



TOWN COWES TOWN COUNCIL GRANTS POLICY

Version Control

Policy	Grants Policy
Approved by	Full Cowes Town Council
Responsible Officers	Town Clerk and Responsible Financial Officer (RFO)
Version	1.0 First Issue
Review Date	Every three years or earlier if legislation changes

1. Purpose

This policy establishes the framework under which Cowes Town Council may award grants to organisations and, where permitted by law, individuals, to support activities that benefit the local community.

Cowes Town Council recognises that grants are an important means of supporting voluntary, charitable, community and not-for-profit organisations in delivering services, facilities and activities that contribute to the social, economic, environmental and cultural wellbeing of the parish.

Cowes Town Council is committed to ensuring that all grants are awarded:

- Lawfully;
- Transparently;
- Fairly;
- Consistently;
- Objectively;
- In accordance with proper financial administration;
- In accordance with recognised standards of local government governance.

No applicant has an automatic entitlement to receive grant funding.

2. Statutory Framework

This Policy shall be implemented in accordance with Cowes Town Council's statutory powers and duties, including (where applicable):

- Local Government Act 1972;
- Local Government (Miscellaneous Provisions) Act 1976;
- Local Government Act 2000;



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- Local Government Act 2003;
 - Localism Act 2011;
 - Local Audit and Accountability Act 2014;
 - Accounts and Audit Regulations 2015;
 - Subsidy Control Act 2022;
 - Equality Act 2010;
 - Human Rights Act 1998;
 - Freedom of Information Act 2000;
 - Environmental Information Regulations 2004;
 - Data Protection Act 2018 and UK GDPR;
 - Bribery Act 2010;
 - Fraud Act 2006;
 - Charities Act 2011;
 - Public Contracts Regulations (where applicable).

Where Cowes Town Council has adopted the General Power of Competence under the Localism Act 2011, grants may also be considered under that power where appropriate.

3. Governance Framework

This Policy shall be read alongside:

- Cowes Town Council Standing Orders;
 - Cowes Town Council Financial Regulations;
 - Scheme of Delegation;
 - Code of Conduct for Members;
 - Employee Code of Conduct;
 - Risk Management Policy;
 - Anti-Fraud and Corruption Policy;
 - Anti-Bribery Policy;
 - Whistleblowing Policy;
 - Procurement Policy;
 - Reserves Policy;
 - Investment Strategy;
 - Budget Strategy;
 - Equality Policy;
 - Data Protection Policy;
 - Records Management Policy;
 - Sponsorship Policy;
 - Community Engagement Policy.
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4. Best Practice Guidance

Cowes Town Council shall have regard to recognised guidance including:

- Joint Panel on Accountability and Governance (JPAG) Practitioners' Guide;
- NALC Model Financial Regulations;
- NALC Model Standing Orders;
- Relevant NALC Legal Topic Notes relating to powers, grants, financial management, Cowes Town Councillor interests and governance;
- CIPFA *Delivering Good Governance in Local Government Framework*;
- The Seven Principles of Public Life (Nolan Principles).

5. Policy Objectives

The Cowes Town Council's grants programme seeks to:

- Improve community wellbeing;
- Support voluntary organisations;
- Encourage community participation;
- Promote environmental sustainability;
- Support cultural, sporting and educational activities;
- Reduce social isolation;
- Improve health and wellbeing;
- Encourage partnership working;
- Support projects that align with the Cowes Town Council's Strategic Plan.

6. Principles

All grants shall be:

- Lawful;
- Proportionate;
- Transparent;
- Accountable;
- Evidence-based;
- Financially sustainable;
- Non-discriminatory;
- Demonstrably in the public interest.

Grant funding shall never be used for political purposes.



7. Availability of Grant Funding

Cowes Town Council shall determine annually through the budget-setting process:

- The total grants budget;
- Grant priorities;
- Maximum grant values;
- Any themed grant programmes.
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Cowes Town Council reserves the right not to award the entire grants budget.

8. Eligible Applicants

Applications may normally be accepted from:

- Registered charities;
- Charitable incorporated organisations;
- Community interest companies;
- Constituted voluntary organisations;
- Parish-based community groups;
- Sports clubs;
- Youth organisations;
- Arts organisations;
- Educational bodies;
- Social enterprises operating on a not-for-profit basis;
- Faith organisations where the funded activity demonstrably benefits the wider community without discrimination.

Applicants for grants exceeding £300 should normally have:

- A governing document;
 - A management committee or trustees;
 - A bank account requiring at least two unrelated authorised signatories or equivalent dual-authorisation arrangements;
 - Appropriate financial controls.
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9. Applications Normally Not Eligible

The Cowes Town Council will normally refuse applications from:

- Political parties;
 - Organisations promoting party political campaigns;
 - Commercial businesses seeking private profit;
 - Organisations whose primary purpose is lobbying;
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- Organisations promoting unlawful discrimination;
 - Organisations without appropriate governance arrangements;
 - Organisations with significant unresolved financial irregularities.

Cowes Town Council will not normally fund expenditure already incurred unless exceptional circumstances exist.

10. Eligible Expenditure

Grants may support:

- Community projects;
 - Equipment;
 - Capital works;
 - Community events;
 - Environmental improvements;
 - Youth activities;
 - Older people's services;
 - Disability access improvements;
 - Cultural activities;
 - Heritage projects;
 - Training;
 - Volunteer development;
 - Community safety initiatives.
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11. Expenditure Normally Not Funded

Grants will not normally fund:

- Political campaigning;
 - Routine maintenance unrelated to community benefit;
 - Repayment of debts;
 - Fines or penalties;
 - Private profit;
 - Activities contrary to legislation;
 - Expenditure already committed without prior approval;
 - Activities outside the Cowes Town Council's legal powers.
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12. Application Process

Applications for grants exceeding £300 shall normally include:

- Completed application form;
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- Constitution or governing document;
 - Latest accounts;
 - Bank statement;
 - Project budget;
 - Evidence of quotations where appropriate;
 - Safeguarding policy (where relevant);
 - Equality Policy (where relevant);
 - Insurance certificates;
 - Details of other funding.

Incomplete applications may be returned.

13. Assessment Process

Applications shall be assessed by the Town Clerk and the Responsible Financial Officer against published criteria.

Officer assessments shall include consideration of:

- Statutory powers;
 - Financial implications;
 - Legal implications;
 - Risk;
 - Strategic fit;
 - Equality;
 - Environmental impact;
 - Organisational capacity;
 - Value for money;
 - Previous grant performance.
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14. Decision Making

Recommendations shall normally be considered by the appropriate Cowes Town Council committee before determination and minuting by the body authorised under the Cowes Town Council's Scheme of Delegation.

Members shall determine grants independently and solely in the public interest.

15. Financial Controls

Grant expenditure shall:

- Be included within approved budgets;
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- Comply with Financial Regulations;
 - Be authorised in accordance with delegated authority;
 - Be supported by appropriate documentation;
 - Be recorded within the Cowes Town Council's accounting records;
 - Be reported through routine budget monitoring.
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16. Conflicts of Interest

Members and officers shall declare interests in accordance with:

- The Localism Act 2011;
- The Members' Code of Conduct;
- Standing Orders.

Persons with an interest shall not improperly influence decisions and shall withdraw from meetings where required.

17. Subsidy Control

Cowes Town Council shall consider the requirements of the Subsidy Control Act 2022 before making grants where recipients undertake economic activity.

18. Equality

Grant decisions shall be made fairly and consistently.

Cowes Town Council will have due regard to the Equality Act 2010 and seek to ensure that funding decisions do not unlawfully discriminate.

19. Fraud Prevention

Cowes Town Council reserves the right to:

- Verify applications;
- Inspect records;
- Request additional information;
- Undertake monitoring visits;
- Suspend payments;
- Recover grants where conditions have been breached.

Suspected fraud shall be investigated under Cowes Town Council's Anti-Fraud and Corruption Policy.



20. Grant Agreements

Successful applicants shall normally enter into a written Grant Agreement setting out:

- The amount awarded;
- Approved purpose;
- Payment arrangements;
- Reporting requirements;
- Monitoring requirements;
- Publicity requirements;
- Repayment provisions;
- Termination provisions.

21. Monitoring

Recipients may be required to provide:

- Progress reports;
- Completion reports;
- Financial evidence;
- Copies of invoices;
- Photographs;
- Outcome reports;
- Evidence of community benefit.

Cowes Town Council may undertake site visits where appropriate.

22. Recovery of Grant

Cowes Town Council may require repayment where:

- False information was supplied;
- Grant conditions are breached;
- Funding is not used for the approved purpose;
- Significant project changes occur without approval;
- Fraud is identified;
- The organisation becomes insolvent before completion of the funded project.

23. Record Keeping

The Town Clerk shall maintain:

- Grant Register;
- Applications;



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- Officer assessments;
 - Committee reports;
 - Decisions;
 - Payment records;
 - Monitoring reports;
 - Correspondence;
 - Recovery actions.

Records shall be retained in accordance with the Cowes Town Council's Records Retention Policy.

24. Transparency

Subject to the Freedom of Information Act 2000, Data Protection Act 2018 and UK GDPR, Cowes Town Council shall publish and maintain a register containing:

- Grant recipient;
- Amount awarded;
- Project title;
- Statutory power;
- Date approved.

The register shall be available for public inspection unless exempt information applies.

25. Audit

Grant expenditure shall be subject to:

- Internal audit;
- External audit;
- Public inspection under the Local Audit and Accountability Act 2014.
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The Responsible Financial Officer shall ensure that an adequate audit trail exists for every grant.

26. Risk Management

Grant funding shall form part of Cowes Town Council's Risk Management arrangements. The Town Clerk shall maintain appropriate controls to minimise:

- Financial loss;
 - Fraud;
 - Reputational damage;
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- Legal challenge;
 - Governance failures.
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27. Complaints and Appeals

Applicants dissatisfied with the administration of the grants process may submit a complaint under the Cowes Town Council's Complaints Procedure.

The Cowes Town Council's decision on the merits of a grant application is discretionary and final unless there has been procedural error, bias, unlawfulness or maladministration.

28. Policy Review

This Policy shall be reviewed:

- Every three years;
 - Following changes in legislation;
 - Following changes to NALC or JPAG guidance;
 - Following internal or external audit recommendations;
 - Following significant governance changes.
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29. Adoption Statement

This Policy shall take effect on the date of its adoption by Full Cowes Town Council and shall apply to all grants awarded by the Cowes Town Council unless a specific statutory scheme requires alternative arrangements.

The Town Clerk, as Proper Officer, and the Responsible Financial Officer are responsible for ensuring that this Policy is implemented in accordance with the Cowes Town Council's Financial Regulations, Standing Orders and applicable legislation.



Appendix A – Grant Application Form

Contents:

- Organisation details;
- Legal status and registration numbers;
- Contact information;
- Bank account details;
- Project description;
- Amount requested;
- Total project cost;
- Project timetable;
- Community benefits;
- Other funding secured or applied for;
- Insurance details;
- Safeguarding and Equality policies (where applicable);
- Declaration of accuracy;
- Data protection consent;
- Declaration of conflicts of interest.

Appendix B – Officer Assessment Report

To provide Members with an impartial professional assessment before making a decision.

Contents:

- Summary of the application;
 - Statutory power authorising the grant;
 - Financial implications;
 - Budget availability;
 - Community benefit;
 - Strategic fit;
 - Risk assessment;
 - Equality implications;
 - Environmental considerations;
 - Previous grant history;
 - Officer recommendation.
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Appendix C – Financial Assessment Checklist

To determine whether the applicant is financially sound and capable of delivering the project.

Checks include:

- Latest accounts reviewed;
- Financial reserves;
- Income and expenditure;
- Cash flow;
- Financial sustainability;
- Previous grants managed;
- Independent examination or audit status;
- Bank account verification.

Appendix D – Due Diligence Checklist

To ensure that applicants are properly constituted and operate with appropriate governance.

Checks include:

- Governing document;
- Committee or trustee structure;
- Charity or company registration;
- Public Liability Insurance;
- Employer's Liability Insurance (if applicable);
- Safeguarding arrangements;
- Equality Policy;
- Data Protection compliance;
- Health and Safety arrangements;
- Financial controls.

Appendix E – Standard Grant Agreement

To set out the contractual conditions attached to grant funding.



Contents:

- Grant amount;
- Approved project;
- Payment arrangements;
- Reporting requirements;
- Publicity requirements;
- Monitoring arrangements;
- Audit rights;
- Repayment provisions;
- Termination clauses;
- Dispute resolution.

Appendix F – Monitoring Report Template

To demonstrate that grant funding has been used appropriately.

Recipients report on:

- Progress achieved;
- Activities delivered;
- Community outcomes;
- Beneficiaries;
- Financial expenditure;
- Evidence of delivery;
- Lessons learned;
- Remaining project work.

Appendix G – Grant Risk Assessment Matrix

To identify and manage risks associated with grant funding.

Typical risks include:

- Fraud;
 - Misuse of grant;
 - Project failure;
 - Insolvency;
 - Reputational damage;
 - Safeguarding concerns;
 - Financial mismanagement;
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- Equality issues;
 - Failure to achieve outcomes.

Each risk should include:

- likelihood;
 - impact;
 - existing controls;
 - further mitigation;
 - responsible officer.
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Appendix H – Grant Evaluation and Scoring Matrix

To ensure all applications are assessed consistently.

Typical scoring criteria:

Assessment Area	Suggested Weighting
Community benefit	25%
Strategic priorities	20%
Value for money	15%
Financial sustainability	15%
Organisational capacity	10%
Partnership working	5%
Environmental benefit	5%
Equality and inclusion	5%

A minimum overall score may be required before funding is recommended.

Appendix I – Delegated Authority and Approval Thresholds

To define who has authority to approve grants.

For example:

Grant Value	Approval
Up to delegated limit	Town Clerk (where authorised)



Grant Value	Approval
Medium-value grants	Finance Committee
High-value grants	Full Cowes Town Council

Appendix J – Committee Report Template

To standardise reports presented to Members.

Sections include:

- Recommendation;
- Financial implications;
- Legal implications;
- Risk implications;
- Equality implications;
- Environmental implications;
- Consultation undertaken;
- Officer comments;
- Decision required.

Appendix K – Grant Register

To maintain a permanent record of all grants awarded.

The register should include:

- Grant reference;
- Applicant;
- Project title;
- Amount awarded;
- Statutory power;
- Budget code;
- Approval date;
- Payment date;
- Monitoring status;
- Completion date;
- Repayment actions (if any).

The register supports transparency, budget monitoring and audit.



Appendix L – Subsidy Control Assessment Checklist

To determine whether the proposed grant is subject to the Subsidy Control Act 2022.

The assessment considers:

- Whether the recipient is carrying out economic activity;
- Whether the award provides a selective advantage;
- Potential effects on competition or investment;
- Applicable exemptions or principles;
- Whether specialist advice is required.

Appendix M – Conflict of Interest Declaration

To ensure Members and officers declare any interests that could influence decision-making.

The declaration should cover:

- Financial interests;
- Employment;
- Family or close personal connections;
- Membership of applicant organisations;
- Previous involvement with the applicant.

It should also record any action taken, such as withdrawal from discussion or voting.

Appendix N – Equality Impact Assessment Checklist

To consider whether grant decisions promote equality and avoid unlawful discrimination.

The checklist should assess:

- Impact on protected characteristics;
- Accessibility;
- Inclusion;
- Opportunities to reduce inequalities;
- Potential adverse impacts and mitigation.



Appendix O – Fraud Prevention and Verification Checklist

To protect public funds before payment is made.

Checks include:

- Applicant identity verified;
- Bank account verified;
- Governing documents reviewed;
- Supporting quotations checked where appropriate;
- Duplicate funding checks completed;
- Grant conditions accepted;
- Payment authorised in accordance with Financial Regulations.

Appendix P – Annual Grants Programme Review Report

To provide assurance to Members that the grants programme is effective and represents value for money.

The annual report should summarise:

- Grants budget approved;
- Grants awarded;
- Unspent budget;
- Grants by category;
- Community outcomes achieved;
- Monitoring compliance;
- Grant recoveries;
- Internal and external audit findings;
- Complaints or appeals;
- Recommendations for future improvements.