PRIDE IN PLACE PROGRAMME: GREENLANDS & WOODROW

GOVERNANCE AND ASSURANCE FRAMEWORK

Redditch Borough Council

1. Introduction

This framework defines the governance arrangements needed to deliver the Pride in Place Programme for Greenlands and Woodrow, lawfully, transparently, and with community legitimacy. It ensures clear accountability, encourages strong community participation, and compliance with statutory duties. The framework also aligns with the Ministry of Housing, Communities and Local Government's (MHCLG) own guidance, that successful delivery is strongest where the following are in place and adhered to:

- A Local Authority acting effectively as the Accountable Body
- A Neighbourhood Board, leading decision-making on projects and priorities
- A local MP, actively engaged as a community convener
- A local community, consulted and engaged with to enable them to influence priorities and hold the above three institutions to account.

This framework establishes clear checks and balances, shared accountability, and local legitimacy, maintaining professional oversight by the Local Authority as the accountable body. It reflects recognised best practise in multi-agency programmes of public funding and governance.

2. Governance and Partnership Structures

Accountable Body

As the Local Authority, Redditch Borough Council must act as the accountable body at the start of the Pride in Place Programme, with responsibility for the following.

2.1 Financial Stewardship and Compliance:

a) To hold and administer the Pride in Place funds as the accountable body, with robust controls, audit trails, and compliance.

b) To ensure that all expenditure complies with:
   i. Managing public money
   ii. The Nolan Principles of Public Life
   iii. The Equality Act 2010
   iv. The Public Sector Equality Duty
   v. Procurement law
   vi. Redditch Borough Council's own procurement policies

c) To recover accidentally misspent funds, where required.

2.2 Governance and Delegated Decision-Making

- For Council Officers to approve (under delegated authority), jointly with the local MP, the selection of the Chair and final membership of the Neighbourhood Board.

- To ensure that the governance structure is transparent, lawful, and auditable.

2.3 Secretariat and Programme Management

- To provide secretariat and programme management support to the Neighbourhood Board.

- To coordinate reporting, project oversight, and strategic alignment with the MHCLG Pride in Place programme guidance (Pride in Place Programme prospectus and guidance - GOV.UK).

- To ensure timely submission of the 10-year Pride in Place Plan and 4-year Investment Plan to MHCLG for approval, and support the Neighbourhood Board with technical, legal, and financial expertise as required.

2.4 Partnership and Support

- To support the Neighbourhood Board to shape and deliver priority projects.

- To provide technical expertise, including but not limited to financial, legal, procurement, regeneration, and community engagement.

- To facilitate collaboration between the local community, services, and delivery partners.

2.5 Enabling Transition to Community-Led Governance

MHCLG have stated that it is their intention that the Pride in Place Programme eventually moves to a community-led governance model and it will be the role of the Council to support the transition towards a community-led delivery model from Year 3 onwards, subject to MHCLG approval and direction.

3. Subsidy Control

MHCLG will provide funding to support the delivery of projects and activities that contribute to the achievement of the priorities and objectives set out in the approved Neighbourhood Plan. The onward award of funding and the substantive design of potential public subsidies will be the responsibility of the Local Authority.

Redditch Borough Council, as accountable body, must comply with the Subsidy Control Act 2022 when administering public money under the programme. Further guidance can be found at: UK subsidy control regime: statutory guidance - GOV.UK

The Local Authority may need to recover funding from project deliverers where subsidy control or state aid law has not been complied with. Where an application presents an unacceptable risk of non-compliant delivery, the accountable body may

choose either to reject it or require adjustments to be made such that funding the project will not contravene subsidy control.

Project deliverers remain responsible for ensuring that all project partners and sub-contractors engaged in the delivery of funded projects are subject to obligations equivalent to those set out in funding agreements. Project deliverers must have appropriate contractual arrangements in place to ensure that project partners or sub-contractors are subject to equivalent Subsidy Control obligations and that any financial consequences, including the recovery of funding where required as a result of non-compliance, can be passed on to the relevant project partner or sub-contractor.

4. Funding and Assurance:

Programme assurance will follow precedent for existing growth funds managed by MHCLG and will involve 3 lines of defence

4.1 First line of defence

The first line of defence will be provided by the Local Authority and is the responsibility of the S151 Officer who must follow Section 151 of the Local Government Act 1972 and Section 73 of the Local Government 1975. The S151 Officer will be required to submit an annual statement to MHCLG, providing written confirmation that they have undertaken to actively apply all the necessary checks to ensure proper administration of its financial affairs regarding the funding programme, particularly in respect to financial administration and transparency of governance.

4.2 Second line of defence

The second line of defence is the responsibility of MHCLG, who will undertake a range of checks on a risk and sample basis. The Local Authority will be required to engage with MHCLG and support this process.

4.3 Third line of defence

The third line of defence will be carried out by MHCLG's independent auditors which will review the activity completed by MHCLG for the second line of defence and liaise with internal audit teams as appropriate.

As the Accountable Body, Redditch Borough Council will implement the following assurance measures:

4.4 Governance and Decision-Making

a. Confirm that the Neighbourhood Board is operating in accordance with its Terms of Reference and any guidance issued by MHCLG.
b. Ensure that decisions are properly documented, transparent and supported by an auditable decision trail.
c. Review and verify declarations of interest, with appropriate management of any conflicts.
d. Monitor Board membership to ensure continued compliance with programme requirements.

4.5 Project Appraisal and Approval

a. Undertake due diligence on project deliverers before funding is awarded.
b. Assess projects against programme objectives, value for money, deliverability, affordability and risk.
c. Verify that projects have secured all necessary consents, permissions and match funding.
d. Ensure compliance with Subsidy Control requirements before approving funding.

4.6 Funding Agreements and Contract Management

a. Put in place funding agreements setting out outputs, outcomes, milestones, reporting requirements and clawback provisions.
b. Ensure delivery partners and sub-contractors are subject to appropriate contractual obligations.
c. Verify that any changes to approved projects are subject to formal change control procedures.

4.7 Financial Assurance

a. Review grant claims before payment and verify expenditure against supporting evidence.
b. Reconcile payments to approved budgets and funding allocations.
c. Monitor project spend profiles and identify risks of underspend or overspend.
d. Ensure adequate arrangements are in place for the prevention and detection of fraud, bribery and corruption.

4.8 Procurement Compliance

a. Verify that procurement activity complies with the Accountable Body's procurement rules and relevant legislation.
b. Review tender documentation and contract award processes where appropriate.
c. Maintain records demonstrating fair, transparent and competitive procurement.

4.9 Performance Monitoring

a. Monitor delivery of agreed outputs, outcomes and milestones.
b. Require regular progress reports from project deliverers.
c. Track programme-wide performance against the Pride in Place Investment Plan.
d. Identify projects at risk of delay or underperformance and implement corrective actions.

4.10 Risk Management

a. Maintain a programme risk register and review it regularly.

b. Escalate significant risks and issues to the Neighbourhood Board and senior governance bodies as appropriate.
c. Monitor dependency risks, including planning, procurement, funding and stakeholder risks.

4.11 Compliance and Audit

a. Undertake periodic compliance reviews of funded projects.
b. Carry out site visits and project verification checks.
c. Ensure projects maintain complete audit trails and retain records in line with programme requirements.
d. Facilitate internal and external audit activity and implement recommendations arising from reviews.

4.12 Change Control and Programme Management

a. Assess and approve requests for project variations, extensions or budget changes.
b. Monitor the impact of any changes on the overall delivery of the Pride in Place Programme.
c. Ensure any proposed changes remain aligned with approved priorities and MHCLG requirements.

4.13 Reporting to MHCLG

a. Submit accurate and timely monitoring returns.
b. Report significant delivery issues, financial risks, fraud concerns or other exceptions to MHCLG.
c. Coordinate programme evaluations and provide evidence of impact and outcomes.

4.14 Clawback and Recovery

a. Monitor compliance with funding conditions and Subsidy Control requirements.
b. Investigate any instances of non-compliance or misuse of funds.
c. Exercise clawback provisions where grant conditions have been breached.
d. Ensure appropriate arrangements are in place to recover funding from project deliverers, partners or sub-contractors where required.

4.15 <u>Delegations and Authorisations</u>

The Section 151 Officer has authority to sign a Memorandum of Understanding with MHCLG and to receive funds.

The Section 151 Officer has authority the authorise funding agreements in accordance with government guidance and all relevant statutory and regulatory requirements.

The Assistant Director Regeneration & Property has delegated authority to recruit and appoint an independent chair of the Greenlands and Woodrow Pride in Place Neighbourhood Board, following consultation with the Leader of the Council (as the relevant portfolio holder) and in agreement with the MP for Redditch and the Villages.

The Assistant Director Regeneration & Property has delegated authority to approve the final membership of the Greenlands and Woodrow Pride in Place Neighbourhood Board following consultation with the Leader of the Council (as the relevant portfolio holder) and in agreement with the MP for Redditch and the Villages.

5. The Neighbourhood Board:

The Neighbourhood Board will be the primary local decision-maker for the Pride in Place Programme; setting priorities for the Greenlands and Woodrow Pride in Place area and ensuring the programme reflects local needs and voices. The Board will be responsible for:

5.1 Strategic Leadership and Decision Making

- Reviewing and determining proposed neighbourhood area boundary changes and for submitting any approved boundary change proposals to MHCLG
- To lead decisions on local priorities and project selection.
- To develop and approve the 10-year Pride in Place Plan and 4-year Investment Plan, with assistance from the designated officers at the Local Authority for technical expertise, ensuring that both plans are rooted in the community's lived experience and aspirations, identified through extensive and inclusive community engagement.

5.2 Community Representation and Engagement

- To ensure broad representation, including residents, community leaders, grassroots groups, local businesses, faith groups, and young people.
- To engage the wider community to shape priorities and to provide democratic accountability.
- To uphold inclusive and transparent decision-making.

5.3 Partnership with the Local MP and Local Authority

- To work with the MP as an equal member of the Board.
- To collaborate with the Local Authority to ensure that plans are financially viable, lawful, and deliverable.
- To protect the democratic legitimacy of Neighbourhood Board membership, with the Local Authority and the MP.

5.4 Oversight of Delivery

- To monitor delivery of individual projects and the investment plan as a whole against agreed outcomes and budgets.
- To approve grants and local investment schemes.
- To escalate any risks promptly to the Local Authority and MHCLG as required.

5.5 Driving Community-Led Transformation

- To encourage local ownership models, including cooperatives, Community Interest Companies, and anchor organisations, where appropriate, to support long-term sustainability and community benefit.

6. The MP

The MP's role is defined by MHCLG guidance and reinforced by the Parliamentary Written Statement of 3rd December 2025. The MP will be responsible for:

6.1 Strategic Responsibilities

- To serve as a member of the Neighbourhood Board, participating in decision-making around local priorities and investments.
- To jointly approve the selection of the Chair and composition of the Neighbourhood Board, in agreement with the Local Authority (which has been delegated to the relevant lead officer to determine).

6.2 Community Engagement

- To act as a community convener, bringing together residents, businesses, faith groups, and grassroots organisations.
- To actively engage hard-to-reach groups and amplify community voices, particularly in areas of significant disadvantage.
- To strengthen transparency, trust, and civic participation.

6.3 Advocacy and Leadership

- To champion the programme publicly.
- To provide democratic leadership, helping to ensure that decisions reflect the aspirations and lived experiences of the Greenlands and Woodrow community.
- To bring insight from local engagement and casework to support evidence-led decision-making.

6.4 Accountability and Oversight

- To hold the Neighbourhood Board to account on behalf of constituents.
- To ensure that plans and investments align with community priorities.
- To apply constructive scrutiny to improve transparency and responsiveness.

6.5 Enabling Delivery and Long-Term Transformation

- To support the transition to community-led delivery where appropriate, helping to ensure that the future governance model proposed by MHCLG reflects local priorities, aspirations and community engagement.
- To help unblock barriers and sustain momentum through cross-government co-ordination

7. Community Involvement

The Pride in Place Programme mandates meaningful community engagement, a transparent selection of the Neighbourhood Board, and public updates on Programme decisions and spending.

8. Background Papers

Pride in Place Programme prospectus and guidance - GOV.UK

Subsidy Control Act 2022

The Public Contracts Regulations 2015

Procurement Act 2023