



Cabinet Office

Guidance for General Grants

Minimum Requirement Three: Complex Grants Advice Panel
(CGAP)

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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 grant 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 \(CoE\)](#). Further references and resources are highlighted throughout. 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.

Contents

Minimum Requirement	4
Purpose	4
Grants Functional Standard: Key References	4
Overview	5
Support Offer	6
Mandatory referral	7
Follow-up	9
Grants Pipeline Control Framework	9
CGAP - Frequently Asked Questions	9
Why should Departments refer a grant to the CGAP?	9
When should Departments refer a grant to the CGAP?	9
Who is responsible for the referral?	10
How do I make a referral to the CGAP?	10
Who should attend the CGAP meeting?	10
What happens after the panel meeting?	10
Examples of issues the CGAP frequently offers advice on:	10
Examples of questions that can be asked of the panel:	10
Last Year at the CGAP – Financial Year 2022/23	11
Further Resources	11

Minimum Requirement

New government grants, including those that are high-risk, novel, contentious or repercussive, as well as those undergoing a step-change in scope or funding, should be considered for submission to the Complex Grants Advice Panel (CGAP) for scrutiny and advice from subject experts.

Purpose

1. **Minimum Requirement Three:** the CGAP and the further guidance for general grants set out below, are focused on the requirement to ensure that there is proportionate, expert scrutiny and challenge applied to the development of all grant schemes, in particular during the design and development stage.
2. The CGAP is an independent, cross-government expert panel, co-ordinated by the Cabinet Office Government Grants Management Function (GGMF). Referral to the panel is strongly recommended by Cabinet Office for all schemes that are high-risk, novel, contentious, or repercussive, as well as schemes undergoing a step change in scope or funding, which impacts the level of risk, for example, a pilot scheme, which has completed evaluation and is moving to national rollout, would constitute a scheme undergoing a step change. In addition, some schemes are subject to mandatory referral, follow-up and reporting against the panel's recommendations (see paragraphs 13-15 below).
3. Schemes which meet the definition above will be provided with advice on a **comply or explain** basis. In practice this means the organisation developing the grant scheme will demonstrate compliance with the minimum requirements, or where that is not possible for specific elements of the requirements, record a supporting rationale providing justification for any areas of non-compliance, as part of the business case, approved by a person with an appropriate level of delegated authority within the funding organisation (see the [Guidance for General Grants](#), paragraphs 5-8, for further information).
4. The CGAP is available to all organisations involved in the management of government grants. The panel provides expert advice aimed at supporting scheme owners with key decisions during the design and development phase, for example, key policy decisions, financial and fraud risks and assessing value for money. The recommendations from the panel can be useful in informing discussions with senior officials and ministers, for example, providing an independent view when seeking approval for the scheme's business case. Furthermore, the panel enables improved oversight of the developing grants landscape in the Cabinet Office, and promotes the sharing of knowledge and good practice across government.

Grants Functional Standard: Key References

Mandatory requirements are defined by the word **shall** in the grants functional standard. The **shall** statements related to this minimum requirement have been extracted from the 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
Governance: Assurance	<p>It is recommended that new grants, which are high-value, high-risk, novel, contentious or repercussive, should be considered by an independent panel (the Complex Grants Advice Panel, see 4.4.6). Referral to the panel is mandatory for some grant schemes (see paragraphs 12-14 below).*</p> <p>Advice from the panel shall not detract from the accountabilities of those being advised.</p> <p>*This update will be reflected in the grants functional standard in the next iteration.</p>	<p>The Complex Grants Advice Panel is an independent, cross-government panel of experts, co-ordinated and chaired by the Cabinet Office, responsible for providing advice and recommendations on design and administration for applicable schemes, to the senior officer responsible for a grant.</p> <p>The panel should meet regularly with the objective of:</p> <ul style="list-style-type: none"> • increasing the efficiency of grant making; • improving the effectiveness of grants; • mitigating losses from fraud and error. 	<p>4.3.2 New general grants.</p> <p><i>Also refer to: 4.5.1 Complex grants advice panel.</i></p>	6
Governance: Roles and accountabilities	<p>[Organisations] shall have (at a minimum) the following roles:</p> <ol style="list-style-type: none"> 1. Senior responsible officer accountable for grants across government;** 2. Accounting Officer; 3. Senior responsible officer for finance in an organisation; 4. Senior officer accountable for an organisation's grants; 5. Senior officer responsible for a grant; 6. Grants champion; 7. Grant manager; 8. Specialist roles. <p>**<i>Central roles within the Cabinet Office</i></p>	<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>	4.4 Roles and accountabilities.	9

Overview

5. The CGAP is an independent cross-government panel, coordinated by the Cabinet Office Government Grants Management Function (GGMF), which provides insight, advice, challenge and recommendations to departments in relation to the development of new or repeat grant schemes. As set out in the panel's terms of reference, available on the [grants Centre of Excellence \(CoE\)](#), the CGAP contributes to the achievement of the GGMF's three key objectives to:
 - increase the efficiency of government grants administration;
 - improve the effectiveness of grant funding; and
 - reduce losses from fraud and error.

Support Offer

6. The key objectives, above, can be further broken down in terms of the type of support the CGAP provides, including to:
 - provide advice, challenge and constructive recommendations in reference to new, high-risk grants, planned across government, as well as schemes undergoing a step change in scope or funding, which impacts the level of risk;
 - enable scrutiny and challenge in relation to the application of the grants functional standard;
 - improve the strategic oversight of government grants, alongside the Government Grants Information System (GGIS); and
 - maximise value for money and eliminate inappropriate practice.
7. The CGAP's focus is on planned government grant spend, where that is defined as higher-value, complexity and risk (see [Minimum Requirement Seven: Risk, Controls and Assurance](#) for more information on the risk definitions). The panel brings together experts from across government in areas such as grants policy, commercial, finance, legal, subsidy control, analysis, digital, fraud, debt, evaluation and the UK Devolved Administrations team, to provide advice across a range of issues.
8. The CGAP is typically chaired by the Head of the Government Grants Management Function. However, when a scheme is subject to mandatory referral, meetings may be chaired by the applicable Minister of State in the Cabinet Office, or a nominated deputy. Ministerial Private Offices or Special Advisers may attend and participate in CGAP meetings on a discretionary basis, where the development of grants relating to manifesto commitments are being discussed.
9. The CGAP assists with scheme development to avoid unnecessary duplication of effort, encouraging cross-government working and identifying alternative funding mechanisms, which might be more suitable than grant funding to deliver a policy objective. The panel can also advise on appropriate governance within a scheme's delivery chain. The breadth of the cross-government panel's expertise allows for the provision of advice that may not be available as a collective within any single department or arm's length body.

10. Departments should refer suitable grants to the CGAP for consideration, **as early as possible within the scheme's lifecycle**. Early engagement with the CGAP allows for a more detailed analysis and consideration. You can contact the CGAP team by email: cgap@cabinetoffice.gov.uk, to confirm availability and schedule a referral as required.
11. CGAP advice can be accessed in two ways: formal meetings for schemes with a higher value, complexity and risk profile, or via correspondence for schemes with a lower value and risk profile. The same process and referral template is used for all referrals and the template should be completed ahead of the review meeting. Following the meeting, a written summary will be provided, which includes the panel's formal recommendations. For further information contact: cgap@cabinetoffice.gov.uk.
12. Typically, it is policy professionals involved in developing a grant scheme who make referrals to the CGAP, although it could also be the Senior Officer Responsible (SOR) for the scheme, or any other person involved in the governance process. The decision on which grants should be referred rests with the department or ALB, taking account of the guidance in this note – with the exception of schemes for which referral is mandatory.

Mandatory referral

13. In January 2021, the Government Grants Management Function (GGMF) initially secured agreement, via the Domestic and Economic Implementation Committee (DEI), to introduce a mandatory referral and follow-up process for schemes related to manifesto commitments. The changes were formally applied to the CGAP in March 2021.
14. Following an evaluation of this framework, in Q4, 2021, it was agreed with Cabinet Office ministers that the mandatory referral category for the CGAP would be extended to include additional schemes that are intended to deliver against priority government policy.¹
15. From 1 April 2025, schemes subject to consideration for mandatory referral to the CGAP are selected using the flow set out in the table below. The initial identification of schemes that are in scope is undertaken by the CGAP secretariat team, as part of the pipeline triage process (see paragraph 25).

¹ The current Government's priorities are encapsulated in the five Missions: <https://labour.org.uk/change/mission-driven-government/>.

Criterion	Question	Response
1	Is your scheme classified as Gold under the categorisation framework?	Yes / No
If 1 = Yes - mandatory referral, if 1 = No then:		
2a	Is your scheme a commitment in the Government's Manifesto?	Yes / No
2b	Is your scheme classified as Silver or Bronze under the categorisation framework?	Yes / No
<p>Where the answer to <u>both</u> questions (2a and 2b) is Yes, the scheme will be subject to mandatory referral to the CGAP.</p> <p>All other schemes remain subject to current guidance on referral, with Silver schemes strongly recommended for referral where they fit the CGAP criteria.</p>		

16. From 1st April, 2025, it will be mandatory for all **general grant** schemes, which are categorised as Gold, to attend the CGAP. Silver and Bronze schemes that will deliver manifesto commitments will also be subject to mandatory referral. This updates the existing criteria under the grants functional control, adjusting the mandatory requirement for manifesto commitments and high-value, high-risk general grant schemes, to reflect scheme designations under the Gold, Silver Bronze framework. Scheme categorisation is now a requirement of the grants functional control. There will be flexibility in this process, using the comply or explain principle. Discussions will continue to take place between the CGAP team and scheme owners on the appropriateness of referrals, for example, certain BAU and repeat schemes may not require a further review by the panel, where both parties agree. The current threshold of £20 million for Level 1 schemes will be replaced with the £50 million Gold value band. The grants functional control process guidance has been fully updated, to incorporate the Gold, Silver, Bronze scheme categorisation framework.

CGAP recommendations

17. Departments and ALBs are encouraged to incorporate CGAP advice into their management decisions. For mandatory referrals, individual recommendations, which are deemed significant by the applicable Minister of State in the Cabinet Office, and rated red by the panel, will require the following action by the referring department:

- consider the recommendation and develop an appropriate response; and
- report to the CGAP team on the response to the recommendation as follows:
 - i. accepted in full;
 - ii. partially accepted;
 - iii. rejected.

The panel allocates a priority rating to all recommendations as set out below:

High	The panel considers that the recommendation will have a significant impact on the success of the grant scheme.
Medium	The panel considers that the recommendation will have a moderate impact on the success of the grant scheme.
Low	The panel considers that the recommendation will have a minor impact on the success of the grant scheme.

18. Where the recommendation is accepted in full, details of the action to be taken, including timelines, should be provided.
19. Where the decision is to partially accept or reject the recommendation, an evidence-based rationale for that determination, approved at an appropriate level within the organisation, must be provided to the CGAP team for reporting to the applicable Minister of State in the Cabinet Office.
20. For non-mandated schemes, recommendations from the panel are not mandatory, however, details of the referral and a response to the advice and any action taken should be included in the business case or equivalent documents (refer to [Minimum Requirement Four: Business Case Development](#)). The scheme owner's response to the panel's recommendations can then be assessed through the departmental governance process and at the final sign-off by the finance, commercial and/ or policy lead. The CGAP team will routinely follow-up on all recommendations made by the panel, including for non-mandatory referrals. Insights from the panel also help to inform support provided by the grants Centre of Excellence (CoE).
21. Referral to the CGAP does not replace internal scrutiny by grant making organisations, nor does it negate the requirement for legal advisers to be consulted on any legal issues in relation to the scheme. It is important to note that the CGAP does not seek to undermine the responsibilities or accountabilities of the Accounting Officer in departments, rather, it provides an additional layer of scrutiny and assurance for the design of individual schemes.

Follow-up

22. All those who submit referrals to the CGAP are expected to provide feedback on the panel's recommendations and its impact on the development of the scheme. The CGAP secretariat will follow-up on referrals one month after recommendations are issued by the panel, to ensure the advice has been appropriately considered and recorded.
23. Recommendations provided by the CGAP must, in all cases, be fully considered by the relevant organisation. If an organisation wishes to challenge the recommendations of the panel, a written justification must be provided, approved by an appropriate official. Such cases will be followed-up by a meeting with the CGAP secretariat team, or by exception, a further attendance at a CGAP meeting, usually in the case of red rated recommendations. Departmental participation in the CGAP will

be monitored by the GGMF, including monitoring of mandatory schemes. To discuss a specific grant scheme, departments should email the GGMF via:

cgap@cabinetoffice.gov.uk.

Grants Functional Control Framework

24. The aim of the **grants functional control framework** is to increase the visibility of government grants at the earliest possible stage, to enable the GGMF to focus its resources and identify schemes where its support offer will have the most impact. The control requires departments to provide advance information on their proposed and in development schemes, which will enable the GGMF to offer appropriate support for grant making organisations involved in the development of government grant schemes, via the updated Government Grants Information System (GGIS).
25. The GGMF undertakes a triage process for all general grants data entered into the pipeline. Schemes will be triaged based on their Gold, Silver, Bronze categorisation, in order to determine, which schemes are subject to mandatory referral to the panel, and to identify the appropriate support offer from the GGMF. Scheme owners will be informed of the result of the triage process, and provided with a description of the level of support available and any ongoing reporting requirements to the GGMF. Process guidance for the functional control framework can be found on the grants Centre of Excellence.

CGAP - Frequently Asked Questions

Why should Departments refer a grant to the CGAP?

26. The CGAP offers an opportunity for grant schemes to be reviewed by a cross-government panel of experts who are able to provide a greater breadth of advice and insight than might be found as a collective in any one department.

When should Departments refer a grant to the CGAP?

27. Grants which are within scope should be referred to the CGAP as early as possible in the development cycle. Preferably at the design and development stage and prior to the final decision being made to use a grant mechanism. This will ensure that the panel members have the best opportunity to inform the development of the policy. It is also possible to seek additional advice from the panel at a later stage of development, once a grant scheme has previously been referred to the CGAP. Schemes that are undergoing a significant step change in scope or funding, should be referred to the CGAP as soon it is clear that such a change may be necessary.

Who is responsible for the referral?

28. Government grant making organisations - departments and ALBs - are responsible for referring appropriate grants to the CGAP. If an organisation marks a scheme as high-risk on the GGIS, but decides not to refer the scheme to the CGAP for review, the rationale for that decision should be captured in the business case. The GGMF's

CGAP team will contact scheme owners and grant champions to discuss referral to the panel for manifesto schemes and other high-risk schemes.

How do I make a referral to the CGAP?

29. In order to arrange a referral to the CGAP, scheme officials should contact the CGAP secretariat team - cgap@cabinetoffice.gov.uk - before making the referral. Where it is agreed that a referral should proceed, the secretariat team will provide the scheme owner with the appropriate template. Use of the referral template enables the department to focus on and distil the key questions for consideration, and to record the specific issues or questions they would like the panel to advise on. In some very high profile/ high-risk cases, a business case and other relevant documents, may be requested by the secretariat, to further support the CGAP discussion.

Who should attend the CGAP meeting?

30. The senior officer responsible (SOR) for the grant, or another suitable individual will be asked to provide an overview of the scheme and the issues to be considered, at the start of the discussion. It is strongly recommended that the department attends the meeting, to enable a two-way conversation between the panel and departmental representatives, however, it is not compulsory for a departmental representative to attend the meeting.

What happens after the panel meeting?

31. The discussion is summarised and the advice and recommendations provided by panel members will be circulated to attendees via a minute of the meeting. The draft minute will be circulated for review, five working days following the discussion, and finalised subject to comments.

Examples of issues the CGAP frequently offers advice on:

- the rationale for a direct award;
- potential links with other grant schemes across government;
- loans, contract procurement or alternative funding vehicles or mechanisms that could provide better value for money than a grant;
- governance within the scheme's delivery chain to ensure strong delivery of objectives;
- risk, including fraud and national security risk;
- blended finance, leveraging or other co-financing options that could be considered to improve value for money and/or reduce the cost of the scheme to government;
- funding optimisation; and
- subsidy control.

Examples of questions that can be asked of the panel:

- Is this grant scheme best suited to a direct award or a competed award?
- What advice does the panel have on the challenges of long-term grant schemes?
- What considerations need to be made where there is a phased/ gated approach to funding?

- What is CGAP's view on the proposed approach to due diligence and the risk of fraud?
- Does the panel have any advice on possible evaluation measures other than those outlined in the referral documents?

Previous Years at the CGAP – Financial Year 2022/23

32. The CGAP builds on the work of two previous grants advice panels that have been operated by the GGMF since 2017: the New Grants Advice Panel (NGAP) and the COVID-19 Complex Grants Advice Panel (C-CGAP).
33. In 2022/23, the CGAP considered 69 different grant schemes worth over £37.7 billion. The advice provided by panel members focused on ensuring the delivery of value for money and social outcomes, whilst mitigating key risks. In 2022/23, 98% of recommendations made by the panel were either accepted in full or partially accepted, and 97% of scheme owners said they would use the CGAP again if they were working on a different scheme.

Further Resources

34. In seeking to comply with this minimum requirement, and in addition to the references and resources highlighted earlier in this guidance, departments may want to consider the following:
- information on the Complex Grants Advice Panel - including an overview, the terms of reference, and referral template - can be found on the grants Centre of Excellence; and
 - organisations should also make full use of wider resources available through the [grants Centre of Excellence \(CoE\)](#).