



Guidance for General Grants

Minimum Requirement One: Senior Officer Responsible for a Grant

Version: 2

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Important note

- ▶ This guidance applies only to general grants made by departments and their arm's length bodies (ALBs) using Exchequer funding. It does not 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' primary concern 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 comply or explain basis. It is important to consider flexibility and proportionality 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.

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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 appropriate individual - with the necessary authority, capability and capacity, and a full understanding of their role and associated obligations - is assigned to each grant scheme, to take responsibility for delivering value for money and for managing risk within acceptable tolerances, as defined by their organisation.

¹ Note: this role was previously referred to as the senior responsible owner (SRO); as part of the move of standardising the 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 senior owners 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](https://www.gov.uk). The ‘shalls’ for the management of grant schemes in relation to this minimum requirement have been extracted from the Standard and are set out below. *Please note that in some cases the information has been paraphrased for conciseness - refer to the standard itself for the full version.*

Area	Requirement(s)	Context	Reference	Page
Principles	<p>Those engaged in managing grants at scheme and award level shall ensure:</p> <ol style="list-style-type: none"> 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’ [2]; 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. 	<p>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.</p>	<p>2 Principles</p> <p><i>Also refer to: Managing Public Money 1.1 Purpose of this government standard.</i></p>	2

<p>Governance Framework: Roles and Responsibilities</p>	<p>[Organisations] shall have (at a minimum) the following roles:</p> <ol style="list-style-type: none"> 1. Senior officer accountable for grants across government; 2. Accounting officer; 3. Senior officer accountable for finance in an organisation; 4. Senior officer accountable for an organisation’s grants; 5. Senior officer responsible for a grant; 6. Grants champion; 7. Grant manager; 8. Specialist roles. 	<p>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.</p>	<p>4.4 Roles and accountabilities.</p>	<p>9</p>
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Overview

1. The SOR for a grant is responsible for ensuring that their assigned grant scheme(s) is aligned with the organisation's remit, legal powers and objectives, and delivers the intended outcomes and benefits. They report 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 of 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 or senior executive officer might be appropriate - with appropriate capability, capacity and delegated authority (per the department'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 through an 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 departments will consider proportionality when defining the role for individual schemes, choosing the most appropriate person to deliver the requirement in terms of their knowledge and experience. Considerations may include the size of the grant in terms of the value, volume of individual awards the level of risk, including whether it is novel, contentious or repercussive, 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 grant'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 grant for success. Furthermore, the SOR will need to establish appropriate processes and controls to manage the grant in line with the organisation's governance framework for grants.
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 on the Grants Academy through the Centre of Excellence. SORs are also encouraged to 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. 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 (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 the grant are entered, and kept up-to-date, on the GGIS (refer to [Minimum Requirement Two: Governance, Approvals and Data Capture](#));
 - ensuring that grants are referred to the Complex Grants Advice Panel (CGAP), where required, that advice is considered, and the panel is provided with a written response covering action taken, or via a further meeting with CGAP (refer to [Minimum Requirement Three: CGAP](#));
 - development and approval of a Business Case, 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 the grant is competed in line with guidance, or in the case of a direct award, is appropriately justified, recorded in the business case and approved (refer to [Minimum Requirement Five: Competition for Funding](#));
 - development and approval of the grant funding agreement template, including terms and conditions and associated schedules (refer to [Minimum Requirement Six: Grant Agreements](#));
 - management of risk, controls and assurance, approval of the due diligence model, and the 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 annual maturity assessment exercise;
 - ensuring appropriate monitoring of the performance of the grant – delivery and financial - and commissioning a proportionate evaluation of delivery in relation to the scheme's impact in relation to the policy objectives (refer to [Minimum Requirement Eight: Performance and Monitoring](#));
 - oversight and approval of annual final reviews for single and multi-year schemes, and implementing recommendations based on any findings from this, or other sources (refer to [Minimum Requirement Nine: Annual Review and Reconciliation](#)); and
 - ensuring that there are resources available, ensuring appropriate capability and capacity to administer the grant, 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](#)).

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

SOR for a Grant in an Arm's Length Body

10. Arm's Length Bodies (ALB) that administer Exchequer funded general grants on behalf of its sponsor department will require an SOR for those grants, in line with the guidance above. Proportionality 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.

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

11. 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.² The senior officer accountable for an organisation's grants and finance, are together responsible for ensuring that the financial requirements for grant schemes and awards are implemented, in full, within the department and its ALBs, where present, and depending on the management arrangements in place and described in the framework document.
12. 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

13. 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.

²This 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.

Grant Champion

14. Each department has a grants champion who is responsible for representing their department as the single point of contact with, and disseminating information from the Cabinet Office grants management function, such as managing data requests and helping to promote adherence to the Grants Functional Standard.³ 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.
15. 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

16. 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

17. In adhering to this minimum requirement and additional guidance, 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.
18. 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).

³Grants champions are chosen, appointed and listed by their organisation, and SORs ought to be able to find their grants champion internally. SORs can also request the contact details of their grants champions from the Cabinet Office grants management function which makes all reasonable effort to hold that data centrally.