Guidance for General Grants

Minimum Requirement One: Senior Officer Responsible for a Grant

Version: 2.6

Date Issued: April 2025

Cabinet Office

Important note

► This guidance applies <u>only</u> to general grants made by departments and their arm's length bodies (ALBs) using Exchequer funding. It <u>does not</u> apply to formula grants or grant in aid. Managing Public Money and local guidance within government grant making organisations is applicable to those categories and minimum requirements may be developed in future.

► Organisations' <u>primary concern</u> when administering grants is to have due regard to the Grants Functional Standard (GovS 015) and the key documents referred to within it including Managing Public Money. Nothing in this guidance is intended to contradict or supersede these. Furthermore, this guidance is not intended to be an additional spending control - departments retain accountability for decisions on grants expenditure.

► This guidance should be read in conjunction with the wider set of minimum requirements guidance documents (including the introduction). Further information and tools supporting this guidance can be found online through the grants Centre of Excellence (CoE). It should also be read alongside organisations' internal guidance, where available, which will provide the departmental policy context.

► This guidance should be approached on a <u>comply or explain</u> basis. It is important to consider <u>flexibility</u> and <u>proportionality</u> in adhering to the minimum requirements. As such there may be some specific instances where the requirements may not be met in full. In these instances, appropriate justification should be recorded within the business case or equivalent approval documents.

Contents

Minimum Requirement

All government grants shall have a **named senior officer responsible (SOR) for a grant** with clearly defined responsibilities throughout the lifetime of the grant.[1]

Purpose

Minimum Requirement One: SOR for a grant and the guidance for general grants set out below, is about ensuring that an individual with the necessary authority, capability and capacity, and a full understanding of their role and associated obligations, is assigned to each grant scheme. The SOR shall take responsibility for delivering value for money and for managing risk within acceptable tolerances, as defined by their organisation's policies, governance and approvals processes.

---

[1] Note: this role was previously referred to as the senior responsible owner (SRO); however, as part of the move to standardise terminology across government functions, the role identified within this minimum requirement is to be referred to as the senior officer responsible for a grant. This is to distinguish between the SRO that is defined within the Project Delivery Functional Standard GovS002, whilst still acknowledging that some SROs may indeed also act as the senior officer responsible for a grant.

Grants Functional Standard: Key References

Mandatory requirements are defined by the word **shall** in the grants functional standard, which can be accessed [on GOV.UK](on GOV.UK). The **shall** statements related to this minimum requirement have been extracted from the functional standard and are set out below. **Please note**: in some cases, the information has been paraphrased for conciseness - refer to the standard itself for the full text.

Area	Requirement(s)	Context	Reference	Page
Principles	Those engaged in managing grants at scheme and award level shall ensure: 1. grants objectives are aligned to government policy and organisational objectives; 2. the application of this standard is proportionate and appropriate, and is reflected in the approach taken to governance, management frameworks and controls, having regard to an accepted balance of opportunity and risk; 3. grants are made in the best interest of the public, the public purse, and operate in line with Managing Public Money; 4. funding is administered with optimum efficiency, economy, effectiveness and prudence, to maximise value for public money; 5. responsibilities and accountabilities are defined, mutually consistent, and traceable across all levels of management; and 6. public service codes of conduct and ethics and those of associated professions are upheld.	The purpose of the government grants functional standard is to set expectations and drive consistency in the management of grants, promoting efficient and effective grant making, to ensure funding is used as intended and provides value for money through high-quality delivery.	2 Principles Also refer to: Managing Public Money 1.1 Purpose of this government standard.	2

Governance Framework: Roles and Responsibilities	[Organisations] **shall** have (at a minimum) the following roles: 1. Senior officer accountable for grants across government; 2. Accounting officer; 3. Senior officer accountable for finance in an organisation; 4. Senior officer accountable for an organisation's grants; 5. Senior officer responsible for a grant; 6. Grants champion; 7. Grant manager; 8. Specialist roles.	Government grants should be afforded the appropriate level of scrutiny by the grant owning department, to ensure the government grants functional standard is being adhered to and grant funding is being administered effectively. These roles are essential to the management of grant funding, and whilst organisations may change the titles and division of responsibilities they shall have (at a minimum) the roles outlined.	4.4 Roles and accountabilities.	9

Overview

1. The senior officer responsible (SOR) for a grant is responsible for ensuring that their assigned grant scheme or schemes are aligned with the organisation's ambit, legal powers and policy objectives. They shall also ensure that schemes deliver the intended outcomes and benefits. The SOR reports to the senior officer accountable for an organisation's grants - see the **other key roles** section below.

2. The SOR for a grant should be assigned by the senior officer accountable for an organisation's grants - or an equivalent official within an organisation - prior to the design and development stage for the scheme. The role will continue until the benefits of the grant have been realised, evaluated and the findings disseminated within the organisation, as appropriate, to inform the development of future grant schemes.

3. The SOR for a grant is usually at the senior civil service (SCS) level - although in some instances a Grade 7 - with appropriate capability, capacity and delegated authority, in line with the organisation's specific guidelines. The SOR's role and responsibilities should be clearly communicated to the individual when they take on the position. This can be achieved through a SOR delegation letter that would cover tenure, objectives and performance criteria, extent and limits of accountability - over financial controls, delegated authority, etc., - and general development issues.

4. It is expected that organisations will consider the required knowledge and experience when defining the SOR role for individual schemes, choosing the most appropriate person to deliver the requirement. Considerations may include the scope of the grant scheme, including the value and volume of individual awards, the level of risk, whether the aims of the scheme are novel, contentious or repercussive, and also the duration of the grant and the department's risk tolerance.

5. The SOR will need to ensure that they have the appropriate level of resources to deliver the requirement throughout the scheme's lifecycle, such as a grant manager and specialist support, as required (see the **other key roles** section below). These should be appointed at a sufficiently early stage so as to set up the scheme for success. Furthermore, the SOR will need to establish appropriate processes and controls to manage the scheme in line with the organisation's governance framework.

6. The SOR for a grant (and all staff involved with grants) should be given access to appropriate training to enable them to carry out their responsibilities effectively (refer to Minimum Requirement Ten: Training for further details). It is worth noting that approved training resources are available through the grants Centre of Excellence. It is strongly recommended that SORs undertake the bespoke training package, focused on the roles and responsibilities linked to the SOR appointment letter. The SOR is also encouraged to ensure they and their team share knowledge and experience with organisations across government, for example, through the Cabinet Office's SOR and Best Practice networks.

7. The name of the SOR for the grant is to be entered on to the Government Grants Information System (GGIS), to provide a level of assurance that a SOR has been assigned for each individual grant scheme in an organisation. The organisation should ensure that this information is updated where the SOR changes during the life of a grant. In addition, the name and contact details for the grant manager should also be recorded on the GGIS, to prevent inappropriate requests being directed to the SOR.

8. An outgoing SOR should adequately brief any replacement SOR, ensuring a smooth handover of responsibilities.

Responsibilities of the SOR for a Grant

9. A letter of appointment for the SOR for a grant should be used by each organisation to inform SORs of their responsibilities. Organisations may have their own versions of the letter.

10. The SOR is accountable for developing the business case for the grant and for navigating through their organisation's governance process for grants, in particular:

- compliance with the requirements of the grants pipeline control framework, including the requirement for all general grant schemes to be assessed as either Gold, Silver or Bronze, with each scheme's category reported via the GGIS (process guidance can be found on the grants Centre of Excellence (CoE));
- oversight of governance and approvals to ensure due regard is given to priority areas, including compliance with the grants functional standard and ensuring appropriate budget cover is in place (refer to Minimum Requirement Two: Governance, Approvals and Data Capture);
- ensuring details of grant schemes are entered into the grants pipeline and the GGIS, and kept up-to-date on the GGIS either directly or via a central grants function (refer to Minimum Requirement Two: Governance, Approvals and Data Capture);
- ensuring that grant schemes are referred to the Complex Grants Advice Panel (CGAP), where mandatory, or on a discretionary basis where appropriate, that advice is considered and the panel is provided with a written response covering actions taken on recommendations, or through a further meeting with the panel (refer to Minimum Requirement Three: CGAP);
- development and approval of a business case for each scheme, which is designed to be proportionate to the level of expenditure and risk, in alignment with delegated authority and governance (refer to Minimum Requirement Four: Business Case);
- ensuring that grant funding opportunities are competed in line with guidance and advertised as a minimum on Find a Grant, or in the case of a direct award, a rationale is developed, recorded in the business case and approved via the organisation's investment committee (refer to Minimum Requirement Five: Competition for Funding); [2]

---

[2] Find a grant is a pilot digital service, where all government general grant schemes must be advertised, enabling potential applicants to search for funding opportunities.

- development and approval of a robust and proportionate grant funding agreement for each award, with legal advice, including appropriate terms and conditions and associated schedules (refer to Minimum Requirement Six: Grant Agreements);
- management of risk, controls and assurance, approval and delivery of the due diligence model and fraud risk assessment and mitigation strategy (refer to Minimum Requirement Seven: Risk, Controls and Assurance);
- reporting to the Cabinet Office as required, for example, in response to an audit request and as part of continuous improvement against the requirements of the grants functional standard, usually via the periodic continuous improvement assessment exercise;
- ensuring appropriate monitoring of the performance for the scheme - delivery and financial - and commissioning a proportionate evaluation of the scheme's impact in relation to the scheme purpose and policy objectives (refer to Minimum Requirement Eight: Performance and Monitoring);
- oversight and approval of annual and final review and reconciliation for single-year and multi-year schemes, and implementing recommendations based on any findings from the same, or other sources (refer to Minimum Requirement Nine: Annual Review and Reconciliation);
- ensuring that there are resources available, including appropriate capability and capacity within the team to administer the scheme and awards, and that all individuals involved in the development and management the grant have clear roles and responsibilities, and undergo appropriate training (refer to Minimum Requirement Ten: Training); and
- compliance with the funded by UK Government Branding Manual. Policy guidance is available on the grants Centre of Excellence.

Note: the list above should not be considered exhaustive and is, therefore, in addition to any SOR requirements stipulated by individual organisations.

11. The Gold, Silver, Bronze categorisation framework, available from April 2025, introduces a new responsibility for the SOR to ensure that an assessment is undertaken for each new **general grant** scheme, to categorise each scheme as either Gold, Silver, or Bronze. The assessment is undertaken on the GGIS, with supporting guidance and a tiering tool available on the grants Centre of Excellence. The rating criteria broadly cover the level of value, risk and complexity present in a general grant scheme and it is the responsibility of the SOR to ensure that the Gold, Silver, Bronze categorisation is an accurate reflection of the value and level of risk and complexity present in the grant scheme. The assessment, together with the guidance and tiering tool, aim to ensure transparency and consistency in the treatment of general grant schemes and proportionality in the process of design and administration. Further information can be found on the grants Centre of Excellence website here.

SOR for a Grant in an Arm's Length Body

12. Arm's length bodies (ALB), which administer Exchequer funded general grants on behalf of a sponsor department, will require a SOR for those grants, in line with the guidance above. Whilst suitability is a key factor in appointing the SOR, in this case consideration should also be given to the nature of the relationship between the ALB

and its sponsor department with regards to levels of accountability, with key decisions being agreed with the department's sponsor team where appropriate, for example:

- some ALBs have opted for the role of SOR to be carried out by their Chief Executive Officers (CEOs) as they also fulfil the role of the Accounting Officer for the ALB, for example, where the volume of grants awarded is not particularly high and/ or when the CEO wishes to take direct responsibility for high value and/ or contentious awards; or
- conversely, in many other instances, where ALBs make numerous low value awards, there may be the need for multiple SORs at an appropriate grade to cope with the volume of work.

Further Key Roles

Note: for more information about each of these roles, see section 4.4 - Roles and Accountabilities - in the grants functional standard. It is worth noting that individual organisations may use different titles and may articulate the division of responsibilities in a slightly different way. The important point is that each department has roles in place, regardless of title, which are demonstrably compliant with the descriptions and requirements specified in the grants functional standard.

Senior Officer Accountable for Finance and Senior Officer Accountable for an Organisation's Grants

13. The SOR is expected to report to the senior officer accountable for an organisation's grants, who in turn will report to the senior officer accountable for finance.[3] The senior officer accountable for an organisation's grants and finance, are together responsible for ensuring that all financial requirements in relation to grant schemes and awards are considered and implemented, in full, within the organisation, and depending on the management arrangements in place, as described in the framework document.

14. The senior officer accountable for an organisation's grants provides leadership and direction for grant-making activity within the department and will direct the actions of SORs to ensure delivery is in line with expectations. They also ensure the implementation of grant related policy and compliance with the grants functional standard.

Grant Manager

15. The grant manager is accountable to the SOR for a grant for the day-to-day management and administration of grants within an organisation, in line with the Grants Functional Standard and associated government and organisational policies.

---

[3] This should not be confused with the senior officer accountable for grants across government, who is accountable to the Chief Executive of the Civil Service for the development and implementation of cross-government grants policy and practice.

Grants Champion

16. Each department has a grants champion who is responsible for representing their department as the single point of contact with the Cabinet Office grants management function, such as disseminating requests, managing data requests and helping to promote adherence to the grants functional standard and minimum requirements.[4] Some ALBs may elect to have their own grants champion, where that is considered proportionate and in line with the relationship with their sponsor department. The grants champion role is defined in a full role description, which is available on the grants Centre of Excellence.

17. SORs will work closely with their grants champions to ensure they are aware of the information flowing from Cabinet Office grants management function.

Other Stakeholders

18. SORs will need to interact with a variety of stakeholders throughout the lifecycle of their grant(s). These may include:

- policy teams that work on awarding, monitoring and evaluating individual grants;
- the Complex Grants Advice Panel (CGAP), an independent, cross-government expert panel, coordinated by Cabinet Office and HM Treasury;
- grants recipients, their advisers and in some instances representative bodies;
- specialists and support staff that may be utilised to cover issues such as those relating to commercial, legal, finance, risk, analysis and counter-fraud; and
- governmental or parliamentary oversight bodies, such as the Government Internal Audit Agency or the National Audit Office.

Further Resources

19. In adhering to this minimum requirement, and in addition to the references and resources highlighted earlier in this document, organisations may want to consider the following resources found on the grants Centre of Excellence (CoE) - in particular:

- training covering performing the role of SOR for a grant, available through the Government Grants Academy page; and
- the role of the Grants Champion.

20. The following materials may also be useful in defining the role of the grant SOR:

- GovS002 – Project Delivery, includes guidance on the role of the Senior Responsible Owner (SRO) for major projects, which may be useful in considering the role of the grants SOR; and
- further guidance on the role of the SRO published by the Infrastructure Projects Authority (IPA).

---

[4] Grants champions are appointed by their organisation. SORs can request the contact details of their grants champions from the Cabinet Office grants management function, which makes all reasonable efforts to maintain a central register.