you can contact your local councillor or MP. You can also get help from a specialist advice agency or organisation which represents people, such as Citizens Advice Bureau (CAB).

Confidential Complaints Procedure

Coast to Capital is committed to creating a work environment with the highest possible standards of openness, probity and accountability. In view of this

commitment we encourage employees and others with serious concerns about any aspect of the LEP's work to come forward and voice those concerns without fear of reprisal. For employees and those working closely with Coast to Capital, please follow the whistleblowing policy on our website. For third parties and members of the public, please follow the confidential complaints procedure outlined below.

However, if a member of the public or third party believes that their complaint fits the description below; they can elect to report their concerns through the whistleblowing policy procedure.

Whistleblowing - where an individual who has concerns about a danger, risk, contravention of rules or illegality provides useful information to address this. In doing so they are acting in the wider public interest, usually because it threatens others or impacts on public funds. By contrast, a grievance or private complaint is a dispute about the individual's own position and has no or very limited public interest.

Confidentiality

If a member of the public or a third party wants to make a confidential complaint or raise a concern, it will be treated in confidence and every effort will be made to protect the person's identity if they wish to remain anonymous. Coast to Capital will investigate all complaints or allegations.

Anonymous allegations

Coast to Capital takes all complaints and concerns raised by members of the public and third parties seriously. We will investigate anonymous allegations. However we remind complainants that when people put their names to an allegation the ability to investigate and therefore reach firm conclusions is strengthened. Concerns expressed anonymously will be considered at the discretion of Coast to Capital. When exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

The Ministry of Housing, Communities and Local Government may request information arising from this process if they have concerns regarding a LEP or have been approached with similar complaints. The expectation is that this information will be provided on an anonymous basis. However it may be necessary to provide personal details to progress a complaint.

Where details are gathered, Coast to Capital will put in place appropriate data protection arrangements in line with the Data Protection Act 1998 and Data Protection Act 2018.

Procedure

Coast to Capital is aware that the organisation's ordinary complaints procedure may not be suitable if someone wants the complaint to remain confidential. If you would like to make a confidential complaint please write or email to:

- Jonathan Sharrock – Chief Executive – jonathan.sharrock@coast2capital.org.uk
- Katie Nurcombe – Head of Communications and Corporate Affairs – katie.nurcombe@coast2capital.org.uk

Alternatively, you can use our secure website form which can be accessed on our website - <http://www.coast2capital.org.uk/contact-us/>.

Please include all the relevant information regarding the complaint and state that you want the complaint to remain confidential. Please note that we may request supplementary information.

Action Taken

The designated complaints officer (Coast to Capital Governance Officer) will raise your concern and investigate the complaint. You can expect the officer to:

- Contact you within 10 clear working days to acknowledge the complaint and discuss the appropriate course of action.
- Write to you within 28 clear working days with findings of the investigation. If the investigation has not concluded within 28 clear working days, the officer will write to you to give reasons for the delay in resolving the complaint.
- Take the necessary steps to rectify the issue.

If you are unhappy with the outcome of the complaint or the complaint involves those responsible for the confidential complaints procedure:

- You can escalate your concerns through Coast to Capital's Accountable Body which is Croydon Council who will have their own confidentiality procedures.
- If you are either unable to raise the matter with Coast to Capital or you are dissatisfied with the action taken you can report it direct to the Cities and Local Growth Unit in the Ministry of Housing, Communities and Local Government and the Department for Business, Energy and Industrial Strategy, at the following email address: localgrowthassurance@communities.gov.uk or by writing to: LEP Policy Deputy Director, Cities and Local Growth Unit, Fry Block, 2 Marsham Street, London, SW1P 4DF. You should clearly mark your email or letter as "Official - complaints".

Annex T

Whistleblowing Policy

Introduction

A Discloser is the person who is the whistle-blower.

This procedure outlines the process to follow for a Discloser when reporting a perceived wrongdoing within Coast to Capital, including something they believe goes against the core values of Standards in Public Life (the Nolan Principles) and the Code of Conduct for LEP Board Members and staff. The Standards in Public Life include the principles of; integrity, objectivity, accountability, openness, honesty, leadership and impartiality.

In particular Coast to Capital Board Members, as the key decision makers of the LEP, have a right and a responsibility to speak up and report behaviour that contravenes these values.

It is important that this procedure is followed when raising any concerns, to ensure that the matter is dealt with correctly.

Definitions

This document uses the following definitions:

- Whistleblowing - where an individual who has concerns about a danger, risk, contravention of rules or illegality provides useful information to address this. In doing so they are acting in the wider public interest, usually because it threatens others or impacts on public funds. By contrast, a grievance or private complaint is a dispute about the individual's own position and has no or very limited public interest.
- The LEP – Coast to Capital
- Discloser – this is the person who is the whistle-blower. They might be an employee, a LEP Board Member, a contractor, a third party or a member of the public.
- Responsible Officer - this is the person, appointed by the LEP, with overall responsibility for maintaining and operating this whistleblowing policy. They will maintain a record of concerns raised and the outcomes (but will do so in a form that does not endanger confidentiality) and will report to senior decision makers as necessary. Their name is Katie Nurcombe (Head of Communications and Corporate Affairs) and their contact details are katie.nurcombe@coast2capital@coast2capital.org.uk and 01403 333840 Pacific House (Second Floor), Hazelwick Avenue, Three Bridges, Crawley, RH10 1EX. If the concern relates to the Responsible Officer then the concern should be raised with Jonathan Sharrock (Chief Executive) jonathan.sharrock@coast2capital.org.uk 01403 333840 Pacific House (Second Floor), Hazelwick Avenue, Three Bridges, Crawley, RH10 1EX. If the concern relates to both of these members of the organisation then the concern should be raised with the Accountable Body. Croydon Council -

contact Lisa.Taylor@croydon.gov.uk.

- Relevant Concern – something the Discloser has been asked to do, or is aware of, which they consider to be wrong-doing and is in the public interest.

Scope

The LEP is committed to creating a work environment with the highest possible standards of openness, probity and accountability. In view of this commitment, we encourage Disclosers with serious concerns about the work of the LEP to come forward and voice their concerns without fear of reprisal.

Disclosers should note that where the concern is one that might fall under the LEP's staff or work force policies on equality and diversity or harassment and bullying or other staff policies, they should consider using the reporting mechanisms for those other policies first.

The LEP has a pre-existing complaints procedure that in many cases will be more appropriate for third parties or members of the public to follow. Third parties or members of the public should review the separate confidential complaints procedure outlined in the LEP's complaints policy on the LEP's website first before going through the whistleblowing process.

However, if a member of the public or third party believes that their complaint fits the description of a 'relevant concern' outlined below, they may report their concerns through the whistleblowing policy procedure.

Policy Statement

The LEP acknowledges that Disclosers may often be the first people to realise that there may be something seriously wrong within the organisation.

This policy aims to:

- Encourage people to feel confident about raising serious concerns and to question and act upon their concerns without fear of victimisation or harassment;
- Provide avenues for Disclosers to raise those concerns and receive feedback on any action taken;
- Allow Disclosers to take the matter further if they are dissatisfied with the LEP's response; and
- Reassure all Disclosers, employees in particular who may have specific concerns about their position and employment status in the LEP, that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure in the public interest.

What is a relevant concern?

If a Discloser is asked to do something, or is aware of the actions of another, which they consider to be wrongdoing, they can raise it using this procedure. The

Discloser must have a reasonable belief that raising the concern is in the public interest.

A Discloser may decide to raise a concern under the whistleblowing policy if they are aware of a situation that they feel:

- is against the LEP's procedures and protocols as set out in its code of conduct and individual LEP Assurance Framework;
- falls below established standards of practice the LEP subscribes to;
- amounts to improper conduct; or
- is an abuse of power for personal gain.

The types of matters regarded as a relevant concern for the purpose of this procedure include, but are not limited to, the following:

- Fraud or financial irregularity;
- Corruption, bribery or blackmail;
- Other Criminal offences;
- Failure to comply with a legal or regulatory duty or obligation;
- Miscarriage of justice;
- Endangering the health or safety of any individual;
- Endangering the environment;
- Improper use of authority; and
- Concealment of any of the above.

Disclosers should not raise malicious or vexatious concerns, nor should they raise knowingly untrue concerns. In addition, this procedure should not be used to raise concerns of a HR/personal nature, such as, complaints relating to a management decision or terms and conditions of employment. These matters should be dealt with using the relevant alternative procedure, for example, the LEP grievance procedure. Equally, this policy would not apply to matters of individual conscience where there is no suggestion of wrongdoing by the LEP but, for example, an employee or LEP Board Member is required to act in a way which conflicts with a deeply held personal belief.

Safeguards

The Public Interest Disclosure Act (1999) gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The LEP believes that no member of staff should be at a disadvantage because they raise a legitimate concern.

The LEP will not tolerate harassment or victimisation and will take action to protect Disclosers when they raise a concern in the public interest.

Raising a concern

If a Discloser experiences something in the workplace which they consider a relevant concern, it is important that the concern is raised as early as possible.

Proof is not required at this point – it is for the LEP to investigate. The Discloser must, however, have a reasonable belief that disclosing the information is in the public interest before raising a concern.

All concerns will be treated in confidence and every effort will be made to protect the Discloser's identity if they wish to remain anonymous. However, at the appropriate time, it is possible that the Discloser will need to come forward as a witness for the matter to progress.

It is important to follow the correct procedure when raising a whistleblowing concern. The following steps should be adhered to:

- a. It is important that the concern is raised with the person best placed to deal with the matter, in most cases this will be the Responsible Officer. However, the Discloser may want to raise the concern with someone they know and trust, such as their line manager who can raise it with the Responsible Officer on their behalf.
- b. If it is suspected that the concern may implicate the line manager in some way, then it could be raised with a more senior manager in the line management chain.
- c. If the Discloser is unable to raise a relevant concern with a line manager or a senior manager or feel that it has not been adequately addressed, it should be raised directly with the Responsible Officer.
- d. Ultimately, the Discloser can raise their concern with the LEP Chief Executive.

Information needed to raise a concern

When raising a concern under the procedure the Discloser should try to provide the following information:

- The background and reason behind the concern;
- Whether they have already raised a concern with anyone and the response; and
- Any relevant dates when actions related to the concern took place.

This information should demonstrate that there are reasonable grounds for the concern to be acted upon. It is important that matters are not investigated by the Discloser themselves.

If applicable, personal interests must be declared from the outset.

How the concern will be handled

All investigations will be conducted sensitively and as quickly as possible. While the LEP cannot guarantee that the outcome will be as the Discloser may wish, it will handle the matter fairly and in accordance with this procedure.

Once a concern has been raised with either the line manager or Responsible Officer, Senior Manager or Chief Executive, a meeting may be arranged with them to determine how the concern should be taken forward.

The LEP may decide to take the matter forward by a number of methods, including:

- An internal inquiry or other formal investigation;
- An internal or external audit;
- Referring the matter to the police;
- Referring the matter to another relevant authority for investigation.

Before a final decision is taken on how to proceed, or as part of the investigation, the Discloser may be asked to meet with those investigating their allegation.

If a meeting is arranged, the Discloser may wish to be accompanied by a trade union representative, colleague or friend. The person who accompanies the Discloser should not be involved or have a direct interest in the area of work to which the concern relates. The meeting can be conducted over the telephone rather than face to face.

Within 10 clear working days of a concern being raised, the LEP's Responsible Officer will write to the Discloser to:

- Acknowledge that the concern has been received;
- Indicate how they propose to deal with the matter;
- Give an estimate of how long it will take to provide a final response;
- Tell the Discloser whether any initial investigation or enquiry has been made;
- Tell the Discloser whether further investigation will be made, and if not, why not;
- Tell the Discloser how frequently the LEP will keep them up to date on progress of the investigation.

The amount of contact between the LEP and the Discloser concerned will vary depending on the concern raised, any difficult issues and any further clarity required. If necessary, the LEP will seek further information from the Discloser.

The LEP will confirm when the matter is concluded and, if appropriate, the outcome of the investigation, maintaining security and confidentiality for all parties as far as possible.

Throughout any investigation, the Discloser will still be expected to continue their duties/role as normal unless deemed inappropriate.

Confidentiality and anonymity

The LEP always encourages potential Disclosers to speak up about potential serious wrongdoing in a way that they feel comfortable. The best way to raise a

concern is to do so openly, as this makes it easier for the LEP to investigate and provide feedback.

Any disclosures made under this procedure will be treated in a sensitive manner. However the LEP recognises that the Discloser may want to raise a concern in confidence, i.e. they may want to raise a concern on the basis that their name is not revealed without their consent.

The LEP will respect any request for confidentiality as far as possible, restricting it to a 'need to know' basis. However, if the situation arises where it is not possible to resolve the concern without revealing the Discloser (for example in matters of criminal law), the LEP will advise them before proceeding. The same considerations of confidentiality should be afforded to the recipient(s) at the centre of the concern, as far as appropriate.

Disclosers may choose to raise concerns anonymously, i.e. without providing their name at all. If this is the case, the investigation itself may serve to reveal the source of information. Disclosers are therefore encouraged, where possible to put their names to concerns raised. When anonymous concerns are raised, they will be treated as credible and investigated so far as possible.

Protection

If a concern is raised in the reasonable belief that it is in the public interest and procedures have been followed correctly, the Discloser raising the concern will be protected by the terms of this policy and, where applicable, by whistleblowing legislation (see gov.uk for more information on who is covered by whistleblowing legislation). Where a Discloser has been victimised for raising a concern, the LEP concerned will take appropriate action against those responsible, in line with the LEP's disciplinary policy and procedures.

Changes to procedures or policy as a result of whistleblowing

If changes are made to LEP policies and processes as result of whistleblowing investigations, the LEP will publicise the changes as appropriate, taking into consideration the importance of protecting the anonymity and confidentiality of individuals.

Untrue allegations

If a Discloser makes an allegation but it is not confirmed by the investigation, no action will be taken against them. However, if a malicious or vexatious allegation is made without good reason to: cause trouble; for personal gain; or to discredit the LEP an investigation may take place. Where the Discloser is an employee or a LEP Board Member or a contractor this may result in disciplinary or other action if they have broken the terms of their employment, acted against the LEP Code of Conduct or broken a clause in a contract.

How this matter can be taken forward if you are not satisfied

This procedure is intended to provide Disclosers with an avenue to raise legitimate concerns. If you are either unable to raise the matter with the LEP or you are dissatisfied with the action taken you can report it directly to the Cities and Local Growth Unit in the Ministry of Housing, Communities and Local Government and the Department for Business Energy and Industrial Strategy, at the following email address: localgrowthassurance@communities.gsi.gov.uk or by writing to: LEP Policy Deputy Director, Cities and Local Growth Unit, Fry Block, 2 Marsham Street, London, SW1P 4DF. You should clearly mark your email or letter as "Official - whistleblowing".

In addition, if you are either unable to raise the matter with the LEP or you are dissatisfied with the action taken you may consider raising it with:

- The LEP's Accountable Body – Croydon Council – contact Lisa.Taylor@croydon.gov.uk
- The police;
- The relevant regulatory body or professional body;
- Your Trade Union;
- Your solicitor;
- Your Citizens Advice Bureau; or
- A prescribed person or body.

Further information and signposting for potential Disclosers is available on www.gov.uk.

If a Discloser does take the matter outside the LEP, to an external body, they should ensure they do not disclose information that is confidential, for example, if you are an employee your contract of employment may set out expectations of your regarding what is confidential.

Feedback on Whistleblowing Policy

Any feedback or comments on this policy should be directed to the LEP's Responsible Officer.

Annex U

Anti-Fraud and Anti-Bribery Policy

1. Introduction

- 1.1. Coast to Capital will not accept any level of fraud, bribery or corruption. We are committed to protecting our assets and are committed to promoting honesty and integrity in all of our activities. Coast to Capital is determined to prevent, deter and detect all forms of fraud, bribery and corruption committed against it, whether by internal or external parties.
- 1.2. Coast to Capital is committed to ensuring all of its business is conducted in an open, honest and fair manner. All staff and third parties working on behalf of Coast to Capital are expected to adopt the highest standards of propriety and accountability, and to play a key role in promoting an anti-fraud culture.
- 1.3. Where fraud is suspected Coast to Capital will take direct action. All cases will be thoroughly investigated and dealt with appropriately. The form of action taken will depend on the level and circumstances of the fraud discovered and may include disciplinary procedures, dismissal and/or criminal prosecution. Coast to Capital will always seek to recover funds lost through fraud.
- 1.4. This policy applies to all staff whether permanent or temporary, and third parties working on behalf of Coast to Capital.

2. Definition of fraud

- 2.1. For the purposes of this policy, fraud is defined as the use of deception (a lie) to deprive, disadvantage or cause loss to another person or party. This can include theft, the misuse of funds or other resources or more complicated crimes such as false accounting and the supply of false information.
- 2.2. The Fraud Act 2006 introduced three main offences. They are as follows:
 - Fraud by false representation - e.g. lying on a CV to obtain employment
 - Fraud by abuse of position - e.g. finance manager uses their position to siphon off funds.
 - Fraud by failing to disclose information - e.g. not declaring an unspent criminal conviction in order to obtain employment.
- 2.3. Other examples of fraud that might occur at Coast to Capital would include:
 - Falsification of expense claims.
 - Theft of cash or other company assets or stock.

- Falsification of invoices for payment.
- Failure to account for monies or invoices paid.

2.4. An individual who commits fraud will face disciplinary action. We reserve the right to bring civil action and/or criminal prosecution. If found guilty of fraud in criminal court, and individual may receive a custodial sentence of up to ten years.

3. Definition of Bribery

3.1. Bribery is a financial or other advantage that is intended to induce "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith. Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift (i.e. lavish treatment during a business trip or tickets to an event).

3.2. Bribery does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

3.3. The Bribery Act 2010 provides the four main offences:

- Giving or offering a bribe
- Receiving or requesting a bribe
- Bribing a foreign public official (also known as facilitation payments)
- Negligently failing to prevent a bribe (corporate offence).

3.4. Under the Bribery Act an offence has been committed even if no money or goods have been exchanged, and a bribe has no minimum value.

3.5. It therefore falls to all staff to ensure that they comply with Coast to Capital's policy on declaring gifts and hospitality offered to them in the course of their work.

3.6. Individuals who commit bribery against Coast to Capital may face criminal prosecution, civil action, disciplinary action. If found guilty of bribery, the individual may receive a ten year custodial sentence and unlimited fines.

4. Prevention of fraud

4.1. Coast to Capital operates within a framework of statutes, regulations, codes of conduct and systems and procedures, including the Code of Conduct and the Whistleblowing Policy. These are designed, in part, to prevent fraud and corruption and to enhance accountability. We require all staff and third parties working on our behalf to act in accordance with this framework.

4.2. Coast to Capital has systems and procedures that incorporate robust internal controls designed to minimise the risk of fraud occurring. Managers are required to identify the risks to which systems are exposed (including the risk of fraud), to develop and maintain controls to mitigate and manage the risks and to ensure that such controls are properly complied with. The Corporate Risk Register identifies the risk of fraud, together with the mitigating actions in place to minimise the risk of fraud occurring. The Internal Audit process reviews the adequacy and effectiveness of internal controls, as part of the annual audit programme, to provide assurance to managers and the Audit Committee.

4.3. Key fraud and bribery prevention measures are:

- Recruitment screening
- Nolan Principles - Seven Principles of Public Life - Annex A
- Gifts and Hospitality Policy
- Travel and Subsistence Policy
- Contract of Employment – Internet Use
- Code of Conduct – Staff
- Code of Conduct - Directors
- Whistleblowing Policy

5. Reporting fraud

5.1. Coast to Capital encourages and expects staff and third parties working on our behalf to report incidents of suspected fraud, bribery and corruption immediately. Any delay in reporting suspected fraud, bribery and corruption may result in further losses. Please refer to **Annex 2** for further details and guidance on how to report suspected fraud, bribery and corruption.

5.2. In the first instance, staff should normally raise the concern with their Line Manager. If the concern relates to a Line Manager, then staff should raise it with the Chief Executive, and if it relates to the Chief Executive, the concern should be raised with the Chairman of the Board.

5.3. Where staff have a difficulty in approaching their own manager, because there is a concern that either management are involved or may not take the matter seriously, they can contact the Chief Executive, Chairman of the Board, or Action Fraud (or other regulatory body).

6. Third parties reporting fraud

6.1. Third parties, including the general public, can report concerns through Coast to Capital corporate complaints procedure or contact Katie Nurcombe (Head of Communications and Corporate Affairs) katie.nurcombe@coast2capital@coast2capital.org.uk. If the concern relates to this named member of the team then the concern should be raised with Jonathan Sharrock (Chief Executive)

jonathan.sharrock@coast2capital.org.uk. If the concern relates to both of these members of the organisation then the concern should be raised with the Accountable Body Croydon Council - contact Lisa.Taylor@croydon.gov.uk.

- 6.2. They can also report concerns direct to any Coast to Capital team member, who will escalate the concern in line with the Anti-Fraud and Anti-Bribery Policy.
- 6.3. In the event that a person feels unable to raise their concerns direct with Coast to Capital, they may contact Coast to Capital's Accountable Body, Croydon Council- contact Lisa.Taylor@croydon.gov.uk.
- 6.4. Anyone concerned about a wrongdoing that threatens the public interest can seek free, confidential legal help from the charity 'Public Concern at Work'. They operate a helpline on 0207 404 6609, and can be emailed at helpline@pcaw.co.uk.

7. Investigating allegations of fraud

- 7.1. In normal cases it will be the relevant manager, in conjunction with the Chief Executive, who will arrange for an investigation to be undertaken. Matters of a criminal nature will be reported to the Police. We will also notify other relevant agencies, such as employers, as appropriate.

8. Training

- 8.1. Coast to Capital recognises that the success of this anti-fraud and anti-bribery policy depends, to a large extent, on all staff and third parties working on our behalf being aware of Coast to Capital's approach to fraud, bribery and corruption.
- 8.2. Details of our Anti-Fraud and Anti-Bribery Policy are published on our website. In addition, fraud training will be provided to all staff as appropriate.

9. Monitoring fraud

- 9.1. The Audit Committee is responsible for reviewing the arrangements in place by which staff may raise concerns about possible improprieties. As part of this, the Audit Committee will approve the Anti-Fraud and Anti-Bribery Policy.
- 9.2. Any action taken by Coast to Capital in connection with suspected fraud, bribery or corruption will be reported to the Audit Committee.

10. Supporting policies

10.1. The Anti-Fraud Policy is supported by the following policies and procedures. These policies can be found on our website unless specified otherwise:

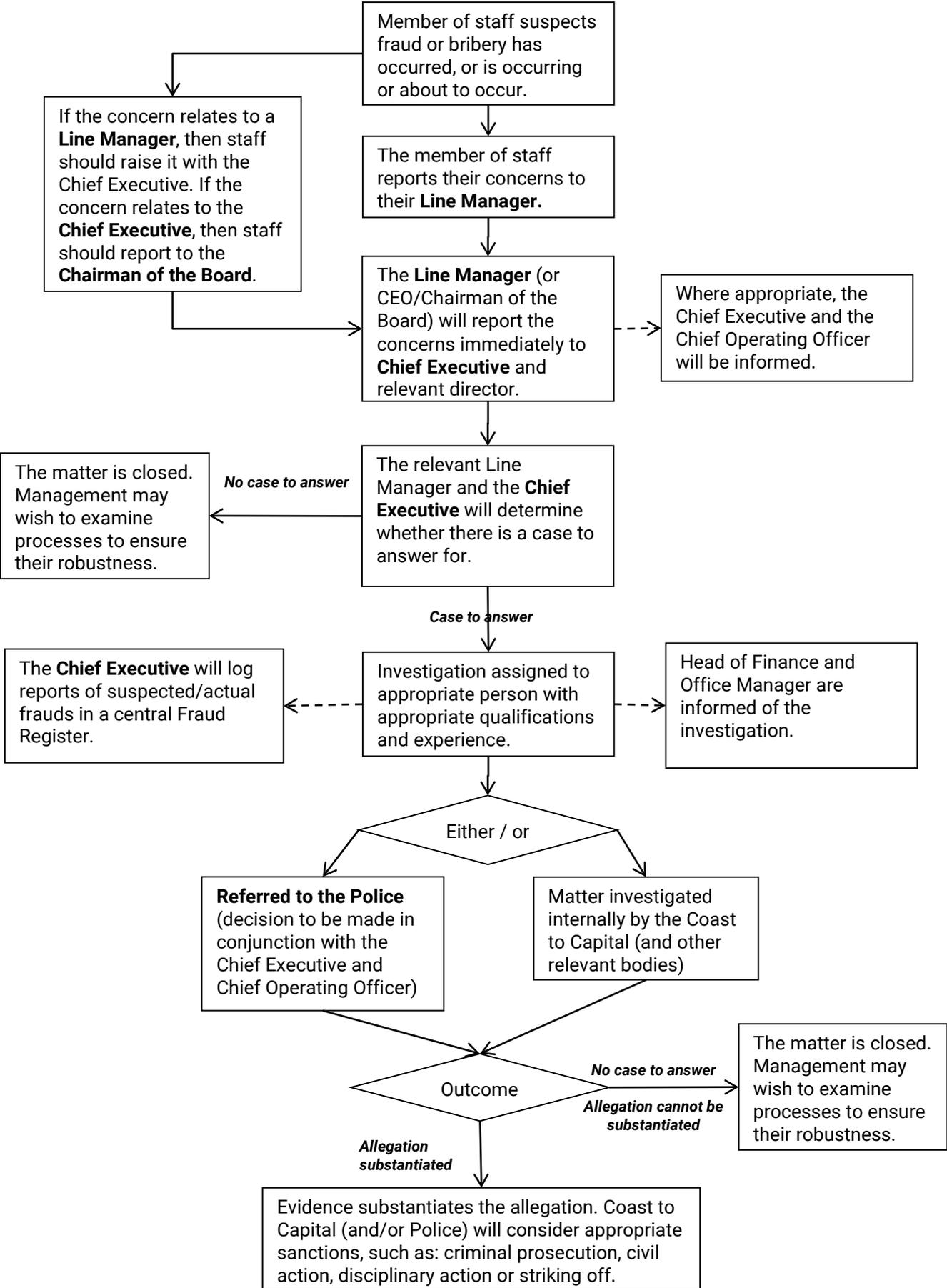
- Whistleblowing Policy
- Code of Conduct – Directors
- Code of Conduct – Staff
- Gifts and Hospitality Policy
- Contract of Employment – Internet Use (not published)
- Travel and Subsistence Policy (not published)

Annex 1 - Seven Principles of Public Life

Underpinning the anti-fraud culture are the Seven Principles of Standards in Public Life. The principles apply equally to staff and third parties working on our behalf, and are:

- Selflessness** - holders of public office should take decisions solely in terms of the public interest. They should not do so to gain financial or other material benefits for themselves, their families or friends.
- Integrity** – holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in their official duties.
- Objectivity** – in carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards or benefits, holders of public office should make choices on merit.
- Accountability** – holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever public scrutiny is appropriate to their role.
- Openness** – holders of public office should be as open as possible about all the decisions and actions they take. They should give clear reasons for their decisions and restrict information only when the wider public interest (or legislation) demands.
- Honesty** – holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- Leadership** – holders of public office should promote and support these principles by leadership and example.

Annex 2 - Reporting Fraud Process Map and Guidance



The following is guidance for individuals who suspect bribery and corruption

Do:

- Stay calm – remember you are a witness not a complainant
- Write down your concerns immediately – make a note of all relevant details such as what was said in 'phone or other conversations, the date, the time and the names of anyone involved
- Do report your concerns to the as soon as possible (**see flowchart**), as any delay may cause the Coast to Capital to suffer further financial loss. We encourage you to raise your concerns - the Public Interest Disclosure Act 1998 protects employees who have reasonable concerns. You will not suffer discrimination or victimisation by following the correct procedures.

Don't:

- Do not investigate the matter yourself. Attempting to gather evidence yourself (unless it is about to be destroyed) may result in it becoming inadmissible and prejudice any criminal investigation. The gathering of evidence must be done in line with legal requirements in order for it to be admissible in court.
- Do not approach the person involved (this may lead to him/her destroying evidence)
- Do not discuss your suspicions or with anyone other than those persons referred to above unless specifically asked to do so by them. Confronting the suspect or conveying concerns to anyone other than those authorised, could the suspect or lead to an innocent person being unjustly accused
- Do not use the process to pursue a personal grievance
- Don't do nothing!

Remember:

- You may be mistaken or there may be an innocent or good explanation – this will come out in the investigation
- The process may be complex and protracted. Investigations are carried out in confidence on a need to know basis. You will be updated as and when it is appropriate to do so; do not be alarmed if you have not heard anything from the investigators.

Annex V

Code of Conduct

All Board Directors of the LEP are required to consider the terms of this Code of Conduct and complete, sign and return this Code of Conduct and the Coast to Capital Register of Interests (Assurance Framework Annex W). You are responsible for updating your Register in accordance with the provisions of the Assurance Framework and this Code of Conduct. This Code of Conduct should be read in conjunction with the Conflicts of Interest Policy (Assurance Framework Annex D) [Nolan Principles](#)

Board Directors agree to act in accordance with the 'Seven Principles of Public Life', known as the Nolan Principles:

- 1. Selflessness** - Holders of public office should act solely in terms of the public interest.
- 2. Integrity** - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- 3. Objectivity** - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- 4. Accountability** - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- 5. Openness** - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- 6. Honesty** - Holders of public office should be truthful.
- 7. Leadership** - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Conduct

Accordingly, when acting in your capacity as a Board Member of Coast to Capital Local Enterprise Partnership:

- You must act in a manner consistent with your LEP's equality and diversity policy and treat your fellow Board Members, members of staff and others you come into contact with when working in their role with respect and courtesy at all times.

- You must act solely in the public interest and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or close associate.
- You must not place yourself under a financial or other obligation to outside individuals or organisations that might be reasonably regarded to influence you in the performance of your official duties.
- When carrying out your LEP duties you must make all choices, such as making appointments, awarding contracts or recommending individuals for rewards or benefits, based on evidence.
- You are accountable for your decisions and you must co-operate fully with whatever scrutiny is appropriate to your position. You must be as open as possible about both your decisions and actions and the decisions and actions of the LEP. In addition, you should be prepared to give reasons for those decisions and actions.
- You must declare any private interests, including membership of any Trade Union, political party or local authority that relates to your LEP duties. Furthermore, you must take steps to resolve any conflicts arising in a way that protects the public interest. This includes registering and declaring interests in a manner conforming with the procedures set out in the Coast to Capital Conflicts of Interest Policy.
- You must, when using or authorising the use by others of the resources of your LEP, ensure that such resources are not used improperly for political or personal purposes (including party political purposes).
- You must promote and support high standards of conduct when serving in your LEP post, in particular as characterised by the above requirements, by leadership and example.

Breach of this Code

Each Director’s participation in the business of the LEP is subject to compliance with the terms of this Code of Conduct and the requirements of the Coast to Capital Local Enterprise Partnership Assurance Framework (January 2020) and any breach may result in a requirement to step down from the Board of the LEP, as determined by the Chief Executive Officer in discussion with the Chair and following a reasonable inquiry into the matter.

Agreement

I confirm that I have read the Code of Conduct and January 2020 Assurance Framework and will abide by its principles and provisions.

Signed..... Date.....

..... Representing.....

(Name)

(Name of organisation and sector)

Annex W

Declaration of Interests

Name: [to add]

Date signed: [to add]

Coast to Capital Local Enterprise Partnership: Register of Members' Interests

As a Board Member/Co-opted Member/ Sub-Board Member/ Staff Member of the Coast to Capital Local Enterprise Partnership (LEP), I declare that I have the following disclosable pecuniary and/or non-pecuniary interests.

(Please state 'None' where appropriate, do not leave any boxes blank).

NOTIFICATION OF CHANGE OF CIRCUMSTANCES

Each Board Member shall review their individual register of interests before each board meeting and decision making committee meeting, submitting any necessary revisions to the LEP and S151/S73 Officer at the start of the meeting. Any recorded interests relevant to the meeting should also be declared at this point.

Even if a meeting has not taken place a Member must, within 28 clear working days of becoming aware of any change to the interests specified below, provide written notification to the LEP and S151/S73 Officer, of that change.

***SPOUSE/PARTNER** – In the notice below my spouse or partner means anyone who meets the definition in the [Localism Act](#), i.e. my spouse or civil partner, or a person with whom I am living as a spouse or a person with whom I am living as if we are civil partners, and I am aware that that person has the interest having carried out a reasonable level of investigation. Where your spouse or partner has recently been involved in any activity which would have been declarable, this should be mentioned, with the date the activity ended.

SECTION 1	ANY EMPLOYMENT, OFFICE, TRADE, PROFESSION OR VOCATION CARRIED ON FOR PROFIT OR GAIN	MEMBER (and/or spouse/partner where applicable)
1.1	Name of: <ul style="list-style-type: none">your employer(s)	

	<ul style="list-style-type: none"> any business carried on by you any other role in which you receive remuneration (this includes remunerated roles such as councillors). 	
1.2	Description of employment or business activity.	
1.3	The name of any firm in which you are a partner.	
1.4	The name of any company for which you are a remunerated director.	
SECTION 2	SPONSORSHIP	MYSELF (and/or spouse/partner where applicable)
2.1	<p>Any financial benefit obtained (other than from the LEP) which is paid as a result of carrying out duties as a Member.</p> <p>This includes any payment or financial benefit from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992 (a).</p>	
SECTION 3	CONTRACTS	MYSELF (and/or spouse/partner where applicable)
	Any contract for goods, works or services with the LEP which has not been fully discharged by any organisation named at 1.1.	
	Any contract for goods, works or services entered into by any organisation named at 1.1 where	
	either party is likely to have a commercial interest in the outcome of business being decided by the LEP.	

SECTION 4	LAND OR PROPERTY	MYSELF (and/or spouse/partner where applicable)
	<p>Any interest you or any organisation listed at 1.1 may have in land or property which is likely to be affected by a decision made by the LEP.</p> <p>This would include, within the area of the LEP:</p> <ul style="list-style-type: none"> • Any interest in any land in the LEP areas, including your place(s) of residency • Any tenancy where the landlord is the LEP and the tenant is a body in which the relevant person has an interest • Any licence for a month or longer to occupy land owned by the LEP. <p>For property interests, please state the first part of the postcode and the Local Authority where the property resides. If you own/lease more than one property in a single postcode area, please state this.</p>	
SECTION 5	SECURITIES	MYSELF (and/or spouse/partner where applicable)

5.1	<p>Any interest in securities of an organisation under 1.1 where:-</p> <p>(a) that body (to my knowledge) has a place of business or land in the area of the LEP; and</p> <p>(b) either –</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which has an interest exceeds one hundredth of the total issued share capital of that class.</p>	
SECTION 6	GIFTS AND HOSPITALITY	MYSELF (and/or spouse/partner where applicable)
	Any gifts and/or hospitality received as a result of membership of the LEP (above the value of £50).	

OTHER INTERESTS

Membership of Organisations

I am a member of, or I am in a position of general control, a trustee of, or participate in the management of:

1. Any body to which I have been appointed or nominated by the LEP:

2. Any body exercising functions of a public nature (eg school governing body or another LEP):

3. Any body directed to charitable purposes:

4. Any body, one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union):

5. Any Local Authority (please state any interests you hold as LA leaders/cabinet members for LA land, resources and the LA's commercial interests):

6. Any other interest which I hold which might reasonably be likely to be perceived as affecting my conduct or influencing my actions in relation to my role.

MEMBER'S DECLARATION AND SIGNATURE (not for publication: for LEP records only)

I confirm that having carried out reasonable investigation, the information given above is a true and accurate record of my relevant interests, given in good faith and to the best of my knowledge;

Date	
Member's Name <i>(Capitals – in full)</i>	
Signature	

RECEIPT BY LEP

Date received by the LEP	
Signature of LEP Chief Executive	

