



## Grant Funding Policy

**Author:** Anna Boyle, Funding Unit Manager

**Head of Service:** Ronan McKenna, Head of Community Planning

**Approved by:** Policy and Governance Committee

**Date approved:** Tuesday 7 January 2025 - Minutes were ratified by Full Council on Monday 27 January 2025

**Responsible Officer:** Funding Unit Manager

**File Ref:** (Corporate File e.g. G/IG/7)

**Version:** 1.0

**Review date:** (January 2026)

**Date of next review:** (January 2026)

# 1. INTRODUCTION

## 1.1 Policy Objective

The Council has made a commitment to implement key strategic actions to ensure our Borough is a place to invest, learn, work, visit and live in, whilst ensuring we create a focused, sustainable and inclusive Borough for everyone.

As part of this commitment the Council will ensure that available grant funding is distributed equitably, effectively and efficiently to eligible organisations and individuals via a process that is transparent and fit for intended purpose.

A guiding principle of Council Grant funding will be to address areas of need and to ensure there is a direct benefit to the Borough that is commensurate with the level of grant funding awarded.

The purpose of this Grant Funding Policy is to set out the principles, criteria and governance procedures for the funding of external bodies, to support the delivery of the Council's strategic aims and objectives.

### 1.1.1 Policy Aim

The Grant Funding Policy is built on a set of agreed principles:

“To have a streamlined, equitable, customer focused process, encompassing appropriate assessment, evaluation and monitoring systems.”

The aim of this policy is to ensure all funding and grants awarded by the Council are aligned to agreed principles and an understanding that the funding:

- Supports delivery against Council Corporate Plan and Community Plan
- Supports growth within the Borough for investment, learning, working, residing and socialising
- Supports and drives areas linked with sustainable practice and social value (economic, environmental and social)
- Strategically targets resources to meet identified needs
- Ensures an equitable, transparent and accessible funding process in line with Section 75 of the Northern Ireland Act 1998
- Provides clear guidance and support to Members, Officers and grant funding applicants
- Awards are made at the sole discretion of the Council but will be dependent on the level of funding available which is determined through the annual and external budget
- Awards in which funding levels are partially or wholly provided to Council through an external body will be subject to the available level of funding which is determined through their annual budget
- Activities and programmes must be fully consistent with the Council Corporate priorities
- Applications will be determined against relevant scheme criteria
- Organisations will not be entitled to funding on the basis they have been previously funded or for any other reason

## **1.2 Context/Background**

After reviewing the current internal grant funding streams and arrangements within Community Development, Good Relations, Leisure, Arts & Culture and Economic Development departments, Council Officers have created a corporate Grant Funding Policy. This policy aligns and standardises the existing grant guidance, procedures and processes.

The purpose of the Grant Funding Policy is to have a consistent customer focused process with relevant assessment and evaluation procedures with appropriate appeal monitoring systems in place.

## **2 SCOPE**

### **2.1 Roles and Responsibilities**

The role of Elected Members, Council Officers and others as appropriate in relation to this Policy are outlined:

**2.1.1** The Elected Council Members are accountable to the Electorate and responsible for:

- Ensuring the proper, prudent and effective use of public monies at all times
- Ensuring that activities and organisations funded are consistent with the Council Corporate Plan and Community Plan and aligned with the strategic objectives and priorities of the Council
- Ensures an equitable, transparent and accessible funding process in line with Section 75 of the Northern Ireland Act 1998

**2.1.2** The Chief Executive is accountable to the Council and responsible for:

- Ensuring that activities and organisations funded are wholly consistent with the Council Corporate Plan and Community Plan and aligned with the strategic objectives and priorities of the Council

**2.1.3** The Directors are accountable to the Chief Executive and responsible for:

- Ensuring that all grant management processes are conducted in an equitable, consistent and customer focused manner
- Ensuring that customers are placed at the core of grant funding with clear guidance and support accompanied by relevant assessment and evaluation procedures with appropriate appeal and monitoring systems in place

**2.1.4** Council Employees are accountable to the Heads of Service/Directors and responsible for:

- Ensuring that grant guidance, procedures and processes for administration, reporting and monitoring are implemented

- Ensuring all employees adhere to this Grant Funding Policy and take all appropriate actions to fulfil policy aims and objectives in line with relevant conflict of interest procedure and Anti-Fraud and Corruption Policy

#### **2.1.5 Grant Aid Recipients are accountable for the expenditure of public monies:**

- Ensuring they fully adhere to their responsibilities as outlined within the relevant Letter of Offer
- Ensuring they are aware of potential Fraud and Corruption and can fully account for all expenditure of their grant award
- Ensuring they have reviewed HMRC guidance to satisfy themselves that their application falls within a Grant or Bursary programme and not a Supply of a Service.

Please see guidance: <https://www.gov.uk/hmrc-internal-manuals/vat-supply-and-consideration/vatsc06310>

## **2.2 Implementation and Compliance**

This policy will be implemented by the Grant Funding Unit and departments with responsibility for the awarding and administrating of grant funding on behalf of Antrim and Newtownabbey Borough Council.

This policy and all individual grant funding guidance documentation will be publicly available through the Council website and Grant Management Software system.

Council Officers responsible for managing grant funding will host a series of funding workshops on an annual basis for Elected Members and Members of the Public.

Regardless of the means by which grant funding is awarded to a third party or arm's length organisation, the following principles, aims and objectives will apply. This policy recognises the need for a transparent and equitable dispersal of grant funding, whilst ensuring due diligence in the management of public monies.

## **3 EVALUATION AND REVIEW**

The Policy will be reviewed every 12months to ensure its effectiveness and applicability. The Council will also monitor the implementation of the Policy at regular intervals and will respond to emerging issues and/or changing circumstance.

## **4 CONSULTATION, SCREENING AND EQUALITY IMPACT ASSESSMENT**

### **4.1 Consultation with Stakeholders**

Departments within the Council have historically held their own policy and guidelines for administration of their own grant funding programmes.

This policy seeks to consolidate the Councils grant funding guidelines into one streamlined policy ensuring a clear corporate approach with a customer focused outcome.

To achieve this a benchmarking and best practice scoping exercise was conducted with several local Councils which included on-site visits and consultation meetings to inform and guide our own processes and practices. The findings of this exercise were shared with an internal stakeholders group comprised from Audit, Legal Services, Community Planning, Arts & Culture, Leisure and Economic Development to develop and agree a core policy.

The Corporate Leadership Team and Policy and Governance Committee have been consulted with in the development of this Policy. Following their approval, the Policy will be provided to the Full Council.

#### **4.2 Screening and Equality Impact Assessment**

Section 75 of the Northern Ireland Act 1998 (the Act) requires Antrim and Newtownabbey Borough Council to comply with two statutory duties:

(1) Section75 (1)

In carrying out our functions relating to Northern Ireland we are required to have due regard to the need to promote equality of opportunity between:

- Persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Men and women generally;
- Persons with a disability and persons without;
- Persons with dependents and persons without.

(2) Section75 (2)

In addition, without prejudice to the obligations above, in carrying out our functions in relation to Northern Ireland we are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

This Policy has been screened for the need for an Equality Impact Assessment (EQIA). An EQIA is not recommended

#### **4.3 Rural Needs Impact Assessment**

This assessment is a process to determine if there is a differential impact on rural areas and, where appropriate, adjustments are made to take account of particular rural circumstances.

Section 1(1) of the Act places a statutory duty on public authorities to have due regard to rural needs when:

- Developing a policy, strategy or plan
- Adopting a policy, strategy or plan
- Implementing a policy, strategy or plan
- Revising a policy, strategy or plan
- Designing a public service
- Delivering a public service

The policy has been screened to assess Rural Needs Impacts. The Policy has no Rural Needs Impacts

#### **4.4 Data Protection Impact Assessment**

If there is a chance that a new type of processing (especially when using new technologies) may cause a high risk to the rights and freedoms of individuals, the Council may need to carry out a Data Protection Impact Assessment (DPIA).

This Policy has been screened for the need to carry out a DPI and it was decided that a DPIA was required as the Policy involves:

1. Involve evaluation or scoring?
2. Involves the processing of data concerning vulnerable data subjects i.e. Children

## **5 POLICY**

### **5.1 PRINCIPLES OF FUNDING**

The fundamental principles underpinning this policy are:

#### **5.1.1 Funding Award is based on evidenced need**

The aim of grant funding is to provide financial support for projects and activities that add benefit to the Borough and contribute to improving the lives of local people and places. The following requirements **MUST** be met to be considered for funding:

- Have a clear purpose to the activity based on clearly evidenced need
- Be able to demonstrate how their project meets relevant funding criteria
- Can deliver high quality desired outcomes in a cost effective manner
- The applicant organisation can demonstrate that it is well run with the capacity to deliver the project as stated
- Reflect the statutory remit of the Council, aligned to the Corporate Plan and Community Plan

#### **5.1.2 Accessibility**

Information on all grant funding programmes will be publicly available through the Councils website and proactively promoted across Mailing Lists, Social Media channels and Borough Life. This will include:

- Guidance on completion of relevant grant application
- Grant Management System embedded into Council public facing platform with digital accessibility options available
- Centralised Grant Funding information on Council webpage
- Guidance notes for all individual grant streams
- Point of contact clearly communicated for relevant queries
- Annual Grants Funding calendar made available

We will strive to ensure the process is user friendly, transparent and fully inclusive.

### **5.1.3 Accountability**

The Council will at all times adhere to the policy and guidance criteria outlined within each grant funding programme.

- A clear decision making process will be utilised, with clear rationale and demonstrable evidence to support funding decisions
- Decision making process will be robust and transparent
- Funding decisions will be approved through Committee and Full Council with details made publicly available
- Unsuccessful applicants will be entitled to receive feedback on their application
- An accessible Appeals process will be communicated as part of each grants call

## **5.2 FUNDING TYPE**

This policy only applies to Grant Funding Awards and Individual Bursary Programmes:

**5.2.1 Grants** – Agreed funding awards across a range of sources from within the Council to an organisation to facilitate an approved goal, aim or objective.

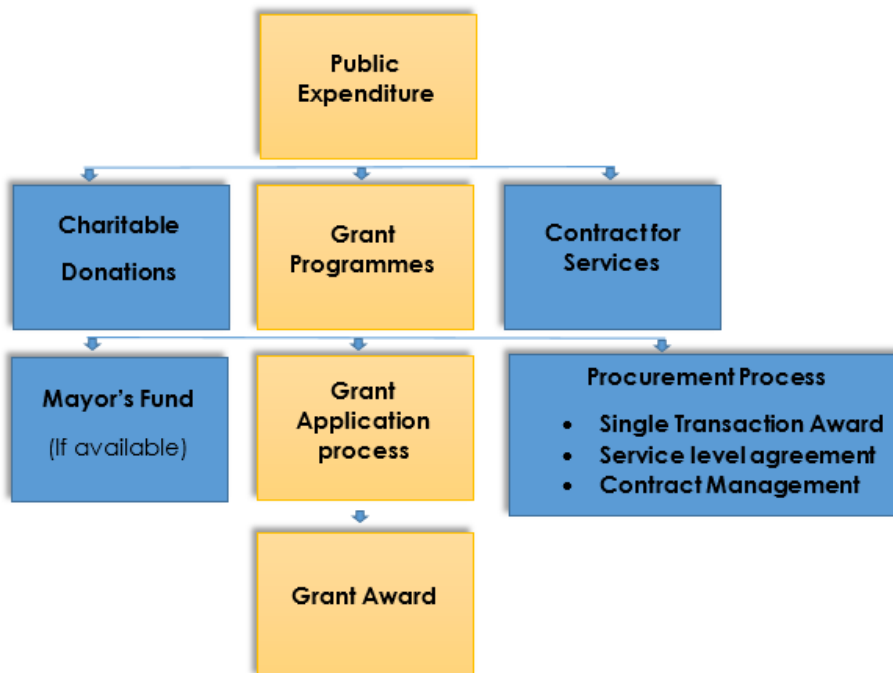
**5.2.2 Bursary** – An award provided to an individual on the basis of meeting pre-agreed criteria to support with personal development and success.

**This policy does not cover eligibility or procedures for:**

**5.2.3 Donations** – Requests for contributions to general appeals, charities and other one off requests should be directed to Member Services and/or Mayor's Office who will provide further advice and guidance as required.

**5.2.4 Contract for Services** – Funding allocation awarded for provision of services undertaken at request or on behalf of the Council will be made following the appropriate procurement process. Direction contained within the Procurement Policy should be adhered to.

## General Funding Sources:



## 5.3 FUNDING AVAILABLE

Following the finalisation of the budget setting process and confirmation of the award of external funding sources for the incoming year, the level of funding available for allocation to relevant grant funding programmes will be decided in line with the annual rates setting process.

The amount of funding, including funding awarded and funding remaining within each grant programme will be reported on, following the closure of each grant call and award of monies.

## 5.4 FUNDING CRITERIA AND ELIGIBILITY

### 5.4.1 Eligibility for Grant Funding

The eligibility criteria for each respective grant scheme will be contained within the 'Applicant Guidance Notes' for that scheme.

Applicant Guidance Notes will contain the following:

- Name and Remit of the Grant Funding Programme
- Who is eligible to apply for the funding



- Exclusions from funding
- General conditions to be satisfied for applicant seeking funding
- Details on Eligible and Ineligible expenditure items
- Scoring criteria
- Funding Award limits and timescales
- Grant Funding checklist
- How to apply
- Point of contact for further information and guidance
- Appeals process and procedure

#### **5.4.2 Eligible costs**

- A proportion of running costs (heat, light, insurance, rent or premises costs, office costs, etc.)
- Programme or activity costs which are directly relevant to the application
- Travel and transport costs
- Hire or purchase of equipment for meeting project needs
- Venue hire (excluding hire of groups won premises)
- Technical assistance
- Training or facilitation costs
- Festivals and events
- Capital costs
- Best practice visits
- Publicity/marketing
- Catering (a limit may be placed on the level of funding allowed towards hospitality and catering/refreshments)

#### **5.4.3 Exclusions from Grant Funding**

Each grant funding stream will have its own particular exclusions, which should be referred to prior to application; however, exceptions\* may be granted to support businesses.

As a guide the following general exclusions will apply to grant funding:

- Organisations and/or Individuals supported through Grant Funding should be based in the Borough. The Council will only provide funding to organisations not based in the Borough on an exceptional basis (see individual applicant guidance notes)
- Applications for specific projects which are clearly the responsibility of another statutory organisation
- Individuals, unless within a Bursary framework
- Projects and/or activities that provide no significant benefit to the Antrim and Newtownabbey Borough Council area
- Projects and/or activities that are delivered outside the Borough
- Projects that duplicate an existing provision
- Projects and/or activities that are not in line with Council policy
- Unrelated professional fees
- Bank charges, loans deficits or fines
- Costs that are already covered by other sources of funding
- Activities which are discriminatory, political or classed as proselytizing in nature

- \*Businesses and for profit organisations where funding would contravene local government, State Aid rules or other legislation (Some Economic Development Programmes such as Council's Enterprise Fund or the Rural Business Development Programmes will grant-aid local businesses but state aid rules will apply)
- Costs that can be claimed back from elsewhere i.e. VAT (where an applicant is VAT registered and can claim back VAT, grants will be calculated using the amount of eligible invoices provided based on net amount)
- If applicant is not VAT registered and cannot claim back VAT, grant award will be calculated using the gross amount of eligible invoices provided  
The amount of grant awarded in Letter of Offer is the maximum payment an applicant can receive
- Costs that are not auditable e.g. cash payments unsupported by a petty cash system.
- Payments made to individual members of the applicant group or organisation who have a pecuniary interest
- Retrospective costs i.e. Activities completed or costs incurred prior to agreement of the funding
- \*Organisations that are able to share out profits to individuals, members or shareholders
- Charity, fundraising events and donations
- Gifts and/or prizes
- Alcohol
- Balloons and single use plastics
- Flags and bunting without prior written approval
- Items for personal use

## **5.5 General conditions for funding**

Each grant funding stream will have its own particular conditions of funding which should be referred to prior to application. Council grant funding is a competitive process and awards are subject to availability of funds and may be subject to change in year and annually.

As a general guide the following general conditions will apply to grant funding:

- Applications completed in full, submitted by closing date with relevant supporting documentation
- Applications must fully meet the criteria to be considered for each respective grant guidance documents
- Payments will only be made by BACS to a suitable Bank or Building Society account, covered by the Financial Service Compensation Scheme and regulated in the UK. Further to this the account must be in the name of the organisation applying, show clear transaction records to include dates and names of payees. Any organisation not registered as a supplier with Council must complete this request form in order to receive grant payments

The following websites will assist organisations to determine if account meets criteria:

<https://register.fca.org.uk/s/>

<https://www.bankofengland.co.uk/prudential-regulation>

- Bursary payments will be made by BACS electronic bank transfer to the named recipient of the award. Where the recipient is under 18 years of age payment may be made to the bank account in name of their parent/guardian by BACS electronic bank transfer or cheque with written permission from both the recipient and the parent/guardian
- The Council need to be satisfied that the applicant can demonstrate that they have the resources to successfully deliver the awarded activity
- All organisations seeking funding support should have a minimum of £2million Public Liability and £10million Employers Liability in place or willing to obtain this cover. These are the Councils minimum requirements but all applicants should consult with their insurance broker to ensure this is sufficient to cover funded activities – with particular reference to bouncy castles, face-painting and fireworks.
- Successful grant applicants must ensure they include Council and other relevant funder logos on all publicity material for duration of grant and that Council support is acknowledged. If requested applicants or their representative must participate in media and promotional events. All publicity materials and use of logo should be agreed and approved by Council officers.
- The Council will reserve the right to request further information or clarification on any request for support and will share information on support with other funders
- Organisations seeking funding must have an Equal Opportunities Policy in place where relevant, further to this if the project involves or may involve children and/or young people under the age of 18 or involves or may involve adults at risk, child protection and/or safeguarding adults policies must be in place
- Organisations seeking funding must ensure they have completed a robust risk assessment (where relevant) for all their proposed activities prior to them taking place.

## **5.6 COMPLIANCE**

### **5.6.1 Non Compliance with Terms and Conditions of Funding Award**

The Council recognises there may occasions in which the grant activity cannot be delivered as intended. In such cases a written request should be submitted to the Council outlining the change in circumstances and requesting guidance on management of the grant funding awarded.

At this point the Council may take the decision to:

- approve a re-profile of the approved expenditure to a similar activity within the agreed budget and timeframes

- Request that any grant monies issued are returned to Council in part or full

All re-profiling requests will be approved by the Head of Service and the Funding Unit Manager and communicated in writing to the organisation requesting the change. Any activity which takes place without approval in place will be deemed unapproved and the Council will take steps to recover the funding in full.

### **5.6.2 Breach of Letter of Offer and Claw-Back arrangements**

If the Grant Purpose ceases to be carried out during the relevant Grant Period as a result of any act, omission or default on the part of the grant applicant organisation, including any breach of the terms and conditions contained within the Letter of Offer, the Council will invoke clawback procedures to demand that the applicant repays in part or full the Grant Funding awarded.

The applicant will be considered in breach of their funding offer if: the following apply – please note this list is not exhaustive:

- They provide misleading or inaccurate information, by accident or deliberate during the application process
- Members of the organisation funded, including volunteers and staff at any time during the project act dishonestly or negligently causing directly or indirectly any detriment to the activity or bring into disrepute the reputation of the Council by association through funding award(s)
- The organisation funded is in receipt of duplicate funding from any other source for any element of the activity
- The organisation does not take positive steps to ensure equality of opportunity in its employment practices, delivery of and access to services
- The organisation by their own actions makes their facilities and/or activities less inviting to any sections of the community
- There is a change of purpose, benefit, ownership or recipient, either during the project or within a reasonable period after its completion

Any reported or identified breaches or potential breaches that cannot be resolved to the satisfaction of the Council will result in the grant award in part or in full being clawed back by the Council.

If funding is withdrawn or clawback procedures invoked the applicant organisation will have no legal redress to have funding reinstated. The decision of Council in this case will be final.

### **5.6.3 Fraud and Corruption:**

The Council is committed to the prevention and detection of fraud and the promotion of an anti-fraud culture.

The Council operates a zero tolerance attitude to fraud and corruption, whether from internal or external sources. The Council requires staff and individuals/organisations that it deals with, to act with honesty and integrity, to safeguard the public resources and to report all suspicions of fraud and corruption.

Every case of alleged or suspected fraud will be thoroughly investigated in accordance with the Anti-Fraud and Corruption Policy, and where appropriate, referred to the Police Service of Northern Ireland (PSNI). The Council will also seek to recover any loss suffered as a result of fraud and if appropriate, will take civil, and/or disciplinary action.

The following relevant policies can be located on the Council website:

Anti- Bribery Policy - April 2023

Anti-Fraud and Corruption Policy - April 2023

Financial Regulations – April 2024

Fraud Response Plan - March 2023

Raising Concerns Policy – November 2023

The Council reserves the right to disallow any other current, pending or future grant applications and claims submitted by an organisation or an individual member of the organisation in respect of the financial year and to apply a moratorium on Council funding to any organisation or individual member of an organisation where fraudulent activity is identified within the current financial year and for at least 2 forthcoming financial years. This will also extend to individuals in receipt or applying for a bursary.

The Council will inform in writing the Chairperson of the organisation, or the individual in case of bursary, where fraud is suspected or has been identified. In the case of a bursary where the recipient is under age of 18 years the parent/guardian will also be notified.

## **5.7 CONTACT DETAILS**

Any issues or queries relating to this policy should be addressed to:

Anna Boyle  
Funding Unit Manager  
Antrim and Newtownabbey Borough Council  
52 Stiles Way  
Antrim  
BT41 2UB

## **6. APPENDICES**

Appendices (to be Completed)

Grant Process and Flowchart (to include appeal procedure)

Grant Funding Programmes Available – To be updated

Grant Guidance Documents – To be updated as centralised approach

Guidance for Officers Vouching and Monitoring Grant Funded Activity – To be updated as centralised approach

| <b>Version Number</b> | <b>Author</b> | <b>Purpose/change</b> | <b>Date</b> |
|-----------------------|---------------|-----------------------|-------------|
|                       |               |                       |             |
|                       |               |                       |             |
|                       |               |                       |             |
|                       |               |                       |             |