

The Local Assurance Framework

**Sussex &
Brighton** | Strategic
Authority

a Combined County Authority

Devolution Priority Programme

2026

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1. Introduction

This is the Assurance Framework for the Sussex and Brighton Strategic Authority (the ‘Strategic Authority’). The Assurance Framework sets out the arrangements that the Strategic Authority has in place to ensure that public money is managed effectively.

It explains how the Strategic Authority identifies, appraises, and evaluates schemes to achieve value for money.

1.1 The Local Assurance Framework

- 1.1.1 Good governance and accountability are at the heart of the culture and ways of working within the Sussex and Brighton Strategic Authority (SBSA). This original submission of the Local Assurance Framework, as required by the Devolution Priority Programme, demonstrates our commitment to decision-making that is evidence-based, proportionate, transparent, and justifiable. These principles underpin how we intend to operate and ensure that governance arrangements effectively support the delivery of our shared ambitions for the Sussex and Brighton area.
- 1.1.2 HM Treasury defines Assurance Frameworks as ‘An objective examination of evidence for the purpose of providing an independent assessment on governance, risk management, and control processes for the organisation.’
- 1.1.3 This first version of the Local Assurance Framework sets out how the Sussex and Brighton Strategic Authority (SBSA) will manage and invest public funds responsibly, ensuring openness, transparency, and the delivery of Value for Money (VFM). It establishes a proportionate and consistent approach for assessing and approving all funding opportunities, as well as initiating, developing, and delivering projects, programmes, and activities that create a financial liability for the Authority beyond Business as Usual (BAU) or designated Corporate Projects.

1.2 The Purpose of the Assurance Framework

- 1.2.1 This Assurance Framework sets out the robust decision making and delivery arrangements that are being put in place within SBSA. This document has been developed in line with the **English Devolution Accountability Framework (Published 16 March 2023)**.
- 1.2.2 The Assurance Framework sets out the systems and arrangements used by the Sussex and Brighton Strategic Authority (SBSA) to ensure public funds are allocated appropriately, in line with legal, fiscal, and best practice standards. It demonstrates that proportionate arrangements are in place to manage the investment programme effectively and that robust processes ensure resources are used with regularity, propriety, and value for money, while delivering the intended outcomes.
- 1.2.3 Specifically the Assurance Framework describes:
- The respective roles and responsibilities of the Strategic Authority Board, the future Mayor and other elements of the decision-making and delivery structure
 - The key processes for ensuring accountability, probity, transparency, legal compliance, and value for money
 - The process to monitor and evaluate projects and programmes to ensure that they achieve value for money and projected outcomes in accordance with the Strategic Authority’s priorities
 - How risk is effectively managed
- 1.2.4 The Assurance Framework sits alongside several other key governance and policy documents – most notably, the Statutory Instrument, the SBSA Constitution, the Financial Regulations, and the Monitoring and Evaluation Framework.
- 1.2.5 The Assurance Framework will sit alongside the core governance and policy documents for the Sussex and Brighton Strategic Authority (SBSA). As this is the first version of the Local Assurance Framework, several key

documents are currently in development and will be formally adopted at the inaugural meeting of the Authority. These include the Constitution (including the Financial Regulations) and the Strategic Framework.

- 1.2.6 The Assurance Framework will reflect requirements set out in the establishment legislation and Statutory Instrument.
- 1.2.7 The Devolution Priority Programme provides Sussex and Brighton Strategic Authority (SBSA) with greater local control, flexibility, and responsibility over funding streams and their outcomes. The ‘single’ approach to funding represents a significant fiscal arrangement within this programme, reducing ring-fencing and consolidating funding lines for which SBSA is the accountable body.

1.3 Updating, evolution and review of the Local Assurance Framework

- 1.3.1 This Local Assurance Framework establishes a robust process to enable SBSA to maximise the impact of devolved funding. It applies to all funds allocated under the Devolution Priority Programme and any subsequent devolved resources. The framework will be reviewed and updated as new funding streams are agreed with HM Government.
- 1.3.2 This Assurance Framework will be reviewed annually by the Monitoring Officer and reported to the SBSA Board who are responsible for all Strategic Authority Frameworks. If any substantial amendments are proposed these will be reviewed by Government Departments in line with the Government Review Process led by the MHCLG Local assurance Team.
- 1.3.3 The annual review will examine the effectiveness of assurance processes and consider any areas for improvement. Any changes to legal, funding, or other contextual changes that might require a change of assurance process will be considered, along with the impact of any other Strategic Authority key strategies, policies or processes.
- 1.3.4 As this is the first Local Assurance Framework for the Sussex and Brighton Strategic Authority (SBSA), it is expected to evolve and mature in line with the development of the Authority’s governance arrangements. This iterative approach reflects the embedding of new structures and processes and will incorporate future governance enhancements, including alignment with the provisions of the English Devolution and Community Empowerment Bill. Updates will ensure the framework remains robust, proportionate, and fully integrated with emerging statutory requirements and best practice.
- 1.3.5 The Board’s adoption of the LAF is recognition of its strong commitment to good governance, transparency, and continuous improvement, underpinned by the shared acceptance of constituent councils that the framework will evolve over time. In endorsing the LAF, the Board and constituent councils acknowledge and support the first annual review as a key governance mechanism through which officer delegations will be examined and an Investment Committee approval delegation considered.
- 1.3.6 This staged evolution aligns with agreed principles that the LAF will progressively increase levels of assurance, strengthen and clarify delegations, and introduce proportionate Investment Committee oversight. Collectively, these measures ensure that the LAF remains robust, auditable, and responsive, while maintaining the confidence of constituent councils and supporting effective and accountable decision making.-making.

2. Sussex and Brighton

2.1 The Region

2.1.1 Geography

The Sussex and Brighton Strategic Authority (SBSA) covers the ceremonial counties of East Sussex and West Sussex, including the unitary city authority of Brighton & Hove. The area encompasses a diverse mix of coastal cities, historic towns, and rural communities, with a combined population of approximately 1.7 million people. The region includes key urban centres such as Brighton, Chichester, Crawley, Eastbourne, and Worthing, and includes large swathes of the South Downs National Park.

2.1.2 The SBSA region benefits from strong transport links to London and Europe via the A23, A27 and A21 corridors, the Brighton Main Line, and Gatwick Airport. It is home to a thriving visitor economy, a growing digital and creative sector, and a strong base in health, life sciences, and advanced manufacturing.

2.1.3 Economically, Sussex and Brighton is a dynamic area with strengths in tourism, creative industries, advanced manufacturing, healthcare, and green energy innovation. Brighton & Hove is a hub for digital and creative sectors, while West Sussex hosts significant aerospace and engineering clusters around Crawley and Horsham. The region benefits from a highly skilled workforce supported by leading universities (University of Sussex and University of Brighton) and further education providers. Agriculture and viticulture also contribute to the rural economy, alongside a growing commitment to sustainable development and energy neutrality by 2040. Despite these strengths, challenges remain in housing affordability, transport infrastructure, and addressing coastal and environmental resilience, making strategic investment critical to unlocking inclusive growth.

2.2 Background to Devolution

2.2.1 Devolution in Sussex and Brighton is being delivered through the Devolution Priority Programme, a national initiative designed to accelerate the transfer of powers and funding from central government to local areas without the need for a negotiated devolution deal. This approach provides the Sussex and Brighton Strategic Authority (SBSA) with greater local control, flexibility, and accountability over key funding streams and strategic priorities.

2.2.2 The programme enables SBSA to take on responsibilities for areas such as transport, housing, skills, economic development, and climate action, ensuring decisions are made closer to the communities they affect. This first Local Assurance Framework reflects the early stage of governance development for SBSA and sets out how the Authority will manage devolved resources responsibly, transparently, and in alignment with emerging statutory requirements, including the English Devolution and Community Empowerment Bill.

Background to the Creation of the Strategic Authority

2.2.3 Following the publication of the Government's Levelling Up White Paper (2022), East Sussex County Council, West Sussex County Council, and Brighton & Hove City Council began discussions on a collaborative approach to regional governance. Recognising shared economic, social, and environmental priorities, the three authorities agreed to pursue a devolution deal under the Strategic Authority model.

2.2.4 In early 2025, the councils jointly submitted a proposal to the Ministry for Housing, Communities and Local Government (MHCLG) outlining their vision for a Sussex and Brighton SBSA. The proposal was informed by public consultation and engagement with local businesses, education providers, health services, and community organisations.

2.2.5 The devolution deal, agreed in principle in mid-2025, includes commitments to devolved powers over transport, adult education, housing, and economic development. It also integrates the functions of the Local Enterprise Partnership coverage across the region to ensure a strong business voice in regional decision-making.

2.3 The Mayoral Strategic Authority

- 2.3.1 The Sussex and Brighton Strategic Authority will come into being following Parliamentary Approval of the Sussex and Brighton Strategic Authority Regulations. The first meeting of the Strategic Authority will take place within 3 weeks of this vesting.
- 2.3.2 The first Mayor of the Sussex and Brighton Strategic Authority will be elected on the 4th May 2028.
- 2.3.3 As and when Government officially devolves further powers to the Strategic Authority, in order to deliver against its policy agenda, this will be reflected in revisions to the Assurance Framework at the appropriate review period.

2.4 Regional and Local Leadership

- 2.4.1 SBSA will have two sets of function, Strategic Authority functions and Mayoral functions, with Mayoral functions coming into operation following the election of the first Mayor in 2028. The Strategic Authority (Board) is the principal decision-maker and provides the strategic direction of the Strategic Authority. The Mayor will be the Chair of the Strategic Authority following election in 2028 and provide regional leadership, alongside the three constituent authorities. Until the first Mayoral election the Strategic Authority Board will determine chairing arrangements from within its constituent council membership.
- 2.4.2 The Strategic Authority will be the Fire & Rescue Authority from April 2027 and the Mayor of the Sussex & Brighton Strategic Authority will be the Police & Crime Commissioner from May 2028.
- 2.4.3 The Mayor will be directly elected by the people of Sussex and Brighton in 2028 to not only chair the Strategic Authority but to also deliver upon their Mayoral priorities, which will be considered within the SBSA strategic planning process.
- 2.4.4 The Strategic Authority consists of constituent members, non-constituent members and associate members. These are as follows:
- The Constituent Councils of SBSA are full voting members, they are
 - East Sussex County Council
 - West Sussex County Council
 - Brighton & Hove City Council
 - Non-Constituent members and Associate Members are to be determined at the first meeting of the Strategic Authority. For clarity:
 - Non-Constituent Members are members who represent another organisation
 - Associate Members are members who provide a specialism and expertise to Strategic Authority considerations
- 2.4.5 Decisions will be made by the Strategic Authority (in relation to non-mayoral functions) and the Mayor once elected (in relation to mayoral functions) or in accordance with the Regulations and the Constitution.
- 2.4.6 The Mayor when elected in 2028 will appoint a statutory Deputy Mayor pursuant to section 29(1) of the 2023 Levelling Up and Regeneration Act from one of the Constituent Council members of the Strategic Authority. The Mayor and the Strategic Authority (Board), and its supporting governance framework will work together in collaboration, in the interests of the people of the region.

2.5 Regional Accountability

- 2.5.1 The Sussex and Brighton Strategic Authority (SBSA) operates with a clear democratic mandate to invest in and deliver for its local communities. The Chair of the Board will provide leadership under a collective cabinet model, accountable to the wider board and through supporting governance arrangements, principally the Overview and Scrutiny function.

2.5.2 Following the first Mayoral election in May 2028 a directly elected Mayor will provide a single, visible point of accountability for residents, ensuring that decisions and actions are subject to democratic oversight. The Mayor will be held to account not only through local elections but also through the Strategic Authority's Overview and Scrutiny arrangements, which reinforce transparency and responsible governance across all Board decisions.

2.6 The Strategic Framework

2.6.1 The Strategic Framework for the Sussex and Brighton Strategic Authority (SBSA) sets out the overarching vision, priorities, and guiding principles for the Authority as it begins its journey under the Devolution Priority Programme. As the first iteration of this framework, it provides a clear foundation for collaborative working across the region, ensuring that decisions are evidence-based, transparent, and aligned with the ambitions of local communities.

2.6.2 The purpose of the Strategic Framework is to:

- **Define the long-term vision** for prosperity, inclusive growth, sustainability, and improved quality of life across Sussex and Brighton.
- **Establish strategic priorities** that guide investment and policy decisions in areas such as transport, housing, skills, economic development, and climate action.
- **Provide clarity and accountability** for how devolved powers and funding will be used to deliver measurable outcomes.
- **Ensure alignment** with national policy, including the English Devolution and Community Empowerment Bill, while reflecting local needs and opportunities.

2.6.3 This framework will evolve as governance arrangements mature and as SBSA embeds its role as a strategic authority, ensuring flexibility to respond to emerging challenges and opportunities.

3. Governance and Accountability

3.1 The Governance Framework

- 3.1.1 At the Sussex and Brighton Strategic Authority (SBSA), we are committed to embedding good governance and accountability at the core of everything we do, as these principles are essential to achieving our ambitions for the region. We will ensure that all decisions are transparent, evidence-based, proportionate, and open to challenge, with a clear focus on delivering benefits for our communities.
- 3.1.2 Robust systems for effective delivery, risk management, and financial stewardship will be established and detailed within the SBSA Constitution and this first Local Assurance Framework. These governance arrangements will be formally agreed at the inaugural meeting of the Strategic Authority following vesting, providing a strong foundation for responsible use of public funds and alignment with national standards.
- 3.1.3 The Strategic Authority adheres to the requirements of the Local Government Accountability Framework. It adheres to this assurance framework and is supported by its governance framework, internal and external audit arrangements, annual reporting of its accounts and the Annual Governance Statement.
- 3.1.4 Sussex & Brighton Strategic Authority is a Mayoral Strategic Authority that will have a Mayor from May 2028, until that point its governance arrangements will reflect that a Mayor has not yet been elected. The specific detail of the governance structure will be determined at the annual general meeting of the Strategic Authority in 2026, once determined this section of the LAF will be updated to reflect the Board decision.

Illustration A: Initial SBSA Governance

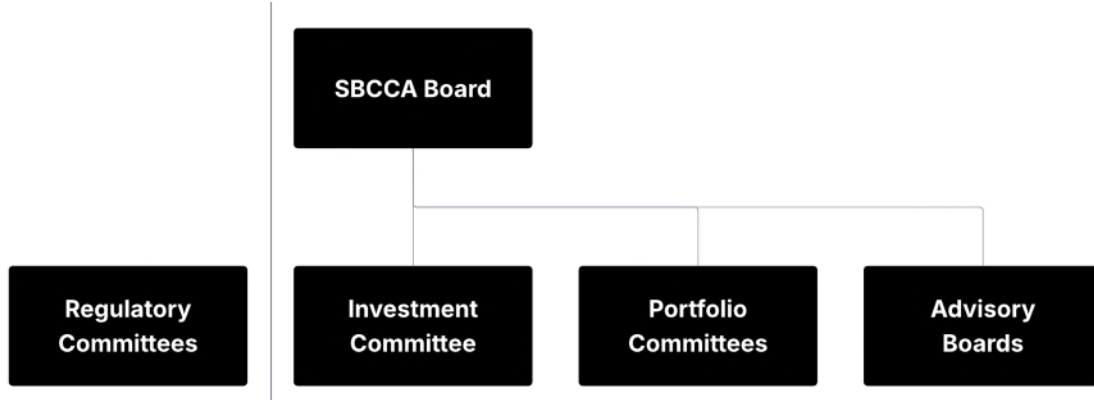
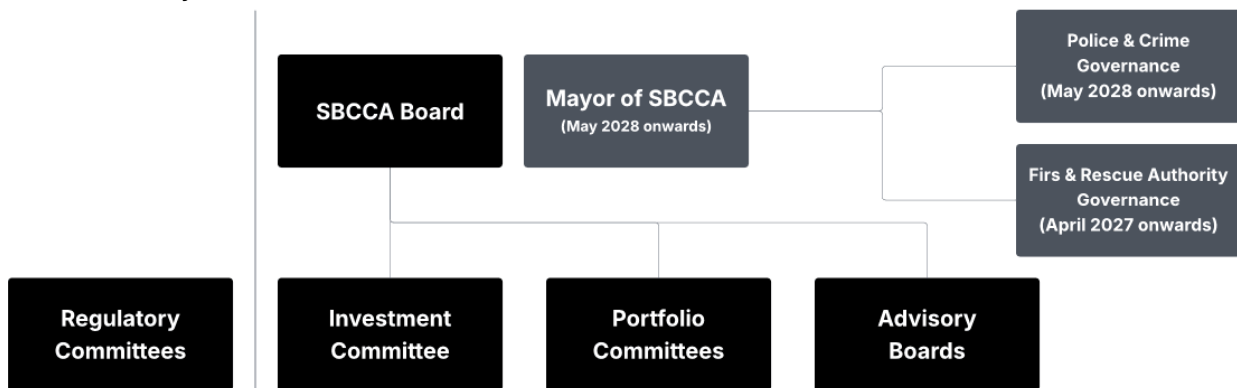


Illustration B: Post-Mayoral Election Governance



- 3.1.5 Members of the Strategic Authority are expected to act in the interests of the Sussex and Brighton area as a whole when making investment decisions. A variety of controls are in place to ensure that decisions are appropriate and free from bias and/or the perception of bias.

3.2 The Strategic Authority

- 3.2.1 The Sussex and Brighton Strategic Authority (SBSA) will become the legal and accountable body for all funding devolved to it, with responsibilities spanning transport, skills, housing, and economic development. Once formally established, the SBSA Board will exercise its powers and functions in accordance with the law and its Constitution, setting the strategic direction for growth across the region, approving strategies and frameworks, and agreeing delegated responsibilities for delivery.
- 3.2.2 Once elected, decisions will be taken by the Mayor for mayoral functions and by the SBSA Board for non-mayoral functions, as defined in the Constitution. Constituent Council Members will represent their local authorities while ensuring that decisions reflect the wider interests and opportunities of the Sussex and Brighton region.
- 3.2.3 This first Local Assurance Framework has been prepared ahead of vesting and will evolve as governance arrangements mature. At the inaugural meeting, the Board will agree clear roles and responsibilities for decision-making on strategy and budgets, supported by a comprehensive governance framework that ensures transparency, accountability, and effective delivery
- 3.2.4 This Local Assurance Framework will be updated following the first meeting and the annual general meeting in 2026 of the Strategic Authority to reflect the establishment decisions taken by the Board in relation to its constitution and governance arrangements. Those arrangements will reflect the table of strategic responsibilities below:

Illustration C: Table of Strategic Responsibilities

SBSA Strategic Role	Relevant Governance
Set the strategic objectives, vision and Corporate Plan	The Board
Approve strategy, key policy and frameworks	The Board
Set the budgetary framework and the Medium-Term Financial Plan	The Board
Develop strategy, framework and policy proposals	Portfolio Committees
Implement Board approved strategy	Portfolio Committees
Deliver operational and delivery oversight and provide operational decision-making	Portfolio Committees
Undertakes strategic level scrutiny	Overview & Scrutiny
Undertakes Mayor and Board accountability	Overview & Scrutiny
Provides oversight and assurance of standards and the Constitution	Audit & Governance
Provides oversight and assurance of governance, assurance and supporting frameworks	Audit & Governance

- 3.2.5 The Strategic Authority Board is responsible for delegating decision-making responsibilities to its Portfolio Committees. The Constitution details SBSA meetings and Boards, which have either decision-making powers or are advisory. All governance bodies will have their Terms of Reference detailed within Part 3: Responsibility for Functions of the Constitution

3.3 The Mayor (first Mayoral election due to take place in May 2028)

- 3.3.1 The Mayor of the Strategic Authority will be directly elected by the region, on a manifesto of commitments and priorities. The Mayor executes certain powers and functions that have been devolved to SBSA by the UK Government, to deliver their manifesto commitments and to enact functions reserved for the Mayor as detailed in the Strategic Authority Constitution.
- 3.3.2 Once elected, the Mayor will assume the role of Chair of the Sussex and Brighton Strategic Authority (SBSA) and its Board. The Mayor will provide strategic leadership, including proposing a Mayoral budget for consideration as part of the Board's process for agreeing revenue and capital budgets. This role will ensure that resources are allocated appropriately and used effectively to deliver the Authority's priorities.

Elections for the position of Mayor of the Strategic Authority will be held every 4 years.

- 3.3.3 The Mayor can nominate Board Members for Portfolio Lead positions, nominations must be considered and approved by the Combined Authority Board.
- 3.3.4 The majority of voting arrangements at the Strategic Authority require a vote in favour that includes the Mayor within the majority in order to pass. Full details on voting arrangements will be set out in Part 3: Responsibility for Functions of the Constitution. [\[link will be added once constitution agreed at first SBSA Board meeting\]](#)

3.4 Portfolio Committees

- 3.4.1 Following formal establishment, the work of the Sussex and Brighton Strategic Authority (SBSA) will be supported by a number of portfolio committees (also referred to as thematic committees), each led by a designated portfolio lead/ Chair. These committees will play a regional role in shaping strategic direction across key policy areas, developing strategies, policies, and investment proposals aligned with the Authority's vision for the region
- 3.4.2 The terms of reference for each committee, including any delegated decision-making powers, will be set out in the SBSA Constitution once adopted. All formal committees within the governance framework will be supported by a Technical Officer Group (TOG), comprising key thematic officers from SBSA and constituent councils, providing direct technical support and guidance to their respective committees.
- 3.4.3 Although yet to be formally determined these portfolio committees are likely to cover core functional areas of responsibility such as Transport and Skills & Employment. The Board may establish a Skills and Employment Committee and a Transport Committee that will oversee key responsibilities on its behalf, including approval of key plans and policies, monitoring performance and outcomes, and overseeing risks, issues and compliance with funding conditions.

The Investment Committee

- 3.4.4 The Strategic Authority will establish an Investment Committee which will support investment decision-making. Initially the Investment Committee will consider all business cases above £1million and make a recommendation on approval to the Strategic Authority Board.
- 3.4.5 The Investment Committee will, once established, act in a regional capacity to shape the investment vision for the Sussex and Brighton Strategic Authority (SBSA) area. It will make recommendations to the SBSA Board in consultation with wider portfolio committees, which will develop thematic investment programme proposals.
- 3.4.6 The SBSA Investment Fund and other devolved funding streams will represent a significant asset base through which the Authority can influence, enable, and deliver a broad range of activities to support inclusive economic growth. This will include investment in transport, clean energy transition, business support, connected communities, skills, and innovation.
- 3.4.7 The Committee is expected to have the following key functions:

- Apply the Local Assurance Framework to consider new funding applications and project variations, recommending investment decisions to the SBSA Board or designated officers.
- Provide a forum for strategic dialogue and coordination between constituent authorities, partners, and SBSA on investment matters.
- Develop a shared understanding of regional investment needs to inform the SBSA pipeline of projects and programmes.
- Ensure alignment between SBSA-led strategies.
- Commission and publish research to inform investment decisions.
- Monitor and performance-manage agreed investments against outputs and outcomes.
- Manage the SBSA investment pipeline.

3.4.8 The Technical Officer Group (TOG) supporting the future Investment Committee will be known as the Investment Panel. At this initial stage, prior to the formal establishment of SBSA, membership is confirmed only for finance and legal functions, including the Section 73 Officer and finance colleagues, and the Monitoring Officer with legal and governance support. Other core enabling service membership will be identified.

3.4.9 The Investment Panel will support the Investment Committee through 5 key roles:

1. Support the development and delivery of the Investment Committee Work Programme
2. Drive Communication between partners
3. Gather intelligence and undertake research
4. Act as the Lead Officer Forum on Investment
5. Drive the development and delivery of strategic investment responsibilities

3.5 Advisory Boards

3.5.1 The Sussex and Brighton Strategic Authority (SBSA) will establish a Business Board that is fully compliant with the English Devolution Accountability Framework. This Board will represent the voice of business across the region and play an integral role within the SBSA governance structure, ensuring that economic priorities reflect the needs and opportunities of local enterprises.

3.5.2 In addition, the Authority will consider the creation of further Advisory Boards as part of the development of its wider governance framework. These arrangements will be confirmed and formally adopted at the inaugural meeting of the Strategic Authority following vesting.

3.6 Statutory Officers

Head of Paid Service

3.6.1 It is the role of the Head of Paid Service, also referred to as the Chief Executive, to ensure that all the Strategic Authority functions are properly coordinated, organising staff and appointing appropriate management.

3.6.2 At SBSA the Chief Executive will fulfil the role of the Head of Paid Service. The Head of Paid Service discharges the functions in relation to the Combined Authority as set out in section 4, Local Government and Housing Act 1989.

3.6.3 The duties and responsibilities of the post include but are not limited to:

- The statutory responsibilities of the Head of Paid Service to manage the budgets and funding allocations available to the Strategic Authority, in partnership with the S73 officer.
- Leading the Senior Leadership Team to deliver the strategic direction for the Strategic Authority as outlined by the Mayor and Board
- Co-ordinate strategy, development and delivery ensuring a joined-up partnership approach to deliver the aspirations of the Strategic Authority
- Champion the delivery of the strategic priorities of the Strategic Authority and its Strategic Framework and put in place the resources necessary to achieve the efficient and effective implementation of the

SBSAs programmes and policies across all services and the effective deployment of the authority's resources to those ends.

- Advise the Strategic Authority Mayor and its Board on all matters of general policy and matters upon which their advice is necessary, with the right attendance at Board and other meetings as appropriate.
- Advising the elected Mayor on the delivery of strategic priorities
- Represent the Strategic Authority at local, regional and national level in partnership with the Mayor.
- Act on advice given by the Monitoring Officer on any situations that could put the Strategic Authority in jeopardy of unlawfulness or maladministration.
- Seek to protect the Strategic Authority against any reputational risks.
- Exercise urgency powers to make decisions in emergency situations.

Section 73 Officer

3.6.4 The Strategic Authority will appoint a statutory Chief Finance Officer (CFO) under section 73 of the Local Government Act 1985, to administer the financial affairs of the Strategic Authority. 3.6.5 The Section 73 Officer is responsible for providing the final sign off for funding decisions.

3.6.5 The responsibilities of the Section 73 Officer reflect those documented in the CIPFA published document The role of the chief financial officer in local government | CIPFA which details 5 key principles:

- the Chief Financial Officer (CFO) in a local authority is a key member of the leadership team, helping it to develop and implement strategy and to resource and deliver the authority's Policy Aims sustainably and in the public interest
- the CFO in a local authority must be actively involved in, and able to bring influence to bear on, all material business decisions to ensure immediate and longer-term implications, opportunities and risks are fully considered, and alignment with the authority's overall financial strategy
- the CFO in a local authority must lead the promotion and delivery by the whole authority of good financial management so that public money is always safeguarded and used appropriately, economically, efficiently, and effectively
- the CFO in a local authority must lead and direct a finance function that is resourced to be fit for purpose
- the CFO in a local authority must be professionally qualified and suitably experience

3.6.6 The Section 73 Officer will be a member of the Strategic Authority Senior Leadership Team and have oversight and an ability to influence all major decisions of the Strategic Authority. They will ensure that the Strategic Authority has robust systems of internal controls and appropriate separation of duties to ensure the legality and probity of financial transactions.

3.6.7 These processes will be set out in the Strategic Authority's Financial Regulations and the Contract Standing Orders. Other policies such as the Anti-fraud and Corruption Policy will also be included in the Constitution and published on the SBSA website.

Monitoring Officer

3.6.8 The SBSA Monitoring Officer discharges the functions in relation to SBSA as set out in section five of the Local Government and Housing Act 1989. Their responsibilities regarding the Assurance Framework are as follows:

- Providing advice on, and maintaining an up-to-date version of the Constitution and ensuring that it is widely available for consultation by members, employees, and the public
- After consulting with the Head of Paid Service and Section 73 Officer, report to the Authority if they consider that any proposal, decision, or omission would give rise to or has given rise to unlawfulness or maladministration. Such a report will have the effect of stopping the proposed decisions being implemented until the report has been formally considered by the Strategic Authority
- Ensuring that decisions, together with the reasons for those decisions and relevant officer reports and background papers are made publicly available as soon as possible
- Advising whether decisions are within budget and policy framework and whether any decisions or proposed decisions constitutes a key decision

- Providing advice on the scope of powers and authority to take decisions, maladministration, financial impropriety, probity and budget and policy framework issues to the Mayor, members and officers, and generally support and advise members and officers in their roles.

4. Checks and Balances

4.1 The Governance Framework

- 4.1.1 As a newly established Strategic Authority for Sussex and Brighton, we recognise the importance of earning the trust and confidence of our communities, stakeholders, and newly elected members. Our ability to make sound decisions on the investment of public funds must be clear and accountable.
- 4.1.2 A strong governance framework is the cornerstone of effective decision-making, transparency, and accountability. Building trust and confidence among our communities, stakeholders, and political membership depends on clear, robust processes for managing public investment.
- 4.1.3 Transparency is central to this commitment. We will maintain comprehensive records that demonstrate compliance with all legal and regulatory requirements, and ensure these records are accessible in accordance with the arrangements outlined below.

4.2 Overview & Scrutiny Arrangements

- 4.2.1 The Strategic Authority will establish Overview and Scrutiny arrangements that comply with statutory regulations and reflect the principles set out in the National Scrutiny Protocol for Devolved Authorities. These arrangements are designed to provide constructive challenge, strengthen accountability, and promote transparency in decision-making, in line with best practice and guidance.
- 4.2.2 SBSA will establish a single Overview & Scrutiny Committee that will:
- review or scrutinise any decision made, or other action taken, in connection with any Non-Mayoral Function or Mayoral Function of the Strategic Authority
 - make reports or recommendations to the Strategic Authority, with respect to any Non-Mayoral Function of the Combined Authority
 - make reports or recommendations to the Mayor, with respect to any Mayoral Function of the Strategic Authority
 - make reports or recommendations to the Strategic Authority or the Mayor on any matter that affects the Strategic Authority's Area or the inhabitants of the Strategic Authority's Area
 - make reports or recommendations to the Strategic Authority, with respect to any activity conducted by anybody incorporated by the Combined Authority for whatever purpose where such body receives public funding
- 4.2.3 As part of our new governance framework, the Overview and Scrutiny Committee will play a central role in ensuring accountability and transparency. It is responsible for holding the Board to account for their decisions and performance. In relation to the Mayor, once elected, the Committee will convene at least two dedicated sessions each year for Mayoral Question Time, providing an opportunity to scrutinise the delivery of the Mayor's priorities and their leadership of the Board in achieving its strategic objectives.
- 4.2.4 Until as Mayor is elected the Strategic Authority intends to hold public question time events to hold the Chair of the Board and Lead Members to account.
- 4.2.5 When appointing members to the Overview and Scrutiny Committee, the Strategic Authority will ensure, as far as reasonably practicable, that the overall membership reflects the political balance of the Constituent Councils taken together, in line with statutory requirements and best practice. The Committee will have the ability to appoint additional non-voting members to its membership to provide specific expertise that it has identified as beneficial to the undertaking of its work programme.

- 4.2.6 The terms of reference for the Overview & Scrutiny Committee will be set out in Part 3: Responsibility for Functions section of the Constitution and published on the SBSA website. [\[link will be added once constitution element agreed at SBSA Board meeting\]](#)
- 4.2.7 The Overview and Scrutiny Committee will undertake the following core responsibilities to fulfil its statutory functions:
- Hold the Strategic Authority Board and Lead Members/ Chairs to account for delivering agreed priority objectives.
 - Scrutinise the Mayor's performance in achieving Mayoral priorities once a Mayor has been elected.
 - Conduct pre-decision scrutiny of proposals before Board decisions are taken.
 - Exercise the Call-In power where decisions appear inconsistent with the principles of decision-making set out in the Constitution.
 - Review policy when requested or where gaps/issues are identified through performance monitoring and accountability processes.
 - Undertake strategic performance reviews of corporate Key Performance Indicators (KPIs).
 - Hold focused sessions on cross-cutting issues or matters of significant public concern.
 - Scrutinise budget proposals, including alignment and delivery of the Medium-Term Financial Plan (MTFP) and associated consultations.
 - Carry out deep-dive reviews or establish task-and-finish groups or working groups as required.
 - Appoint Rapporteurs to shadow Lead Member portfolios, advisory committees, and relevant bodies corporate.
 - The above roles could involve examination and scrutiny of significant business cases

4.3 Audit Committee Arrangements

- 4.3.1 SBSA will establish an Audit and Governance Committee in line with the requirements of the *Combined Authorities (Overview and Scrutiny, Access to Information and Audit) Regulations 2017*. This Committee will fulfil the statutory obligation to appoint an audit committee. In accordance with the law, the Committee will include at least one independent person, who will serve as Chair and be appointed through an open recruitment process.
- 4.3.2 This committee will be a key component of the Strategic Authority's corporate governance arrangements and an important source of assurance regarding the organisation's arrangements for managing risk, maintaining an effective control environment, reporting on financial and annual governance processes and for the promotion and maintenance of high standards of conduct by its Members.
- 4.3.3 The functions of the Audit & Governance Committee will be to:
- review and scrutinise the Strategic Authority's financial affairs
 - review and assess the Strategic Authority's risk management, internal control and corporate governance arrangements
 - review and assess the economy, efficiency and effectiveness with which resources have been used in discharging the Strategic Authority's functions
 - make reports and recommendations to the Strategic Authority in relation to reviews conducted under paratha bullets above
 - implement the obligation to ensure high standards of conduct amongst Members.

4.4 Local Checks and Balances

- 4.4.1 The Strategic Authority will meet all the requirements set out in chapter 7 of the Localism Act 2011 and will have in place a robust Code of Conduct. In addition, it will meet the requirements set out in the Local Audit and Accountability Act 2014 and is committed to continuing to review and improve our approach, consulting with other MCAs to identify best practice.
- 4.4.2 The Strategic Authority's approach to Overview and Scrutiny will build upon the statutory guidance, the Scrutiny Protocol and guidance from the Centre for Governance and Scrutiny, and best practice from other Mayoral Combined Authorities.

Enabling the Business Voice

- 4.4.3 SBSA will establish a Business Board as part of its governance arrangements. This Board will act as an advisory body to SBSA and the Mayor once elected, providing strategic advice and guidance through representation of the business voice to support the exercise of both Strategic Authority and Mayoral functions.
- 4.4.4 Once operational, the Business Advisory Board is expected to have the ability to nominate members to SBSA Committees, ensuring that business perspectives are represented across portfolio and thematic areas.

Value for Money

- 4.4.5 As the Sussex and Brighton Strategic Authority (SBSA) moves toward formal establishment, this Local Assurance Framework sets out the Authority's commitment to implementing arrangements that meet the requirements of the Local Audit and Accountability Act 2014 and recognised best practice. Once operational, SBSA will appoint independent external auditors to verify its accounts and ensure compliance with statutory obligations. These arrangements will be supported by an Audit and Governance Committee, which will provide oversight of financial affairs, corporate governance, and risk management, and will assess whether resources are being used efficiently and delivering value for money.
- 4.4.6 This Single Assurance Framework establishes the principles and processes SBSA will adopt to make robust value-for-money judgements on potential investments. All business cases seeking approval will be assessed through this framework and evaluated against HM Treasury's Five Case Model, as set out in the Green Book, ensuring decisions are evidence-based and proportionate
- 4.4.7 Through this framework, SBSA aims to use public resources responsibly, creating and maximising public value while achieving agreed policy objectives. Specific arrangements for demonstrating Value for Money in Department for Transport projects, including compliance with TAG guidance, are detailed in Annex B.

Internal Audit

- 4.4.8 Internal Audit services will be established to provide a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. The internal audit provision will conform to the Public Sector Internal Audit Standards which are intended to promote further improvement in the professionalism, quality, consistency and effectiveness of internal audit across the public sector.

External Audit

- 4.4.9 It is a requirement for the Strategic Authority to have independent external auditors appointed. As the Combined Authority has opted into the National Scheme (as do the vast majority of other Local and Combined Authorities), the appointment of the external auditors is undertaken by Public Sector Audit Appointments Limited (PSAA), a not-for-profit company limited by guarantee incorporated by the Local Government Association (LGA) which operates independently of both the LGA and PSAA's sole member and guarantor (the Improvement & Development Agency (IDeA)) which is itself a subsidiary of the LGA.
- 4.4.10 PSAA is specified by government as an appointing person for principal local government and police bodies under the Local Audit and Accountability Act 2014 and the Local Audit (Appointing Person) Regulations 2015. As such it both appoints auditors and sets the scale of audit fees for principal authorities (such as the Strategic Authority) who have opted into the National Scheme.
- 4.4.11 The role of the external auditors is to:
- Express an opinion on:
- The Authority's financial statements for each financial year audited.
 - Conclusions relating to going concern; and

- The consistency of other information published with the financial statements, including the narrative statement

Reporting by exception:

- If the Governance Statement does not comply with relevant guidance or is not consistent with their understanding of the Authority
- If they identify a significant weakness in the Authority's arrangements in place to secure economy, efficiency and effectiveness in its use of resources; and
- Any significant matters that are in the public interest.

4.5 Accountability to Government

- 4.5.1 As the Sussex and Brighton Strategic Authority (SBSA) moves toward formal establishment, this Single Assurance Framework sets out the Authority's intended approach to ensuring that appropriate safeguards and standards are embedded in the development and delivery of programmes and projects, and that robust stewardship of devolved funding is maintained in full compliance with legislative requirements
- 4.5.2 Once operational, SBSA will implement processes and controls to ensure that all funding streams, many of which originate from Government grants and loans with specific conditions, are managed in accordance with those requirements. These arrangements will reflect best practice and statutory obligations, including the Local Audit and Accountability Act 2014.
- 4.5.3 Where funds are distributed to external parties, including through open competition, SBSA will publish decision-making criteria in advance to ensure transparency and fairness. Decisions on whether to administer funds in-house or through external fund managers will be based on the conditions set out in funding agreements and an assessment of internal capability. In some cases, SBSA may choose to deliver investment funds with the intention of recycling resources to maximise long-term impact. Any such funds will operate within investment strategies that evolve over time but remain aligned with government conditions and statutory requirements.
- 4.5.4 Expenditure will be subject to rigorous audit arrangements, both internally and through external audit processes, to provide assurance that resources are used lawfully, efficiently, and effectively.

4.6 Accountability to the Public

- 4.6.1 In preparation for the formal establishment of the Sussex and Brighton Strategic Authority (SBSA) this Local Assurance Framework sets out the intended governance approach to ensure clarity, transparency, and accountability across all future decision-making structures. The governance framework will define clear roles and responsibilities for the Board, Advisory Boards, and Committees, creating multiple layers of accountability to support strategic objective setting, performance monitoring, decision-making, and operational delivery.
- 4.6.2 In addition to the assurance provided through the governance arrangements outlined in this framework, such as Overview and Scrutiny and other checks and balances, SBSA is committed to implementing additional measures to maintain transparency and uphold public accountability.
- 4.6.3 Once operational, SBSA will adopt a proactive approach to communication, ensuring that strategies, decisions, and delivery progress are shared openly and regularly. Comprehensive information will be published on the SBSA website, supported by updates through multiple channels, including social media, to ensure accessibility and consistency of messaging.
- 4.6.4 The introduction of a directly elected Mayor in May 2028 will provide a single, visible point of democratic accountability, enabling residents to hold the Mayor to account for performance and decisions at the ballot box. Furthermore, the Overview and Scrutiny Committee will convene public Mayoral Question Time sessions at least twice annually, with plans to extend this accountability to Portfolio Leads as governance arrangements mature.

- 4.6.5 In line with principles of transparency and compliance with statutory requirements, SBSA will make key records and documents publicly available. These will include:
- Meeting agendas and papers
 - Financial statements and annual reports
 - Annual Assurance and Governance Statements
 - Application guidelines for funding programmes
 - Registers of interests, gifts, and hospitality
 - Remuneration details for officers and members
 - Policies on complaints, whistleblowing, confidentiality, and Freedom of Information
 - The Code of Conduct

These measures will ensure that SBSA operates to the highest standards of openness and integrity, fostering trust and confidence among residents and stakeholders.

4.7 Subsidy Control

- 4.7.1 The Strategic Authority will ensure that all public funded programmes and projects are delivered in line with Subsidy Control law. This will include assessing all applications against the relevant requirements (which at this time are primarily set out in the Subsidy Control Act 2022 as clarified in the Statutory Guidance) and where necessary making referrals to the Competition and Markets Authority prior to an award being made.
- 4.7.2 All grant funding agreements will contain appropriate legal conditions on Subsidy Control. Where a misuse of a subsidy is identified, the Strategic Authority may exercise its right under Section 77 of the Subsidy Control Act 2022.
- 4.7.3 Subsidy Control will be considered as part of the decision-making process. The Strategic Authority will conduct appropriate legal due diligence should it determine that the characteristics of the proposal require additional scrutiny, including if a proposed measure is novel, contentious or repercussive.
- 4.7.4 Records of compliance will be kept. The transparency requirements set out in the Subsidy Control Act 2022 will be satisfied, in line with the relevant timescales.

4.8 Commitment to evolution of Accountability Arrangements

- 4.8.1 The Strategic Authority will continue to review and set out how it will further strengthen its accountability arrangements for future devolved funding and powers. SBSA understands as a new Strategic Authority that it will need to regularly review and evolve its governance, assurance and accountability arrangements. Additionally it will conduct an annual review of its governance framework and assurance framework
- 4.8.2 The English Devolution Accountability Framework introduced the Scrutiny Protocol as a key mechanism to ensure that overview and scrutiny arrangements within devolved institutions meet the highest standards, both for holding authorities to account for delivery and for contributing effectively to policy development and strategic decision-making.
- 4.8.3 The Sussex and Brighton Strategic Authority (SBSA) is committed to developing robust accountability arrangements, strengthening its Overview and Scrutiny function, and fully implementing the Scrutiny Protocol in line with best practice. These measures will ensure compliance with the requirements of the English Devolution and Community Empowerment Bill and support transparent and effective governance.

5. Transparency

5.1 Remuneration and Induction

- 5.1.1 As the Sussex and Brighton Strategic Authority (SBSA) moves toward vesting, arrangements for allowances and expenses will be established in accordance with legislative requirements and best practice. In the early stages following vesting, the Independent Remuneration Panel (IRP) will be convened and asked to consider developing recommendations for a Member Allowances Scheme alongside considering the provisions relating to leadership recognition set out in the English Devolution and Community Empowerment Bill.
- 5.1.2 The relevant regulations make clear that no expenses will be payable to SBSA members other than allowances for travel and subsistence, which will be administered under a scheme approved by the Authority. Allowances for the Mayor and wider positions able to receive allowances will be determined by the Board, following recommendations from the IRP.
- 5.1.3 Similarly, remuneration for the Chair of the Audit & Governance Committee and the Chair of the Overview & Scrutiny Committee will be set by the Board based on IRP advice. Members of these regulatory committees, as well as Independent Persons appointed for standards matters, will also receive allowances as determined through this process. Full details will be published in SBSA's Constitution under the Members' Allowances Scheme.
- 5.1.4 It is anticipated that the English Devolution and Community Empowerment Bill will address matters relating to Leadership recognition and will enable additional allowances to be paid by the Strategic Authority. The Bill and its implications will be considered within the IRP review.
- 5.1.5 New Board members will undertake induction training covering governance structures, including the Single Assurance Framework, senior management roles, funding arrangements, risk management, and annual objectives. Committees and Advisory Boards will also receive induction tailored to their governance role and SBSA's strategic framework.

5.2 Publication of Information

- 5.2.1 Once SBSA is formally established, it will adopt transparency arrangements in line with legislative requirements and best practice. The schedule of meetings for each calendar year will be published on the SBSA website. Notices of meetings, agendas, and accompanying papers for formal Board and Committee meetings will be made available at least five clear working days in advance.
- 5.2.2 SBSA will include its Forward Plan within the agendas of Board and Overview & Scrutiny Committee meetings. Where papers contain commercially sensitive information or fall under exemptions set out in Schedule 12A of the Local Government Act 1972 or the Freedom of Information Act 2000, they will be classified as private and withheld from publication. The Monitoring Officer will advise on whether an item should be treated as private.
- 5.2.3 To enhance transparency and accountability, SBSA will publish a Forward Plan of key decisions at least 28 days before they are taken, and where possible, up to six months in advance, enabling public visibility and comment. All decisions will be published in accordance with the transparency provisions set out in SBSA's Constitution.

5.3 Transparency Arrangements

- 5.3.1 The Strategic Authority will operate in accordance with statutory transparency requirements and adopt recognised good practice standards. The key arrangements to be implemented include:
- Upholding the public's right to attend meetings and inspect documents
 - Live streaming meetings to enable public access online.

- Publishing agendas and reports for Board and Committee meetings on the SBSA website at least five clear working days before each meeting.
- Making minutes of meetings publicly available on the SBSA website as soon as practicable.
- Publishing business case summaries for all schemes requiring decisions as part of meeting agendas.
- Ensuring reports of Board and Committee meetings are accessible to the public via the SBSA website.
- Publishing key decisions taken by officers on the SBSA website.
- Complying with the Local Government Transparency Code, which requires the publication of additional datasets to promote openness and accountability.

5.4 Gifts and Hospitality

- 5.4.1 A Gifts and Hospitality policy and a procedure will be in place to ensure that no SBSA Member or officer receives remuneration or expenses in relation to its activities, other than their salary and in accordance with policy.
- 5.4.2 The Gifts and Hospitality Policy and accompanying procedure will be published on the Sussex and Brighton Strategic Authority website and kept under regular review. Publication of this information will support transparency, enable public scrutiny, and ensure compliance with statutory transparency requirements and recognised best practice. Registers of gifts and hospitality declared by Members and relevant officers will also be made publicly available in accordance with the Constitution and data protection requirements, reinforcing public confidence in the integrity of decision-making within the Authority.

6. Standards and Ethical Framework

6.1 Nolan Principles and the Code of Conduct

- 6.1.1 The Seven Principles of Public Life (the ‘Nolan principles’) underpin this Assurance Framework to ensure that the Strategic Authority, their Mayor once elected and Members and their officers, are upholding the highest standards of conduct and ensuring robust stewardship of the resources they have at their disposal.
- 6.1.2 Statutory provisions require the Strategic Authority to adopt a Members’ Code of Conduct (the ‘Code’) which applies to Members of the Strategic Authority and to voting Members of committees appointed by the Strategic Authority.

6.2 Conflicts of Interest

- 6.2.1 The Strategic Authority’s codes of conduct for members and for officers will set out clear procedures for dealing with any conflicts of interest which may arise when carrying out the business of SBSA. All Members and Officers will be required to declare interests they are aware of, and this will be recorded centrally on a register. This information will be reviewed and updated annually.
- 6.2.2 Board members must declare any interests in items being discussed at meetings, as required by law. The Code of Conduct will set out when a member must leave the meeting during consideration of such items. Constituent Authority members will also have completed their own local Register of Interests. SBSA officers must declare any interests in contracts. Failing to declare a relevant interest is a criminal offence, and it is each member’s personal responsibility to assess their position before decisions are made.

6.3 Complaints

- 6.3.1 A procedure will be in place to ensure that any complaints relating to the arrangements, processes or decision making associated with a project is dealt with fairly and effectively. The Strategic Authority’s Code of Conduct for Members will include a process for dealing with complaints of alleged breaches of the Code.

6.4 Whistleblowing

- 6.4.1 SBSA will adopt a Whistleblowing Policy to enable and encourage employees to raise concerns about wrongdoing by the Strategic Authority, Officers or contractors without fear of reprisal or detriment.

6.5 Freedom of Information

- 6.5.1 As a public body, the Strategic Authority is subject to the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and the Data Protection Act 2018, which includes the General Data Protection Regulation (GDPR). The Strategic Authority will hold records and will deal with statutory information requests. Applicants will be made aware of their right to access information with requests dealt with in accordance with the relevant legislation.

6.6 Policy

- 6.6.1 The Strategic Authority is fully committed to complying with the Equality Act 2010 and the Public Sector Equality Duty and to fulfilling its statutory duties towards its employees and residents with regards to equality and inclusion. Before making and implementing decisions, policies, plans, practices and procedures, SBSA will show due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Where decisions have the potential to impact people differently based on protected characteristics, an Equality Impact Assessment will be undertaken.

- 6.6.2 The Strategic Authority will adopt corporate policies such as counter fraud, anti-bribery and modern slavery which will be published on the SBSA website.

7. Assurance Framework Phases

7.1 Introduction and Definitions

- 7.1.1 SBSA aspires to a consistent business case lifecycle to guide the development of projects from concept initiation, through development (covering the business case, options appraisal, analysis), into approval, delivery/monitoring and evaluation. The aim is to provide clarity to partners and stakeholders on the process and its requirements, those preparing business cases and members responsible for decision-making, approval and scrutiny.
- 7.1.2 This Assurance Framework sets out the framework to be applied throughout the lifecycle of programmes and projects. It sets out the key processes for ensuring accountability, probity, transparency and legal compliance, also ensuring value for money is achieved across its investments. It provides assurance to decision-makers and Government that all investment proposals meet the expected standards.
- 7.1.3 The Assurance Framework will be applied across the lifecycle of all projects and programmes that will incur a financial liability on the Strategic Authority. Where financial liability is placed onto the Strategic Authority, the Assurance Framework is applicable throughout all stages of the project or programme lifecycle: concept initiation, development, approvals, delivery, monitoring and evaluation.
- 7.1.4 It will remain appropriate to apply proportionality in the development of business cases based on the size of spend involved, the degree of flexibility in the funding supporting the case and the risk associated with the programme/ project.
- 7.1.5 **The Principle of Approval** is the core principle within the Assurance Framework and this will drive a Collective Cabinet approach within the Strategic Authority by ensuring that only the Board can determine the strategic content of the Strategic Authority pipeline of interventions.
- 7.1.6 The Assurance Framework will work to the following definitions:

(i) **An Assurance Framework Intervention**

Projects and Programmes which follow the Assurance Framework are focused on achieving positive outcomes for the local community. They are typically funded by external sources such as devolution deals and bid applications/grant awards from Central Government, for example the Investment programme, where SBSA is the accountable body.

The Assurance Framework will be applied flexibly and proportionately, dependent on the level of risk associated with the Programme/Project. The Assurance Framework enables an independent assessment and appraisal of an investment opportunity. Programmes and Projects following the Assurance Framework route should ensure a strong strategic fit to the SBSA Strategic Framework.

The Assurance Framework does not apply to Corporate Projects. Despite this the intention is to apply the principles and practices outlined in the Assurance Framework to Corporate Projects, the Investment Panel for example will support the development of business cases and apply test and challenge.

(ii) **A Corporate Project**

A Corporate project is created to address an internal business need, benefitting the organisation, for example a change to the operating systems of an organisation. Risk management should be considered with risks reviewed as part of the activity.

Once a corporate project is complete it may become business as usual (BAU). Corporate projects will be supported by specialists across the Strategic Authority including Finance, Project Management, Human

Resources and Legal professionals as appropriate, to strengthen the case for funding, the identified benefits and support effective delivery.

- 7.1.7 The Assurance Framework explains how the level of assurance increases with the value and risk of a business case. It sets out processes for risk assessment, guidance on developing business cases, and the documents needed for approval. It also includes independent review and appraisal, supported by clear guidance, templates, and criteria to ensure a consistent approach throughout the project lifecycle.

7.2 Value for Money

- 7.2.1 As a future investor of public funds, SBSA must make sure its decisions deliver the best value for taxpayers. Every investment proposal and business case will include a Value for Money assessment. The Assurance Framework follows HM Treasury's Green Book guidance, which requires Value for Money to be considered throughout project development and approval. All business cases will use the HM Treasury Five Case Model, with templates designed to reflect proportionality based on project size and risk.
- 7.2.2 Partners will use recognised toolkits—such as the Green Book, DfT TAG, and MHCLG guidance, to show the economic, social, and environmental benefits and costs over an appropriate period. The assessment will look at:
- Economy: Keeping resource costs as low as possible.
 - Efficiency: Getting the most output for the resources used.
 - Effectiveness: Achieving the intended results and objectives.
- 7.2.3 SBSA's process will include cost-benefit analysis, including Benefit-to-Cost Ratios (BCR), and consider non-monetised impacts. Preference will be given to schemes rated at least 'High Value for Money,' but projects with lower ratings may still be approved if they have a strong strategic case, such as promoting equality, social mobility, or inclusive growth. These decisions will be fully explained and evidenced in the business case.
- 7.2.4 The following table sets out Value for Money (VfM) categories that the Strategic Authority will use:

Category	Description	What 'high' vs 'low' VfM means
Economy	Minimising the cost of resources used without compromising quality	High VfM: Costs are low, and inputs are of an acceptable quality
Efficiency	Achieving the maximum output for a given level of input	High VfM: Outputs are high relative to inputs
Effectiveness	Achieving project outcomes and objectives successfully	High VfM: Outcomes meet or exceed targets
Equity	Ensuring fair distribution of benefits and resources across different groups	High VfM: Benefits are distributed equitably among stakeholders
Cost effectiveness	Comparing costs to benefits (often used in health and infrastructure)	High VfM: Benefits far outweigh costs. Lower VfM: Marginal gains
Strategic Fit	Alignment with policy goals, long-term impact, and stakeholder priorities	High VfM: Strong alignment with strategic priorities

- 7.2.5 The following table sets out an explanation of what BCR/ Monetised benefit bandings will be used to indicate a particular VfM category prior to the consideration of non-monetised benefits:

VfM Category	Implied by...
Very High	BCR greater than or equal to 4.0
High	BCR greater than or equal to 2.0 and then than 4.0
Medium	BCR greater than or equal to 1.5 and less than 2.0
Low	BCR greater than or equal to 1.0 and less than 1.5

Poor	BCR greater than or equal to 0.0 and less than 1.0
Very Poor	BCR less than 0.0

- 7.2.6 The Assurance Framework requires:
- The delivery, and costs, of outputs must be quantified within all applications for funding. Assessing Value for Money will be done in accordance with Government guidance.
 - The use of options consideration for Value for Money is key, to assist a do minimum option will always be included in business cases to provide an essential benchmark that can help reveal the real value of additional changes.
 - The Senior Responsible Officer responsible for programme/project development will review and document that they are satisfied with the Value for Money assessment within in a business case. This element will also be scrutinised by the Section 73 Officer as part of the SAF process prior and to final approval of funding and award of contract
- 7.2.7 To help establish Value for Money considerations and assessment the Strategic Authority follows the new Green Book advice and reviews the following as they apply within a proportionate approach:
- **Objectives:** That a number of SMART objectives and Critical Success Factors are used to ensure short-list options, that will be assessed in fuller detail at business case stage, are aligned with the strategic objectives of the organisation and as a result is likely offer VfM to society.
 - **Benefits:** The net present value to society of all social, economic and environmental benefits (not always proportionate to consider for lower-level investments). The benefits may be monetised, quantitatively or qualitatively. This is carried out in greater detail within the business case stage.
 - **Costs:** The net present public resource costs and societal costs following whole life costing method. This includes capital costs, operating and maintenance costs and as well as opportunity costs (if appropriate). This is carried out in greater detail at the business case stage.
 - **Risk:** Any risk costs associated with managing and mitigating identifiable and significant risks. This is carried out in all stages with increasingly detailed analysis as the scheme progresses through different business case stages. Residual 'hard to quantify' risk and uncertainty, where it is likely to be significant, are also considered as part of the value for money judgment. For example, the impact on public transport fare revenue due to increased levels of working from home and online shopping.
 - **Wider Impacts:** That any additional wider impacts, which are not readily or credibly quantifiable or monetisable, but which are considered decisively important enough to be considered, are considered. The Strategic Authority requires an economic narrative or other ways of justification for such impacts. This is carried out in greater detail at the business case stage.
 - **Equality and Diversity:** That the distribution of the likely impact on different parts of society, and across protected characteristics, are considered in the VfM judgement.
- 7.2.8 For transport schemes, the Strategic Authority will ensure that modelling and appraisal is sufficiently robust and fit for purpose for the scheme under consideration, and that modelling, and appraisal meets the guidance set out in DfT's Transport Analysis Guidance (TAG), this is further set out in Annex B.

7.3 Bids and Funding Opportunities

- 7.3.1 External funding opportunities will be led by relevant SBSA Business Areas and managed through the External Funding Application process (see Annex A). This process makes sure the Section 73 Officer and Senior Leadership Team know about all potential funding applications. It helps identify risks, funding conditions, and the resources needed to deliver projects, and ensures approval is given before proceeding if the application is successful.

7.4 Entry Points (Strategic Framework and In-Year)

- 7.4.1 There are three entry points into the Assurance Framework as follows:
1. The Strategic Framework
 2. In-Year Proposals
 3. New Funding Opportunities

- 7.4.2 Every proposal entering the Assurance Framework must complete a Concept Document, regardless of how it enters the pipeline. This ensures all proposals provide the same core information, allowing SBSA to apply consistent standards and check that each proposal fits with the agreed strategic framework. This approach supports clear, fair, and transparent decision-making from the start.

Primacy of the Strategic Framework

- 7.4.3 The SBSA Strategic Framework will be the foundation for determining pipeline themes and interventions. All proposals must clearly demonstrate how they align with this framework, ensuring that investment decisions reflect SBSA's agreed priorities and ambitions. This approach guarantees that the pipeline is Board-driven, with a clear focus on delivering outcomes that support local priorities. By embedding the strategic framework at the heart of decision-making, SBSA will promote consistency, transparency, and accountability, while enabling meaningful engagement with constituent authorities, partners, and stakeholders.
- 7.4.4 The initial Strategic Framework has been developed through a 'strategy sprint' approach that has driven engagement across the region with key partners and stakeholders. This has created a Strategic Framework that:
- Articulates the Strategic Authority's Prosperity Strategy which sets out the area's investment priorities so that partners and stakeholders understand the key areas of focus and the improved outcomes they are designed to achieve.
 - Provides strategic context for the Strategic Authority as an organisation so its plans and operational activity are aligned to the overall vision agreed by its Board
 - Enables oversight and review of performance against priorities.
- 7.4.5 The Strategic Framework will create core pipeline themes, some of which will have detailed interventions set out for development, others will set out desired outcomes and objectives. This will inform categories of pipeline content which will be set out as:
- A. High level priority for development and delivery
 - B. Medium level priority for development so it is ready for delivery when funding becomes available
 - C. Low level priority for pipeline inclusion to be developed at future point
- 7.4.6 Proposals that are drawn down from the Strategic Framework enter Phase 2 of the Assurance Framework.

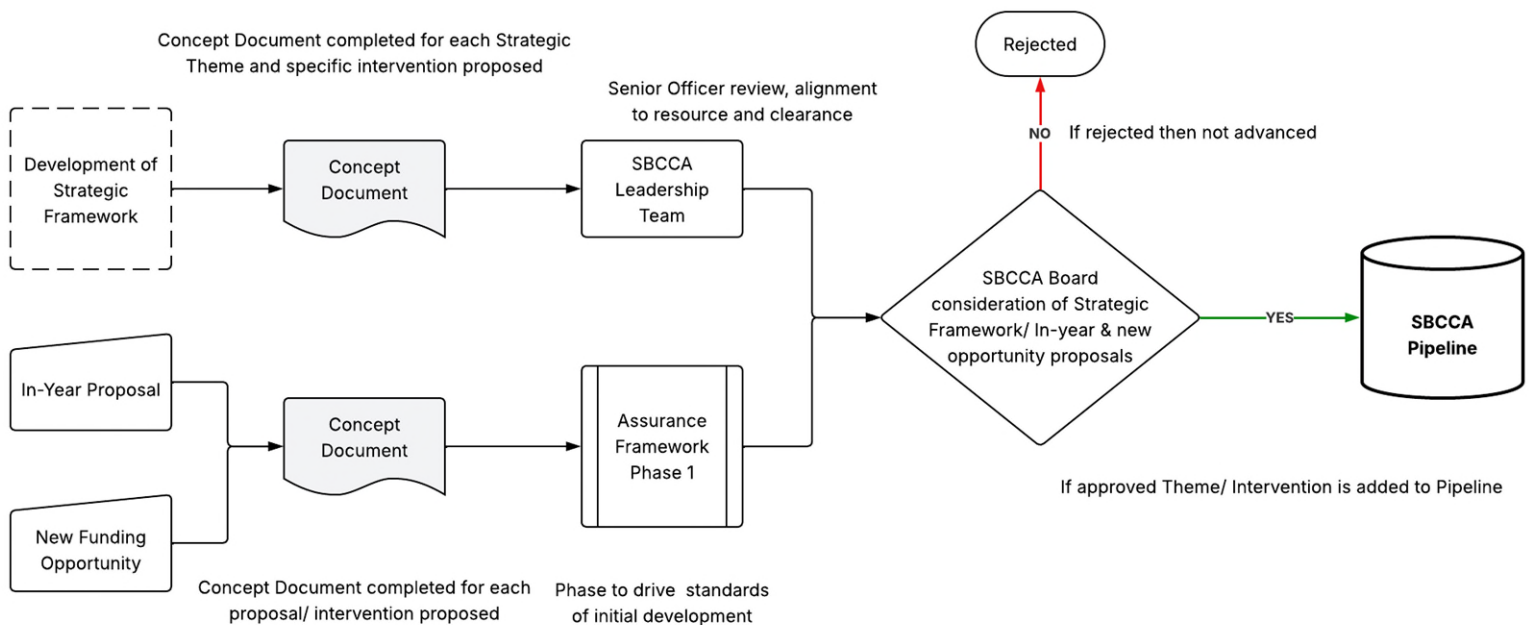
In-Year Proposals

- 7.4.7 The Strategic Authority, the Mayor once elected, Officers, Constituent Councils, Partners and Stakeholders may submit in-year proposals that have not been included within the Strategic Framework for consideration. Such submissions will require the completion of a Concept Document to drive strategic alignment of any proposals with the agreed SBSA Strategic Framework, as well as ensuring appropriate key elements of the Strategic Authority are engaged early in the process to provide guidance on finance, legal, communications, procurement and other considerations.
- 7.4.8 In-Year proposals enter Phase 1 of the Assurance Framework.

New Funding Opportunities

- 7.4.9 In-year, SBSA may need to pursue unexpected funding opportunities that arise from new government initiatives, changes to existing priorities, or emerging local needs. These opportunities will be assessed to ensure they align with SBSA's strategic priorities and deliver maximum benefit. Initially such opportunities will be discussed at SBSA Senior Officer level and will require completion of a Concept Document.
- 7.4.10 In-year proposals and new funding opportunities may result in concept proposals that fall outside the existing Strategic Framework, **the Principle of Approval** ensures that all such proposals require Board approval.

7.4.11 The following illustration sets out the entry points onto the SBSA Pipeline and subsequently into the Assurance Framework.



7.5 Assurance Framework Phase 1: Concept Initiation

7.5.1 The primacy of the Strategic Framework makes the themes, desired outcomes and proposed interventions developed through the strategic planning process the central entry point onto the SBSA Pipeline and therefore into the Assurance Framework. Phase 1 of the Assurance Framework applies to in-year proposals and new funding opportunities.

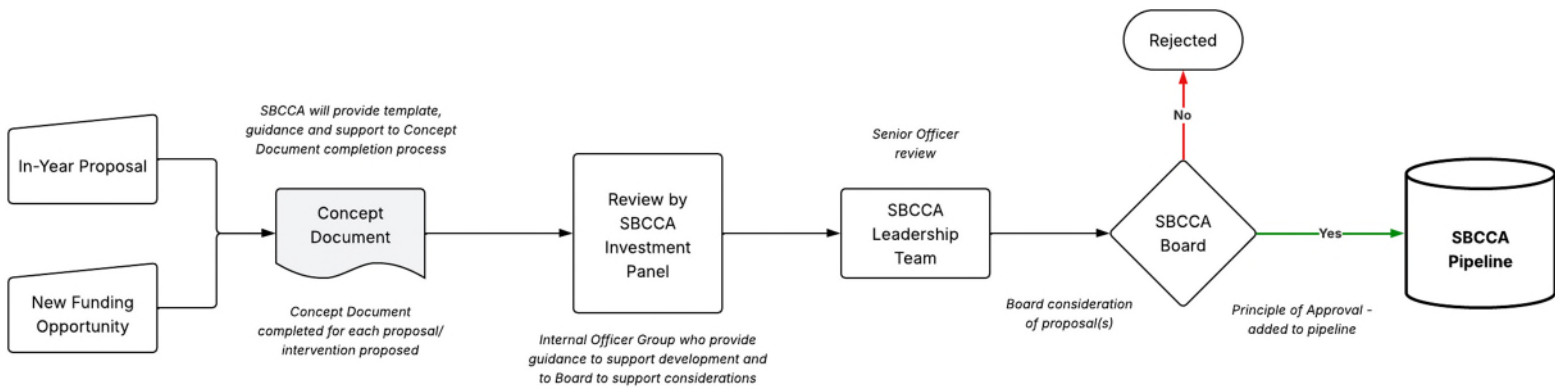
7.5.2 The Concept Initiation Phase is where in-year ideas, proposals and opportunities are developed into concepts for consideration. This stage provides early assurance that proposals fit SBSA’s strategic objectives, have the right resources, and include input from core enabling services (such as Legal, Finance, Investment, HR, Comms). Where they do not fit within the Strategic Framework this stage drives the development of a justification argument for Board to consider.

7.5.3 To ensure consistency, all proposals, both internal or external, must complete a Concept Document. This provides a consistent entry document which focuses on strategic fit, enabling early assessment and prioritisation. The same document is developed as part of the Strategic Planning process to drive consistency of considerations. The Concept Document:

- Provides justification of strategic alignment with SBSA’s framework.
- Provides high-level details on costs, benefits, risks, and assumptions.
- Provides information to help officers review and make recommendations to the Board.
- Creates a clear basis for the Board to decide whether the concept progresses.

7.5.4 The process enables early engagement with the core areas of the Strategic Authority to enable subject matter expert input from an early stage from relevant core business areas, such as Legal and Finance, PMO, Communications and Human Resources. It provides preliminary assurance that proposals are in line with strategic priorities, legally compliant, and have available resources and budget. It identifies the most appropriate route for the approval of funding as well as identification of any required development funding.

7.5.5 The following illustration sets out the process for Phase 1 of the Assurance Framework:



7.5.6 Projects approved by Board through this process will move into the Strategic Framework and onto the SBSA Pipeline, joining those already included via the strategic planning process. This process could involve reprioritising a new concept over an existing intervention. These proposals can then be developed into full business cases based as and when prioritised.

7.5.7 The Investment Panel will review each concept, assessing its merits against SBSA’s Strategic Framework, priorities and the Medium-Term Financial Plan (MTFP). The Panel will make recommendations to the Board, but the final decision rests with the Board.

- 7.5.8 The Board will decide:
- Whether the concept is added to the SBSA pipeline.
 - The route for business case development.
 - The category of development it falls under

7.5.9 This process ensures that **the Principle of Approval** is upheld with all pipeline content Board-driven, strategically aligned, and transparent. Board determine if an accepted proposal is set out in the Pipeline as a:

- A. High level priority for development and delivery
- B. Medium level priority for development so it is ready for delivery when funding becomes available
- C. Low level priority for pipeline inclusion to be developed at future point

7.6 The Pipeline

7.6.1 The SBSA Pipeline represents the approved Strategic Framework. It translates agreed strategic themes and priorities into specific interventions that can be developed and delivered over time. The pipeline ensures that all activity aligns with SBSA’s vision and objectives, providing a structured approach to investment planning. Within the Pipeline interventions are grouped into three categories as set out above in 7.5.9.

- 7.6.2 When specific interventions are deemed to be a priority they can be drawn down from the pipeline for business case development, following the process set out in Assurance Framework Phase 2. Where pipeline content represents a strategic theme or desired outcomes rather than a specific intervention, SBSA officers will initiate development through one of the following approaches:
- a) Open Call – Inviting proposals from partners and stakeholders
 - b) Expression of Interest (EOI) – Seeking initial ideas to shape interventions
 - c) Commissioning Approach – Developing targeted projects to meet strategic objectives
 - d) Intervention Development/ Feasibility

This structured process ensures that SBSA maintains consistency, transparency, and alignment with its strategic priorities while enabling flexibility to respond to emerging opportunities.

- a) Open Calls

- 7.6.3 An open call is a process SBSA will use to invite partners, stakeholders, and delivery organisations to submit proposals that address a specific strategic priority or theme identified in SBSA's Strategic Framework.
- 7.6.4 How SBSA will run an open call:
- SBSA will publish the call on its website and through partner networks, clearly stating the priority area, objectives, eligibility criteria, and deadlines.
 - Interested organisations will submit proposals showing how their intervention aligns with SBSA's strategic objectives and delivers measurable outcomes.
 - SBSA officers will review submissions against published criteria, including strategic fit, deliverability, and value for money.
 - Shortlisted proposals will then move into business case development under the Assurance Framework Phase 2.
- b) Expression of Interests
- 7.6.5 An Expression of Interest process is a structured way for SBSA to identify potential partners or delivery organisations to help achieve a specific strategic priority or objective. It allows SBSA to gauge market interest and capability before committing to full project development.
- 7.6.6 How SBSA will run an EOI:
- SBSA publishes an EOI notice on its website and through partner networks, setting out the priority area, objectives, and submission requirements.
 - Interested parties submit a short proposal summarising their approach, experience, and alignment with SBSA priorities.
 - SBSA officers review EOIs against published criteria, such as strategic fit, deliverability, and potential impact.
 - Successful EOIs may be invited to develop a full proposal or business case under Assurance Framework Phase 2.
- c) Commissioning Approach
- 7.6.7 A commissioning approach is where SBSA takes the lead in designing and procuring a specific intervention to deliver a strategic priority. Rather than inviting open proposals, SBSA defines the requirements and outcomes, then selects delivery partners through a structured process.
- d) Intervention Development/ Feasibility
- 7.6.8 When SBSA identifies a strategic priority or theme within its approved Strategic Framework, the next step is to develop specific interventions that can deliver the desired outcomes. This process ensures that proposals are well-evidenced, viable, and aligned with SBSA's objectives before moving into full business case development.
- 7.6.9 Before committing resources to a full business case, SBSA may decide to undertake a feasibility study to determine the deliverability of potential approaches to delivering a strategic priority. This study tests the viability of the intervention by examining:
- Strategic fit with SBSA priorities and government missions
 - Technical and operational feasibility
 - Indicative costs and funding options
 - Potential benefits and risks
 - Delivery timescales and dependencies

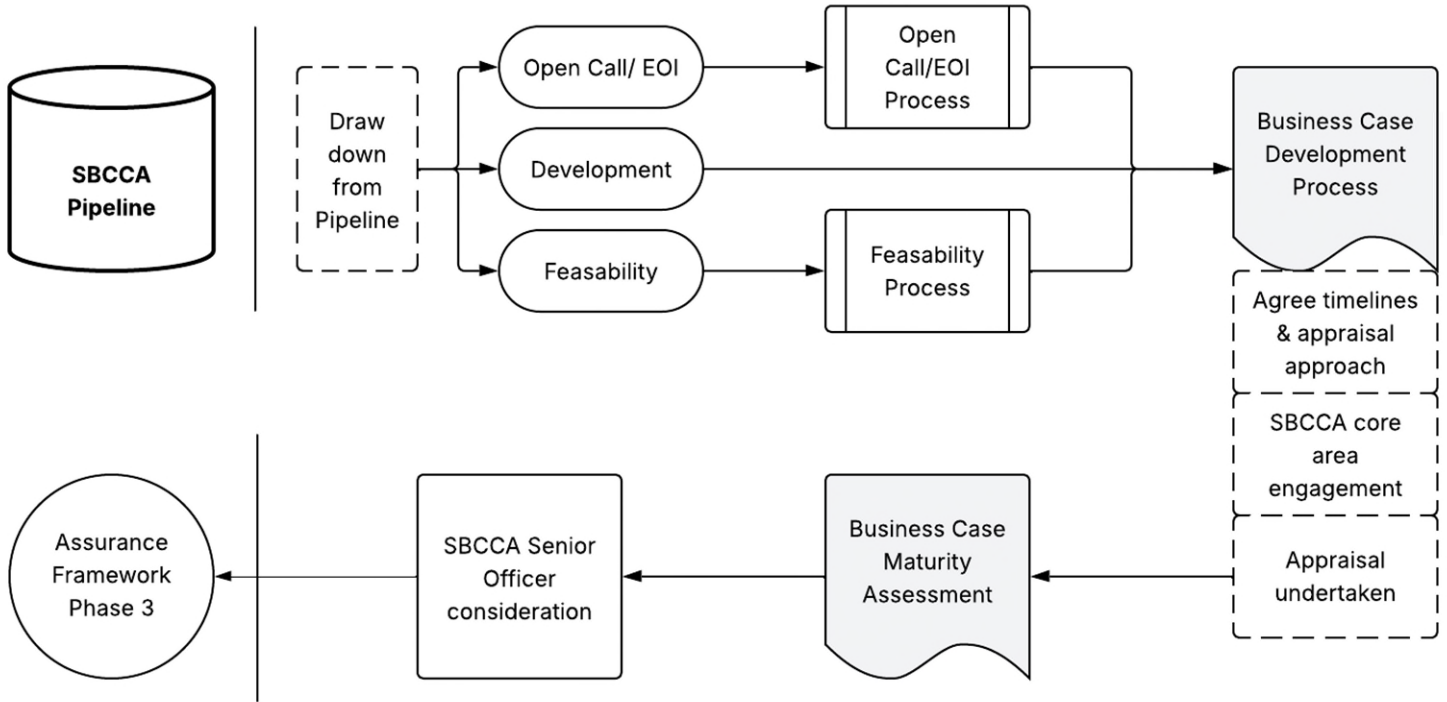
7.7 Assurance Framework Phase 2: Business Case Development

- 7.7.1 After passing strategic planning and Phase 1 of the Assurance Framework, projects move into the Business Case Development Phase. This is where the full business case is prepared and reviewed before approval.

- 7.7.2 The Key points within the Phase are as follows:
- Every time a business case is needed, this process must be followed.
 - SBSA's Officers will guide the development route, including the number and type of business cases required.
 - The aim is a single case approach, with detail proportionate to the project's size and complexity.
 - This phase includes shaping the project, creating delivery and resource plans, assessing value for money, identifying third-party impacts, and addressing risks and uncertainties.
 - Large or complex projects may require two stages: an Outline Business Case followed by a Full Business Case.
- 7.7.3 The sponsoring business area (or external delivery partner) is responsible for developing the business case using SBSA templates and guidance, ensuring compliance with the Assurance Framework and HM Treasury's Five Case Model. External partners will receive support from SBSA teams and subject matter experts.
- 7.7.4 Experts involved include Programme Assurance & Evaluation, Finance, Legal, and Procurement, who review and input before approval. The lead business area must meet deadlines, engage the right experts, and follow required formats.
- 7.7.5 The goal is to produce a robust, Green Book-compliant case for funding. Each business case will undergo an independent technical appraisal and a maturity assessment to confirm readiness, highlight issues, and suggest improvements before Board consideration. All business cases will be completed using the SBSA business case templates and adhere to the HMT five case model as follows:

Five Case Model	Description
Strategic Case	The strategic case sets out the rationale for the proposal; it makes a compelling case for change at a strategic level. It should set out the background to the proposal and explain how the project provides fit with the SBSA strategic objectives, as well as any relevant local and/or national strategic priorities
Economic Case	The economic case is the essential core of the business case and should be prepared according to HMT's Green Book guidance. This section of the business case assesses the economic costs and benefits of the proposal to society as a whole, and spans the entire period covered by the proposal.
Commercial Case	The commercial case is concerned with issues of commercial feasibility and sets out to answer the question "can the proposed solution be effectively delivered through a workable commercial deal or deals?". The first question therefore is what procurement does the proposal require, is it crucial to delivery, and what is the procurement strategy?
Financial Case	The financial case is concerned with issues of affordability, and sources of budget funding. It covers the lifespan of the scheme and all attributable costs. The case needs to demonstrate that funding has been secured and that it falls within appropriate spending and settlement limits.
Management Case	The management case is concerned with the deliverability of the proposal and is sometimes referred to as a programme management or project management case. It confirms that the capacity is available and proportionate to the delivery requirements. The management case must clearly set out management responsibilities and governance and reporting arrangements. If it does not, then the business case is not yet complete. The Senior Responsible Officer should be identified.

7.7.6 The following illustration sets out the process for Phase 2 of the Assurance Framework



7.7.7 The illustration above sets out a number of key phases within Phase 2:

Draw down from SBSA Pipeline	Item is drawn down in line with priorities, it is an Open Call/ EOI/ Feasibility study then the appropriate process is undertaken prior to moving to Business case development. If it is an intervention to head into Business Case development it enters immediately.
Business Case Development	Start to draft the business case in alignment with SBSA guidance and HMTs five case model requirements, using appropriate SBSA template.
Development Planning	Work with relevant SBSA Officers to timetable development and appraisal.
Core Area Engagement	Regular check ins with Finance, Legal and identified other core SBSA business areas in support of drafting the business case. A Value for Money assessment is required for all business cases which will be reviewed by the Section 73 Officer.
Appraisal	Out of business area appraisal of the business case needs to be undertaken in alignment with agreed appraisal approach identified in planning.
Maturity Assessment	Maturity assessment of the business case is undertaken to determine if it is mature enough for the next stage, this process also enables red flags to be raised and addressed.
Senior Officer Consideration	SRO must sign off business case for advancement once they are satisfied with its content, it is then considered by the appropriate SBSA Senior Officer who considers whether it should be put forward for approval consideration. The Senior Officer assumes responsibility for the business case through the approvals process and so must be satisfied with its content.

7.7.8 Initially SBSA will apply a proportionate, light-touch approach to project appraisal, unless Government Departments require additional criteria. Specific Transport appraisal requirements are detailed in Annex B

7.7.9 For business cases that require an approval above £2.5million an additional Risk & Investment Appraisal will be undertaken to further inform decision-makers. This appraisal is taken outside of the relevant Business Area, its purpose is to provide a report identifying the risk and opportunities profile to help inform decision-makers. A

proportionate approach is applied to the level of Appraisal completed in lieu of the financial ask; a Summary Appraisal is completed for items below £2.5million whereas a more comprehensive Appraisal Report is created for items over £2.5million.

- 7.7.10 This appraisal looks at the information in a business case to give an objective view of key issues. It includes:
- Checking the business case against HM Treasury's Five Case Model (Green Book guidance).
 - Reviewing the evidence in the Economic Case to make sure it is accurate.
 - Assessing social value, inclusive growth, and overall impact.
 - Looking at risks and opportunities around delivery, cost, timing, and funding.
 - Reviewing financial, regulatory, investment, and reputational risks, along with proposed mitigations set out in SBSA's Strategic Risk Framework.

The aim is to provide additional assurance to ensure decisions are based on reliable evidence and that risks are understood and managed

- 7.7.11 The report will set out the following impartial advice to inform the decision makers:
- an assessment of the level of risks and opportunities in approving that Business Case
 - observations on how the level of risk could be mitigated, including cost, including the post mitigation risk level.

Due Diligence

- 7.7.12 Due diligence means checking key information provided by a scheme promoter and verifying their financial position before SBSA agrees to fund or enter into an agreement. This process supports risk management and complements the appraisal stage. SBSA will carry out due diligence at any point before signing a Grant Funding Agreement (GFA). The scope will depend on the type of funding and the organisation involved. For private sector promoters, this usually includes reviewing ownership structure, financial stability, and any other risks identified at the time. Any conditions agreed during negotiations, such as overage or clawback, will be written into the Grant Funding Agreement.

7.8 Assurance Framework Phase 3: Approvals

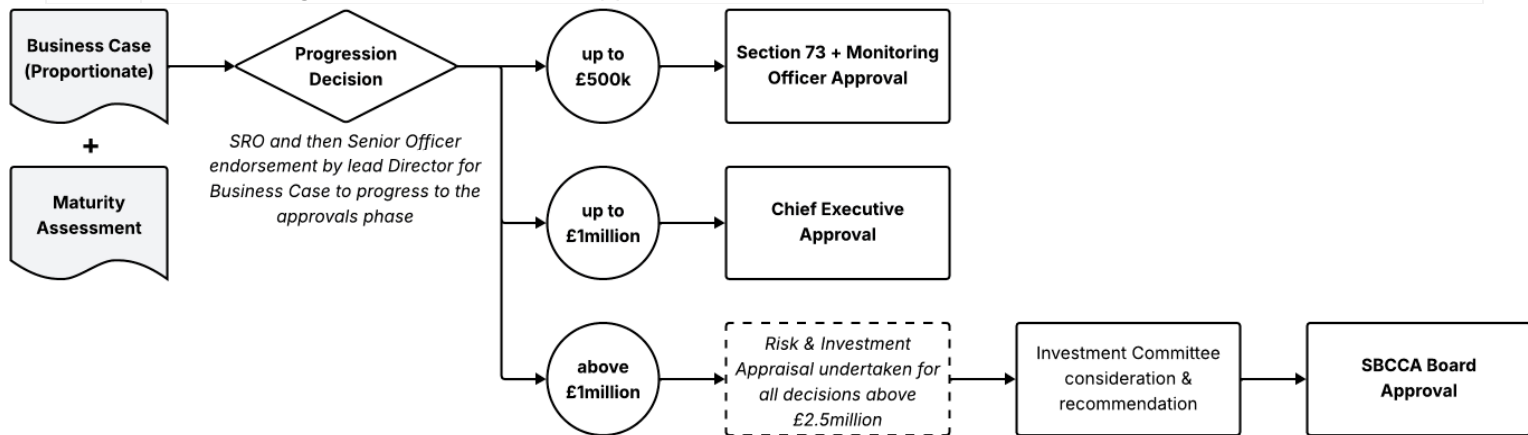
- 7.8.1 This phase focuses on approving business cases that follow the initial principles set by the Strategic Authority Board. Approval routes depend on the financial level and constitutional tolerances.
- Key points within Phase 3 cover:
- Approvals are delegated based on financial thresholds.
 - Higher financial requests require greater assurance and scrutiny.
 - The process ensures proportionate checks, expert input, and guidance throughout.
 - Decisions are evidence-based, supported by independent assurance and technical advice.
 - Approval timelines reflect the size of the financial ask.

The aim is to provide clear accountability, informed decision-making, and increasing levels of assurance as financial commitments grow.

- 7.8.2 SBSA recognises as a new Strategic Authority its approach to approval will involve a process of evolution. In its first year of operation approval thresholds and requirements have been designed to support learning of roles and responsibilities, development of key skillsets within the Investment Committee, initial Board oversight and control of decision-making and support deliverability as the organisation builds its staff and systems.
- 7.8.3 Board accepts the requirement of evolution which will be led by the annual review process undertaken by the Monitoring Officer, Board accepts the principle that this evolution will involve expansion of officer delegations and the introduction of an approval delegation to the Investment Committee once it has upskilled to fulfil this role.
- 7.8.4 The required approval route is dependent on the level of financial approval that is required. In principle, the approach to business case approvals will be as follows:

Approval Value	Approver
Up to £500k	S73 Officer and Monitoring Officer
Above £500k and up to £1Million	Chief Executive in consultation with S73 Officer and Monitoring Officer
Above £1Million	Investment Committee consideration and recommendation to SBSA Board for consideration and approval decision * Noting that summary appraisals are required for business cases under £2.5million and comprehensive appraisals are required for business cases above £2.5million

7.8.5 The following illustration sets out the Approval routes:



7.9 The Investment Panel

7.9.1 These approval routes are supported by the Investment Panel which is a Technical Officer Group (TOG) for the Investment Committee. It provides a technical test and challenge of business case proposals over £2.5million in value and makes recommendations to the Investment Committee and Strategic Authority Board. It does this through the undertaking of a Risk & Investment Appraisal.

7.9.2 Investment Panel members will be expected to not only push the key lines of enquiry relevant to producing a quality business case but also ensure that agreed priorities of SBSA have been adequately addressed.

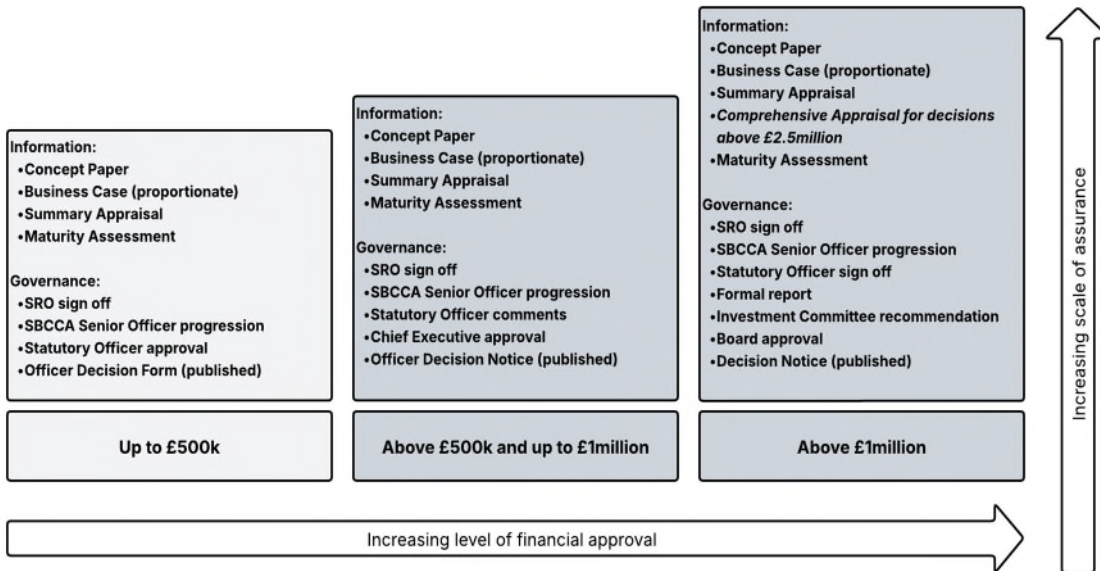
7.10 Scale of Assurance and Tolerances

7.10.1 The approach to the Assurance Framework set out above creates an ever-increasing scale of assurance aligned to the increasing level of financial approval required from the Strategic Authority.

7.10.2 There are set tolerances that cut across all approval decision-making that involve an option of escalated progression to support the decision-maker if they have any concerns regarding a business case approval that has a significant reputational and/or political risk. In such circumstances approvals can be escalated to Board for final approval.

7.10.3 An additional tolerance exists to allow escalation of approval with regard to inclusive growth and social value. Therefore, if a business case had a low benefit cost ratio score the decision could be escalated to Board for final approval to ensure wider intended benefits of projects can be supported if another approver was not minded to support.

7.10.4 The following illustration provides a visual description of the ever-increasing scale of assurance at SBSA:



8. Post Approval

8.1 Release of Funding

- 8.1.1 The Section 73 Officer must approve all funding decisions before any money is released. Funding claims are reviewed against the agreed project baseline, including financial profiles, outputs, and outcomes set in the original funding agreement. Payments are normally made quarterly in arrears after a satisfactory review.
- 8.1.2 Each funding agreement includes a claw-back clause to ensure funds are used only for the approved scheme and linked to agreed outputs and outcomes. As part of SBSA's assurance process, monitoring involves sample checks of invoices and outputs to verify compliance.

8.2 Management of Contracts

- 8.2.1 After approval, SBSA will issue a Funding Offer Letter. This letter confirms the project name, applicant, maximum funding contribution, payment schedule, eligible expenditure, and start and completion dates. It also outlines monitoring and evaluation requirements. Before the letter is sent, it is reviewed and signed off by the Legal Team.
- 8.2.2 SBSA will use a performance management process aligned with the Procurement Act 2023 to ensure contracts deliver as agreed. This includes clear contract ownership, regular performance meetings, and ongoing monitoring of risks and issues. Providers submit regular performance reports against agreed indicators, and improvement plans are implemented where needed. The process ensures value for money, effective change control, and timely resolution of problems.

8.3 Funding Agreements

- 8.3.1 After a decision point or approval of a change request, SBSA will enter into a funding agreement with the external promoter. This agreement will include any funding conditions, which may cover a funding cap, annual expenditure certification by the promoter's Chief Internal Auditor, or monitoring arrangements for private entities.
- 8.3.2 The agreement may also reference security arrangements in separate legal documents and include claw-back provisions to ensure funds are used only for the approved scheme. Claw-back will also apply to land purchases if the scheme does not proceed, and any cost savings on completion must be returned. Where a scheme could generate a return on investment, overage clauses may be negotiated and included.
- 8.3.3 SBSA will decide when funding is released and may carry out local audits to prevent misuse of funds. All funded organisations must acknowledge SBSA and Government support in communications, branding, and marketing, including logos and specified wording in press releases and case studies. SBSA reserves the right to recover funding in cases of non-compliance, misrepresentation, or under-performance

8.4 Performance Reporting and Risk Management

- 8.4.1 The Performance Management Framework works alongside the Assurance Framework to provide a clear and consistent approach to managing performance. It sets out how we monitor progress, govern activities, and report on results. This framework supports compliance with the English Devolution Accountability Framework (EDAF), which requires Mayoral Combined Authorities to be accountable to local scrutiny, the public, and UK Government. It demonstrates SBSA's commitment to strong governance and transparency
- 8.4.2 Performance is reported for local scrutiny through committee reports, business plans, and project updates. The public is kept informed through committee meetings, Question Time arrangements, social media, dashboards, and regional reviews. The SBSA also reports to Government departments such as MHCLG, DWP, and DfT and is committed to embedding a culture of performance management and continuous improvement across the organisation.

- 8.4.3 The Strategic Authority Risk Management Framework will work alongside the Assurance Framework to make sure risk is managed in a clear, consistent, and joined-up way.
- 8.4.4 Risk Management Framework will follow the key principles from the HMT Orange Book (2020): good governance, integration, collaboration, clear processes, and continuous improvement. We will adapt these principles to fit how the Strategic Authority works, while staying compliant with the Assurance Framework.
- 8.4.5 The Orange Book says that good risk management helps organisations plan better, set priorities, achieve goals, and respond quickly to challenges. For us, risk management is a vital part of planning and decision-making so we can meet our objectives successfully.
- 8.4.6 The SBSA Risk Management Framework will cover:
- SBSA’s risk culture and corporate risk appetite
 - Key definitions
 - How risks are escalated
 - Roles and responsibilities
 - Risk management at corporate, service/programme, and project levels
 - Processes and tools in our risk procedure document
- 8.4.7 The Chief Executive, with statutory officers, is responsible for making sure corporate risk management meets the required standards. This includes capturing and updating risks and completing actions to reduce them. The Leadership Team will review the corporate risk register every quarter. Directors and Heads of Service manage risks for their areas, and project managers handle project-level risks.
- 8.4.8 The Audit and Governance Committee oversees the Risk Management Framework, its procedures, and the corporate risk register to make sure everything meets the right standards.

8.5 Change Requests and Funding Clawback

- 8.5.1 Change Control is the process for handling any requests to change the approved baseline of a project or programme. All changes must be captured, assessed, and then approved, rejected, or deferred. A change request form is needed if the agreed tolerances in the Business Case, such as time, cost, or scope, are or will be exceeded.
- 8.5.2 All early warnings and change requests must be documented, with evidence of approvals and notifications saved where relevant. Approval should follow the agreed delegation levels and be proportionate. For example, a minor time extension that doesn’t require extra funds doesn’t need Board approval, even if the original business case was approved by the Board. This avoids unnecessary delays.
- 8.5.3 If extra funding is required, the request must go to the Board or Investment Committee, in line with delegation rules. Early warnings should be reported to the Investment Panel as soon as possible, who will escalate if needed. Any changes beyond the tolerances in the Business Case or the Change Management procedure must be approved by the Investment Committee.
- 8.5.4 Funding clawback and recovery processes for underperforming projects must be clearly set out in the funding agreement or contract.

8.6 Monitoring and Evaluation

- 8.6.1 The Combined Authority will develop a Monitoring and Evaluation (M&E) Framework in line with HMT’s Green and Magenta Books. It will ensure:
- Consistent, locally defined reporting to the Leadership Team
 - Proportionate and meaningful evaluation
 - Data collected once and reused across key documents
 - Consistent baselines for initiatives
 - Monitoring and evaluation embedded in all activities

- Lessons learned inform future policy and projects

- 8.6.2 All funded schemes must include an M&E Plan at the business case stage. Plans will set out how objectives, outcomes, and impacts will be measured and meet both local and government requirements (such as DfT Local Authority Major Schemes Guidance and TAG Unit E-1 evaluation). They will follow relevant guidance (e.g., transport schemes over £5m use DfT standards) and be signed off through governance processes.
- 8.6.3 M&E ensures accountability to the public and government, demonstrates impact, supports reinvestment decisions, and builds an evidence base for future funding. Outputs and outcomes will be published for transparency.
- 8.6.4 Lessons learned will be reported to the Board and published where appropriate. The M&E Framework complements the Assurance Framework, providing a consistent and streamlined approach

8.7 Closure

- 8.7.1 The delivery of projects will be managed by Key Performance Indicators (KPIs) and contract clause obligations enforceable within the terms of the contract or grant agreement, which is why it's essential to only operate via written agreements for the delivery of projects.
- 8.7.2 Investment Programme Projects are to be evaluated in two stages. The first stage comprises the production of a Project Closure and Lessons Learnt Report in accordance with HM Treasury's Green and Magenta Books. It reviews the milestones and success factors of the project vis-à-vis its proposed Delivery Plan:
 - to confirm outstanding issues, risks and mitigations, recommendations, and proposed course of action to resolve them
 - outline outstanding tasks and activities required to close the project, and
 - identify project highlights and best practice for future interventions.
- 8.7.3 As part of the funding agreement, SBSA is required to undertake 5-year Gateway Reviews to assess the impact delivered by our investments led by an independent National Evaluation Panel. The purpose of the National Evaluation Panel is to evaluate the impact of locally appraised interventions on economic growth in each locality to inform the Gateway Review and Ministerial decision-making on future funding

9. Partnership and Communication

9.1 Partnership and Engagement

- 9.1.1 Insofar as is practicable and proportionate, SBSA is committed to involving stakeholders in everything the Strategic Authority does. Regular updates will be shared with the Board, committees, and through informal governance arrangements with our constituent and non-constituent members, partners, and stakeholders. This reflects our commitment as a Strategic Authority to make partnership working central to how we operate.
- 9.1.2 Our Communications and Engagement approach will develop clear guidance for funding streams. The main objectives are to:
- Keep the public and stakeholders informed about progress and key milestones.
 - Encourage participation in engagement and consultation activities.
 - Build support for devolution across the Sussex and Brighton region by sharing our vision, ambitions, and benefits for local communities.
 - Ensure fair and accurate representation of Sussex and Brighton in all media coverage.
- 9.1.3 All communications will follow the Local Government Act 1986 code of practice. This means publicity is factual, objective, and free from political bias. Comments must be balanced, informative, and accurate.

9.2 Accountability

- 9.2.1 SBSA is committed to strong accountability and openness, ensuring local leaders are answerable for their decisions and performance. The Mayor and Portfolio Holders will be held to account through robust governance arrangements.

The Overview & Scrutiny Committee plays a key role in this process. It holds the Board to account for decision-making and delivery of priorities, this will specifically relate to the Mayor once they are elected. Once a Mayor is in place, at least twice a year, the Committee will run Mayoral Question Time sessions to review the Mayor's priorities and their role as Chair of the Board. Portfolio Holders are also invited to attend Committee meetings to answer questions about their areas of responsibility.

- 9.2.2 For clarity, this question time will apply to the Chair of the Board until the Mayor has been elected and is in position. There will also be a public question facility as a standard item at all Board meetings to enable the submission of public questions, this will be defined in the constitution. [\[Insert link once constitution approved\]](#)
- 9.2.3 In line with the government's Scrutiny Protocol, the Mayor once elected must make themselves available to take questions from the public in addition to the Mayoral Question Time that is operated through the Overview & Scrutiny function. SBSA will meet this requirement through independently moderated question time events, organised by the Communications Team.

9.3 Communication

- 9.3.1 The primary communications tools available to SBSA are as follows:
- Website: All information about SBSA, including background information, timelines, news and events, will be published on the website.
 - Social media: All news, updates and events will be shared via social media.
 - A suite of funding publicity guidance for beneficiaries/ delivery partners will also be available on the website.
 - E-newsletter.
- 9.3.2 SBSA will actively engage with the media to amplify messages to the broadest possible audiences.

- 9.3.4 All communications relating to the Strategic Authority will be accessible and transparent. Stakeholders and the public will be kept updated with progress, delivery and decision making. The approach taken will also seek to support effective and meaningful engagement activity to encourage participation in the relevant activities and enable local partners and the public the opportunity to inform key decisions and future strategy development.

10. Annex Section

This annex forms part of the first iteration of the SBSA Local Assurance Framework, developed prior to the formal establishment of the Combined Authority.

The initial framework ensures SBSA meets all statutory requirements for assurance while also being operationally ready from day one. The processes set out are proportionate and tailored to the needs of a newly formed Combined Authority that will progressively build its resources, systems, and relationships.

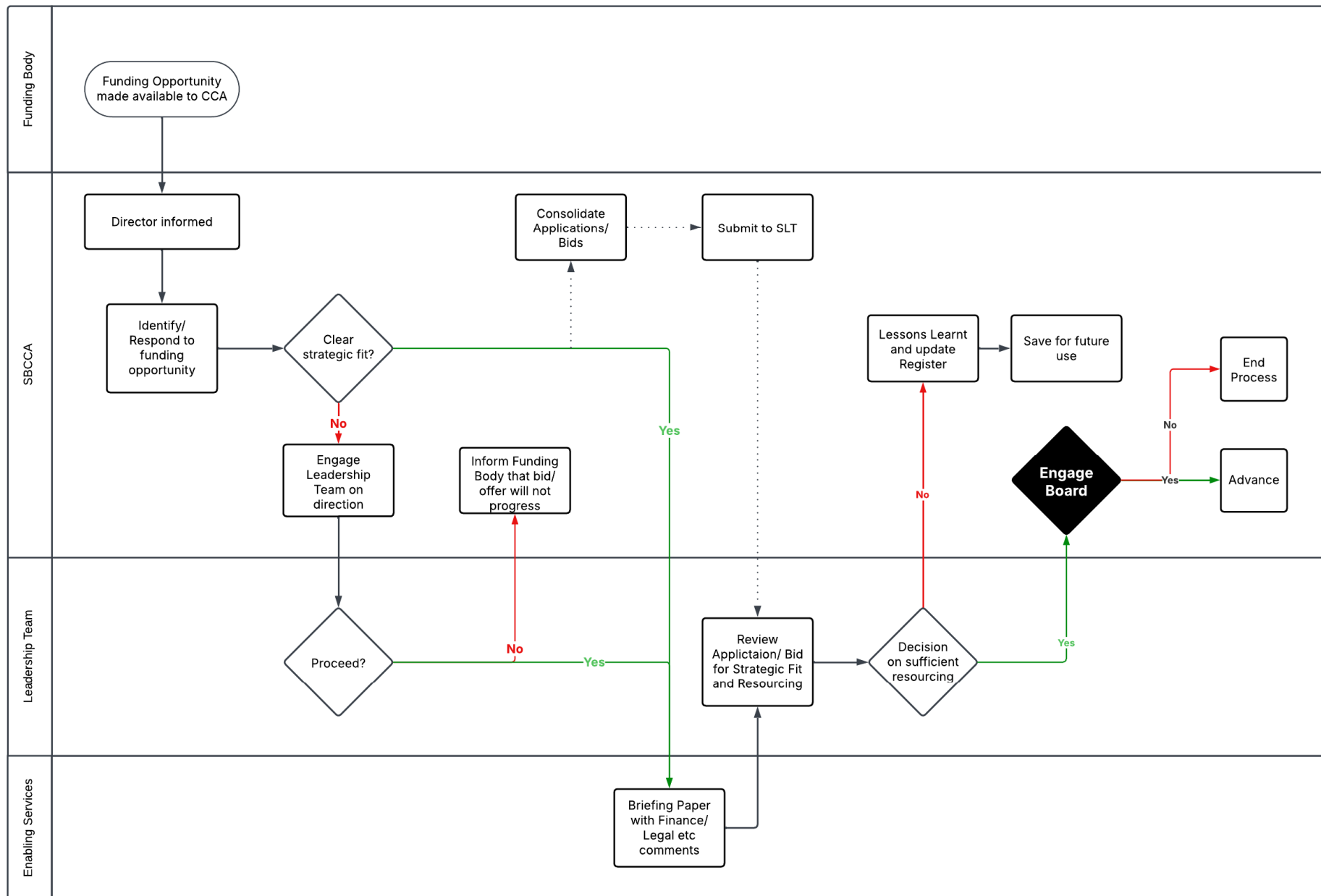
10.1 Evolution of the Assurance Framework

- 10.1.1 SBSA recognises that its governance and assurance arrangements will need to develop as the organisation matures. While substantive changes to this framework will require engagement with government departments, SBSA intends to review and refine its approach over time to ensure that its approach remains agile and effective.
- 10.1.2 Board has agreed through the adoption of this Local Assurance Framework to a commitment to evolution of approval delegations and thresholds and appropriate scales of assurance. The first review of the Assurance Framework should be completed by March 2027 and will include recommendations relating to officer delegations and an Investment Committee approval delegation, as well as an assessment of the overall application and effectiveness of the Local Assurance Framework.
- 10.1.3 The first formal review will take place within 12 months of establishment. That review will introduce additional annexes, including:
- A Delivery Plan for the Scrutiny Protocol, ensuring robust oversight and transparency.
 - An annex to support the development of a Strategic Place Partnership, aligned with emerging best practice and regional priorities.
- 10.1.3 This approach reflects SBSA's commitment to proportionate governance, continuous improvement, and readiness to deliver effectively from inception

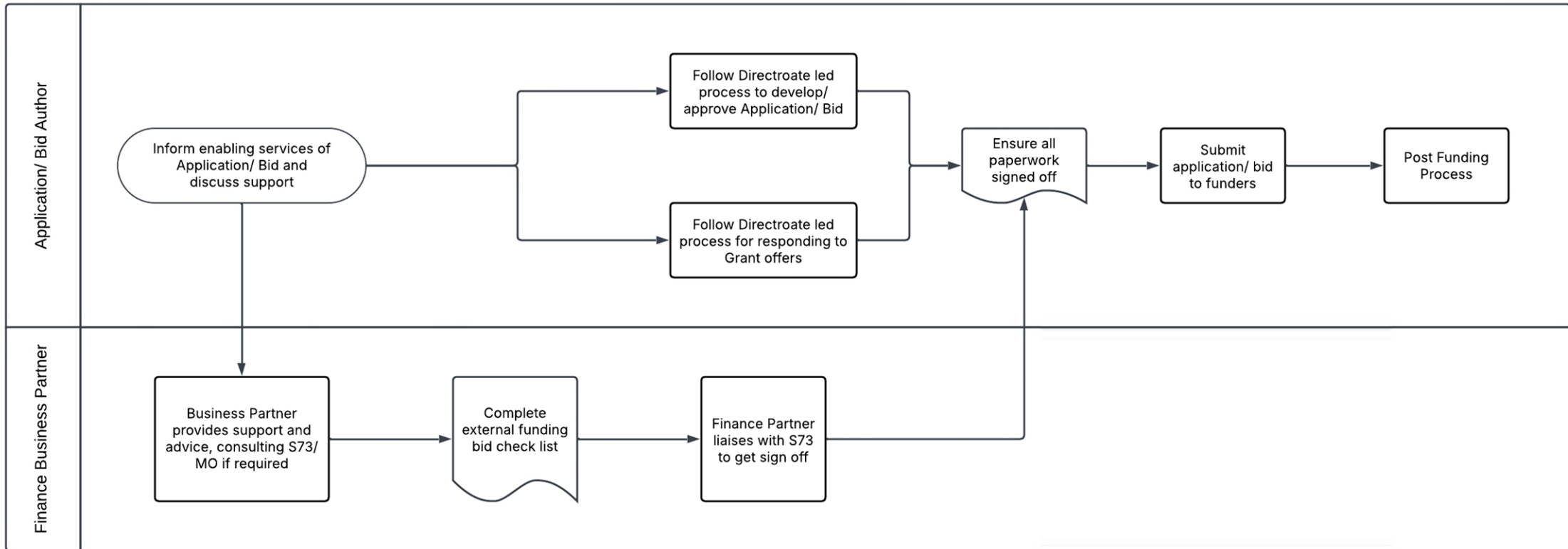
10.2 Annex Section Content

- 10.2.1 Contained within this Annex section is the following:
- Annex A: Bid process (the process for external funding applications)
 - Annex B: Transport Annex
 - Annex C: Adult Skills Annex

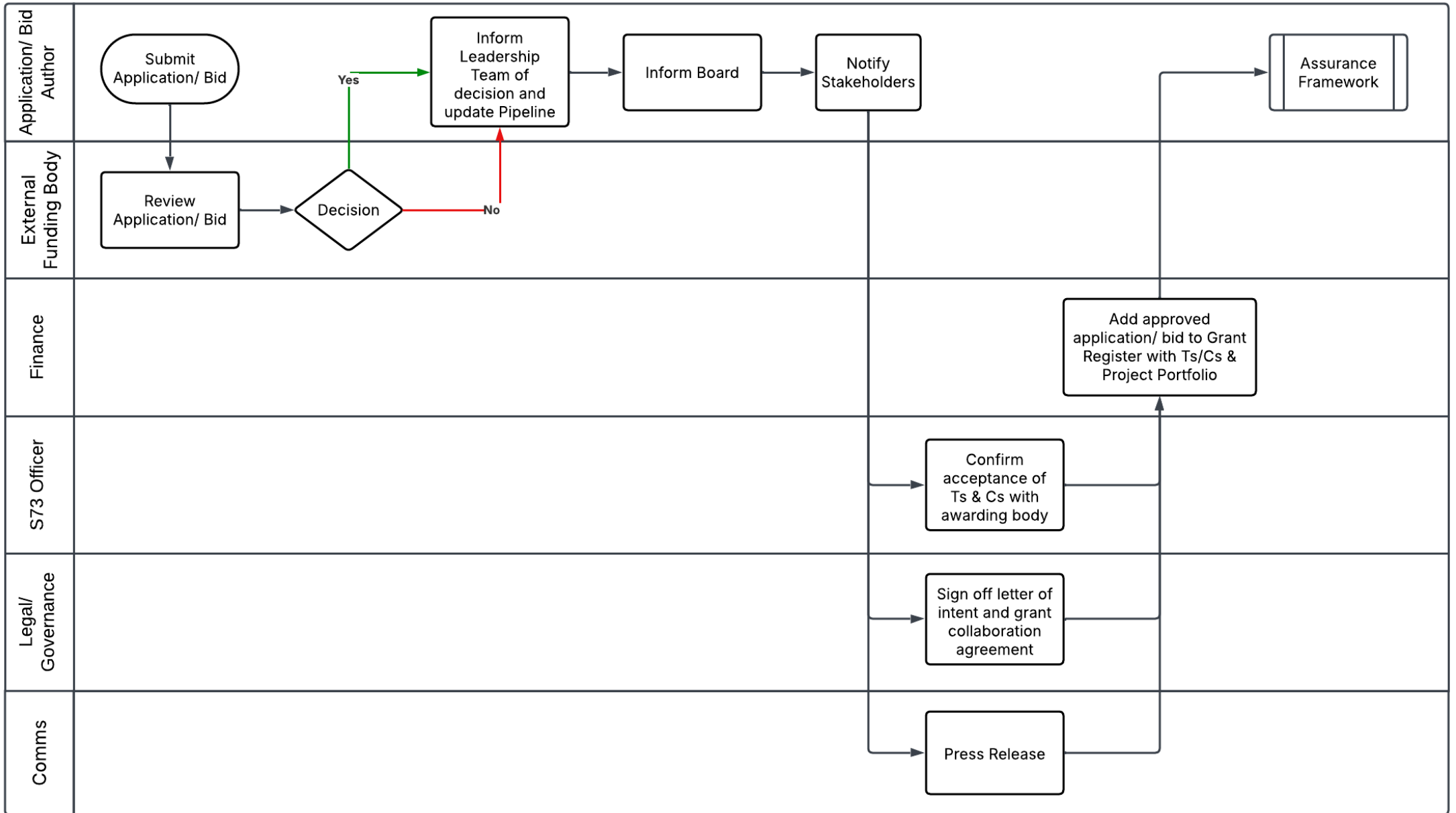
Annex A: Bid Process (External Funding Application Process) (Part A)



Annex A: Bid Process (External Funding Application Process) (Part B)



Annex A: Bid Process (External Funding Application Process) (Part C)



Annex B: Transport Annex

(Transport Programmes & Projects)

1. For the purposes of the Assurance Framework a transport scheme is defined as any scheme that significantly changes the transport network infrastructure or its operation, whatever the objective of the scheme. All transport schemes will be delivered in line with the requirements of the English Devolution Accountability Framework and any additional fund specific requirements set out by Government as necessary.
2. The Assurance Framework ensures a flexible and proportionate approach, enabling transport business cases to retain the benefits of local assurance in terms of speed of decision making.
3. For transport infrastructure schemes, the Strategic Authority will ensure that modelling and appraisal is sufficiently robust and fit for purpose for the scheme under consideration, and that modelling, and appraisal meets the guidance set out in TAG.
4. To ensure that the scope of the business case meets the requirements of relevant funding streams, those involving Transport will ensure that project business cases will be developed in accordance with DfT requirements and that those projects are managed in delivery to the same standards.

Highways Maintenance and Integrated Transport Block Funding

5. The Highways Maintenance Block and Integrated Transport Block allocations for Sussex and Brighton are awarded by DfT. The allocation amounts are determined using DfT formulae which are based on data specific to each local authority area. The allocations are used for small-scale, high-volume activities, e.g. highway and footway resurfacing, local crossing installations and traffic signal improvements, which do not align with standard business case processes. It is noted that the Local Transport Grant (LTG) will replace the Integrated Transport Block (ITB) from April 2026, this section of the Local Assurance Framework will be amended to reflect this change in April 2026. SBSAA will adhere to the requirement for publication of highways maintenance transparency reports.
6. These allocations will be 'passported' to the Constituent Authorities to determine usage based on local criteria. The monitoring of spend and delivery will be in accordance with DfT grant settlement conditions and recipients will also be asked to provide periodic reporting to the Transport Team within SBSA.

Transport Investment Programme

7. The Transport Investment Programme forms a pipeline of transport investment proposals that builds on the existing Constituent Local Transport Plans, prior to the completion of Transport Transition from the Constituent Councils to SBSA. On adoption of the region's first Local Transport Plan the Investment Programme will provide the delivery of the Plan's objectives. In order to be considered for investment through devolved funds, and for transport funding opportunities provided for by non-devolved funds, projects must be included with the Transport Investment Programme.
8. The Transport Investment Programme forms part of the project initiation process for transport schemes. The additional criteria upon which transport proposals will be assessed are:
 - A qualitative assessment of how the project achieves regional and/or programme objectives
 - Value for money, measured either through an economic appraisal that provides a benefit cost ratio (BCR), or a qualitative statement of value for money when an economic appraisal has yet to be conducted
 - Deliverability to timescales/funding window
 - Risk profile

9. The prioritisation of transport projects and schemes adopts a model similar to the Department for Transport Early Assessment Sifting Tool (EAST), with clear priorities, driven by the Sussex and Brighton economic, inclusive growth, decarbonisation and health objectives.
10. The process also involves a rigorous review and challenge at business case development of any planning powers and/or consents that may be required for the project to progress, construction issues involved, the certainty of third-party funding and consultation evidence on the public acceptability of the proposal.
11. A mechanism will be used, whereby options are appraised. This will facilitate onwards ranking and prioritisation of options with unfeasible options removed.
12. The prioritisation process identifies preferred local transport investments for funding opportunities and is central to local decision making. The process is designed to be robust, evidence based, and transparent in line with best practice.
13. This process ensures all transport investment will deliver the strategic objectives of SBSA. Statutory requirements, conditions of funding and other local transport objectives also form a key component of investment decisions, with the particular objectives and priorities of each funding stream made available by Government taken into account.

Appraisal

14. The appraisal process for the Assurance Framework is consistent with HM Treasury's Green Book and Business Case Appraisal process. For transport schemes this includes supplementary and departmental guidance, such as the Department for Transport's (DfT) TAG appraisal guidance.
15. SBSA will ensure Value for Money (VfM) and transparency of transport schemes through its business case assessments, that assessment requirement will be proportionate to the scale of investment.
16. The transport team within SBSA will be responsible for ensuring that modelling and appraisal is sufficiently robust and fit for purpose for the scheme under consideration, and that it meets the guidance set out in TAG. In addition to TAG, other robust or evidence-based assessments or methodologies may be employed to assess the overall business case of a scheme.
17. The transport team have a responsibility to ensure that modelling and appraisal is robust and fit for purpose, but not to undertake that appraisal which will be done by specialist external appraisers. This will ensure a clear separation of roles between business case author and those undertaking analysis, even if both were to be undertaken by external specialists they would be undertaken by separate specialists.
18. In addition, analytical assurance would be provided through the out of business area business case maturity assessment as well as the Finance Department Risk and Investment appraisal which would take place in addition (to inform the decision-maker of the key risks, opportunities, and approval recommendation to inform their decision)
19. The assessment requirement will be proportionate to the scale of the investment as set out in the table below, noting that the Concept Paper required for all pipeline content are intended to provide significant strategic justification as to not require an SOC within the available routes:

Scale of Scheme	Business Case Assessment (in alignment with DfT guidance)
< £500,000	Business Justification Case
£500k - £2.5m	Single Case (FBC)
£2.5m - £5m	Outline Business Case (OBC) and then Full Business Case (FBC)

> £5m	Outline Business Case (OBC) and then Full Business Case (FBC) + Full Risk & Investment Appraisal
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20. Decisions will be taken appropriate to the phase of a scheme and greater scrutiny and emphasis on VfM will be undertaken as schemes progress through the process, with greater scrutiny of final stage VfM.
21. TAG will be used for all schemes but for schemes with low value (below £5m) a proportionate approach will be taken.
22. There is a general expectation that all schemes must endeavour to achieve “high” VfM, where benefits are at least double costs as set out within DfT’s guidance, at all stages of the approval process, however exceptions may be considered where there is strategic justification. The intention is to state that there may be occasions where a scheme with lower VfM but higher social value can be supported when broader societal benefits outweigh economic metrics. The intent is to ensure that decision-makers should consider spending objective impacts alongside VfM when assessing a scheme’s business case, for example, a transport project that improves access for disadvantaged communities may have a low benefit-cost ratio (BCR) but deliver significant equity and inclusion benefits.
23. VfM for transport schemes will be independently scrutinised on behalf of SBSA as part of the appraisal process. This will be undertaken either by expertise in house with responsibility sitting outside of the business area developing or promoting the business case or via a commission to a specialist transport consultant, fully independent from the scheme promoter and with no involvement in the development of the scheme being appraised.
24. The modelling and appraisal of schemes contained in business cases will be developed in accordance with the guidance published in TAG at the time the business case is submitted for approval. Central case assessments will be based on forecasts which are consistent with the definitive version of NTEM (DfT’s planning dataset).
25. Alternative planning assumptions may be considered as sensitivity tests, the results from this may be considered as part of the decision-making process to approve a scheme. Appraisal and modelling will be scrutinised to ensure it has been developed in accordance with TAG principles. This will be undertaken through the independent appraisal process and overseen by SBSAs transport function.

Cycling and Walking Schemes

26. All cycling and walking schemes must meet the latest standards set out in Local Transport Note 1/20 Cycle Infrastructure Design (LTN 1/20). To ensure consistency in the quality and safety of schemes, Active Travel England (ATE) will provide support to ensure cycling and walking schemes are designed and delivered to high standards, including compliance with LTN 1/20. SBSA will work with ATE and all its constituent authorities to ensure the design quality of all active travel schemes funded is in line with relevant design guidance, with design reviews undertaken prior to any scheme approval.

Delivery

27. SBSAs transport function, as the accountable business area will carry out the programme management of agreed transport schemes, to ensure their delivery by scheme promoters. The identification of schemes, development of scheme proposals and completion of business cases is the responsibility of scheme promoters, supported by the Transport team and subject matter experts within SBSA.
28. This arrangement where SBSA is not the promoter will be underpinned by the establishment of formal grant funding agreements, signed off by the Monitoring Officer, that protect the financial interests of SBSA and enables SBSA to fulfil its responsibility to deliver VfM whilst setting out respective responsibilities including reporting and audit requirements.
29. Business cases will be published on the SBSA website in line with DfT guidance and published where it is appropriate to do so as part of submission for the decision to approve funding.

Annex C: Adult Skills Annex

1. The Adult Skills Fund will be fully devolved to the Sussex and Brighton Strategic Authority once it has met the readiness conditions set by the Department for Work & Pensions (DWP).
2. The Governance structures, system, process, and policies that will be developed and implemented by the Strategic Authority as the accountable and decision-making body, will provide the DWP with confidence that it has in place all relevant infrastructure to effectively manage the process and risks associated with the allocation of devolved Adult Skills Fund funding, including accountability to:
 - the public, via the Overview and Scrutiny Committee and Audit and Governance Committee, including scrutiny of the accounts and local audit reports.
 - the UK government. The Strategic Authority will also discharge, on an annual basis its responsibilities to devolved AEB funding as set out in the English Devolution Framework and produce an Annual Assurance Report alongside other yet to be agreed document such as an Adult Skills Fund (ASF) Assurance Framework document, including project appraisal and value for money processes.
3. The following Annex is set out to demonstrate readiness for the devolution of the Adult Skills Budget to the Sussex and Brighton Strategic Authority. The following is set out to apply following the successful devolution of the Adult Skills Budget.

Adult Skills Post-Devolution of AEB

4. All investment decisions made in relation to this funding will be undertaken having considered:
 - Statutory duties relating to adult education and training which have been transferred to the Strategic Authority under the English Devolution & Community Empowerment Bill once it becomes an Act, and any relevant Statutory Instruments.
 - Statutory entitlements to education and training of adults living in devolved areas, and policy entitlements where relevant.
 - Statutory and non-statutory guidance.
5. The Strategic Skills Plan will set out the strategic vision and priorities for all skills funding and programmes. There will be an implementation plan that provides clear direction of how devolved funds should be commissioned. The Strategic Skills Plan will support the Local Growth Plan, Corporate and Investment Plans as well as key priorities in the region's Local Skills and Improvement Plans (LSIPs).

Annual Assurance Report

6. The Strategic Authority will produce an Annual Assurance Report on the delivery of its Adult Skills Fund functions in line with wider monitoring and evaluation requirements and the English Devolution Accountability Framework. This will be reported to DWP by 31 January each year and published in line with EDAF requirements on the SBSA website.
7. The Strategic Authority will also submit an Annual Assurance Statement to the DWP in July each year following consideration by the Skills & Employment Committee.

Funding Requirements

8. The County Combined Authority will publish its Funding & Performance Management Rules specific for each academic year. This document will set out the conditions of ASF funding and apply to all providers who receive ASF funding from the Strategic Authority.

Stakeholder Engagement

9. SBSA will regularly consult with its key stakeholders, including learning organisations and learners, in order to best inform policy direction and decision making.

Local Skills Implementation Plan (LSIP)

10. Alongside the Strategic Skills Plan, LSIPs will also set out the current and future skills needs of the region and how local provision can help people develop the skills they need to get good jobs and increase their prospects. SBSA will work with the designated Employer Representative Bodies (ERB's) in the SBSA area, utilising and sharing local labour market intelligence and analysis to inform the commissioning approach for ASF. SBSA will also ensure that the ASF responds to the employer feedback contained within the LSIPs for our region.

Monitoring and Evaluation

11. The Adult Skills Fund Budget reporting will operate in line with the English Devolution Accountability Framework, it will be included within SBSA monitoring and evaluation submissions as required under the devolution agreement. The Strategic Authority will submit required policies for adult education, these are required as part of the readiness conditions and will be published as part of the commissioning process. Evaluation on residents' outcomes and impact will be undertaken in the 2nd year of ASF devolution, and regular ongoing evaluations will be undertaken to develop and measure the positive impact and best practice for future development of the ASF.
12. The Strategic Authority's Monitoring and Evaluation Framework will be used for the Adult Skills Fund Budget activity including the use of logic models. It will meet the national requirements together with locally determined requirements so that it can be used to inform and shape the criteria for future funding awards. This formal evaluation is undertaken on an annual basis. Government has the authority to escalate intervention via EDAF such as through a diagnostic review and best value notice.

Assurance

13. The Strategic Authority is responsible for assuring the use of funds by all learning organisations delivering the Adult Skills Fund Budget. Wider assurance includes internal controls such as performance management and monitoring, risk management and quality assurance reviews.

14. Annex D: Glossary

AF	ASSURANCE FRAMEWORK
SBSA	SUSSEX AND BRIGHTON STRATEGIC AUTHORITY
SBSA	STRATEGIC AUTHORITY
ASF	ADULT SKILLS FUND
CRSTS	CITY REGION SUSTAINABLE TRANSPORT SETTLEMENT
HMG	HIS MAJESTY'S GOVERNMENT
HMT	HIS MAJESTY'S TREASURY
MHCLG	MINISTRY HOUSING, COMMUNITIES & LOCAL GOVERNMENT
DfE	DEPARTMENT FOR EDUCATION
DWP	DEPARTMENT FOR WORK AND PENSIONS
DfT	DEPARTMENT FOR TRANSPORT
BAU	BUSINESS AS USUAL
EDAF	ENGLISH DEVOLUTION ACCOUNTABILITY FRAMEWORK
PMO	PROJECT MANAGEMENT OFFICE
GFA	GRANT FUNDING AGREEMENT
TOG	TECHNICAL OFFICER GROUP