



COTSWOLD

District Council

Cotswold District Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 10 SEPTEMBER 2026
Subject	GRANT MANAGEMENT POLICY
Wards affected	All
Accountable member	Councillor Patrick Coleman, Cabinet Member for Finance Email: patrick.coleman@cotswold.gov.uk
Accountable officer	David Stanley, Deputy Chief Executive and Chief Finance Officer Email: david.stanley@cotswold.gov.uk
Report author	Emma Cathcart, Assistant Director Counter Fraud and Enforcement Unit Email: emma.cathcart@cotswold.gov.uk
Summary/Purpose	To present Cabinet with a new Grant Management Policy for approval and adoption. To provide an over-arching Policy that provides guidance to employees on the Council's governance and approach for administration and management of grant income, in order to ensure that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.
Annexes	Annex A – Grant Management Policy Annex B – Equalities Impact Assessment
Recommendation(s)	That Cabinet resolves to: 1. Approve and adopt the Grant Management Policy attached to this report. 2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services.



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Corporate priorities	• Delivering Good Services
Key Decision	NO
Exempt	NO
Consultees/ Consultation	Any policies drafted or revised by the Counter Fraud and Enforcement Unit are provided to Legal Services for review and are issued to the relevant Senior Officers, Management and Governance Officers for comment.



1. EXECUTIVE SUMMARY

- 1.1** Cotswold District Council supports the voluntary and community sector, and businesses within the district through the operation of community grants schemes and via the distribution of grants received from third parties or Central Government.
- 1.2** As a Local Authority, the Council is entrusted with public funds and has a duty to ensure that funding is distributed properly and spent lawfully and that processes used to determine grants are fair and transparent.
- 1.3** The Grant Management Policy, attached at Annex A, has been developed to set out the processes to be followed when managing grants, including applying for external funding, developing and launching a new grant scheme and the distribution of funds.
- 1.4** It lays out aims and principles in awarding grants and sets out verification checks that we need to undertake, whilst at the same time ensuring that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.
- 1.5** The Counter Fraud and Enforcement Unit has developed this Policy with Governance Officers and consulted with the Economic Development and Communities Team.

2. BACKGROUND

- 2.1** The Council manages various grant schemes but to date, does not have an overarching Policy or Procedure that provides guidance to employees on the governance and approach for administration and management of grant income.
- 2.2** The attached Policy includes details relating to:
 - Roles and responsibilities;
 - Funding agreements;
 - Outcomes;
 - Eligibility criteria;
 - Assessment and awarding process;
 - Conflicts of interest;
 - Segregation of duties, and
 - Due diligence checks.



- 2.3** The Policy sets out the processes to be followed when managing grants, including applying for external funding, developing and launching a new grant scheme and the distribution of funds.
- 2.4** It lays out the aims and principles in awarding grants and sets out verification checks that we need to undertake, whilst at the same time ensuring that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.
- 2.5** The Council may also be tasked by Central Government with providing emergency funding or grants on an ad hoc basis and at short notice following national emergencies such as flooding, pandemics, welfare issues and humanitarian crises etc and this Policy will also apply to the distribution of those funds.
- 2.6** Different types of grant funding schemes will have very different eligibility criteria, but all require an application process, due diligence, verification checks and decisions regarding eligibility that should be transparent, consistent, fair and auditable.
- 2.7** The Council may also have to agree to a mandated Government application, verification or audit process before commencing payments, so it is important the scheme is legally and meticulously implemented.
- 2.8** All grant schemes require a named lead officer with defined responsibilities for the lifetime of the grant. They will be responsible for the key stages of the grant giving process outlined in the Policy, ensuring consultation and approval as appropriate.
- 2.9** The Policy includes guidance on developing a community grant scheme including application guidelines, timescales, promotion, and assessment of applications. It also includes guidance about funding agreements with grant recipients and performance monitoring and reporting.
- 2.10** To mitigate fraud and error, the CFEU developed a grants toolkit to be used in conjunction with this Policy. It provides guidance on the minimum verification and due diligence checks which must be undertaken. These checks should be determined at the start of the grant process and relevant documentation should be provided with every new grant application request, regardless of whether an organisation has received funding before.
- 2.11** Due regard should also be given to the internal processes and systems required to administer a grant scheme



- 2.12** The Policy and toolkit will be communicated to managers and employees involved in the administration and management of the Council's grant income following approval.

3. ALTERNATIVE OPTIONS

- 3.1** None

4. FINANCIAL IMPLICATIONS

- 4.1** This Policy will ensure that the Council has robust systems of financial control in place for the management of grants.
- 4.2** Whilst there are no direct financial implications arising from the implementation of the Policy, relevant financial implications must be taken into consideration as part of the application for any grant funding and the development of any grant schemes.
- 4.3** The adoption and approval of this Policy will help to support the prevention and detection of misuse of public funds and will support the Council's objectives in reducing crime and financial loss to the Council.

5. LEGAL IMPLICATIONS

- 5.1** There are a number of powers given to Councils to provide grant funding. The most appropriate power for grants to small voluntary and community sector grants is the general power of competence under Section 1 of the Localism Act 2011.
- 5.2** The subsidy control position for all grants, regardless of value must be considered before setting up a grant scheme and Legal Services can provide support with this.
- 5.3** Legal Services can assist with prepared template grant agreements for use by the Communities and Sustainable Economies Team for smaller grants.
- 5.4** Legal Services should review funding agreements from Central Government and draft bespoke agreements to pass on this funding to local groups.

6. RISK ASSESSMENT

- 6.1** Deliverability of grants schemes will be monitored via the relevant performance and monitoring arrangements as set out in individual grant agreements. .

7. EQUALITIES IMPACT

- 7.1** An Equality's Impact Assessment has been completed and is attached at Annex B.



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7.2 The impact for this policy is neutral however; individual grant schemes should consider their equalities impact when being developed.

8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

8.1 The Policy has a neutral impact however, individual grant schemes should consider their environmental and climate change implications when being developed.

9. BACKGROUND PAPERS

9.1 None.

(END)