

Liverpool City Region
Local Enterprise Partnership
National Assurance Framework

*AGREED BY THE TREASURER
OF THE LIVERPOOL CITY REGION COMBINED AUTHORITY*

28th February 2018

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1. **Introduction and overview**

- 1.1 In 2014, the Government required all Local Enterprise Partnerships (LEPs), as part of the Growth Deal process to develop, agree and implement a single assurance framework covering government funding flowing through LEPs. This was to ensure that LEPs have robust value for money processes in place.
- 1.2 Since then, there have been governance changes in Local Government such as the formation of Combined Authorities and which in some cases has led to the agreement of Mayoral Devolution Deals with additional powers and funding.
- 1.3 In these cases, delegated and devolved funds could be administered by the Combined Authority as a Single Pot and which is subject to a Single Pot Assurance Framework. Further, by agreement of the LEP, funds previously devolved such as Local Growth Fund could be included in these administrative arrangements.
- 1.4 As a consequence, the guidance issued by Government¹ has been revised to improve clarity over the decision-making arrangements adopted and seek assurance that they are taken properly in a transparent manner and deliver value for money.
- 1.5 Regardless of the local arrangements adopted and the existence of a Single Pot Assurance Framework, Government have made it a condition of future award of Local Growth Deal funds that LEP Assurance Frameworks are reviewed and remain fit for purpose. This has to be assessed and agreed by the LEP's Accountable Body's Section 151 or Section 73 Officer. This must be undertaken annually and confirmed by 28 February each year.
- 1.6 Liverpool City Region has negotiated a Mayoral Devolution Deal² and has agreed a Single Investment Fund Assurance Framework with the Ministry for Housing, Communities and Local Government. The Liverpool City Region LEP (LCR LEP) also agreed that funds previously devolved or delegated to LCR LEP would form part of the Single Pot and managed by the LCR Combined Authority (CA).
- 1.7 As a consequence of both the revised guidance issued by Government in November 2016 and the changes in local governance arrangements in LCR, this LEP Assurance Framework was also revised. The Assurance Framework is updated when necessary and is subject to annual review prior to the Section 73 Officer of the LCR Combined Authority (the LCR LEP's Accountable Body) confirming by 28 February that it remains compliant.
- 1.8 This revised LEP Assurance Framework sets out the LEP's arrangements for;
 - a. Governance and decision making;
 - b. Transparency of decision making; and

¹ Local Enterprise National Assurance Framework November 2016

² Agreed on 17 November 2015

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/477385/Liverpool_devolution_deal_unsigned.pdf

- c. The accountability of decision making.
- 1.9 With the creation of a Single Pot, which includes funds previously awarded to the LEP, this revised Assurance Framework complements the Single Investment Fund Assurance Framework that deals with the Combined Authority's governance and investment decision making processes as well as project lifecycle and monitoring and evaluation.
- 1.10 As such, this Assurance Framework deals only with the role of the LEP in the wider governance arrangements of the LCR Combined Authority SIF Assurance Framework or where it retains sole and specific governance responsibility of any funds not subsumed into or would not form part of the Single Pot e.g. LEP operating costs or Growth Hub.
- 1.11 Despite the introduction of a Single Pot and the Single Investment Fund Assurance Framework it has been agreed that the LEP retains its strategic role as the primary body for determining and promoting economic development across Liverpool City Region and its Chair is also a member of the LCR Combined Authority (LCR CA).
- 1.13 This Assurance Framework replaces the previous version, reviewed and updated in February 2017, following the Ney Review and the publication of the LEP Best Practice Guidance on Governance and transparency. That version was agreed by the Combined Authority's Treasurer on 24 February 2017. This revised Assurance Framework should be read in conjunction with the LCR Combined Authority Single Investment Fund Assurance Framework. The SIF AF provides much of the detail that was provided in the appendices to the previous LEP Assurance Framework. Although the first version has been replaced it still explains the arrangements that pertained when the Local Growth Fund Round 1 and 2 funds were allocated to the LEP and so is still available for reference and can be found here;

<https://www.liverpoollep.org/wp-content/uploads/2015/08/Growth-Deal-Assurance-Framework-for-the-Liverpool-City-Region-AMENDED-DRAFT-FINAL-VERSION-APRIL-2016.pdf>

1.14

2. **Governance and decision making arrangements**

- 2.1 The Liverpool City Region LEP was established in shadow form in 2010 until it became incorporated in March 2012. The requirements of Local Growth Deals, in particular the LEP Assurance Framework, led to the LEP reviewing its governance structures and its delivery responsibilities and whether these were compromised or conflicted by its legal form. On occasions, the LEP, in its incorporated status, may also act as the promoter or deliverer of schemes falling within the scope of, or funded by the LGF. As a consequence, the LEP instituted changes to its governance in April 2015, to clearly separate its strategic role and its delivery role. This was to avoid a conflict of interest for board members who have responsibilities to the LEP as a Company, with delivery responsibilities, and also 'strategic' responsibilities in the LEP's capacity as a strategic adviser in the use of Local Growth Deal funds.

- 2.2 In December 2015, these changes took on legal form by the removal of LEP Board Members' status as Company Directors of the LEP incorporated entity other than for a sub-set of the LEP Board. The latter act as a Company Board to oversee the LEP's business and co-delivery activities, this is distinct and separate to the LEP Board who provide the strategic leadership for the development and implementation of economic strategy. The division is shown in the schematic Diagram 1 in the section 'LEP Company'.

LEP Board Constitution and Conflicts of Interest Policy

- 2.3 At the same time, the LEP Board adopted a Constitution (to replace the Company's Articles of Association) which can be viewed here;

<https://www.liverpoollep.org/wp-content/uploads/2016/07/LEP-Constitution-October-2017.pdf>

The LEP Constitution sets out the aims, objectives and priorities of the LEP Board as well as its functions and responsibilities. The composition of the LEP Board and the necessary number to make it quorate, it also set out its accountability and arrangements for publishing its meeting agendas, minutes and associated papers. The latter are published on the LEP website.

In addition to the LEP Board Constitution, there is a **Code of Conduct and Conflicts of Interest Policy**. The latter is supported by a **Declarations of Interest Policy** these can be found at the link below along with the individual register of interest declarations;

<https://www.liverpoollep.org/about-lep/lep-governance/about-the-board/>

- 2.4 In addition to these policies and following the Ney Review in 2017 the LCR LEP has adopted other policies, namely; Confidential Reporting, Whistleblowing and Gifts and Hospitality. Links to these policies can be found below in 3.5

- 2.5 The separation of duties and responsibilities, reduced and removed the potential for conflicts of interest to arise. However, LEP Board members, who are also Company Directors of the LEP Company, are required to declare an interest should the Company be a beneficiary from any advice or recommendation of the LEP Board. Such declarations are additional to those as a LEP Board Member whereby declarations of conflicts of interest are made at each meeting of the LEP Board. A register of interests is also maintained which is updated with any in-year changes and reviewed annually. The relevant policies and forms are published on the LEP website and can be found here;

<https://www.liverpoollep.org/about-lep/lep-governance/about-the-board/>

- 2.6 A key strength of the LEP lies in its ability to harness the breadth of skills, experience and priorities of the large number of private sector and public sector partners that it represents through its Board, Advisory Council and sub-boards. Democratic accountability in the LEP Board is provided through local authority Leader and Mayor representation on the Board and also the elected Metro

Mayor. Accountability to the business community flows through the business representation at the LEP Board, its sub-boards, the Advisory Council and its relationship with representative organisations in the City Region.

LEP Board Membership

- 2.7 The LEP Board has twenty-two members, with a Chair taken from the private sector along with the Metro Mayor, the Mayor of the City of Liverpool and the other five local authority leaders who together constitute the Combined Authority. The public sector positions are ex-officio positions. In addition, there are a further fifteen co-opted members taken from the private sector and other sectors relevant to LCR such as higher education and voluntary. Eleven members are taken from the private sector which, together with the Chair, constitute twelve of the twenty-two members. This Board provides a unified platform which binds public and private sectors together, bolstering joint and inclusive governance and decision-making processes ultimately leading to funding decisions taken by the Combined Authority. The members of the LEP Board can be found on the LEP website at

<https://www.liverpoollep.org/economic-strategy/lep-board/>

- 2.8 In seeking individuals to join as co-opted Members of the LEP Board the LCR LEP makes it clear that it seeks representation from all sectors of the LCR economy, its geography and its diverse community. Potential Members should also be able to demonstrate a level of expertise, knowledge and experience to complement the other Members of the Board and this will change over time.

The appointment of LEP Board Members is considered and proposed by an Appointments Committee for approval by the LEP Board. The LEP Board has also determined that one or more of its members will act to champion Equality and Diversity, they also serve on the Appointments Committee. The Terms of Reference of the Appointments Committee can be found here;

<https://www.liverpoollep.org/about-lep/lep-governance/about-the-board/>

LEP Sub-Boards

- 2.9 The LEP Board extends its representation of the local community and draws strength from the wider expertise and knowledge available through its sub-boards and Advisory Council. However, these have no authority conferred on them either explicitly or implicitly in directing or deciding on the use of public funds, their role is purely as expert advisers to the LEP Board on the growth opportunities in the sectors or cross-cutting themes on which they focus their expertise and experience.
- 2.10 Their terms of reference and the selection of a Chair are all at the discretion of the LEP Board. Such matters are reported to the LEP Board and are recorded and published in the agenda, papers and minutes of the LEP Board meeting at which they were considered. Terms of Reference can be found on the LEP website and are developed against a standard template that can be seen here

<https://www.liverpoollep.org/about-lep/lep-governance/lep-sub-boards/>

- 2.11 In making the governance changes the benefits of the duality of roles was preserved by retaining the sub-board structure supporting the LEP Board. The linkages between the LEP Board and sub-boards is strengthened either through the sub-board Chair being a member of the LEP Board or a member of the LEP Board acting as a 'Champion' and a member of the sub-board. The key drivers of economic growth were identified as '**Key Growth Sectors**'. Sub-boards have oversight of their progress and success and are supported by lead Executives employed by the LEP Company. More can be found about these here;

<https://www.liverpoollep.org/growth-sectors/>

- 2.12 In addition to the Key Growth Sector sub-boards, there are other sub-boards as follows;

- a. Enterprise Advisory Board
- b. Innovation Board
- c. Mersey Waters Enterprise Zone Board
- d. Sci-Tech Daresbury Enterprise Zone Board

- 2.13 In particular, the Enterprise Advisory Board provides a direct interface with the SME business community. The Chair of the Enterprise Advisory Board, who is a member of the LEP Board, is also the nominated individual to engage with the SME community.

- 2.14 In addition, the LEP has an Advisory Council which acts as a senior stakeholder sounding board to provide an additional and focused feedback group.

Award and receipt of Government Funds

- 2.15 The LCR LEP has primary responsibility for the development and maintenance of the LCR's Growth Strategy ('Building Our Future' this can be found [here](#) which provides the strategic framework to inform SIF investment decisions. Legally, the Combined Authority acts as the final decision-maker and accountable body on public sector spend, and has responsibility for ensuring that public sector risks and responsibilities are met. In relation to LGF funding decisions, the LEP acts in a strategic, expert capacity, utilising the private sector capacity of its Board and sub boards. It makes recommendations and provides advice to the Combined Authority on the merits or otherwise of schemes coming forward for eventual financial approval by the CA, unless the funds have been transferred to the SIF in which case the SIF Assurance Framework operates. Furthermore, the LEP is represented on the Combined Authority with the LEP Chair being a member of the Combined Authority.

- 2.16 As previously stated the LEP Board is an unincorporated body and as such no funds are received or awarded directly by it. By agreement with Government the Combined Authority is the Accountable Body for LCR and receives and awards funds given to the LEP by Government.

- 2.17 The LEP Board makes no funding decisions, advising only on the strategic merit of programmes and projects in the context of the Single Growth Strategy. Such

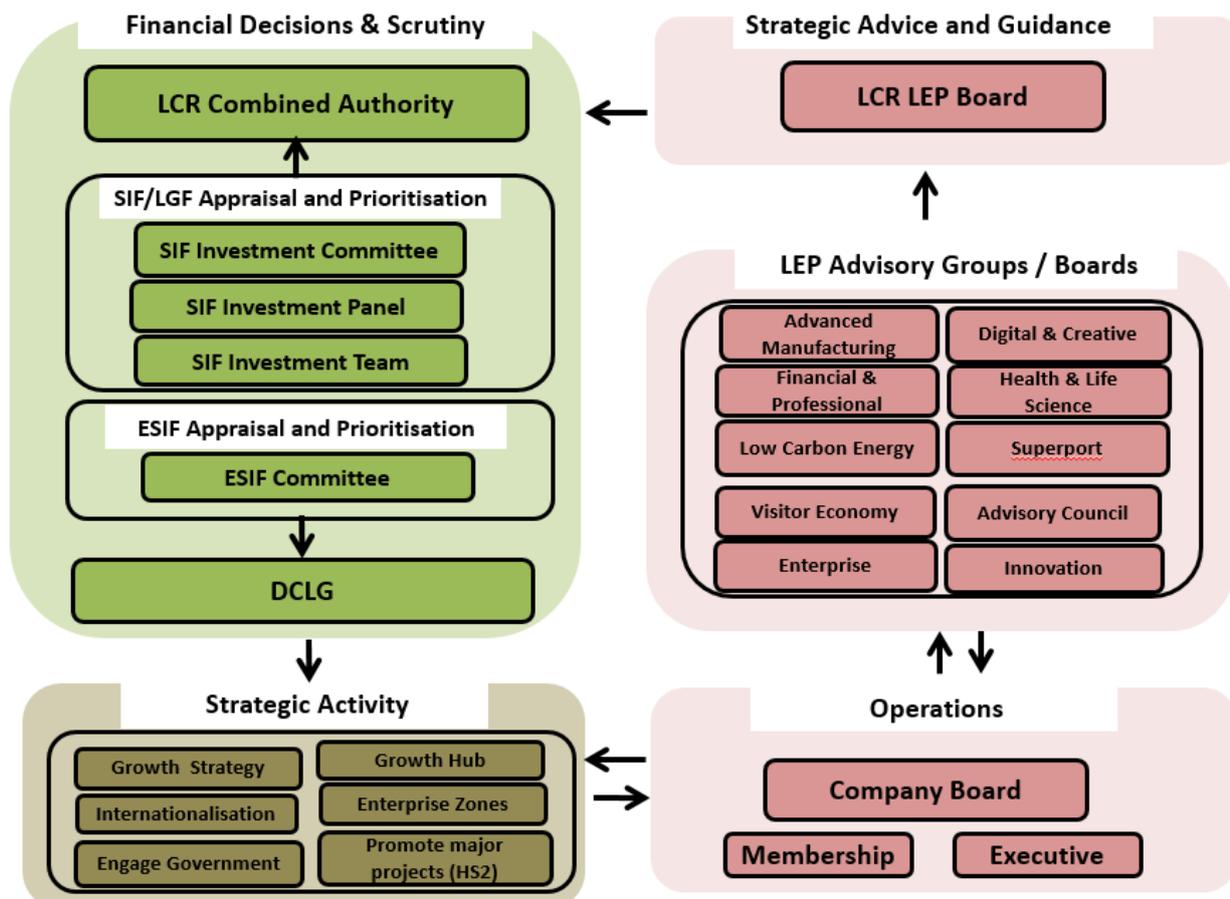
decisions are reserved for the Combined Authority which includes the LEP Chair as one of its eight Members. The SIF AF explains the governance and decision making processes of the CA with regard to the Single Pot. This together with a SIF Prospectus can be found at the link below;

<https://www.liverpoollep.org/funding/sif/>

LEP Company

- 2.18 The LEP Board and its sub-boards, which are all voluntary and with no legal status, are provided with executive support through an incorporated entity which employs staff and enters contracts to provide support and also to undertake direct interventions in the City Region economy to stimulate growth.
- 2.19 The activities of the LEP Company are under the oversight of a sub-set of the LEP Board who assume Company Director responsibilities. The number is set to a maximum of five and will not exceed one-third of the LEP Board to avoid it being able to exercise undue influence. The Company Directors include one local authority leader, nominated by the local authority leaders, together with up to four members taken from the private sector cohort of the LEP Board. The local authority leader is also subject to Combined Authority Code of Conduct and has declared their role as a Company Director of the LEP.
- 2.20 For the avoidance of doubt, in instances where the incorporated LEP Company would apply for funds, in the same way as any entity undertaking delivery activities, it would be bound by the terms of any funding agreement governing the use of those funds. As previously stated the LEP Board does not make decisions over the award of funding.

Diagram 1 : Relationship between LEP and CA and LEP Company and responsibilities



3. Transparent Decision Making

- 3.1 The LEP has a dedicated website through which local partners and the public can access the LEP Board agenda, minutes and papers and which also provides details about the LEP Board's constitution and other relevant policies.
- 3.2 The website also provides other important and key documents such as the Single Growth Strategy (Building Our Future), the Single Investment Fund and Local Growth Deal documentation and on which progress on implementing the Growth Deal can be seen.

<https://www.liverpoollep.org/publications/>

- 3.3 These papers record those LEP Board decisions that relate only to the strategic merits of programmes and projects and that the appropriate processes in bringing forward a recommendation have been followed. The funding decision, both in terms of whether to make an award and the value of that award, is a decision reserved solely for the CA (or has been delegated from the CA to an officer of the CA). The minutes of the CA record such funding decisions or if there has been delegation to another public body on their website. The CA minutes can be found at the link below;

<http://liverpoolcityregion-ca.gov.uk/meetings-196>

- 3.4 The negotiation of the Devolution Deal by the CA and the introduction of a Single Pot to be managed by a Single Investment Framework has given rise to the SIF Assurance Framework. By agreement with the LEP, this now deals with the governance and decision making processes for Local Growth Funds and also the monitoring and evaluation. The CA will be responsible for providing relevant information to the LEP to allow it to publish this through the LEP website. The CA will also respond to Freedom of Information and Environmental requests in respect of funds allocated to the LCR LEP.
- 3.5 As described in section 2 the LCR LEP has developed a number of key policy documents to explain its arrangements for;
- a. [Conflicts of interest](#)
 - b. [Register of interests](#)
 - c. [Enquiries and Feedback](#)
 - d. [Confidential Reporting](#)
 - e. [Whistleblowing](#)
 - f. [Guidance on publication of Board meeting papers](#)
- 3.6 Besides the direct relationships between the LEP Board and the CA and its constituent Local Authorities the LEP Board engages widely throughout the City Region. There are a number of forms in which this takes such as;
- a. The Advisory Council
 - b. An informal association of representative groups called G12 which includes;
 1. Chambers of Commerce (5 covering 6 LAs).
 2. Federation of Small Businesses
 3. Institute of Directors
 4. Liverpool BID company
 5. Professional Liverpool
 6. Downtown Liverpool in Business
 7. Social Enterprise Network
 8. The Women's Organisation
 - c. LEP Partnership Scheme
 - d. LEP Sub-Board membership
- 3.7 Other channels of communication besides the website include;
- a. Bi-Monthly newsletter
 - b. Twitter and LinkedIn
 - c. Free thematic events listed on LEP website

4. **Accountable Decision Making**

- 4.1 The LCR CA is the accountable body for the LEP Board and for any devolved or delegated funds from Government for the LCR. Only the CA is able to make funding decisions with regard to public funds allocated to the City Region, as compared to those awarded to individual Local Authorities. The governance and decision making arrangements of the CA are set out in the SIF Assurance Framework and that should be read in conjunction with this Assurance Framework to gain a holistic view of the LCR's governance arrangements in a devolved setting with a Single Pot.

- 4.2 The CA continues to evolve and has negotiated a Devolution Deal that brought additional powers and funds under a reconstituted CA with an elected Mayor. The LEP Chair will remain a member of the CA.
- 4.3 The Metro Mayor and the Leaders/City Mayor of the six constituent Local Authorities are also LEP Board Members which brings democratic accountable representation to the discussions at the LEP Board. Such a close relationship allows a candid and open dialogue to be held between public and private sectors on the opportunities for growth and any barriers.
- 4.4 This also reduces the likelihood of disagreement when the CA makes funding decisions and although the LEP Chair is a non-voting member of the CA, they are able to voice their opposition to a decision should the views of the LEP Board be disregarded and that would be a matter of public record. The CA Treasurer is also required to ensure that the LEP supports decisions taken by the CA and equally that the CA does not take decisions under pressure from the LEP that would be improper or inappropriate.
- 4.5 The CA has an independent Scrutiny Committee and whilst this has no direct remit to review the business of the LEP Board it will scrutinise the decisions of the CA. As the LEP Board performs a role in assessing the strategic fit of many of these decisions and provides advice and guidance to the CA this would make those areas open to scrutiny by the CA's Scrutiny Committee.
- 4.6 All funds devolved or delegated by Government to the LCR (including those for the LEP such as LGF) are received and administered by the CA. Merseytravel, the transport executive for the City Region, has delegated authority from the CA to undertake this role on its behalf and also to account for the use of these funds alongside the City Region's own locally generated funds at City Region level. Merseytravel prepare and publish their accounts in accordance with Local Government accounting requirements. In addition to the annual accounts regular reports are made to the CA during the year and these are published on the CA website.
- 4.7 Where necessary, the Combined Authority will scrutinise the LEP's activities in respect of funds for which the CA is the Accountable Body in accordance with existing processes. The Audit Committee and Scrutiny Panel within the CA's structure will scrutinise delivery and compliance with this assurance framework. The LEP's activities may also be subject to audit by Merseytravel's established internal auditing processes, acting on behalf of the Combined Authority as its appointed Internal Auditors, where it is felt appropriate to do so in response to a CA Corporate Risk. Merseytravel will be granted full and open access to the LEP's records, effectively acting as Internal Auditors.
- 4.8 Any complaints or concerns about the application of Funding process should be directed to and administered by the Combined Authority's Monitoring Officer. The LEP's approach to more general enquiries relating to the LEP's role, complaints and Freedom Of Information requests are explained in the 'Enquiries and Complaints Policy see here;

5. Value for money assessment

- 5.1 LEPs with a Combined Authority that had opted for a Devolution Deal were provided with the choice of electing for previously delegated or devolved funds to be transferred to the CA to be administered with the Single Pot.
- 5.2 LCR LEP agreed to this transfer and as a consequence all appraisal, prioritisation and value for money assessments are carried out by the CA in accordance with the SIF Assurance Framework (which makes use of HMT Green Book guidance to inform value for money assessments). The CA will also undertake the monitoring and evaluation of those investment decisions and report on their impact, including social value, to the LEP to check progress towards the achievement of the Single Growth Strategy's objectives.
- 5.3 The Combined Authority is developing an Investment Strategy for the City Region, as commissioned by the Head of Paid Service. This will prioritise where investment is made and what funding will be used, including that made available by the LEP such as LGF. This strategy will be guided by the Single Growth Strategy produced by the LEP and by consultation with the LEP's Sector Boards. It will help shape future SIF priorities. It will also act as a transitional mechanism for investment decisions prior to the production of the Local Industrial Strategy.

1. **Introduction**

- 1.1 As part of the Liverpool City Region Growth Deal, the Liverpool City Region has secured funding to deliver a wide range of initiatives that support growth.
- 1.2 To secure the effective use of this funding, the Liverpool City Region's key partners have agreed an Assurance Framework. This is to ensure that robust local arrangements are in place to ensure value-for-money and the effective selection, delivery and management of projects.
- 1.3 This document details the governs the use of Growth Hub funding, and forms an appendix to the Assurance Framework agreed by the Combined Authority, Local Enterprise Partnership and Merseytravel in March 2015. It should also be read in conjunction with the Growth Hub offer letter from the department for Business Innovation and Skills (BIS) on 6 March 2015 and updated in 2016, 2017 and 2018

2. **Governance and project management**

Governance

- 2.1 Oversight of the Growth Hub is the responsibility of the Enterprise Advisory Board, a sub-board of the Local Enterprise Partnership Board. The membership of this board consists of representatives from LEP partners including; Local Authorities, Chambers of Commerce, and other private sector bodies. This group works closely with Growth Hub staff to set a suitable strategy of business growth for the City Region which the Growth Hub leads on.
- 2.2 The terms of reference of the Enterprise Advisory Board clearly set out the roles and responsibilities of the board and how the Growth Hub is intended to operate these can be found here;

<https://www.liverpoollep.org/wp-content/uploads/2017/02/Enterprise-Board-TOR-Mar-17.pdf>
- 2.2 The accountable body for the Growth Hub is the Liverpool City Region Combined Authority who execute this role through Merseytravel. The latter issued a Grant Funding Agreement (the 'Agreement') to the LEP Company to commission it to deliver the Growth Hub project on its behalf and to support activities specified in Schedules 1 and 3 of BIS' offer letter dated 6 March 2015.
- 2.3 The Combined Authority will scrutinise the LEP's activities in respect of this fund in accordance with existing processes. The Audit Committee and Scrutiny Panel within the CA's structure will scrutinise delivery and

compliance with this assurance framework. The LEP's activities may also be subject to audit by Merseytravel's established internal auditing processes, acting on behalf of the Combined Authority as its appointed Internal Auditors, where it is felt appropriate to do so in response to a CA Corporate Risk. Merseytravel will be granted full and open access to the LEP's records, effectively acting as the Internal Auditors of this scheme.

- 2.4 As the Growth Hub fund is limited in scope to the provision of business services, a separate process of prioritisation is not required in order to release funding for specific projects, as is the case with other Growth Deal funds.
- 2.5 In the event that Growth Hub funds are used as match for subsequent funding bids (e.g. a European Regional Development Fund bid), then an accountable body shall firstly be identified and agreed by the CA. The agreed accountable body shall assume all liabilities associated with any such subsequent bids and funding.

Management

- 2.6 £550,000 of Growth Hub funding was initially granted for the 2015-16 financial year to the Combined Authority, as the accountable body for Growth Deal-related funds. Subsequently, £451,00 per year was awarded for 2016-17, 2017-18, 2018-19 and 2019-20. The Growth Hub project is being delivered by a co-operative of delivery partners under the leadership of the Liverpool City Region Local Enterprise Partnership Company.
- 2.7 The day to day management of the Growth Hub is by the LEP Company through a Business Growth Manager who reports directly to the Managing Director of the LEP Company. They have primary responsibility to manage the contracts with the brokerage partners, BEIS and the CA. The Managing Director also attends the Enterprise Advisory Board.
- 2.8 The LEP Company provide Merseytravel with full access to financial and progress reports in order to ensure the assurance framework conditions are met and an independent audit certificate is required at the end of each financial year. This process ensures there is a full audit and management trail for both funding and activity as well as a level of transparency across the Growth Hub and partners.
- 2.9 The Agreement made clear that the Combined Authority's funding contribution is a capped contribution and will be subject to clawback in the event of any mismanagement or misuse. In the event that the project costs escalate, then the Combined Authority will not be liable for any costs, as its contribution is capped. Any overspends will need to be managed from within existing LEP contingency budgets. Merseytravel will require regular updates on spend profiles and on any emerging issues or problems.

- 2.10 Any future funds from BEIS for the continuation or extension of Growth Hub activities after 2019-20 and beyond shall also be transferred to the LEP Company for delivery on the same terms, unless otherwise stipulated by the Combined Authority.
- 2.11 The LEP Company meets the definition of a contracting authority for public contract regulations. As such, it is subject to Public Contract Regulations 2015 (PCR) for all of its procurement activity.
- 2.12 The LEP Company issued a formal OJEU notice in respect of services required to deliver Growth Hub brokerage and management activities. This was an open procurement process, with all of the appropriate contractual documentation published as required with the notice. All background documentation was made available to the Combined Authority's Treasurer.
- 2.13 This process was managed by the LEP Company in a fully OJEU compliant manner. The Agreement stipulated that the LEP Company shall comply with all aspects of the PCR, and that the LEP Company is financially liable in the event of any deviation from these processes or in the event of any external challenge.
- 2.14 Each broker has an SLA and handbook which details targets and definitions and how the broker is an unbiased position which means brokering businesses into the most suitable destination be it either a funded programme or a private sector advisor. All interactions and brokerages are recorded by our CRM system and the LEP runs detailed reports and analyses to ensure that businesses are indeed receiving an unbiased and effective service.
- 2.15 No financial advantage shall be gained by the LEP Company as a result of this grant and programme of activity. Mechanisms shall be developed to prevent cross subsidy of public funding into commercial activities, and confirmed in writing with Merseytravel.

3. **Other aspects**

- 3.1 The Agreement from Merseytravel stipulated that a funding condition will be to monitor and evaluate the Growth Hub project. The LEP will develop and submit to Merseytravel a monitoring and evaluation method statement, in addition to BEIS's monitoring requirements, and which shall be funded by the LEP.
- 3.2 The LEP shall be responsible for securing compliance with the Accountable Body's Equality and Diversity policies and with the provisions of the Equality Act 2010. The project could have implications in terms of the diversity of businesses and entrepreneurs that are beneficiaries from the project. This will need to be addressed by the LEP in its delivery of the project, in terms of the diversity of businesses and entrepreneurs targeted.

3.3 Any complaints or concerns about Growth Hub funding shall be directed to and administered by the Combined Authority's Monitoring Officer.