

# Coast to Capital

**Meeting:** Coast to Capital Audit and Risk Committee Meeting  
**Date:** Thursday 29 September 2021  
**Report Title:** Governance Update  
**Report by:** Nicholas Darwin  
**Item No:** 5

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## Recommendation:

The Committee is asked to:

- **Note** the future expected work on the Assurance Framework
- **Recommend** Version 8.1 of the Assurance Framework to the Board
- **Note** the update on the Accountable Body service
- **Note** the update on Company Policies

## 1. Context

We continue to work on the delivery of the Business Plan 2021/22. As we settle into the new company structure, the Executive Committee has had discussions regarding its effectiveness and discussions with staff are ongoing as to further steps to be taken to improve its efficiency. The business has recently undergone an Away Day to focus on the work coming up in the next few months and to reconnect and have fun with colleagues after an extended period of working from home for all staff. In addition, the Executive team is working on plans to organise team collaboration days and events in the office.

We are enjoying a good working relationship with Brighton and Hove City Council as our Accountable Body, and we have been utilising the help offered by their team in many aspects. Following on from Anthony's update to the Committee, we await the LEP review for changes to our Assurance Framework or Accountable Body relationship.

We also note to the Committee **that the following policies have been updated** to fall in line with our restructure:

- Anti-Fraud and Anti-Bribery policy
- Complaints Policy
- Whistleblowing Policy

These changes relate to ensuring we have the correct contact information and that

the roles mentioned correspond with the new structure. They have been reviewed by the Accountable Body.

## 2. Assurance Framework

An update to the National Local Growth Assurance Framework has been published as of 02 September. What is more, Government have ended the exemptions allowed for COVID-19. A new set of exemptions has been issued for LEP's due to the uncertainty of the LEP review.

An updated version of our Assurance Framework has been drafted to address these recent changes (Annex A). The changes in summary are:

- LEP Review section has been added in Chapter 3 of the Assurance Framework. This highlighted the exemptions that have been granted by Government relating to the composition/recruitment of our Board
- Clear reference to the requirement of publishing a separate Expenses register alongside the Gifts and Hospitality register. This Expenses register will be developed with the Head of Finance and will consist of a short summary of expenses for Staff, Board members, CEO and Chair.
- Added a Reference to "Mid-Year Reviews" to our Scrutiny section.

We have been in contact with our deputy Area Lead, Sarah Bosley, to ascertain clarity on the publication of an expenses register which has duly been provided. Our Accountable Body has undertaken a legal review to ensure compliance with the National Assurance Framework and guided by updates given on the changes by our Area Leads. Finally, this has been reviewed by our Executive Committee before being presented to this Committee meeting. **We ask that the Committee recommend this version of the Assurance Framework to the Board to approve.**

A further amendment to the Assurance Framework will need to be undertaken to ensure that the document is aligned with our current Business Plan and the outcome of the LEP review. Should we have the result of the LEP review in early October, **we would aim to present this version to the November Audit and Risk Committee so that this version could be approved at the January Board.**

## 3. Accountable Body

The Accountable Body relationship has been working well across the team. There are no issues to report at this time. Recruitment for the Head of Finance has been completed and Stephen Trigg is in post.

## 4. Next Steps

Following the restructure, the Governance Officer will lead on these updates to the Committee, supported by the corporate team.

## **5. Diversity Statement**

There are no diversity considerations to raise.

## **6. Legal Statement**

This paper has been reviewed by Brighton and Hove City Council in their role as the Accountable Body.

## **7. Financial Statement**


There are no financial implications to consider.

### **Annexes:**

Annex A – Assurance Framework Version 8.1

### **Further information on request:**

- Assurance Framework Version 8



**Assurance  
Framework  
April 2021**

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In addition, the following policies can be found on the Coast to Capital website:

- Anti-Fraud and Anti-Bribery Policy
- Complaints Policy (including Confidential Complaints Procedure)
- Conflicts of Interest Policy
- Directors Expenses and Remuneration Policy
- Equality, Diversity and Inclusion Policy and Anti-Racist Policy
- Gifts and Hospitality Policy
- Procurement Policy
- Risk Policy
- Whistleblowing Policy

The Board Director Code of Conduct and the Declaration of Interest Form can also be found on our website.

[www.coast2capital.org.uk](http://www.coast2capital.org.uk)

Field Code Changed

## Version Control

Version	Reason for update	Publication date
<a href="#">V8.1 - 2021</a>	<a href="#">Updated following exemptions given due to ongoing LEP Review</a>	<a href="#">October 2021</a>
V8	Updated following a Governance Review in line with our annual review of the Assurance Framework	April 2021
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. 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.

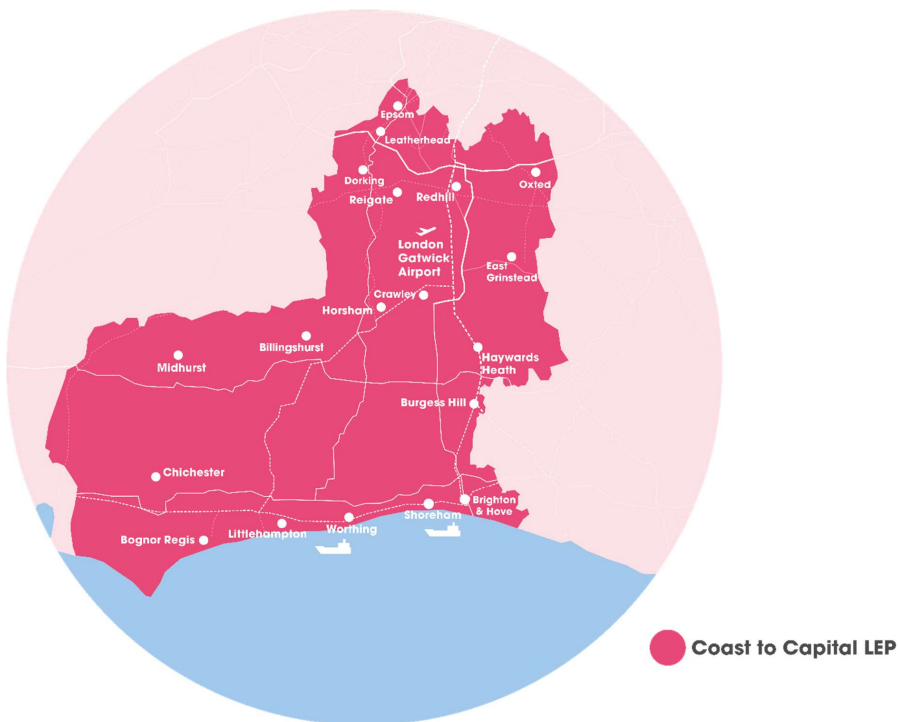
In its National Local Growth Assurance Framework Government confirms that LEPs should focus their activities on the following four activities to support the development and delivery of their Local Industrial Strategy:

- **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.



## 1.2 Our Area

The Coast to Capital region has long been the UK economy's unpolished gem. Unprecedented global connections, enviable links into the heart of London, one of the world's greatest cities, and home to the most entrepreneurial coastal city region in the country.



As Croydon is a gateway between our region and London, Croydon Council and the London LEAP continue to be a key strategic partner. In recognition of the wider Greater Brighton area which includes Lewes and Newhaven we work closely with Lewes District Council and the South East LEP.

## 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 primarily by our Core Grant from Government and contributions from our Local Authority partners.

- **Investment** - includes provision for the costs of administering and monitoring the Local Growth Fund (LGF), Growing Places Fund (GPF) and the Growth Grant Programme (GGP). LGF, GPF 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 and Enterprise Advisor Network. We receive grants to fully fund the Growth Hub and part fund the Enterprise Adviser Network (50%).
- **Discretionary** - includes provision for delivering our Policy & Strategy work.

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 year<sup>1</sup>;
- 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
- 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.

Coast to Capital looks to trade fairly with all suppliers and therefore seeks to pay all invoices recognised as accurate and in line with expectations within 30 days of receipt in the mail box [accounts@coast2capital.org.uk](mailto:accounts@coast2capital.org.uk).

#### 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

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<sup>1</sup> 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.

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](http://www.coast2capital.org.uk) contains full and up to date details on our activities.

## **1.5 Our Principles**

Transparency and accountability are 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 considered all of the relevant information available at the time of evaluation. Any decision 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 having taken advice from its Accountable Body beforehand.

### **Commitments**

Our Board Directors 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 Directors 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**

In 2018 we published our ambitious Strategic Economic Plan, 'Gatwick 360'. Following this, we undertook extensive research, analysis, and stakeholder engagement to prepare a Local Industrial Strategy. This put us in an extremely strong position to prepare a recovery strategy following the pandemic in 2020. We were pleased to publish 'Build Back Stronger, Smarter, Greener' in September 2020. These strategy documents and our evidence base can be found on our website.

### **2.1 Our Vision**

Our vision is to build back stronger, smarter and greener – working with our partners to make a difference to people and places and ensuring that our region is a fantastic place to live, grow and succeed.

### **2.2 Our Approach**

Coast to Capital produces a 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 Build Back Stronger Smarter Greener**

Our strategy Build Back Stronger, Smarter and Greener sets out a compelling case for a series of place based, transformational infrastructure projects for our area that will speed recovery and accelerate growth. These will address long term productivity challenges in our economy as well as the significant short-term impacts of the Coronavirus pandemic, identified in our Coronavirus (COVID-19) Economic Impact Assessment. More information on this strategy can be found on the website.

### **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, marketing strategies including social media, monthly newsletters, press releases and targeted communications.

## **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 Transport for the South East and the Greater South East Energy Hub. Up to date information on these partnerships and related strategies can be found on our website.

We engage bilaterally with our partner LEPs and are also part of 'Catalyst South' which brings together LEPs across the wider South East to identify areas for collaboration and to maximise the impact of our engagement with Government. Coast to Capital, Enterprise M3, Hertfordshire, Solent, South East and Thames Valley Berkshire LEP are members of Catalyst South.

### **Collaborative Working**

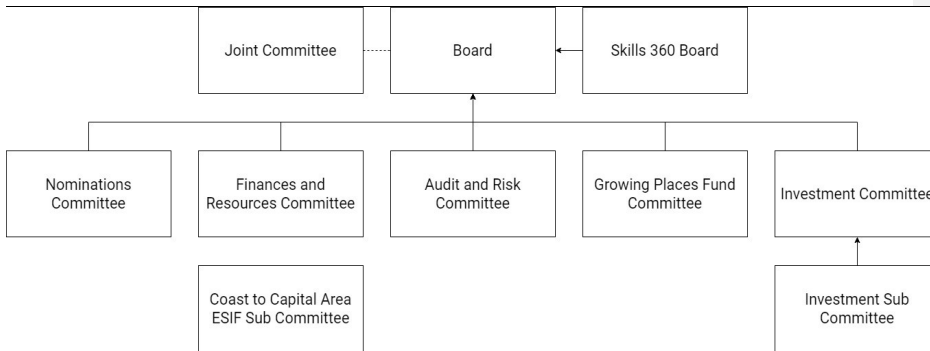
We are committed to working with other LEPs to maximise the impact of our strategy and investment across local geographies. We engage with other LEPs on projects and decisions which are likely to have an effect across our boundaries. Our collaborative activity and opportunities for collaboration is reported 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.

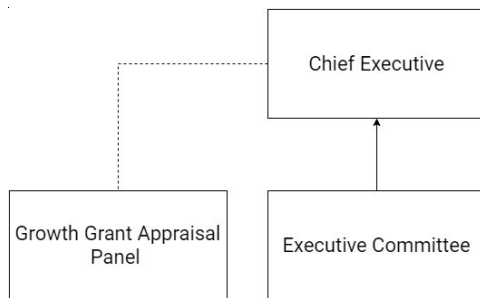
### 3. Our Governance

#### 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 Corporate team.



#### 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;

- ten 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.

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 Board Directors.

We also appoint Independent Members to our Committees to bring relevant skills and expertise as required. This is set out in our Committee Terms of Reference.

A named Board Director represents and engages with the Small and Medium Enterprise (SME) business community as our SME Champion. Details of Board Directors and their specific roles, including our SME Champion and Equality and Diversity Champion within Coast to Capital, are set out on our website. We have also identified Board Sponsors for key sector/priority areas. These are also set out on the 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.

Board Directors must live and/or work in the Coast to Capital area or have strong connections to the area.

### **Board Director Duties and Accountability**

Every Board Director 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 Directors have to adhere to the seven principles of public life, also known as the Nolan Principles. All Board Directors are required to sign an undertaking to abide by the Nolan Principles as part of our Board Director Code of Conduct.

The Board is responsible for ensuring Coast to Capital achieves its purpose and is properly and legally managed. The key function of Board Directors is one of governance rather than management ensuring that the organisation operates effectively rather than doing the work themselves. The scope of responsibilities include:

- Organisational purpose



- Leadership
- Integrity
- Decision-making, risk and control
- Board effectiveness
- Diversity
- Openness and accountability

As stated in the Board Director Code of Conduct Board Directors are accountable for their decisions and must co-operate fully with whatever scrutiny is appropriate to their position. Board Directors must be as open as possible about both their decisions and actions and the decisions and actions of the LEP. In addition, Board Directors should be prepared to give reasons for those decisions and actions.

Board Directors 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 Directors are expected to consult and canvas as relevant their respective sectors to inform Board discussions and decisions.

In exceptional circumstances, a Board Director may be asked to perform an executive role where their expertise or experience is required. This will be for a defined period only and on advice by the Chief Executive and agreement by the Chair. Any arrangement agreed will be confirmed in writing and shared with the Board.

### **Board Remuneration Policy**

All Board Director roles as described above, but with the exception of the Chief Executive and Chair 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, unless in exceptional circumstances as agreed by the Chair. The salary is adjusted annually in line with the Coast to Capital pay settlement, which is agreed by the Finance and Resources Committee.

The Chair role became remunerated in August 2020 currently set at £20,000 per annum. This is flat for three years after which it will be reviewed.

### **Diversity Statement**

Coast to Capital is committed to equality and diversity and is continually striving towards improving inclusion and supporting an inclusive culture. 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. We understand the inherent value of diversity and aim to proudly

celebrate and respect our individual differences. Diversity fosters growth and innovation and is integral to the delivery of our strategy.

Through our strategy work we have an excellent understanding of the economic and geography of the area; however, we are currently undertaking analysis to understand in more detail the diversity of the region including the demographic makeup of the population and the proportion of businesses that are female owned-led for example. We are tailoring and targeting our support in response and plan to extend this beyond gender. Our use of data and monitoring is a priority for the coming year.

We exceed the current requirement that at least one third of our Board Directors 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 Equality and Diversity Champion which is set out on our [website](#) along with a description of the role and its responsibilities.

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 Equality and 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 and Committee 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 strategy development. Our approach to engagement will be kept under review and reported to the Board.

We publish an Equality, Diversity and Inclusion 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 and set the strategic direction of Coast to Capital - to ensure the development and implementation of our strategy to promote economic growth in the area
- Being a champion at a national level through the LEP Network and Ministerial engagement, and at the South East level through the Catalyst South Chairs Group

- Be a figurehead for the wider regional business community and our partners, demonstrating an understanding of the economy and building traction on the issues raised to support and attract business growth
- Advocate for the economic, commercial and demographic issues facing the area, particularly strengths and opportunities that should be taken to drive forward economic growth
- Chair the Board of Directors meetings
- Take a leading role in determining the structure of the Board and leading the appointment of Board Directors and the Vice Chair
- Work collaboratively with the Board and executive team to build a strong organisation based on best practice from the Private Sector
- Ensure that Coast to Capital is run in a transparent and accountable way, in compliance with the Assurance Framework and adhering to the seven Nolan Principles of public life
- Be the line Manager for the Chief Executive and provide support, advice and challenge to them
- 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. In particular in relation to setting priorities, developing plans, monitoring performance, managing risks and ensuring that there are enough resources available
- Contributing to the development of an effective private, public and education sector partnership to achieve practical outcomes with a consensual approach
- Attending and chairing working groups and other meetings on specific issues and engaging with stakeholder groups and forums such as Transport for the South East or seek nominations from others to do so
- Declare any interests that may be relevant to any Coast to Capital decisions and comply with the Code of Conduct and relevant policy
- Represent Coast to Capital at high profile events including speaking opportunities
- Understand and commit to Coast to Capital's Equality and Diversity aspirations and policy

The Chair may be a member of Coast to Capital Committees and provide contributions and expertise; however, they would not be expected to Chair any Committees.

### **Our Vice Chair**

Our Vice Chair's responsibilities are to:

- Support the Chair to deliver their duties;
- Deputise for the Chair at Board and other meetings as required as a proxy, also in instances when the Chair is conflicted;
- Support the Chief Executive with operational matters and key relationships;
- Foster positive working relationships amongst Board Directors and exemplify Board Director behaviour and input;

- Attend Coast to Capital Board meetings and provide support to Board members and Committees as required;
- Act as an ambassador and champion for Coast to Capital, engaging in projects which require Board member leadership;
- Advise the Executive Team and support strategy development; and
- Ensure that the LEP acts in a transparent, efficient and effective way.

### **Our Private Sector Directors**

As a business-led organisation our success depends on the strength of our Private Sector 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, Further Educational Institutions or third sector organisations are not classified as public sector organisations for this purpose.

### **Our Public Sector Directors**

The Board is directly accountable to the public through the three democratically elected directors drawn from the upper tier and unitary authorities in our area. Our Public Sector Directors are the Leaders of Surrey County Council, West Sussex County Council and Brighton and Hove City 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.

### **Third Sector Representation**

Our Third Sector Board representation is under review. We have a named Third Sector Sponsor on the Board which is set out on the website.

### **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 Nominations 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 Directors (unless the Board decides otherwise).

The Chair and Vice 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 appointment of any new Director to the Board must be by a majority vote in favour.

The Nominations Committee Terms of Reference can be found in Annex A.

### **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.

## **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 Nominations 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 upon a recommendation from the Nominations Committee to the Board. 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 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. The Board has the following specific responsibilities:

- Approval of the strategy;
- Approval of any submissions made to Government for funding;

- Approval of investments of more than £2 million (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 (including Coast to Capital itself), negotiations, labour relations, legal professional privilege and in connection to the investigation or prosecution of a crime. or

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, taking advice from the Accountable Body as required.

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 to which the comments relate.

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. If there are voluminous comments in relation to a matter the Board will be presented with a summary covering report produced by the Coast to Capital team. The full comments will be fully accessible to the Board on request. Public comments, or the summary covering report, 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 Directors 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 Directors 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 Directors 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 and the LEP Network 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. Our Board Development process is currently under review.

Along with the organisational strategy, this process informs Board succession planning and underpins the specific role profile and person specification for planned upcoming Board Director 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 the Finance and Resources Committee.

### LEP Review

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Coast to Capital is, with other LEP's, part of the on-going government-led reviewed into the role of LEP's which has led to exceptional circumstances. Therefore, there may be circumstances where the Board relies on the following discrepancies in meeting the specifications that have been raised in this chapter due to these Exceptional Circumstances. These new temporary exemptions provided by the Ministry of Housing Communities & Local Government to the National Local Growth Assurance Framework: flexibility and are as follows:

- There may be circumstances where the Board That the Coast to Capital Board may opts to extend or temporarily appoint board members/chairs without needing to proceed to a full recruitment, on the basis that a full and open recruitment is conducted after these exceptional circumstances cease. If this exemption applies, Coast to Capital must notify the Area Lead from the Government and provide clear justification for the decision. Any extensions should be within the current financial year only.
- That the Coast to Capital Board may wish to extend a Chair or Deputy Chair beyond normal term. If this exemption applies, Coast to Capital must notify the Area Lead from the Government for consent to extend the term.
- There may be circumstances where hat tthe Coast to Capital private sector composition of the Board is temporarily non-compliant. If private sector representation drops below may not meet its requirements set out in the above framework for private sector composition being two thirds, .of the Board members. Coast to Capital must notify the Area Lead from Government and provide clear explanation of why representation cannot be maintained.
- That the Coast to Capital Board may not meets its requirements set out in the above framework for one third of members to be women with an expectation to be equal by 2023 There may be circumstances where the gender composition of the Board is temporarily non-compliant. Should the Board composition drop below one- third female representation,, Coast to Capital must notify the Area Lead from Government providing clear explanation of why representation cannot be maintained

If any of the above are to be enacted, the LEP will contact its Area Lead from Government evidencing its decision.

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### 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 on our website.

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 on our website.

#### Gifts and Hospitality Policy

The Coast to Capital Gift and 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 on our website [alongside our Gift and Hospitality register](#).

## **Expenses**

Board Directors are entitled to claim reasonable travel, subsistence and associated expenses in accordance with their Coast to Capital related duties. The Board Expenses Policy was reviewed in 2020 and shared with Board Directors. These should be submitted to the Head of Finance on a monthly basis. Chief Executive expenses are approved by the Chair and other Board Director 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. [All expenses will be published in a register maintained on the website.](#)

## **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 on our website.

## **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 on our website.

## **Procurement Policy**

The purpose of the Coast to Capital Procurement Policy is to structure purchasing processes and sourcing strategies to ensure that the services and goods acquired are the result of transparent, objective, time and cost-effective decision making and risk management. Our Procurement Policy can be found on our website.

### 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	Risk Management	Strategy & Policy	Services
<b>Assurance &amp; Audit by :</b>	<i>Audit and Risk Committee (process) Investment Committee (delivery)</i>	<i>Audit and Risk Committee</i>	<i>Audit and Risk Committee</i>	<i>Audit and Risk Committee</i>	<i>Audit and Risk Committee Joint Committee</i>	<i>Audit and Risk Committee</i>
<b>Reporting to &amp; Oversight by :</b>	<i>Board</i>	<i>Board</i>	<i>Finance and Resources Committee</i>	<i>Board</i>	<i>Board</i>	<i>Board</i>
<b>Decisions by :</b>	<i>Investment Committee and Board (subject to funding level)</i>	<i>Growing Places Committee</i>	<i>Chief Executive and Executive Committee (subject to mandate)</i>	<i>Board (risk appetite) Audit and Risk Committee (interventions) Executive Committee (day-to-day)</i>	<i>Board</i>	<i>Board</i>
<b>Refinement &amp; validation of Recommendations by:</b>	<i>Investment Sub Committee or Executive Team</i>	<i>Executive Committee</i>	<i>Executive Committee</i>	<i>Executive Committee</i>	<i>Executive Committee</i>	<i>Executive Committee</i>
<b>Recommendations by:</b>	<i>Executive Team Member with portfolio remit</i>	<i>Executive Team Member with portfolio remit</i>	<i>Executive Team Member with portfolio remit</i>	<i>Executive Team Member with portfolio remit</i>	<i>Executive Team Member with portfolio remit</i>	<i>Executive Team Member with portfolio remit</i>
<b>Initiation request by :</b>	<i>Grant applicant</i>	<i>Loan applicant</i>	<i>LEP Officer</i>	<i>The Risk Manager</i>	<i>Government</i>	<i>Government</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. Any member of a Committee may give one months' notice in writing of intention to withdraw from the membership of a Committee.

The membership of the Committees will be reviewed on an annual basis by its Chair.

#### **Nominations Committee**

The Nominations Committee is responsible for Coast to Capital Board recruitment and reappointment including the Chair, Vice Chair, Chief Executive, Private Sector Directors and Co-opted Directors. The terms of reference of this Committee are set out in Annex A.

#### **Finance and Resources Committee**

The Finance and Resources Committee is responsible for the oversight of the company's financial strategy and performance, and the effective use of the company's resources. The terms of reference of this Committee are set out in Annex B.

#### **Audit and Risk Committee**

The Audit and Risk Committee is responsible for overseeing the Coast to Capital Assurance Framework, Annual Audit Plan, External Audit and Risk Management process. The terms of reference of this Committee are set out in Annex C.

#### **Joint Committee**

This Committee consists of the Leaders of all the local authorities within the Coast to Capital area. 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 this Committee are set out in Annex D.

#### **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 this Committee are at Annex E.

### **Investment Committee Sub-Committee**

The Investment Committee Sub-Committee is responsible for the scrutiny and appraisal of projects prior to the approval of funding by the Investment Committee or Board. The terms of reference of this Committee are at Annex F.

### **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 G.

### **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 the skills needs of the area. These are set out in the Skills Strategy and Action Plan published in September 2020 and in our annual Local Skills Report to the Department for Education. The terms of reference of this Committee are set out in Annex H.

### **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 I.

## **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 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 Directors 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 J.

### **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	Finance and Resources Committee	Executive Committee	Audit and Risk Committee
<b>Operational day to day expenditure that exceeds overall gross LEP budget</b>	Recommends to Finance and Resources Committee		Approves			Recommends		Audits & reports to Board
<b>Award of Grant Funding (including LGF)</b>		Recommends	Approves above £2m	Approves up to £2m Audits & Reports to Board (delivery)				Audits & reports to Board (process)
<b>Withdrawal of Grant Funding</b>			Approves	Recommends				Audits process and Reports to Board
<b>Award of Recovery Grants</b>		Grants under £50k approved by Chief Executive and Internal Heads.	Approves over £2m	Approves £50k to up to £2m Approves operation of Recovery Grant Appraisal Panel				Audits & reports to Board
<b>Operational budget setting &amp; approval</b>			Approves			Recommends	Recommends to Finance and Resources Committee	Audits & reports to Board

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<b>Agreement of Policy &amp; Strategy</b>		Recommends	Approves					
<b>Recruitment Decisions</b>	Approves	Recommends						
<b>Remuneration decisions</b>	Recommends					Approves unlimited		Audits & reports to Board
<b>Award of Growing Places fund loans</b>		Recommends	Approves above £2m		Approves up to £2m			Audits process & reports to Board
<b>Virements of funding on LGF projects</b>		Recommends		Approves unlimited				Audits process & reports to Board
<b>Material changes to LGF outputs</b>		Recommends	Approves significant changes		Approves			Audits process & reports to Board
<b>Operational day to day management decisions within financial delegation limits</b>	Approves	Approves					Approves	Audits & reports to Board
<b>Initiation of debt recovery action on loan defaults</b>					Approves		Recommends	Audits process & reports to Board
<b>Material changes to loan agreements</b>			Approves significant changes		Approves		Recommends	Audits process & reports to Board
<b>Governance Changes</b>			Approves				Recommends to Audit and Risk Committee	Recommends to Board

<b>Calls for bids for grants or loans</b>			Approves	Recommends	Recommends			
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## 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 [Chief Executive Officer Head of 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.

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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 **Working 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.

To support our Services function and the strategic development of our Growth Hub service we are establishing a Business Recovery and Growth Advisory Group which is an informal network of Board Directors, and external experts where appropriate, to bring additional guidance, skills and expertise to this area. It is not be part of the formal governance and will share key messages with the rest of the Board.

#### **Freedom of Information Requests (FOIs)**

Coast to Capital is not subject to the provisions of the Freedom of Information Act or Environmental Information Regulations; however, our Accountable Body, public sector partners and Joint Committee are subject to the provisions in the Act and the Regulations. Coast to Capital will respond to all information requests in line with the spirit of the Act. In the first instance, FOIs and EIR requests should be directed to Coast to Capital via its website and Brighton and Hove City Council, as Accountable Body, will provide advisory support to ensure such 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. If it is not possible to hold this event in person it will be a fully accessible virtual event.

Each year we take part in an Annual Performance Review with Government where our performance is reviewed, [in addition to regular Compliance checks, deep dives and mid-year reviews](#). We also participate in the Peer Review process led by the LEP Network.

## **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**

Our approach to scrutiny is embedded throughout the organisation and relates strongly to our Risk Policy and the Board's agreed appetite to risk. For example:

- Our Local Growth Fund projects are scrutinised based on our robust risk management process and subject to our Funding Withdrawal Protocol (see section 4).
- Grant funds that we administer are subject to full due diligence processes.
- Our approach to the Stronger, Smarter, Greener Investment pipeline has agreed scrutiny arrangements focused on investment projects that have greater involvement from Coast to Capital (see section 4).

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 and Risk Committee. This independently assesses our performance and compliance with this framework on a targeted risk basis. Reports from these reviews can be found on the governance page of our website.

We are also able to call on our Accountable Body'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.

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

We are able to draw on the internal auditors of the Accountable Body as required.

### **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 Directors to inspect.

### **3.6 Our Accountable Body**

#### **Our Accountable Body**

Coast to Capital has a single Accountable Body, Brighton and Hove City Council, which is responsible for overseeing the proper administration of the governance and financial affairs within Coast to Capital. Brighton and Hove City Council commenced the role of Accountable Body on 1 April 2021. The Accountable Body Agreement with Brighton and Hove City Council can be found on our website which defines the role and requirements of the Accountable Body. 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 Governance including the Board, Investment Committee and Audit and Risk Committee. The Accountable Body also attends the Annual Review with Government.

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, administrating 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 and audit arrangements.
- A support function providing technical advice on the relevant law and legal risks.

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 Subsidy Control 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 Body's presence at all decision making meetings and at the Coast to Capital Board.

The Head of Finance, appointed by the Accountable Body, liaises with Coast to Capital teams and delivery bodies to ensure data is correctly received and approved. They work closely with the Section 151 Officer at Brighton and Hove City 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;
- Attend Audit and Risk 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 and Committee 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 Brighton and Hove City 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 Brighton and Hove City Council as the Accountable Body. A Head of Finance is in post who reports to both the Coast to Capital Chief Executive and Brighton and Hove City Council's Section 151 Officer. The Section 151 Officer approves all payments and attends the Board, Investment and Audit and Risk Committee to ensure appropriate use of resources.

### **4.1 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 strategy
- 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.

### **4.2 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 L summarises the decision making processes accordingly.

### **4.3 Our Funding, Programmes and Schemes**

This section sets 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 of £275m that we govern, deploy and monitor on behalf of Government. The LGF supports the delivery of infrastructure projects, which have been agreed with Government and are key in supporting economic growth in the region.

#### **Growing Places Fund**

This is a revolving business loan fund which provides loan finance, on a strictly recoverable model basis, to growth businesses to unlock development that the UK

loan market has not been able to service. £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 Fund Committee is charged with monitoring the £23m deployed via the Growing Places Fund and reporting to the Board.

### **Getting Building Fund**

Coast to Capital was allocated £19.2 million Getting Building Fund focused on supporting the delivery of shovel-ready infrastructure projects to boost economic growth, and fuel local recovery and jobs. This fund has been fully allocated. An Assurance Statement which sets out the Governance and decision making in relation to this programme is published on our website.

### **Backing Business Fund**

The Coast to Capital Backing Business Grants is a £2 million fund that was set up to provide grants to independent small businesses and social enterprises (excluding charities) in our area who have been affected by COVID-19 during the emergency response to the pandemic. The Backing Business Grant fund is now closed as we have deployed the funding that we had available.

### **Business Recovery Grant Programme**

The Coast to Capital Recovery Grant Programme is a capital equipment (capex) grant funded by Local Growth Fund (LGF). The grants part-fund projects undertaken by innovative, high growth small and medium sized enterprises (SMEs), charities and social enterprises in the Coast to Capital LEP area. Eligible projects will result in recovery of pre COVID-19 sales levels, job recruitment and retentions, innovation and social value. This Programme ended on 31 March 2021. An Assurance Statement which sets out the Governance and decision making in relation to this programme is published on our website.

### **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 and Careers Hub**

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.

## **Peer Networks Programme**

Launched in September 2020, the Peer Networks is a programme of expertly facilitated monthly meetings focused on a key topic of interest identified by the members themselves. The Peer Networks programme is funded by the Department for Business, Energy and Industrial Strategy (BEIS) and runs to March 2021 unless extended by Government. This model of peer-to-peer roundtables is a professionally delivered programme. Each peer-to-peer group will be limited to no more than 11 businesses. The programme delivery partners was appointed following a rigorous tender process and awarded to MDHub.

## **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 Growth Relationship Managers to provide specialist areas of support for business to unlock further growth. The Growth Champion activity is funded through the SEEDA Legacy funded which will be fully spent by the end of March 2021.

## **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.

## **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 match fund the core funding from Government, and help cover our operational costs.

## **4.4 Monitoring of Existing Grant Investments**

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 and

Getting Building Funds 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 these grant funds 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 and since August 2020 the Getting Building Fund is correctly deployed and administrated within our region. In some circumstances, funds may become available – for example because certain projects can no longer be delivered. 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 Annex L and section 1.6 of this document below.

We are accountable to Government for the delivery of a range of outputs relating to economic growth, as part of our Growth Deal, and Getting Building Fund allocation. The key core outputs that we monitor and report, and the definitions/evidence as defined by us to our Delivery Bodies can be seen in Annex N.

The Investments team monitor all grant projects throughout their lifetime, to ensure that conditions and clauses within the funding agreement are being adhered to, and that project delivery, outputs and milestones are on track. The monitoring process includes but is not limited to;

- Quarterly project 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 claim forms include reporting on project output delivery, milestones, and matched funding, and reporting is conducted up until project completion.
- 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 (LGF and GBF).
- Site Visits and Project Reviews. The Investment Programme Managers conduct regular site visits where possible, and project meetings with Delivery Bodies to ensure delivery is progressing to the anticipated timescale including milestones, and also to get updates around outcomes and risks. These are conducted at various stages of the project, from funding approval, to completion/evaluation.

- 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 risks and financial risks. These documents include the High Risk Report, Full Risk Register, Output Spreadsheet, and other financial updates.
- Audit Reviews. The Investments Committee, Board and Investment Programme and Risk Manager have the ability to commission an audit review by our Investments Audit and Compliance Officer, or to commission a 'deep dive' audit review on any of our grant 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 accessible to Board members on request. 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 M.

The Coast to Capital Investment Committee is updated with project delivery updates, with a key focus on risk on milestones, outputs and finance. Where project delivery is at risk, the High Risk Monitoring Protocol, or Funding Withdrawal protocol may be invoked as set out in Annex O and Annex P. 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.

#### **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, in the event of non-compliance or underperformance by a delivery body, or 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, or underperformance, or failure to meet the terms of the funding agreement (outcomes and/or milestones). This starts with a risk assessment of the project which is developed by the Investments team, and 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 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.

This information will form part of the High Risk Monitoring Protocol as set out in Annex O, whereby Committee members will take one of the following options; watch and wait, write to Government to request a funding carry forward, apply sanctions or withdrawal of funding. 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 Investment Committee recommendation within Board consent paper. See Annex P for full details of the funding withdrawal process.

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.

#### **4.6 Future Grant Investments & Pipeline Projects**

If and when we have available funding, or returned grant funding to deploy, we may revert to our existing pipeline of projects or issue targeted commissioning 'project calls' to build a new pipeline of projects in line with Gatwick 360 , or Build Back: Stronger Smarter Greener Programme. These project calls may identify different categories of projects to include:

- Projects that the LEP will lead and broker partner involvement in.
- Projects that the LEP will invest future grant funding in.
- Projects that the LEP will advocate strongly for but is less likely to provide investment in.

We will have open and transparent calls for projects. 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 project expressions of interest (EOIs), or bids will be developed through our Integrated Programme Office (IPO), and 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, and will be



available through 'bid call' guidance. Both private and public sector organisations can apply for funding on the basis that necessary criteria is met, in addition to meeting a matched funding contribution.

Expressions of interest will be reviewed by the IPO and the Strategy and Policy team to determine strategic alignment and support. Project initiation documents would be issued by the IPO, with applications for funding, and business cases following our Gateway system as set out below:

- **Gate 1:** The Investment Committee Sub-Committee (Annex F) will evaluate and review applications/business cases.
- **Gate 2:** The Investment Committee (Annex E) will review and sign off business cases or applications with a value of up to £2 million of funding.
- **Gate 3:** The Board will receive recommendations from the Investment Committee for approving business cases with a value of over £2 million. The Board also notes any decisions taken by the Investment Committee on business cases or applications under £2 million.

The Board have the opportunity to raise questions against any decision or approval taken by the Investment Committee, but the Board cannot overturn decisions made and can only ask for their re-consideration.

Once a project application or business case has been approved, Brighton and Hove City Council in its role as Accountable Body, will agree that Coast to Capital can enter into a funding agreement with the successful Delivery Body; detailing the roles and responsibilities of the parties and setting out how grant funding will be released to the delivery body.

The projects will then be monitored robustly by the IPO through the lifetime of the project and a robust audit trail is kept to demonstrate compliance.

Any decision that is made in contravention of the gateway 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.

Further information in relation to the IPO and Gateway process can be found in Annex L.

#### **4.7 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:

##### **Procurement Policy for our own purchases**

The Coast to Capital Procurement Policy can be found on our website. 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.

##### **Business Case Appraisal**

We ensure that thorough reviews of business cases and their supporting documentation is undertaken prior to any funding approvals by the Investment Committee, or Board. This can include taking expert advice from consultants around the value for money of projects, in addition to the appraisal of strategic alignment, project risks and outcomes in line with the Government funding guidance.

##### **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 clauses impose these requirements and we will audit through our reviews to ensure that delivery partners adhere to these standards. Delivery Bodies may be required to evidence prior to issuing funding agreements that they 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.

##### **Monitoring outputs and wider impacts 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 to the Board if evidence of adequate performance is not provided. In general, funding payments are released by Coast to Capital on a quarterly basis in arrears through completion of a quarterly claim form.

### **Risk Management**

Corporate risk management is governed as set out in the Risk Policy which can be found on our website.

A projects high risk report, and full 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, and Funding Withdrawal protocol is operated by the Investment Committee and Board and is detailed in Annex Q.

### **Social Value**

How we approach and record Social Value is currently under review.

Social value is firmly in mind when evaluating projects that have received grant funding, for the purposes of sharing achievements and understanding the true value and impact of the project.

For future projects, we will be ensuring that social value becomes a key part of the business case review and appraisal to help inform decision making. Projects will then report on social value as part of monitoring processes.