

Specimen framework document:

Non-departmental public body (excluding central government companies)



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Department
for Culture,
Media & Sport

Framework Document (2023-25)

Department for Culture, Media and Sport (DCMS) and The
Sports Grounds Safety Authority (SGSA)

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Introduction and background

1. Purpose of Document

- 1.1. This framework document (the “framework document”) has been agreed between the Department for Culture, Media and Sport (DCMS) and the SGSA in accordance with HM Treasury's handbook Managing Public Money: (“MPM”) (as updated from time to time) and has been approved by HM Treasury.
- 1.2. The framework document sets out the broad governance framework within which the SGSA and DCMS operate. It sets out the SGSA’s core responsibilities, describes the governance and accountability framework that applies between the roles of DCMS and the SGSA and sets out how the day-to-day relationship works in practice, including in relation to governance and financial matters.
- 1.3. The document does not convey any legal powers or responsibilities but both parties agree to operate within its terms.
- 1.4. References to the SGSA include all its subsidiaries and joint ventures that are classified to the public sector and central government for national accounts purposes. If the SGSA establishes a subsidiary or joint venture, there shall be a document setting out the arrangements between it and the SGSA agreed with DCMS.
- 1.5. Copies of the document and any subsequent amendments have been placed in the libraries of both Houses of Parliament and made available to members of the public on the [SGSA Website](#).
- 1.6. This framework document should be reviewed and updated at least every 3 years unless there are exceptional reasons that render this inappropriate that have been agreed with HM Treasury and the Principal Accounting Officer of the sponsor department. The latest date for review and updating of this document is 1st December 2025.

2. Objectives

- 2.1. DCMS and the SGSA share the common objective of ensuring safety at all regulated sports grounds. To achieve this the SGSA and DCMS will work together in recognition of each other's roles and areas of expertise, providing an effective

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1000670/MPM_Spring_21_with_annexes_080721.pdf

environment for the SGSA to achieve its objectives through the promotion of partnership and trust and ensuring that the SGSA also supports the strategic aims and objective of the department and wider government as a whole.

3. Classification

- 3.1. The SGSA has been classified as a central government organisation by the ONS/HM Treasury Classifications Team.
- 3.2. It has been administratively classified by the Cabinet Office as a non-departmental public body (NDPB).

Purposes, Aims and Duties

4. Purposes

- 4.1. The SGSA has been established under the Sports Grounds Safety Authority Act 2011. Its purposes are set out in sections 1, 2, 3, 4 and 5 of that Act.

5. Powers and Duties

- 5.1. The SGSA's powers and duties stem from the Safety of Sports Grounds Act 1975, the Football Spectators Act 1989 and the Sports Grounds Safety Authority Act 2011.
- 5.2. The SGSA's statutory duties and functions are to:
 - On an application duly made by a responsible person, exercise its discretion to grant a licence to admit spectators to any premises for the purpose of watching any designated football match played at those premises, which currently includes the Premier League and English Football League grounds, along with Wembley and the Principality Stadium; and
 - Oversee local authorities in their duties to sports grounds safety and safety certification.
- 5.3. It also has an advisory role in providing safety advice and support to other sports both in the UK and internationally in areas including:
 - Strategic advice, including identifying potential physical infrastructure and safety management risks to existing, new and refurbished stadiums;
 - Proactive action planning to enable sports bodies/grounds to develop and enhance spectator safety; and
 - Educating to plan and prepare for challenging scenarios through the provision of training and scenario planning programmes.
- 5.4. The SGSA sets safety standards through its internationally-recognised best practice guidance, including the Guide to Safety at Sports Grounds (Green Guide), which is used to build and develop sports grounds around the world.

6. Aims

6.1. The SGSA has the following strategic aims, which are set out in the SGSA's

Strategic Plan:

- Continuously improve its performance as the safety regulator for football grounds in England and Wales;
- Raise the profile and status of sports grounds safety in the UK and internationally;
- Become the strategic safety partner of choice for governments, sports governing bodies and organisers of major events; and
- Improve its efficiency and performance as a non-departmental public body.

6.2. The SGSA's priority is to maintain and build on the high standards of safety in the UK and to help spread best practice around the world, ultimately improving the safety of the sector both domestically and internationally.

Governance and Accountability

7. Governance and Accountability

7.1. The SGSA shall operate corporate governance arrangements that, so far as practicable and in the light of the other provisions of this framework document or as otherwise may be mutually agreed, accord with good corporate governance practice and applicable regulatory requirements and expectations.

7.2. In particular (but without limitation), the SGSA should:

- comply with the principles and provisions of the Corporate Governance in Central Government Departments Code of Good Practice² (as amended and updated from time to time) to the extent appropriate and in line with their statutory duties or specify and explain any non-compliance in its annual report;
- comply with MPM;

² <https://www.gov.uk/government/publications/corporate-governance-code-for-central-government-departments-2017>

- in line with MPM have regard to the relevant Functional Standards³ as appropriate and in particular those concerning Finance, Commercial and Counter Fraud; and
- take into account the codes of good practice and guidance set out in Annex A of this framework document, as they apply to ALBs.

7.3. In line with MPM Annex 3.1 the SGSA shall provide an account of corporate governance in its annual governance statement including the Board's assessment of its compliance with the Code with explanations of any material departures. To the extent that the SGSA does intend to materially depart from the Code, the sponsor should be notified in advance.

³ <https://www.gov.uk/government/collections/functional-standards>

Role of DCMS

8. The Responsible Minister

- 8.1. The Secretary of State and other members of the DCMS Ministerial team are accountable to Parliament for all matters concerning the SGSA.
- 8.2. The Ministers' statutory powers in respect of the SGSA are set out in the Safety of Sports Grounds Act 1975, the Football Spectators Act 1989 and the Sports Grounds Safety Authority Act 2011.
- 8.3. These are:
 - the power to set licensing criteria for seating facilities within football stadia
 - the power to make SGSA board appointments
 - the ability to review the SGSA licence fee
 - the power of the Secretary of State to consent to the provision of advice to persons outside England and Wales
 - the power to designate football matches

Appointments to the Board

- 8.4. The Chief Executive of the SGSA is appointed by the SGSA's Board with the approval of the responsible Minister. A DCMS representative should sit on the appointments panel. This appointment is subject to the Public Appointments Order in Council and as such must comply with the Governance Code on Public Appointments.
- 8.5. The Minister shall have the following appointment and approval rights in relation to the SGSA's Board:
 - The chairperson is appointed by the Secretary of State under paragraph 2(a) of Schedule 1 to the Sports Grounds Safety Authority Act 2011. This appointment is subject to the Public Appointments Order in Council and as such must comply with the Governance Code on Public Appointments;
 - At least 4, but not more than 8 other non-executive members are appointed by the Secretary of State under paragraph 2(b) of Schedule 1 to the Sports Grounds Safety Authority Act 2011. This appointment is subject to the Public Appointments Order in Council and as such must comply with the Governance Code on Public Appointments; and
 - All such appointments should have regard to the principle that appointments should reflect the diversity of the society in which we live, and appointments should be made taking account of the need to appoint boards which include a balance of skills and backgrounds.

Other Ministerial Powers and Responsibilities

8.6. The Minister is also responsible for:

- the policy framework within which the SGSA operates;
- setting the performance framework within which the SGSA will operate
- matters regarding spending approvals, acquisitions, disposals, and joint ventures in line with delegations as set out in the delegation letter; and
- such other matters as may be appropriate and proportionate.

9. The Principal Accounting Officer

9.1. The Principal Accounting Officer (PAO) is the Permanent Secretary of the department.

PAO's Specific Accountabilities and Responsibilities

9.2. The PAO of DCMS designates the Chief Executive as SGSA's Accounting Officer (AO) and ensures that they are fully aware of their responsibilities. The PAO issues a letter appointing the AO, setting out their responsibilities and delegated authorities.

9.3. The respective responsibilities of the PAO and AOs for ALBs are set out in Chapter 3 of MPM.

9.4. The PAO is accountable to Parliament for the issue of any grant-in-aid to SGSA.

9.5. The PAO is also responsible, usually via the sponsorship team, for advising the responsible Minister on:

- an appropriate framework of objectives and targets for the SGSA in the light of the department's wider strategic aims and priorities;
- on an appropriate budget for the SGSA in the light of the sponsor department's overall public expenditure priorities;
- how well the SGSA is achieving its strategic objectives and whether it is delivering value for money; and
- the exercise of the Ministers' statutory responsibilities concerning the SGSA as outlined above.

9.6. The PAO, via the sponsorship team, is also responsible for ensuring arrangements are in place in order to:

- monitor the SGSA's activities and performance;

- address significant problems in the SGSA, making such interventions as are judged necessary;
- periodically and at such frequency as is proportionate to the level of risk carry out an assessment of the risks both to the department and the SGSA's objectives and activities in line with the wider departmental risk assessment process;
- inform the SGSA of relevant government policy in a timely manner; and
- bring ministerial or departmental concerns about the activities of the SGSA to the full SGSA board, and, as appropriate to the departmental Board, requiring explanations and assurances that appropriate action has been taken.

10. The Role of the Sponsorship Team

- 10.1. The Sport Team in DCMS is the primary contact for the SGSA. The responsible senior civil servant for this relationship is the Head of Sport. They are the main source of advice to the responsible Minister on the discharge of their responsibilities in respect of the SGSA. They also support the PAO on their responsibilities toward the SGSA.
- 10.2. Officials of the Sport Team in DCMS will liaise regularly with SGSA officials to review performance against plans, achievement against targets and expenditure against its DEL and AME allocations. The Sport Team will also take the opportunity to explain wider policy developments that might have an impact on the SGSA.
- 10.3. Performance, issues and risks will be discussed regularly between the Sport Team and SGSA staff. Relevant officials from the DCMS Finance, Human Resources, Commercial and/or Public Bodies teams may attend accountability meetings as necessary.
- 10.4. In the event of performance, reputational or compliance issues, DCMS and SGSA will work to resolve these promptly. In the event of severe and/or prolonged issues, concerns will be escalated between the SGSA's Accounting Officer and/or Chair and the Principal Accounting Officer.

11. Resolution of Disputes between the SGSA and DCMS

- 11.1. Any disputes between the department and the SGSA will be resolved in as timely a manner as possible. The department and the SGSA will seek to resolve any disputes through an informal process in the first instance. If this is not possible, then a formal process, overseen by the senior sponsor, will be used to resolve the issue. Failing this, the senior sponsor will ask the relevant policy Director General to oversee the dispute. They may then choose to ask the

Permanent Secretary to nominate a non-executive member of the department's Board to review the dispute, mediate with both sides and reach an outcome, in consultation with the Secretary of State.

12. Freedom of Information Requests and Other Data Requests

12.1. Where a request for information is received by either party under the Freedom of Information Act 2000, or the Data Protection Act 1998 or the Data Protection Act 2018, the party receiving the request will consult with the other party prior to any disclosure of information that may affect the other party's responsibilities.

13. Reporting on Legal Risk and Litigation

13.1. The SGSA shall provide a quarterly update to the sponsor on the existence of any active litigation and any threatened or reasonably anticipated litigation. The parties acknowledge the importance of ensuring that legal risks are communicated appropriately to the sponsor in a timely manner.

13.2. In respect of each substantial piece of litigation involving the SGSA, the parties will agree to a litigation protocol which will include specific provisions to ensure appropriate and timely reporting on the status of the litigation and the protection of legally privileged information transmitted to the sponsor to facilitate this. Until such time as a protocol is agreed, the parties will ensure that:

- material developments in the litigation are communicated to the sponsor in an appropriate and timely manner;
- legally privileged documents and information are clearly marked as such;
- individual employees handling the legally privileged documents are familiar with principles to which they must adhere to protect legal privilege; and
- circulation of privileged information within government occurs only as necessary.

The SGSA Governance Structure

14. The Chief Executive

Responsibilities of the SGSA's Chief Executive as Accounting Officer

14.1. The Chief Executive as AO is personally responsible for safeguarding the public funds for which they have charge; for ensuring propriety, regularity, value for money and feasibility in the handling of those public funds; and for the day-to-day operations and management of the SGSA. In addition, they should ensure that the SGSA as a whole is run on the basis of the standards, in terms of governance, decision-making and financial management, that are set out in Box 3.1 of MPM. These responsibilities include the below and those that are set in the AO appointment letter issued by the PAO of the sponsor department.

Responsibilities for Accounting to Parliament and the Public

14.2. Responsibilities to Parliament and the public include:

- signing the accounts and ensuring that proper records are kept relating to the accounts and that the accounts are properly prepared and presented in accordance with any directions issued by the Secretary of State;
- preparing and signing a Governance Statement covering corporate governance, risk management and oversight of any local responsibilities, for inclusion in the annual report and accounts;
- ensuring that effective procedures for handling complaints about the SGSA in accordance with Parliamentary and Health Service Ombudsman's Principles of Good Complaint Handling are established and made widely known within the SGSA and published on the [SGSA's website](#);
- acting in accordance with the terms of MPM and other instructions and guidance issued from time to time by the department, the Treasury and the Cabinet Office;
- ensuring that as part of the above compliance they are familiar with and act in accordance with:
 - any governing legislation;
 - this framework document;

- any delegation letter issued to body as set out in paragraph 18.1;
 - any elements of any settlement letter issued to the sponsor department that is relevant to the operation of the SGSA; and
 - any separate settlement letter that is issued to the SGSA from the sponsor department.
- ensuring they have appropriate internal mechanisms for monitoring, governance and external reporting regarding non-compliance with any conditions arising from the above documents; and
 - giving evidence, normally with the DCMS PAO, when summoned before the Public Accounts Committee on the SGSA's stewardship of public funds.

Responsibilities to DCMS

14.3. Responsibilities to DCMS include:

- establishing, in agreement with the Department, the SGSA's corporate and business plans in the light of the department's wider strategic aims and agreed priorities;
- informing the Department of progress in helping to achieve DCMS's policy objectives and in demonstrating how resources are being used to achieve those objectives; and
- ensuring that timely forecasts and monitoring information on performance and finance are provided to the Department; that the Department is notified promptly if over or under spends are likely and that corrective action is taken; and that any significant problems whether financial or otherwise, and whether detected by internal audit or by other means, are notified to the department in a timely fashion.

Responsibilities to the SGSA Board

14.4. The Chief Executive is responsible for:

- advising the Board on the discharge of their responsibilities as set out in this document, in the founding legislation and in any other relevant instructions and guidance that may be issued from time to time;
- advising the Board on the SGSA's performance compared with its aims and objectives; and
- ensuring that financial considerations are taken fully into account by the Board at all stages in reaching and executing its decisions, and that financial appraisal techniques are followed.

Managing Conflicts

- 14.5. The Chief Executive should follow the advice and direction of the Board, except in very exceptional circumstances with a clear cut and transparent rationale for not doing so.
- 14.6. If the Board, or its chairperson, is contemplating a course of action involving a transaction which the Chief Executive considers would infringe the requirements of propriety or regularity or does not represent prudent or economical administration, efficiency or effectiveness, is of questionable feasibility, or is unethical the chief executive in their role as AO should reject that course of action and ensure that the Board have a full opportunity to discuss the rationale for that rejection.
- 14.7. Such conflicts should be brought to the attention of the PAO and the responsible Minister as soon as possible.
- 14.8. Furthermore, and if agreed with the responsible Minister, the AO must write a letter of justification to the chair of the Board setting out the rationale for not following the advice and recommendation of the Board and copy that letter to the Treasury Officer of Accounts.
- 14.9. If the responsible Minister agrees with the proposed course of action of the Board it may be appropriate for the Minister to direct the AO in the manner as set out in MPM paragraph 3.6.6 onwards.

15. The Board

Composition of the Board

- 15.1. The SGSA will have a board in line with good standards of corporate governance and as set out in its establishing statute and in guidance as set out in **Annex A**. The role of the Board shall be to run the SGSA, and to deliver the objectives, in accordance with the purposes as set out above, their statutory, regulatory, common law duties and their responsibilities under this framework document. Detailed responsibilities of the board shall be set out in the Board terms of reference. Remuneration of the Board will be disclosed in line with the guidance in the Government Financial Reporting manual (FReM).
- 15.2. The Board will include the chairperson and the Chief Executive. The board will consist of at least four, but no more than nine independent non-executive members (including the Chair), to ensure that executive members are supported and constructively challenged in their role. These individuals should have a balance of skills and experience appropriate to directing the SGSA's business. For the SGSA members who have experience of finance, legal issues, safety, operational delivery, corporate services such as HR, technology, communications or performance management would be desirable. The Board should include a majority of independent non-executive members to ensure that executive members are supported and constructively challenged in their role.

Board Committees

- 15.3. The Board may set up such committees as necessary for it to fulfil its functions. As is detailed below at a minimum this should include an Audit and Risk Committee chaired by an independent and appropriately experienced non-executive member of the Board.
- 15.4. While the Board may make use of committees to assist its consideration of appointments, succession, audit, risk and remuneration it retains responsibility for, and endorses, final decisions in all of these areas. The Chair should ensure that sufficient time is allowed at the board for committees to report on the nature and content of discussion, on recommendations, and on actions to be taken.
- 15.5. Where there is disagreement between the relevant committee and the Board, adequate time should be made available for discussion of the issue with a view to resolving the disagreement. Where any such disagreement cannot be resolved, the committee concerned should have the right to report the issue to the sponsor team, PAO and responsible Minister. They may also seek to ensure the disagreement or concern is reflected as part of the report on its activities in the annual report.
- 15.6. The Chair should ensure board committees are properly structured with appropriate terms of reference. The terms of each committee should set out its responsibilities and the authority delegated to it by the Board. The Chair should ensure that committee membership is periodically refreshed and that individual independent non-executive directors are not overburdened when deciding the chairs and membership of committees.

Duties of the Board

- 15.7. The Board is specifically responsible for:
- establishing and taking forward the strategic aims and objectives of the SGSA, consistent with its overall strategic direction and within the policy and resources framework determined by the Secretary of State;
 - providing effective leadership of the SGSA within a framework of prudent and effective controls which enables risk to be assessed and managed;
 - ensuring the financial and human resources are in place for the SGSA to meet its objectives;
 - reviewing management performance;
 - ensuring that the Board receives and reviews regular financial and management information concerning the management of the SGSA;

- ensuring that it is kept informed of any changes which are likely to impact on the strategic direction of the SGSA Board or on the attainability of its targets, and determining the steps needed to deal with such changes and where appropriate bringing such matters to the attention of the responsible Minister and PAO via the executive team, sponsorship team or directly;
- ensuring that any statutory or administrative requirements for the use of public funds are complied with; that the Board operates within the limits of its statutory authority and any delegated authority agreed with the sponsor department, and in accordance with any other conditions relating to the use of public funds;
- ensuring that in reaching decisions, the Board takes into account guidance issued by the sponsor department;
- ensuring that as part of the above compliance they are familiar with:
 - this framework document;
 - any delegation letter issued to body as set out in paragraph 18.1
 - any elements of any settlement letter issued to the sponsor department that is relevant to the operation of the SGSA;
 - any separate settlement letter that is issued to the SGSA from DCMS; and
 - that they have appropriate internal mechanisms for the monitoring, governance and external reporting regarding any conditions arising from the above documents and ensure that the Chief Executive and the SGSA as a whole act in accordance with their obligations under the above documents.
- demonstrating high standards of corporate governance at all times, including by using the independent audit committee to help the board to address key financial and other risks;
- appointing with the responsible Minister's approval a Chief Executive and, in consultation with the department, set performance objectives and remuneration terms linked to these objectives for the Chief Executive which give due weight to the proper management and use and utilization of public resources;
- in line with the DCMS principle of chair appraisals being led and conducted by DCMS senior officials, putting in place mechanisms for independent appraisal and annual evaluation of the performance of the chairperson by the independent non-executives, taking into account the views of relevant stakeholders. The outcome of that evaluation should be made available to the responsible Minister; and
- determining all such other things which the Board considers ancillary or conducive to the attainment or fulfilment by the SGSA of its objectives.

15.8. The Board should ensure that effective arrangements are in place to provide assurance on risk management, governance and internal control.

15.9. The Board should make a strategic choice about the style, shape and quality of risk management and should lead the assessment and management of opportunity and risk. The Board should ensure that effective arrangements are in place to provide assurance over the design and operation of risk management, governance and internal control in line with the Management of Risk – Principles and Concepts (The Orange Book)⁴. The Board must set up an Audit and Risk Assurance Committee chaired by an independent and appropriately experienced non-executive member to provide independent advice and ensure that the department’s Audit and Risk Assurance Committee are provided with routine assurances with escalation of any significant limitations or concerns. The Board is expected to assure itself of the adequacy and effectiveness of the risk management framework and the operation of internal control.

16. The Chair’s Role and Responsibilities

16.1. The Chair is responsible for leading the board in the delivery of its responsibilities. Such responsibility should be exercised in the light of their duties and responsibilities as set out in their contract of employment/appointment letter, the priorities in the chair’s letter issued to them by the sponsor team, the statutory authority governing the SGSA, this document and the documents and guidance referred to within this document.

16.2. Communications between the SGSA’s Board and the responsible Minister should normally be through the Chair.

16.3. The Chair is bound by the Code of Conduct for Board Members of Public Bodies⁵, which covers conduct in the role and includes the Nolan Principles of Public Life⁶.

16.4. In addition, the Chair is responsible for:

- ensuring including by monitoring and engaging with appropriate governance arrangements that the SGSA’s affairs are conducted with probity; and
- ensuring that policies and actions support the responsible Minister’s wider strategic policies and where appropriate, these policies and actions should be clearly communicated and disseminated throughout the SGSA.

16.5. The Chair has the following leadership responsibilities:

- formulating the Board’s strategy;

⁴ <https://www.gov.uk/government/publications/orange-book>

⁵ <https://www.gov.uk/government/publications/code-of-conduct-for-board-members-of-public-bodies>

⁶ <https://www.gov.uk/government/publications/the-7-principles-of-public-life>

- ensuring that the Board, in reaching decisions, takes proper account of guidance provided by the responsible Minister or the Department;
- promoting the efficient and effective use of staff and other resources;
- delivering high standards of regularity and propriety; and
- representing the views of the board to the general public.

16.6. The Chair also has an obligation to ensure that:

- the work of the Board and its members are reviewed and are working effectively including ongoing assessment of the performance of individual board members with a formal annual evaluation and more in-depth assessments of the performance of individual board members when being considered for re-appointment;
- that in conducting assessments that the view of relevant stakeholders including employees and the sponsorship team are sought and considered;
- that the Board has a balance of skills appropriate to directing the SGSA's business, and that all directors including the Chair and Chief Executive continually update their skills, knowledge and familiarity with the SGSA to fulfil their role both on the Board and committees. This will include but not be limited to skills and training in relation to financial management and reporting requirements, risk management and the requirements of board membership within the public sector;
- Board members are fully briefed on terms of appointment, duties, rights and responsibilities;
- they, together with the other board members, receives appropriate training on financial management and reporting requirements and on any differences that may exist between private and public sector practice;
- the responsible Minister is advised of the SGSA's needs when board vacancies arise;
- there is a Board Operating Framework in place setting out the role and responsibilities of the board consistent with the Government Code of Good Practice for Corporate Governance; and
- there is a code of practice for board members in place, consistent with the Cabinet Office Code of Conduct for Board Members of Public Bodies.

17. Individual Board Members' Responsibilities

17.1. Individual board members should:

- comply at all times with the Code of Conduct for Board Members of Public Bodies, which covers conduct in the role and includes the Nolan Principles of Public Life as well as rules relating to the use of public funds and to conflicts of interest;
- demonstrate adherence to the 12 Principles of Governance for all Public Body Non-Executive Directors as appropriate⁷;
- not misuse information gained in the course of their public service for personal gain or for political profit, nor seek to use the opportunity of public service to promote their private interests or those of connected persons or organisations;
- comply with the Board's rules on the acceptance of gifts and hospitality, and of business appointments;
- act in good faith and in the best interests of the SGSA;
- ensure they are familiar with any applicable guidance on the role of public sector non-executive directors and boards that may be issued from time to time by the Cabinet Office, HM Treasury or wider government.

⁷ <https://www.gov.uk/government/publications/public-bodies-non-executive-director-principles/12-principles-of-governance-for-all-public-body-neds>

Management and Financial

Responsibilities and Controls

18. Delegated Authorities

- 18.1. The SGSA's delegated authorities are set out in the delegation letter. This delegation letter may be updated and superseded by later versions which may be issued by the sponsor department in agreement with HM Treasury.
- 18.2. In line with MPM Annex 2.2 these delegations will be reviewed on an annual basis.
- 18.3. The SGSA shall obtain the department's and where appropriate HM Treasury's prior written approval before:
- entering into any undertaking to incur any expenditure that falls outside the delegations or which is not provided for in the ALB's annual budget as approved by the department;
 - incurring expenditure for any purpose that is or might be considered novel or contentious, or which has or could have significant future cost implications;
 - making any significant change in the scale of operation or funding of any initiative or particular scheme previously approved by the department;
 - making any change of policy or practice which has wider financial implications that might prove repercussive or which might significantly affect the future level of resources required; and
 - carrying out policies that go against the principles, rules, guidance and advice in MPM.

19. Spending Authority

- 19.1. Once the budget has been approved by the sponsor department and subject to any restrictions imposed by statute, the responsible Minister's instructions, this document, HM Treasury settlement or delegation letter, the SGSA shall have

authority to incur expenditure approved in the budget without further reference to the sponsor department, on the following conditions:

- The SGSA shall comply with the delegations set out in the delegation letter. These delegations shall not be altered without the prior agreement of the sponsor department and as agreed by HM Treasury and Cabinet Office as appropriate;
- The SGSA shall comply with MPM regarding novel, contentious or repercussive proposals;
- inclusion of any planned and approved expenditure in the budget shall not remove the need to seek formal departmental approval where any proposed expenditure is outside the delegated limits or is for new schemes not previously agreed; and
- the SGSA shall provide the sponsor department with such information about its operations, performance, individual projects or other expenditure as the sponsor department may reasonably require.

20. Banking and Managing Cash

- 20.1. The SGSA must maximise the use of publicly procured banking services (accounts with central government commercial banks managed centrally by Government Banking).
- 20.2. The SGSA should only hold money outside Government Banking Service accounts where a good business case can be made for doing so and HM Treasury consent is required for each account to be established. Only commercial banks which are members of relevant UK clearing bodies may be considered for this purpose.
- 20.3. Commercial accounts where approved should be operated in line with the principles as set out in MPM.
- 20.4. The AO is responsible for ensuring the SGSA has a banking policy as set out in MPM and ensuring that policy is complied with.

21. Procurement

- 21.1. The SGSA shall ensure that its procurement policies are aligned with and comply with any relevant UK or other international procurement rules and in particular the Public Contracts Regulations 2015.
- 21.2. The SGSA shall establish its procurement policies and document these in a Procurement Policy and Procedures Manual.
- 21.3. In procurement cases where the SGSA is likely to exceed its delegated authority limit, procurement strategy approval for the specific planned purchase must be sought from the department's commercial director.

- 21.4. Goods, services, and works should be acquired by competition. Proposals to let single-tender or restricted contracts shall be limited and exceptional and a quarterly report explaining those exceptions should be sent to the department.
- 21.5. The delegated limit for single tender action contracts is set out at Annex B. The SGSA must comply with the Single Tender Action process as outlined at Annex B and as otherwise communicated to them by the Department.
- 21.6. Procurement by the SGSA of works, equipment, goods, and services shall be based on, a full option appraisal and value for money (VfM), i.e. the optimum combination and whole life costs and quality (fitness for purpose).
- 21.7. The SGSA shall:
- engage fully with department and government wide procurement initiatives that seek to achieve VfM from collaborative projects;
 - comply with all relevant Procurement Policy Notes issued by Cabinet Office; and
 - co-operate fully with initiatives to improve the availability of procurement data to facilitate the achievement of VfM.
- 21.8. The SGSA shall comply with the commercial⁸ and grants standards⁹. These standards apply to the planning, delivery, and management of government commercial activity, including management of grants in all departments and ALBs, regardless of commercial approach used and form part of a suite of functional standards that set expectations for management within government.

22. Risk Management

- 22.1. The SGSA shall ensure that the risks that it faces are dealt with in an appropriate manner, in accordance with relevant aspects of best practice in corporate governance, and develop a risk management strategy, in accordance with the Treasury guidance Management of Risk: Principles and Concepts¹⁰.

23. Counter Fraud and Theft

- 23.1. The SGSA should adopt and implement policies and practices to safeguard itself against fraud and theft.
- 23.2. The SGSA should act in line with guidance as issued by the Counter Fraud Function and in compliance with the procedures and considerations as set in in MPM Annex 4.9 and the Counter Fraud Functional Standard¹¹. It should also take all

⁸ <https://www.gov.uk/government/publications/commercial-operating-standards-for-government>

⁹ <https://www.gov.uk/government/publications/grants-standards>

¹⁰ http://www.hm-treasury.gov.uk/orange_book.htm

¹¹ <https://www.gov.uk/government/publications/government-functional-standard-govs-013-counter-fraud>

reasonable steps to appraise the financial standing of any firm or other body with which it intends to enter a contract or to provide grant or grant-in-aid.

23.3. The SGSA should keep records of and prepare and forward to the department an annual report on fraud and theft suffered by the SGSA and notify the sponsor department of any unusual or major incidents as soon as possible. The SGSA should also report detected loss from fraud, bribery, corruption and error, alongside associated recoveries and prevented losses, to the counter fraud centre of expertise in line with the agreed government definitions as set out in Counter Fraud Functional Standard.

24. Staff

Broad Responsibilities for Staff

24.1. Within the arrangements approved by the responsible Minister and the Treasury, the SGSA will have responsibility for the recruitment, retention and motivation of its staff. The broad responsibilities toward its staff are to ensure that:

- the rules for recruitment and management of staff create an inclusive culture in which diversity is fully valued; appointment and advancement is based on merit; there is no discrimination against employees with protected characteristics under the Equality Act 2010;
- the level and structure of its staffing, including grading and staff numbers, are appropriate to its functions and the requirements of economy, efficiency and effectiveness;
- the performance of its staff at all levels is satisfactorily appraised and the ALB performance measurement systems are reviewed from time to time;
- its staff are encouraged to acquire the appropriate professional, management and other expertise necessary to achieve the SGSA's objectives;
- proper consultation with staff takes place on key issues affecting them;
- adequate grievance and disciplinary procedures are in place;
- whistle-blowing procedures consistent with the Public Interest Disclosure Act are in place; and
- a code of conduct for staff is in place based on the *Cabinet Office's Model Code for Staff of Executive Non-departmental Public Bodies*¹².

¹²https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/80082/PublicBodiesGuide2006_5_public_body_staffv2_0.pdf

Staff Costs

- 24.2. Subject to its delegated authorities, the SGSA shall ensure that the creation of any additional posts does not incur forward commitments that will exceed its ability to pay for them.

Pay and Conditions of Service

- 24.3. The SGSA's staff are subject to levels of remuneration and terms and conditions of service (including pensions) within the general pay structure approved by the sponsor department and the Treasury. The SGSA has no delegated power to amend these terms and conditions. Historically, the SGSA have modelled their annual pay awards on the DCMS as its Sponsor Department; however, as of 2023-4, the SGSA must now comply with the pay remit.
- 24.4. If civil service terms and conditions of service apply to the rates of pay and non-pay allowances paid to the staff and to any other party entitled to payment in respect of travel expenses or other allowances, payment shall be made in accordance with the [Civil Service Management Code](#)¹³ and the annual Civil Service Pay Remit Guidance, except where prior approval has been given by the department to vary such rates.
- 24.5. Staff terms and conditions should be set out in an Employee Handbook, which should be provided to the department together with subsequent amendments.
- 24.6. The SGSA shall abide by public sector pay controls, including the relevant approvals process dependent on the organisations classification as detailed in the Senior Pay Guidance¹⁴ and the Public Sector Pay and Terms Guidance¹⁵.
- 24.7. The SGSA shall operate a general pay structure approved by the department and the Treasury, where relevant with due regard to the Senior Pay Guidance.
- 24.8. The travel expenses of board members shall be tied to the rates allowed to senior staff of the SGSA rates. Reasonable actual costs shall be reimbursed.

Pensions, Redundancy and Compensation

- 24.9. Compensation scheme rules and pension scheme rules should reflect legislative and HM Treasury guidance requirements regarding exit payments.
- 24.10. The SGSA staff shall normally be eligible for a pension provided by Principal Civil Service Pension Scheme (PCSPS). Staff may opt out of the occupational pension scheme provided by the SGSA, but that employers' contribution to any personal pension arrangement, including stakeholder pension, shall normally be limited to the national insurance rebate level.

¹³ <https://www.gov.uk/government/publications/civil-servants-terms-and-conditions>

¹⁴ <https://www.gov.uk/government/publications/senior-civil-service-pay-and-reward>

¹⁵ <https://www.gov.uk/government/publications/public-sector-pay-and-terms-guidance-note>

24.11. Any proposal by the SGSA to move from the existing pension arrangements, or to pay any redundancy or compensation for loss of office, requires the prior approval of the department. Proposals on severance must comply with the rules in chapter 4 of MPM.

Business Plans, Financial

Reporting and Management

Information

25. Corporate and Business Plans

- 25.1. The SGSA shall submit annually to DCMS, in January, a draft business plan covering the financial year (April-March) ahead. The draft should reflect the agreed strategic priorities and be finalised and submitted to DCMS by the end of May each year. The business plan shall reflect the SGSA's strategic priorities, statutory and/or other duties and, within those duties, the priorities set from time to time by the responsible Minister (including decisions taken on policy and resources in the light of wider public expenditure decisions). The business plan shall demonstrate how the SGSA contributes to the achievement of the department's medium-term plan and priorities and aligned performance metrics and milestones.
- 25.2. The business plan shall include updates on key performance indicators and milestones for the year immediately ahead and shall be linked to budgeting information so that resources allocated to achieve specific objectives can readily be identified by the department. Subject to any commercial considerations, the strategy and business plans should be published by the SGSA on its website and separately be made available to staff.
- 25.3. The following key matters should be included in the plans:
- key programmes of work that are planned for the year to deliver against SGSA's agreed strategy;
 - Key performance indicators;
 - Specific objectives on SGSA's in-year commitment to promote equality, diversity and inclusion;

- alternative scenarios and an assessment of the risk factors that may significantly affect the execution of the plan but that cannot be accurately forecast;
- forward years, and the strategy for achieving those objectives; and
- other matters as agreed between the department and the SGSA.

26. Budgeting Procedures

26.1. Each year, in the light of decisions by the department on the updated draft corporate plan, the department will send to the SGSA in Quarter 2:

- a formal statement of the annual budgetary provision allocated by the department in the light of competing priorities across the department and of any forecast income approved by the department; and
- a statement of any planned change in policies affecting the SGSA.

26.2. The approved annual business plan will take account both of approved funding provision and any forecast receipts. It will include a budget of estimated payments and receipts together with a profile of expected expenditure and of draw-down of any departmental funding and/or other income over the year. These elements form part of the approved business plan for the year in question.

27. Grant-in-Aid and any Ring-Fenced Grants

27.1. Any Grant-in-Aid provided by the Department for the year in question will be voted in the Department's Supply Estimate and be subject to Parliamentary control.

27.2. The Grant-in-Aid will normally be paid in monthly instalments on the basis of written applications showing evidence of need. The SGSA will comply with the general principle, that there is no payment in advance of need. Cash balances accumulated during the course of the year from Grant-in-Aid or other Exchequer funds shall be kept to a minimum level consistent with the efficient operation of the SGSA. Grant-in-Aid not drawn down by the end of the financial year shall lapse. Subject to approval by Parliament of the relevant Estimates provision, where Grant-in-Aid is delayed to avoid excess cash balances at the year-end, the Department will make available in the next financial year any such Grant-in-Aid that is required to meet any liabilities at the year end, such as creditors.

27.3. In the event that the department provides the SGSA separate grants for specific (ring-fenced) purposes, it would issue the grant as and when the SGSA needed it on the basis of a written request. The SGSA would provide evidence that the grant was used for the purposes authorised by the department. The SGSA shall not have

uncommitted grant funds in hand, nor carry grant funds over to another financial year.

28. Annual Report and Accounts

- 28.1. The SGSA Board must publish an annual report of its activities together with its audited accounts after the end of each financial year. The SGSA shall provide the department its finalised (audited) accounts in accordance with the guidance issued by DCMS in order for the accounts to be consolidated within DCMS's. A draft of the report should be submitted to the department two weeks before the proposed publication date. The accounts should be prepared in accordance with the relevant statutes and specific accounts direction issued by the department as well as the Treasury's Financial Reporting Manual (FRM).
- 28.2. The annual report must:
- cover any corporate, subsidiary or joint ventures under its control;
 - comply with the FRM and in particular have regard to the illustrative statements for an NDPB¹⁶; and
 - outline main activities and performance during the previous financial year and set out in summary form forward plans.
- 28.3. Information on performance against key financial targets is included within the annual report and subject to the auditor's consistency opinion. The report and accounts shall be laid in Parliament and made available on [the SGSA's website](#), in accordance with the guidance in the FRM.

29. Reporting Performance to the Department

- 29.1. The SGSA shall operate management, information and accounting systems that enable it to review in a timely and effective manner its financial and non-financial performance against the budgets and targets set out in the corporate and business plans.
- 29.2. The SGSA shall inform the sponsor department of any changes that make achievement of objectives more or less difficult. It shall report financial and non-financial performance, including performance in helping to deliver Ministers' policies, and the achievement of key objectives regularly – opportunities to do so include official level meetings and quarterly accountability meetings between the SGSA and DCMS.
- 29.3. The SGSA's performance shall be reviewed by the department's sponsor team quarterly.
- 29.4. The responsible Minister will meet the Chair and Chief Executive once a year.

¹⁶ <https://www.gov.uk/government/publications/government-financial-reporting-manual-2020-21>.

29.5. The DCMS Director General with responsibility for Sport will meet the Chief Executive at least once a year.

30. Information Sharing

30.1. The department has the right of access to all the SGSA records and personnel for any purpose including, for example, sponsorship audits and operational investigations.

30.2. The SGSA shall provide the sponsor department with such information about its operations, performance, individual projects or other expenditure as the sponsor department may reasonably require.

30.3. The department and HM Treasury may request the sharing of data held by the SGSA in such a manner as set out in central guidance except insofar as it is prohibited by law. This may include requiring the appointment of a senior official to be responsible for the data sharing relationship.

30.4. As a minimum, the SGSA shall provide the department with information monthly that will enable the department satisfactorily to monitor:

- the SGSA's cash management;
- its draw-down of grant-in-aid;
- forecast outturn by resource headings;
- other data required for the Online System for Central Accounting and Reporting (OSCAR);
- data as required in respect of its compliance with any Cabinet Office Controls pipelines or required in order to meet any condition as set out in any settlement letter.

Audit

31. Internal audit

31.1. The SGSA shall:

- establish and maintain arrangements for internal audit;

- ensure that any arrangements for internal audit are in accordance with the Public Sector Internal Audit Standards (PSIAS) as adopted by HM Treasury¹⁷;
- ensure the sponsor department is satisfied with the competence and qualifications of the Head of Internal Audit and the requirements for approving appointments in accordance with PSIAS;
- set up an audit committee of its board in accordance with the Code of Good Practice for Corporate Governance and the Audit and Risk Assurance Committee Handbook;
- forward the audit strategy, periodic audit plans and annual audit report, including the SGSA's Head of Internal Audit opinion on risk management, control and governance as soon as possible to the sponsor department;
- keep records of and prepare and forward to the department an annual report on fraud and theft suffered by the SGSA and notify the sponsor department of any unusual or major incidents as soon as possible; and
- will share with the sponsor department information identified during the audit process and the Annual Audit Opinion Report (together with any other outputs) at the end of the audit, in particular on issues impacting on the department's responsibilities in relation to financial systems within the SGSA.

32. External Audit

32.1. The Comptroller & Auditor General passes the SGSA's audited accounts to the Secretary of State who will lay the accounts together with the C&AG's report before parliament.

32.2. In the event that the SGSA has set up and controls subsidiary companies, the SGSA will in the light of the provisions in the Companies Act 2006 ensure that the C&AG has the option to be appointed auditor of those company subsidiaries that it controls and/or whose accounts are consolidated within its own accounts. The SGSA shall discuss with the sponsor department the procedures for appointing the C&AG as auditor of the companies.

32.3. The C&AG:

- will consult the department and the SGSA on whom – the NAO or a commercial auditor – shall undertake the audit(s) on his behalf, though the final decision rests with the C&AG;
- has a statutory right of access to relevant documents, including by virtue of section 25(8) of the Government Resources and Accounts Act 2000, held by another party in receipt of payments or grants from the SGSA;

¹⁷ <https://www.gov.uk/government/publications/public-sector-internal-audit-standards>

- will share with DCMS information identified during the audit process and the audit report (together with any other outputs) at the end of the audit, in particular on issues impacting on the Department's responsibilities in relation to financial systems within the SGSA; and
- will consider requests from departments and other relevant bodies to provide regulatory compliance reports and other similar reports at the commencement of the audit. Consistent with the C&AG's independent status, the provision of such reports is entirely at the C&AG's discretion.

32.4. The C&AG may carry out examinations into the economy, efficiency and effectiveness with which the ALB has used its resources in discharging its functions. For the purpose of these examinations the C&AG has statutory access to documents as provided for under section 8 of the National Audit Act 1983. In addition, the SGSA shall provide, in conditions to grants and contracts, for the C&AG to exercise such access to documents held by grant recipients and contractors and sub-contractors as may be required for these examinations; and shall use its best endeavours to secure access for the C&AG to any other documents required by the C&AG which are held by other bodies.

Reviews and Winding Up

Arrangements

33. Review of ALB's Status

33.1. The SGSA was subject to a review in 2022 as part of the wider Public Bodies Reviews programme.

34. Arrangements in the event that the ALB is wound up

34.1. The sponsor department shall put in place arrangements to ensure the orderly winding up of the SGSA. In particular it should ensure that the assets and liabilities of the SGSA are passed to any successor organisation and accounted for properly. (In the event that there is no successor organisation, the assets and liabilities should revert to the sponsor department.) To this end, the department shall:

- have regard to Cabinet Office guidance on winding up of ALBs¹⁸;
- ensure that procedures are in place in the SGSA to gain independent assurance on key transactions, financial commitments, cash flows and other information needed to handle the wind-up effectively and to maintain the momentum of work inherited by any residuary body;
- specify the basis for the valuation and accounting treatment of the SGSA's assets and liabilities;
- ensure that arrangements are in place to prepare closing accounts and pass to the C&AG for external audit, and that, for non-Crown bodies funds are in place to pay for such audits. It shall be for the C&AG to lay the final accounts in Parliament, together with his report on the accounts; and
- arrange for the most appropriate person to sign the closing accounts. In the event that another ALB takes on the role, responsibilities, assets and liabilities, the succeeding ALB AO should sign the closing accounts. In the event that the department inherits the role, responsibilities, assets and liabilities, the sponsor department's AO should sign.

¹⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/690952/Public_Bodies_-_a_guide_for_departments_-_chapter_10.pdf

34.2. The SGSA shall provide the department with full details of all agreements where the SGSA or its successors have a right to share in the financial gains of developers. It should also pass to the department details of any other forms of claw-back due to the SGSA.

Annex A: Guidance

The SGSA shall comply with the following guidance, documents and instructions:

Corporate Governance

- This framework document
- Corporate Governance Code for Central Government Departments (relevant to Arm's Length Bodies) and supporting guidance:
<https://www.gov.uk/government/publications/corporate-governance-code-for-central-government-departments-2017>
- Code of conduct for Board members of Public Bodies:
<https://www.gov.uk/government/publications/code-of-conduct-for-board-members-of-public-bodies>
- Code of practice for partnerships between Departments and Arm's Length Bodies:
<https://www.gov.uk/government/publications/partnerships-with-arms-length-bodies-code-of-good-practice#:~:text=This%20code%20of%20good%20practice,partnership%20approach%20to%20shaping%20relationships.>

Financial Management and Reporting

- Managing Public Money (MPM):
<https://www.gov.uk/government/publications/managing-public-money>
- Government Financial Reporting Manual (FRoM):
www.gov.uk/government/collections/government-financial-reporting-manual-frem
- Relevant Dear Accounting Officer (DAO) letters:
www.gov.uk/government/collections/dao-letters
- Relevant guidance and instructions issued by the Treasury in respect of Whole of Government Accounts: <https://www.gov.uk/government/collections/whole-of-government-accounts>
- The most recent letter setting out the delegated authorities, issued by the parent department.

Management of Risk

- Management of Risk: www.gov.uk/government/publications/orange-book and <https://www.gov.uk/government/publications/management-of-risk-in-government-framework>
- Public Sector Internal Audit Standards: www.gov.uk/government/publications/public-sector-internal-audit-standards
- HM Treasury approval processes for Major Projects above delegated limits: <https://www.gov.uk/government/publications/treasury-approvals-process-for-programmes-and-projects>
- The Government cyber-security strategy and cyber security guidance: <https://www.gov.uk/government/publications/national-cyber-strategy-2022/national-cyber-security-strategy-2022> and <https://www.gov.uk/government/collections/cyber-security-guidance-for-business>

Commercial Management

- Procurement Policy Notes: <https://www.gov.uk/government/collections/procurement-policy-notes>
- Cabinet Office spending controls: <https://www.gov.uk/government/collections/cabinet-office-controls>
- Transparency in supply chains - a practical guide: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040283/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

Public Appointments

The following are relevant where public bodies participate in public appointments processes.

- Guidance from the Commissioner for Public Appointments: <https://publicappointmentscommissioner.independent.gov.uk/>
- Governance Code on Public Appointments: www.gov.uk/government/publications/governance-code-for-public-appointments
- Procurement Policy Note 08/15 – Tax Arrangements of Public Appointees: <https://www.gov.uk/government/publications/procurement-policy-note-0815-tax-arrangements-of-appointees>

Staff and Remuneration

- HM Treasury guidance on senior pay and reward: www.gov.uk/government/publications/senior-civil-service-pay-and-reward

- Civil Service pay guidance (updated annually): www.gov.uk/government/collections/civil-service-pay-guidance
- Public sector pay and terms: <https://www.gov.uk/government/publications/public-sector-pay-and-terms-guidance-note>
- Whistleblowing Guidance and Code of Practice: <https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-of-practice-for-employers>
- The Equalities Act 2010: www.gov.uk/guidance/equality-act-2010-guidance

General

- Freedom of Information Act guidance and instructions: www.legislation.gov.uk/ukpga/2000/36/contents and <https://ico.org.uk/for-organisations/guide-to-freedom-of-information/>
- The Parliamentary and Health Service Ombudsman's Principles of Good Administration: <https://www.ombudsman.org.uk/about-us/our-principles>
- Other relevant instructions and guidance issued by the central Departments (Cabinet Office and HM Treasury)
- Recommendations made by the Public Accounts Committee, or by other Parliamentary authority, that have been accepted by the Government and are relevant to [the ALB].
- Guidance from the Public Bodies team in Cabinet Office: www.gov.uk/government/publications/public-bodies-information-and-guidance
- The Civil Service diversity and inclusion strategy (outlines the ambition, to which Arm's Length Bodies can contribute): <https://www.gov.uk/government/publications/civil-service-diversity-and-inclusion-strategy-2022-to-2025>
- Guidance produced by the Infrastructure and Projects Authority (IPA) on management of major projects: www.gov.uk/government/organisations/infrastructure-and-projects-authority
- The Government Digital Service: www.gov.uk/government/organisations/government-digital-service
- The Government Fraud, Error, Debt and Grant Efficiency function; www.gov.uk/government/collections/fraud-error-debt-and-grants-function and www.gov.uk/government/publications/grants-standards

- Code of Practice for Official Statistics:
<https://code.statisticsauthority.gov.uk/#:~:text=The%20Code%20of%20Practice%20for%20Statistics%20sets%20the,produced%20by%20people%20and%20organisations%20that%20are%20trustworthy.>
- Accounting Officer System Statements (AOSS are produced by departments with input from ALBs): www.gov.uk/government/publications/accounting-officer-system-statements

Annex B: DCMS Commercial

Requirements

The following outlines in full the commercial requirements of DCMS Public Bodies, as well as a list of mandated reporting requirements. This document provides additional detail to PBs' Framework Documents, in order to support their full compliance with commercial and procurement requirements.

Public Contracts Regulations:

The SGSA shall comply with the Public Contracts Regulations 2015 (PCR) (as amended) in its procurement activity. As a Central Government Authority / Sub-Central Contracting Authority (as set out at Schedule 1 of the PCR), The SGSA shall comply with the relevant thresholds for procurement activity that apply.

Central Government Policy and Processes:

The SGSA shall acquire goods and services through fair and open competition, in accordance with the Government Commercial Operating Standards (including the Outsourcing Playbook), delivering value for money through procurement, and operating in line with UK and other international law, including restrictions on state aid/subsidy controls.

The SGSA shall comply with current and future requirements on additional spend controls, delegated authorities and authorisations on procurement and leases as notified to them by the Department.

Where possible and appropriate, the SGSA shall utilise whichever Crown Commercial Services frameworks are relevant to its needs.

The SGSA must support the wider Government Commercial Function's strategies and programmes in their design, implementation and sustained application.

The SGSA must embed all applicable current and future Procurement Policy Notes into its commercial operations. In particular, the SGSA must:

- Support the Government's SME agenda through appropriate procurement activity.
- Promote the inclusion of the Social Value Act and its associated principles in procurement activity wherever possible.
- Comply with Government transparency policies and commitments.

Support Commercial Procurement and Contract Management improvement and oversight initiatives including:

- Contract Classification for all contracts
- Internal spend control assurance & governance processes, aligned to the Department and Cabinet Office Commercial Spend Control approval processes.
- GCOS Implementation and Reporting
- Pipeline reporting
- Assurance and audit implementation and reporting
- Contracts Finder compliance reporting
- Contract KPI reporting for external public publication
- Commercial Systems and Data improvement initiatives eg. CASIE

Attend Cabinet Office training programmes designed to raise commercial awareness and improve commercial capability, including Playbook and GCOS masterclasses, and Contract Management Capability Training.

Departmental Policy and Processes

The SGSA shall comply with departmental spend controls as set by DCMS Commercial.

In procurement cases where the SGSA is likely to exceed its delegated authority limit, procurement strategy approval for the specific planned purchase must be sought from the DCMS Commercial Director.

The SGSA must comply with the Single Tender Action process. The DCMS Commercial Director will consider the delegated limit for single tender action contracts annually each March and may adjust as appropriate.

Collaborative Initiatives

The SGSA shall:

- Support all Commercial Procurement and Contract Management improvement and oversight initiatives from DCMS and the Cabinet Office.
- Support collaborative procurement and commercial efforts across the Department and its Public Bodies. This will include supporting the establishment of a DCMS Commercial Council or similar body, where such a group has been instituted, and wider commitments to support knowledge-sharing and training for staff involved in Commercial and Procurement activity across DCMS Public Bodies.
- Support the formation and ongoing activities of a commercial function across the DCMS family of public bodies, through engagement with the DCMS Commercial team.
- Engage fully with Department and Government wide procurement initiatives that seek to achieve VfM from collaborative projects.

Departmental Policy and Processes Grants and other bodies

The SGSA shall comply with the Commercial and Grants Standards. These standards apply to the planning, delivery, and management of government commercial activity, including management

of grants in all departments and arm's length bodies, regardless of commercial approach used and form part of a suite of functional standards that set expectations for management within government.

In circumstances where the PB finds itself having oversight and assurance of other public bodies or the procurement activities of private bodies spending public money the PB shall ensure, as far as is reasonably practicable, and in so far as it has legal authority to do so, that all such parties adhere to the principles of Managing Public Money including the encouragement of transparent and robust practices and compliance with any applicable law.

Departmental Policy and Processes, management information and Compliance

The Department and SGSA are committed to sharing information to ensure transparency and alignment.

The SGSA recognises that the Department will at times need to request information on an ad hoc basis and/or with a short time frame as required. The SGSA must (and within any reasonable timescale required by DCMS) supply any information requested by DCMS, and should proactively seek to provide DCMS with advanced sight of events and publications which the Government would take an interest in.

In addition to this ad hoc information and open lines of communication, DCMS expects the SGSA to provide regular information on Commercial and Procurement. A list of this information can be found below. The list is intended to enable advanced planning for periodic Departmental commissions; it is not exhaustive and may be subject to change.

Commission title	Timescale	DCMS lead team	Purpose
Consultancy Spend Control pipeline and compliance return (including nil returns)	Quarterly	Commercial	For DCMS and the Cabinet Office to plan and keep track of the public sector consultancy contracts and approvals
Commercial Spend Control Pipeline return (including nil returns)	Quarterly	Commercial	For the submission of the Departments quarterly Commercial Spend Control pipeline to Cabinet Office in accordance with Cabinet Office guidelines
Contract register	Quarterly	Commercial	For oversight of commercial liability and risk across sectors, categories and suppliers, if a contract register is available..
Government Commercial Operating Standards (GCOS) return	Six months	Commercial	For the submission of the Departments annual Government Commercial Operating Standards (GCOS) return and six month update against improvement plans.
Contracts finder compliance report	Six months	Commercial	Transparency policy compliance reporting

Submission of procurement spend transactions to Bravo	Annually	Commercial	To comply with Cabinet Office spend reporting requirements
Government Key Contracts Public KPIs return	Quarterly	Commercial	For the submission of the Department's quarterly Key Contracts Public KPIs return to the Cabinet Office
Procurement pipeline for publication return	Quarterly	Commercial	For the submission of the Departments quarterly pipeline return for publication on .Gov.uk
Social Value reporting return	Quarterly	Commercial	To comply with Cabinet Office policy on Social Value reporting. Specifically at (a) pipeline (b) procurement strategy (c) Contract award (d) contract close subject to PPN06/2020
Prompt Payment reporting for contracts	Quarterly	Commercial	To ensure accurate reporting to Cabinet Office of in-scope contracts including any exclusions and exemptions requested
Return for the review of key metrics, targets and reports related to procurement, contract management and commercial resourcing	Quarterly	Commercial	To benchmark procurement spend, compliance assessment to policy and provide data on economic effect of spend by Departments and PBs including 3rd party spend and commercial risk reporting.
Direct and Indirect SME spend	Quarterly and Annually	Commercial	To support the Government's SME Agenda and the DCMS SME Action Plan

HM Treasury contacts

This document can be downloaded from www.gov.uk

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