Intelligent monitoring

An element of Financial Relationships with Third Sector Organisations

A decision support tool for public bodies in England
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Intelligent monitoring

An element of Financial Relationships with Third Sector Organisations

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PRACTICAL GUIDANCE ON IMPLEMENTING THE PRINCIPLES OF PROPORTIONATE MONITORING
‘Intelligent monitoring’ is the term we use for putting into practice the principles of good monitoring and for avoiding the pitfalls of poor practice in monitoring. This guidance offers a clear, robust framework for intelligent monitoring. Along the way, we offer examples and practical tools and techniques. It has the support of the Office of the Third Sector, HM Treasury and the Commission for the Compact.
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About monitoring

Why monitor?

Ministers are accountable to Parliament for their policies. Government organisations must use public money that is awarded to them with regularity, propriety and value for money. Accounting Officers, appointed by HM Treasury, are accountable to Parliament for this.

‘Regularity’ means using money and other resources only for purposes authorised by Parliament (including any Parliamentary authority delegated to HM Treasury). A similar requirement may apply to other sources of funding, such as European Union funds.

‘Propriety’ means patterns of resource consumption should respect Parliament’s intentions, conventions and control procedures, including any laid down by the Public Accounts Committee.

‘Value for money’ means the optimum combination of whole-life costs and quality. Finding solutions that achieve the best mix of quality and effectiveness for the least outlay does not always mean choosing the immediately cheapest option. For instance, it may be more cost effective to buy a more reliable service or a better quality asset with lower maintenance costs and a longer operating life.

The concept of regularity and propriety is powerful. Parliament has consistently interpreted it as delivering public sector values in the round, encompassing the qualities summarised in the box below. In striving to meet these standards, central government departments should give a lead to the partners with which they work.

If a government organisation (called a ‘funder’ in this note) has a financial agreement with an external organisation (‘provider’), the funder must monitor the provider to ensure regularity, propriety and value for money.

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2 Each programme has an accounting officer. This is usually the permanent secretary (the most senior manager) of the department, the chief executive of the agency or another, designated, senior manager.
4 For a fuller definition, see Treasury Officer of Accounts, Regularity, Propriety and Value for Money, HM Treasury, 2004.
5 Chapter 1 – Responsibilities, Managing Public Money, HM Treasury, February 2009.
7 In this note, a ‘financial agreement’ is an arrangement under which the funder agrees to pay the provider, whether this is through procurement, grant or grant-in-aid.
Benefits

Monitoring, both internally for providers and externally for funders is an element of good management practice. Done well, monitoring gives all those with an interest in a financial relationship – funder, taxpayer, provider, user – information about what is being achieved with the fund. This in turn supports better understanding between funder and provider and promotes partnership working. It also enables shared learning about what works, which provides for policies and programmes to be adjusted so they continue to meet need\(^8\).

Impact of excessive monitoring

Monitoring puts a demand on providers: the information has to be specified, collected, analysed and submitted. This has a cost. Where the funder, by requiring the provider to carry out some monitoring, imposes a cost on the provider, the funder should pay for this, through full cost recovery if making grants and through price if contracting\(^9\). Often, that is a normal and acceptable part of the cost of managing the programme.

But monitoring can be excessive. There is some evidence\(^10\) that public funders’ monitoring of third sector providers is more likely to be excessive; and that, on average, public funders impose a heavier monitoring burden\(^11\) on TSOs than do other funders\(^12\).

### Standards expected of all public services

- honesty
- impartiality
- openness
- accountability
- accuracy
- fairness
- integrity
- transparency
- objectivity
- reliability

**carried out:**
- in the spirit of, as well as the letter of, the law
- in the public interest
- to high ethical standards
- achieving value for money

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11 Ibid – Measured as the proportion of the fund, in financial terms, that is needed to meet the monitoring demand.
12 Such as charitable foundations and trusts.
If monitoring is excessive, it can take money away from the service and users by absorbing more of the grant or increasing contract costs. Or the costs may be hidden or unfairly carried by providers. Aside from the cost, the burden of meeting excessive monitoring demands can be too high for some TSOs. It may simply be too much for small TSOs. And TSOs involved in campaigning and advocacy may feel these roles are constrained by it. They may be deterred from taking part in public service delivery. Or they may be undermined in doing so. This is evidently not in the interests of those TSOs. However, neither is it in the interests of funders or society. This is because there is a risk that the market of providers that are able and willing to accept offers of publicly-funded work is undermined. This undermines Government’s ability to achieve its objectives, and weakens civil society.

**Principles**

Seeking to promote good practice in monitoring, the Government and National Audit Office have said:

> Funding bodies should seek to minimise the monitoring and inspection burden on the recipients of funds to a level proportionate to the level of funding and risk, and which maintains proper control of public monies\(^\text{13}\).

The Government has expanded on this in its principles of proportionate monitoring *(Annex A)*\(^\text{14}\).

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Intelligent monitoring

‘Intelligent monitoring’ is the term we use for putting into practice the principles of good monitoring, and for avoiding the pitfalls of poor practice in monitoring.

In the sections that follow, we offer a clear, robust framework for intelligent monitoring. Along the way, we offer examples and practical tools and techniques.

We discuss in turn:

- **What to monitor**
- **Practical considerations in monitoring**

## What to monitor

Intelligent monitoring requires good decisions on what to monitor. When considering what information you require under these headings, think carefully about why it is needed. You should be able to relate the information you ask for to the objectives of your fund. If you have designed your funding programme following the Decision Support Tool, you will have done this at Stage 2\(^{15}\). Think too who will use it and what for. You should consider whether there are any alternative ways of getting the information that do not involve getting it from the provider, with the burden that involves.

Remember too that your fund must pay the provider for the work involved in collecting and submitting every item of information. This is part of full cost recovery\(^{16}\).

We approach this by examining what needs to be monitored:

- **Before the award**\(^{17}\) of public money
- **During the operation** of the agreement.

We then also describe a small number of other types of monitoring.

We then offer examples of these types of monitoring in practice.

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16 See the Decision Support Tool.

17 An award may follow a procurement or be an award of grant or grant-in-aid.
What to monitor – before the award

At this stage, you should carry out:

- Risk analysis
- Checks for due diligence.

These are discussed below.

What to monitor – during the operation of the financial agreement

During the operation of the financial agreement, you should carry out two types of monitoring:

- Performance monitoring
- Support monitoring.

These are discussed in turn below.

What to monitor – other types of monitoring

Funders may need information for four further purposes:

- Process assurance
- Evaluation of the policy
- Further policy development and maintenance
- Parliamentary accountability

In many cases, funders can obtain this information from elsewhere than providers: for example, much of this information may be obtained through separate contracts with a research organisation. However, sometimes the information may best be obtained from providers. We therefore discuss each in turn below. We also give examples of how these types of monitoring may be put into practice.
Practical considerations

In carrying out intelligent monitoring, there is a series of practical considerations. These are set out here as:

- **Rules of thumb** to use when monitoring
- A set of validation questions you can use to check your approach.

These are discussed in turn below.

**Rules of thumb**

There are three rules of thumb to be applied to monitoring practice.

First, **start early**: begin the discussion about monitoring early.

The Decision Support Tool has the establishment of monitoring and evaluation as a ‘tactical decision’ during the design of the funding model, that is, before implementation. You may need to consult potential providers at this stage. Be clear about your monitoring requirements when you invite applications or tenders and be prepared to discuss them at that stage. Too often, the discussion about monitoring starts during the tender or application process, or even after the award. This does not allow time for proper planning. It makes it hard for the provider to cost the monitoring requirement and build that cost into its proposal for funding. All this tends to lead to disproportionate and badly-managed monitoring.

Second, **justify** your need for information.

It is not sufficient to impose a requirement. Funder and provider should agree the requirement. Funders should expect providers to ask them to justify requests for information. This contributes to good decision-making by funders.

Third, **give feedback**: tell the provider what you will do with the information you ask for.

Providers are more likely to engage with monitoring requirements if they can see how they contribute to higher goals. Sending information into a ‘black hole’ is demotivating. If a provider knows what information is needed for, it may be able to suggest a better piece of information or a better source.

All three rules of thumb depend on good dialogue between funder and provider. Monitoring that is based on open dialogue helps to build trust between the funder and provider, identify and overcome risk and helps improve how public services are delivered. This positive working relationship between funder and provider can be achieved by recognising and implementing Compact commitments which this guidance is consistent with.

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18 Drawn from Office of the Third Sector, Principles of Proportionate Monitoring and Reporting, Cabinet Office.
20 Commission for the Compact [http://www.thecompact.org.uk](http://www.thecompact.org.uk)
Validating questions

You can use **eight questions** to test and validate your approach to monitoring. These are set out in the table below. For each question, an explanation and an example are given. These questions should be asked at regular intervals throughout the funding agreement or programme to ensure that reporting remains proportionate.

<table>
<thead>
<tr>
<th>Validating questions</th>
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<tbody>
<tr>
<td>Eight questions</td>
</tr>
<tr>
<td>1. Can the information be provided <strong>less frequently</strong>?</td>
</tr>
<tr>
<td>2. Can the information be provided in time with the <strong>provider’s own reporting systems</strong>?</td>
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<tr>
<td>3. Can the information be reported only <strong>by exception</strong>?</td>
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<tr>
<td>4. Is there an <strong>alternative item of information</strong>, perhaps more cost-effective, that could be used instead?</td>
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<tr>
<td>5. Can information that the provider <strong>already collects for another funder</strong> be used instead?</td>
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<td>6. Can this information be collected on a <strong>sample</strong> basis?</td>
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<td>7. Can this information be <strong>collected other than from the provider</strong> – such as a survey?</td>
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<tr>
<td>8. How can you <strong>assure the reliability</strong> of this information?</td>
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</tbody>
</table>

Each question is explained in Annex B.

Finally, a fictional example of **monitoring a programme** is shown in Annex C.
Before the award

Risk analysis

What is this?

Any financial agreement contains some risk. It is impossible and undesirable to eliminate risk. Risk should be managed.

Some programmes are inherently risky – because, for example, they deal with an innovation that may not work as hoped or a piece of research and development that may not result in the desired breakthrough for another year. You and senior managers and Ministers need to be clear about this: given the uncertainties involved in your programme, what level of risk are you prepared to take? Further guidance on the management of innovation can be found in the NAO report “Innovation across central government” (March 2009).

Depending on the nature and confidentiality of such risks, you may involve stakeholders, including potential providers, in this work. For some funds, there is a risk committee, with external members, to help with this.

Risk management needs to be done throughout the period of a financial agreement. This first stage in this is to identify the risk before the award. This will help you make decisions further into the process. You should reassess risk on a regular basis to identify new risks which have arisen, changes in existing risks, or risks that have ceased to exist or to be relevant.

Advice

There are four types of risk:

- **Financial**
- **Performance**
- **Reputational**
- **Opportunity**

Financial risk is the risk that the budget you and the provider have agreed may be exceeded; and/or that there is poor value for money. You should also consider risks to regularity and propriety e.g. whether a grant is spent on the purposes intended.

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Performance risk is the risk that the objective you and the provider have agreed may not be met.

Reputational risk is the risk that unwanted actions of the provider may bring it, the programme or the funder into disrepute.

Opportunity risk is the risk that the funder or the provider, because they have not analysed risks fully and accurately and are too risk averse, decide not to take an opportunity that presents itself and so damage their effectiveness.

Using these headings, you should identify the risks facing your programme. Consider whether and how these risks are already addressed, e.g. by processes, controls, existing monitoring or contingency plans. Use a risk register to capture and document these. Work with your auditors on this.

Due diligence

What is this?

Before a public funder enters into a financial agreement with a TSO, it needs to check that the TSO is a suitable organisation to do public business with – especially that it is fit to receive public money. This check is known as due diligence.

Advice

There is no set list of due diligence information that a funder must obtain about a potential provider. Here we provide examples of the information you may need. Use your risk register to guide you on what information to ask for.

The first is accounts. These may be available from sources other than the provider itself. For example, if the potential provider is a registered charity, the funder can check its entry on the Charity Commission website. Depending on the size of the charity and its income, this can include copies of audited annual accounts. This includes information a funder may find useful for due diligence. You may need to ask the provider for further accounting information. If a provider is a limited company, its annual accounts may be available through Companies House. But funders should be able to place reliance on the provider’s audited accounts. You can ask your organisation’s accountants for advice on this.

A funder may need other, non-financial, information. For example, a funder may also require the provider to have relevant insurance (for example, insurance to cover the risk of giving bad advice to a client). Depending on the nature of your programme, you may ask providers for copies of internal management procedures, such as policies on safeguarding children and health and safety.

29 Most large programmes will be taken forward through procurement. In that case, see Office of Government Commerce, An Introduction to Public Procurement, Office of Government Commerce.
30 The Charity Commission is the Government regulator of charities.
Another source of reassurance may be certificates of membership of professional organisations and/or quality frameworks\(^{31}\). You may also be able to ‘re-use’ due diligence information that the TSO has given to another funder.

For the provider, collecting together the due diligence information you ask for and submitting it to you can be a burden in itself. Ask yourself whether you need to see each item or whether you need to know that it exists. For example, do you need to see a provider’s health and safety policy or is it sufficient to know it has one.

Depending on the way your funding application process is structured, you may find it helpful to collect due diligence information in ‘layers’. For example, in a two-stage process, you might ask all the organisations in stage 1 to submit (or confirm they have, or signpost you to) initial information, such as their annual accounts (or signpost to their entry on the Charity Commission website). In stage 2, you might ask for more detailed information, such as bank details, information about the TSO’s constitution and public liability insurance.

During the operation of the financial agreement

Performance monitoring

Performance monitoring consists of monitoring of:

- Performance against outcomes
- Value for money

These are discussed in turn below.

Outcomes

What are these?

A financial agreement will include a statement of the objectives\(^{32}\) of the funding\(^{33}\). These objectives should be framed as outcomes\(^{34, 35}\). Outcomes information shows performance against these outcomes. For example, a financial agreement could state that the objective was for the provider to help people into jobs. In reporting on its performance, the provider would state how many people it had helped into jobs.

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\(^{31}\) Such as Investors in People or PQASSO (Practical Quality Assurance System for Small Organisations) Quality Mark.

\(^{32}\) ‘Objective’ – something you need to achieve in order to meet your goal. To be effective, objectives should always be written so that they are SMART (Specific, Measurable, Achievable/Agreed, Relevant and Time-bound).


\(^{34}\) Outcomes are the real-life improvements brought about by the programme. Outcomes result from the outputs of the programme. Outputs are the product of the provider. Outputs result from processes. Processes are the activity of the provider. Processes result from inputs; inputs are the resources put in the programme.

Advice

The objectives of an individual funding agreement should link back to the objectives of the fund, which should link back to the strategic objectives of the funder.

The objectives should be expressed in Smart \(^{36}\) and outcome terms \(^ {37}\). This will focus minds on what the programme is for, reduce the number of objectives needed and help make monitoring straightforward. Any one programme should have a small number of such objectives, no more than five or ten \(^ {38}\).

It is good practice to:

- Monitor performance using outcomes \(^ {39}\) (Example 1).
- Link payment to the achievement of outcomes (Example 2).

For further guidance please refer to other sources such as the Charities Evaluation Services website.

Example 1: Monitoring performance using outcomes

A funder agrees to pay an environmental charity to clean up a polluted stretch of river to meet environmental standards. Those standards are agreed in advance, as part of the negotiation of the financial agreement. It is also agreed that performance will be measured by the number of metres of the river that meet the standard. And it is agreed that the funder will be paid a fixed price per 100 metre stretch of river that meets the standard. In this case, the provider only needs to give the funder one piece of information – the number of metres meeting the standard – to report on both aspects of performance – outcomes and finance – at the same time.

Many real-life cases are not as straightforward as the above example. A common problem is that the desired outcomes of a programme are so far into the future that they are not useful as basis for performance management or for payment.

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36 ‘Smart’ is defined in the DST. Different funders use different terminology. But the same principles apply.
38 Ibid.
Intelligent monitoring

Value for money

What is this?

There are three groups of information in this type.

First, the payment formula is a key part of any financial agreement. This makes clear the criteria that will be used for making payments to the provider. This type of information shows progress against those criteria. For example, a financial agreement could state that the funder would pay £3,000 per road show run by the provider. In reporting on its finance, the provider would state how many road shows it had run.

Second, depending on the funding model used, and the extent to which the funder attaches terms and conditions specifying how funds should be spent, the provider may need to treat the funding as a ‘restricted fund’ (i.e., only for the service specified), and account for the funding separately in its annual accounts.

Example 2: Linking payment to achievement of outcomes

A funder wishes to pay a children’s organisation in the third sector to give parenting classes to the carers of children with behavioural, emotional and social difficulties. The longterm objective is to help the children grow up to be fulfilled, happy and productive adult members of society. However, the timeframe of this objective is roughly 15 years. That is too distant in the future to be useful as the basis either for monitoring the provider’s progress or for making payments to the provider.

In such circumstances, you will need to identify some interim stage(s) for the purpose of monitoring performance and making payments. In this DST, we call that a ‘milestone’. You should choose a milestone that is still as focused on the desired outcome as possible. In this case, for example, you might choose a milestone based on the number of children (whose parents have been on the parenting training) whose behaviour has changed in a positive way. You could use this to monitor performance and make payments.

However, if you have to monitor performance in the shorter term, you may find this milestone is still too far off in the future. If so, think about whether you can monitor the achievement milestone over a shorter term, such as changes in the knowledge, skills and confidence of the parents who have attended the course. If this is not possible, you may need to fall back on an output. In this example, that could be the number of parents who have completed the parenting classes on offer. The danger is that you and/or the provider will lose sight of the long term outcome. It will, therefore, be important to focus back on the long term in performance dialogues with the provider.

Value for money

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40 ‘Payment formula’ is defined in the DST. It includes, for example, any agreement to pay in advance and the periodicity of payment.
41 Stage 2: Strategic decisions – Choose a funding channel, Financial relationships with third sector bodies, NAO 2006.
Third, effective TSOs carry out their own evaluations of their effectiveness. You may be able to draw on these provider-level evaluations to establish value for money.

**Advice**

Regarding payment, the payment formula will generate a list of information the funder needs to pay a claim. The financial agreement should also include the procedure for the provider to make a claim, such as the timing of claims.

Regarding accounting for a restricted fund, this is an area where funders can overburden small providers. Consider whether:

- it is actually necessary to attach such tightly specific terms and conditions to your funding? If not, it may be unnecessary for the provider to treat the funding as ‘restricted’. This will significantly reduce the bureaucracy for the provider of accounting for the fund. That will reduce costs for the provider and, ultimately, your fund;

- you will require the provider to supply you with proof they have only used the money for the designated purpose. Some funders demand this in the form of itemised information, such as time sheets and receipts for expenses. This is very burdensome and is normally unnecessary. You may rely instead on the provider’s own general accounts (as long as they show your fund separately) or on a specific account for your fund.

This area of restricted funds is complicated. Getting it wrong potentially places a large and unnecessary burden on providers. It is sensible to discuss this at the outset with your organisation’s accountants or internal auditors.

Regarding evaluation, effective TSOs evaluate themselves continuously. This should include their effectiveness in delivering on your financial agreement. With a provider’s agreement, you may be able to draw on this source of data to provide you with information you need. This will impose little or no additional work on the provider.

**Support monitoring**

Support consists of:

- **Ongoing risk** monitoring

- Reporting of serious cases/incidents.

These are discussed in turn below.

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43 These are distinct from policy evaluation, discussed below.

44 ‘Payment formula’ is defined in the DST. It includes, for example, any agreement to pay in advance and the periodicity of payment.

45 Claim: the word used for a provider’s request for funding to the funder.
Ongoing risk

What is this?

Funder and provider should regularly share up to date, open information about risk. This will help to reduce the amount of other monitoring that the funder needs. Project and risk management techniques need to be used in a way that is proportionate to the scale of the particular project.  

Advice

As explained above, in intelligent monitoring, monitoring is proportionate to risk. So effective risk management reduces the amount of other monitoring needed. It also protects funder, provider and the programme from risk.  

At the start of the financial agreement, you should agree a risk register with the provider. You should base this on the risk register for the programme that you will have already produced. Use the same format. You should also draw on any risk register the provider has.  

If you have a small number of large, high-risk providers, you may need to draw up a risk register for each provider. But, if you have a large number of low-risk providers, all delivering the same programme, you may be able to draw up a generic risk register for all providers of the programme.  

Once the risk register has been drawn up, it provides a basis for monitoring. This can be done by periodically updating and circulating the register. If the assessment of risk remains the same, no further special action is needed. If risk is assessed as greater, the defences against risk will need to be employed. These may require more focused monitoring but are likely to need closer management and action, possibly even terminating contracts or grants. If risk is assessed as less, then you may be able to reduce the amount of monitoring.  

An example of how risk may be monitored in practice is set out below.

Serious incidents/cases

What is this?

To inform the funder about serious incidents/cases. This might include, for example, a fatal accident in a government-funded work-based training scheme.

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47 Office of Government Commerce, HM Treasury, Managing Risks with Delivery Partners. Office of Government Commerce says ‘good-quality monitoring information should include the scale of risks and how they are being managed and ‘the scale and intensity of monitoring… should be increased where there are signs that significant risks [may] materialise’.
Advice

The funder has a need to know about serious incidents/cases. This is particularly – but not exclusively – the case if the provider is delivering a public service that would otherwise be provided by the funder (for example, in cases of ‘contracting out’).

Many providers will be familiar with the principles of reporting serious incidents/cases. Normally, the provider must report to the funder on a by-exception basis.

The funder and the provider should agree in advance the procedure for reporting serious incidents/cases. This should include a list of the types of incident/case to be reported. But it will be impossible to identify every item on this list in advance. This list should therefore be indicative and non-exhaustive.

The funder and provider should develop a protocol and trust around this issue. An example of how serious incidents/cases may be monitored in practice is set out below.

Example 3: reducing the monitoring requirement

Four types of information – performance, due diligence, risk and serious incidents/cases – can, together, be thought of as a ‘minimum monitoring requirement’. For many financial agreements, this information should meet your needs.

In these circumstances, the provider will have to supply a small amount of due diligence information before the financial agreement is finalised. It will then have to supply a small amount of information on outcomes achieved (in order both to meet the funder’s need for performance data and to trigger a payment).

The provider and the funder will also have to agree a risk register. The funder and provider will need to update this periodically. As long as all risks show as ‘green’, the provider will not have to supply further information.

The requirement for information of serious incidents/cases can be integrated into the risk register. This can be done by listing the risk of a serious incident/case as one of the risks in a risk register. Because the risk register is a ‘living document’ shared by the provider and funder, this will encourage proper defences and contingency plans to be in place. Reporting any serious incidents/cases will be a function of effective management of the risk of such incidents/cases, not an afterthought. (In particular, ‘notify provider of serious incident/case’ will be one of the contingency plans to be put in place if a risk materialises).

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48 Two examples: for health and safety reporting requirements, see Health and Safety Executive, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations. Health and Safety Executive; and for the NHS, see National Patient Safety Agency, National Reporting and Learning Service, National Health Service.
Other types of monitoring

Process

What is this?
In certain programmes, you may be concerned about how a provider carries out the work you fund (the process) as well as what it achieves in doing so (the outcomes). To this end, you may wish to monitor the provider’s adherence to the agreed process.

Advice
For example, if you are funding a TSO to work with young offenders in the community, you may express the objectives as an outcome (such as reduction in re-offending). However, in certain circumstances, you may also wish to specify which interventions the TSO should use in working with the young people. This could be because there is solid research evidence that a certain methodology is effective and/or because it is known to be safe. You would usually include the requirement to include this methodology in the financial agreement.

If you require assurance that a specified methodology is being used, you can use a number of different sources. Not all involve monitoring. For example, you may place some reliance on the fact that the staff have appropriate professional qualifications and membership. Or the TSO may subscribe to a licensing arrangement for the methodology concerned. Alternatively, the service may be subject to external inspections (by an inspectorate such as Ofsted or HM Inspectorate of Probation). You can take assurance from their reports. Similarly, you can study the methodologies used by the provider if you visit its premises.

But, if you decide that, despite taking the above steps, you still want to monitor the provider’s adherence to a specified methodology, you and the provider will have to agree what you are going to monitor. To do this, you need to select a small number of the important steps in the process. You will then need to express these ‘standards’ in Smart terms (in the same way as the objectives – see above). You will then need to agree with the provider that it will supply you with data on its adherence to these standards.

This kind of monitoring – of process – should be avoided where possible. It is burdensome on the provider – and thus costly (for the funder, ultimately). It deters the TSO from innovation – because it is tied to a single, specified methodology. And it undermines the professional confidence of the TSO and its staff. You should introduce this kind of monitoring, therefore, only if risk analysis shows it to be a requirement. This is more likely for particularly vulnerable beneficiaries or dangerous processes.

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49 Outcomes are the real-life improvements brought about by the programme. Outcomes result from the outputs of the programme. Outputs are the product of the provider. Outputs result from processes. Processes are the activity of the provider. Processes result from inputs; inputs are the resources put in the programme.
Policy evaluation

What is this?
Funders have to evaluate their policies\(^50\). To support an evaluation, they need information about the programme and the environment it operates in – often over time, so they can detect and explore the impact of the programme. Funders may gather some of this information from the providers of the programme that is being evaluated. For providers, good monitoring and reporting help them to showcase the work they are doing as well as learn and develop.

Advice
The impacts of a policy can be economic, environmental and social and may require a range of evaluation tools. Some of these tools may be more appropriate than others when evaluating policies with third sector involvement, for example Social Return On Investment (SROI)\(^51\).

Funders should work with their evaluation experts (in-house analysts, for example) to:

- Develop their plan for evaluating a programme
- Draw up a list of the information they will need for this evaluation
- Work out how this information is going to be collected.

If you are going to use a provider as the source of some information for evaluation, be aware of the additional workload this will place on a provider. You will need to pay the provider for collecting it on your behalf.

An example of how to monitor in practice for policy evaluation is set out below.

Policy development

What is this?
Funders have to keep their policies up to date. To support such policy development and maintenance, they need information about the programme and the environment it operates in – often over time, so they can detect and explore changes in the environment. Funders may gather some of this information from the providers of the programme.

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\(^{50}\) Government Social Research Unit, Guidance Notes on Policy Evaluation (also known as the “Magenta Book”), HM Treasury, 2007.

\(^{51}\) Social Return on Investment (SROI) is an approach to measurement and value that can be used across the public, private and third sectors. Developed from cost-benefit analysis and social accounting, SROI uses economic valuation to make visible a far greater range of social, environmental and economic costs and benefits than conventional analyses. The Office of the Third Sector is developing guidance on SROI.
Advice
Funders should:

- Draw up a list of the information they will need for this policy development
- Work out how this information is going to be collected.

If you are going to use a provider as the source of some information for policy development, be aware of the additional workload this will place on a provider. You will need to pay the provider for collecting it on your behalf.

An example of how to monitor in practice for policy development is set out below.

Parliamentary accountability

What is this?
Information that the funder may need to give Parliament about the programme.

Advice
Ministers and Accounting Officers are accountable to Parliament and, ultimately, to the public for their programmes. This means funders have to be prepared to answer reasonable questions from Parliament or the public. For example, it may be reasonable to answer a question from a Member of Parliament about how many people have benefited from a programme broken down by simple geography and ethnic origin. But a funder would not normally be expected to give a lot of information about beneficiaries that is not directly relevant to the objectives and management of the programme.

Funders need to make sensible judgements about what information they will collect for accountability. You should be able to answer many questions by drawing on information collected for other purposes. This means the question can be answered without imposing any burden of collecting additional information. You may also be able to draw on information the provider collects for its own purposes.

However, in certain cases, you may need to collect information specifically for accountability. To prepare for this, you may collect routinely information that may be needed in the future. But you should not use accountability as an excuse to collect a lot of information that is not really needed.

An example of how to monitor in practice for accountability is shown overleaf.
Example 4: combining monitoring for accountability, evaluation and policy

The last three types of monitoring – accountability, evaluation and policy – are different in nature from the others. Those are concerned with the effective management of the programme. The last three are concerned with the funder’s wider responsibilities. In particular:

- **Accountability** monitoring is designed to help a funder account for its work to Parliament and/or the public.
- **Evaluation** monitoring is designed to help the funder learn lessons from the programme in action that will be helpful improve the funder’s work in the future.
- **Policy** monitoring is designed to give the funder information about the policy environment that will help it to develop better policy.

Funders need to recognise that requiring providers to supply these types of information is a requirement on top of the need for effective programme management. You must agree the requirement for these types of information with providers beforehand. You should compare monitoring – as a method of collecting information for policy work – with other methods (such as surveys) before deciding to add to the monitoring requirement in this respect.

**Example**

You are responsible for a programme to check that old people’s homes are secure against burglaries. You have decided to procure the service on a regional basis. In three of the regions, third sector organisations win the work.

Before drawing up the invitation to tender for the procurement process, you should consider what information you are likely to need for:

- **Accountability**
- **Evaluation**
- **Policy**

Once you have a list of these items of information, you should decide how you are going to collect them. In broad terms, you have three choices:

- Your **own organisation** may collect the information
- Fund a **research company** to collect them for you
- Fund your **providers** to collect them for you

You can appraise these options on value for money grounds. A mix of these is also possible. Once you have decided, any requirement for providers to collect this information for you needs to be included in the invitation to tender or apply for a grant or grant-in-aid. The funder should then include this in the price it quotes you in its proposal.
Annex A

Principles of proportionate monitoring and reporting

When Government and third sector organisations work well together, we can achieve great results for communities and individuals. But if these relationships are to succeed, it is vital to have good monitoring of and reporting about funding.

For funders, good monitoring and reporting:

- help to ensure value for money
- show how the recipient spends the money, and
- demonstrate the impact of funding.

For funded organisations, good monitoring and reporting help them to:

- showcase the work they are doing, and
- learn and develop.

Government recognises that monitoring and reporting should be proportionate – that is, they should be fair in the requirements they place on both recipient and funder. We have developed these 12 principles to reduce red tape and enable people in the third sector to devote more of their time and resources to the groups they serve.

Central government departments have agreed to ensure these principles become embedded in their interactions with third sector organisations. Central Government will work with their delivery partners to promote an increased understanding and encourage adoption and embedding of the principles. Local government and non-statutory funders can also use the principles. While they apply mainly to grant funding, the principles should also be seen as best practice for all funding agreements.
Principles for funders

1. **Understand costs**: Monitoring and reporting has a cost both for the funder and the recipient. Consider this when you design reporting requirements.

2. **Start early**: Discuss monitoring and reporting requirements with potential funding recipients at an early stage.

3. **Specify requirements**: Specify and indicate the scale of reporting requirements at the application or tender stage.

4. **Justify needs**: To ensure that monitoring and reporting are proportionate to the level of funding and risk:
   - be able to justify why you need each piece of information
   - be clear how the funding fits with your strategic objectives
   - be clear how you will use the information.

5. **Communicate clearly**: Provide clear forms, using simple language. Where appropriate offer other ways to report back, such as face-to-face meetings.

6. **Give feedback**: Feedback on their reports helps people in the third sector to understand how you use their information. It also helps them learn and develop as an organisation.

7. **Use existing reports**: Where possible, use existing reports, such as trustees’ annual reports and the organisation’s annual accounts. Encourage the recipient to use standard reports where appropriate, particularly if it is joint funded.

Principles for funded organisations

1. **Understand why reporting is important**: Reporting is essential to ensure that public funds are properly spent and have an impact, and reporting can help your organisation prove its worth.

2. **Identify useful information**: If you understand what information is useful to your organisation, you can have a constructive discussion with your funders to agree realistic monitoring and reporting requirements. This discussion should include questioning the funder’s requirements if you are not clear how it will use your information.

3. **Meet deadlines**: Provide specified reporting information to the funder within agreed timescales.

4. **Co-ordinate**: Make sure the person who is bidding for funding co-ordinates with the person who will project-manage the work, where relevant.

5. **Suggest using existing systems**: Discuss with funders whether you could use a standard report based on your own reporting systems, especially if you can identify several funders who are likely to need similar information.
Annex B

Validating questions

You can use eight questions to test and validate your approach to monitoring. These are set out in the table below. For each question, an explanation and an example are given.

<table>
<thead>
<tr>
<th>Validating questions</th>
<th>Eight questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Can the information be provided <strong>less frequently</strong>?</td>
</tr>
<tr>
<td>2</td>
<td>Can the information be provided in time with the <strong>provider’s own reporting systems</strong>?</td>
</tr>
<tr>
<td>3</td>
<td>Can the information be reported only <strong>by exception</strong>?</td>
</tr>
<tr>
<td>4</td>
<td>Is there an <strong>alternative item of information</strong>, perhaps more cost-effective, that could be used instead?</td>
</tr>
<tr>
<td>5</td>
<td>Can information that the provider <strong>already collects for another funder</strong> be used instead?</td>
</tr>
<tr>
<td>6</td>
<td>Can this information be collected on a <strong>sample</strong> basis?</td>
</tr>
<tr>
<td>7</td>
<td>Can this information be <strong>collected other than from the provider</strong> – such as a survey?</td>
</tr>
<tr>
<td>8</td>
<td>How can you <strong>assure the reliability</strong> of this information?</td>
</tr>
</tbody>
</table>

Each question is explained overleaf.

A **fictional example of monitoring a programme** is shown in Annex C.
1 Can the information be provided less frequently?

**Explanation**

Funders often require providers to supply monitoring information in time with payments. For example, if a funder agrees to pay a provider once a quarter, it will require the provider to submit the agreed monitoring information with the quarterly claims for payment. Every time an item of information is collected and supplied to a funder, there is an associated cost. Funders and providers should, therefore, agree to the supply of each item of information only as frequently as it is needed. This could mean that, for example, some information is supplied quarterly while other information is collected and supplied annually.

**Example**

A funder has a financial agreement with a provider to train unemployed young people. The provider, a voluntary organisation with limited working capital, needs to be paid quarterly. The funder requires certain information quarterly to justify payments. But the funder agrees that the provider can submit all other monitoring only every six months.

2 Can the information be provided in time with the provider’s own reporting systems?

**Explanation**

A funder may ask for certain information on a certain timescale. The provider may explain that it already produces this information but on a different timescale. It would cost more to produce the information to the funder’s preferred timescale. In this case, the funder should weigh up the costs and benefits of collecting the information on the two timescales. All things being equal, the funder should accept the information on the timescale that the provider already produces it.

**Example**

In a programme to encourage children to go for dental check-ups, the funder asks the provider for data on the children every quarter. The provider explains that it already collects such information via schools, once a term (ie, three times a year). Collecting the information four times a year would add significantly to the cost because the fourth collection would fall during the summer when the children would be away from school. The funder agrees to use the provider’s termly figures.
3 Can the information be reported only by exception?

**Explanation**

Often, a funder requires the provider to supply every agreed item of information in each monitoring report. Collecting and supplying all this information has a cost. Another approach is for the funder and provider to agree that the provider will supply the information only if there has been a change (of a pre-agreed size or type) since the last report (or from a baseline). This can be particularly useful in monitoring issues such as risk. So long as there has been no change in the status of the risk, there is no need to supply other information on it.

**Example**

A funder sets up a programme to insulate people’s homes. Before funding starts, the funder and provider agree a risk register. This includes a risk that the cost of materials will rise beyond what the programme can afford. The funder and provider include this in a risk register, with defences and contingencies. The funder circulates an up to date version of the risk register every quarter. The ‘traffic light’ for the cost-of-materials risk remains at ‘green’ unless the cost of materials rises past an agreed level. The funder requires no further information in this area.

4 Is there an alternative, more cost-effective piece of information that could be used instead?

**Explanation**

When planning monitoring information, funders should be aware that providers usually collect information to support their own management and governance. They may also be collecting other information for other funders. Adding extra monitoring requirements adds cost. It is therefore a good idea to use, where possible, information that the provider already collects.

**Example**

In a programme to consult local people about plans for the regeneration of a neighbourhood, the funder wishes to know how many school-age residents are consulted. The provider does existing consultation with children and young people at schools and colleges in the area. It points out, though, that not all those who attend local schools and colleges live in the area (and some children and young people who do live in the area go to schools and colleges outside). The funder, nevertheless, decides to use the existing data because to change it would add greatly to costs without much difference in the quality of information gained.
5 Can information that the provider already collects for another funder be used instead?

**Explanation**
Funders should be aware that providers often have financial agreements with more than one funder. A provider of your programme may, thus, already collect and supply information to another funder. When planning monitoring, it is a good idea to use, where possible, information that the provider already collects for another funder. Adding extra monitoring requirements adds cost.

**Example**
A funder has a financial agreement with a TSO to consult residents about the reconfiguration of sports and leisure facilities in their city. The funder wants the work to be done to a high quality. But it does not want to get involved in detailed monitoring of the quality of the work.

The provider explains that a previous funder has raised the same issue. To address this, the previous funder and the provider agreed that the provider would seek PQASSO\(^{53}\) accreditation. The provider achieved this and now sends the previous funder a copy each year of its PQASSO certificate.

The new funder agrees to share in this arrangement. The provider will continue as before but will now send a copy of the certificate to the new funder too.

6 Can this information be collected on a sample basis?

**Explanation**
If a funder has financial arrangements with a number of different providers, it may be possible to collect certain information from some, not all, providers. This use of a ‘sample’ will relieve the burden, and therefore cost, for those providers that are not part of the sample. Sampling may also reduce the cost of monitoring to the funder.

**Example**
A funder has a financial agreement with 50 different providers across the country to give consumer legal advice. For policy reasons, the funder wishes to know the age profile of those receiving the advice. The funder works with its in-house analysts to construct a sample. It is decided that 20 providers in a specified range of settings (urban-rural, north-south etc) will collect this information. The other 30 providers will not need to.

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53 PQASSO (the Practical Quality Assurance System for Small Organisations) is a quality scheme run by Charities Evaluation Services (which is part-funded by the Office of the Third Sector).
7. Can this information be collected other than from the provider – such as a survey?

**Explanation**

There may be some information that the funder needs about the programme that is better not collected as part of monitoring information from the provider. It could be collected through a survey – separately funded – instead.

**Example**

In a smoking cessation programme, the funder wishes to know the motivations of smokers for both continuing and giving up. Initially, the funder plans to require the provider to collect this data and submit it with the monitoring information. However, when the provider and funder look into this together, they establish that it would be more cost-effective for the funder to obtain this information separately from a market research company.

8. How can you assure the reliability of this information?

**Explanation**

You may be supplied with false monitoring information. Usually, this will be down to error. But, occasionally, it could be deliberate. There are ways you can safeguard against this. In particular, make clear to the provider from the start that its data and records will be open to scrutiny by you and your team, as well as by auditors and inspectors. Be clear about what information you require and the quality and robustness of it. A good working relationship with the provider will help and may include face-to-face meetings and personal visits.

**Example**

You manage a fund with 60 third sector providers. All give roughly the same service and get paid by results. They send you a quarterly return of their results. You use this to make payments.

You work with your auditors on a risk register. This includes the risk that the data used to make payments may be false. You agree that your auditors will visit a sample of the providers to check this data.
Annex C

A worked example

Having looked at the ‘parts’ of intelligent monitoring, a fictional example is shown in the table below.

Advice on using the table then follows.

This (fictional) programme will take people who are in debt through a money management course. Its long term goal is to help people in the UK who are in debt get out of debt and stay out of it. The providers are TSOs. The following table shows the monitoring requirement. The funder and provider have agreed this through following.

<table>
<thead>
<tr>
<th>Monitoring schedule (example)</th>
<th>1 Information type</th>
<th>2 Information item</th>
<th>3 Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk</td>
<td>Violent incidents on site</td>
<td>By exception</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Low user satisfaction</td>
<td>By exception</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Programme will not be able to recruit clients</td>
<td>By exception</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Clients will drop out of course before the end of the course</td>
<td>By exception</td>
<td></td>
</tr>
<tr>
<td>Due diligence</td>
<td>Charity Commission website entry</td>
<td>One-off</td>
<td></td>
</tr>
<tr>
<td></td>
<td>National Money Advice Federation membership</td>
<td>Yearly</td>
<td></td>
</tr>
<tr>
<td>Outcome</td>
<td>Number of people who have been through the course and who are no longer in debt a year later</td>
<td>Quarterly (after one year)</td>
<td></td>
</tr>
<tr>
<td>Milestone</td>
<td>Number of people who have been through a course and have begun to reduce their debt</td>
<td>Quarterly</td>
<td></td>
</tr>
<tr>
<td>Output</td>
<td>Number of people who have been through a course</td>
<td>Quarterly</td>
<td></td>
</tr>
<tr>
<td>Value for money</td>
<td>Number of people who have been through course</td>
<td>Quarterly</td>
<td></td>
</tr>
<tr>
<td>Serious incidents/cases</td>
<td>Number of serious assaults on staff</td>
<td>As occur</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of serious assaults on clients</td>
<td>As occur</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unspecified other serious incidents/cases</td>
<td>As occur</td>
<td></td>
</tr>
<tr>
<td>Accountability</td>
<td>Number of interviews by sex and ethnic origin</td>
<td>Half yearly</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of disabled interviewees</td>
<td>Half yearly</td>
<td></td>
</tr>
<tr>
<td>Evaluation</td>
<td>Number of cases referred by other agencies</td>
<td>Yearly</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of cases self-referred</td>
<td>Yearly</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of cases on tax-credits before joining a course</td>
<td>Yearly</td>
<td></td>
</tr>
<tr>
<td>Policy</td>
<td>Number of clients who are ex-offenders</td>
<td>Half-yearly</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of clients who were in local authority care</td>
<td>Half-yearly</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of clients with debts to ‘loan sharks’</td>
<td>Half-yearly</td>
<td></td>
</tr>
</tbody>
</table>

In this example:
Column 1 contains the types of information discussed in the section on what to monitor
Column 2 contains the list of items of information that will be collected
Column 3 contains the frequency with which the provider will submit the information to the funder.
The funder has drawn up a risk register with the provider. In that, four risks threaten the achievement of the programme’s goal: violent incidents on site; low user satisfaction; provider not being able to recruit clients; clients dropping out before the end of the course. The funder and the provider agree a risk register for these. They will agree an up to date version of this quarterly. As long as the profile of these four risks does not change, they will continue to show ‘green’ in the traffic light system that the funder and provider have agreed for monitoring risk.

The provider will be handling public money and vulnerable people. The funder therefore needs to carry out a due diligence check before it can sign the financial agreement. The provider is a charity. The funder therefore checks its entry on the Charity Commission website, as a one-off exercise. To give assurance about the quality of the provider’s work, the provider supplies a certificate of its membership of the (fictional) National Money Advice Federation. This helps avoid the need for process monitoring.

The first item of performance information is number of people who have been through the course and who are no longer in debt a year later. In terms of frequency, by definition this information will not start to become available until a year after the start of the programme. Thereafter, the provider plans to collect it quarterly. After this time, this will be the main measure of the programme’s performance.

Because this main performance information will not be available for a year, the provider needs a shorter term measure of performance. Funder and provider have agreed on a shorter term output measure: number of people who have been through a course. This will be collected quarterly. Furthermore, the same piece of information, submitted quarterly, will also trigger quarterly payments to the provider. The provider will be paid by the number of these outputs – people through the course – it achieves.

In terms of serious incidents/cases, the funder has funded similar programmes in the past. From this experience, it knows aggressive behaviour on the sites is not uncommon. Ideally, the funder wants to leave this to the provider to manage. But the funder knows from previous cases that Ministers want to know about such cases. The funder has therefore agreed that the provider will notify serious assaults and of other serious incidents as they happen.
There is a lot of interest among MPs in ensuring debt advice reaches minorities. The funder proposes to encourage good working relationships between MPs and providers in their constituencies. Nevertheless, Ministers will expect to be able to provide basic equalities information to their colleagues in Parliament. The monitoring requirement therefore includes quarterly reports of the sex, race and disability breakdown of clients.

The funder has a separate contract with a research organisation to carry out an evaluation of the policy. These researchers will be pulling together data from a number of sources. You, they and the providers have agreed that the providers will report annually on: the number of cases referred to the provider by other agencies; number of cases self-referred; and the number of cases on tax-credits before joining the programme.

Finally, this programme is not meant to be the last word in tackling household debt. The Government may introduce other policies and programmes. To help with the research and development work for these, providers agree to supply data every six months on three issues in which there is a lot of policy interest: number of clients who are ex-offenders; number of clients who were in local authority care; and number of clients with debts to ‘loan sharks’. 
Annex D

Documents reviewed and people consulted

Documents reviewed


\textsuperscript{54} The predecessor organisation in government to the Office of the Third Sector.

\textsuperscript{55} Now the Better Regulation Executive within the Department for Business, Innovation and Skills.

Croydon Council, Croydon Strategic Partnership, *Voluntary and Community Sector Funding and Commissioning Guide*.

Derby City Council, Derby City NHS Primary Care Trust, *Joint Commissioning Framework for the Voluntary and Community Sector*.


Health and Safety Executive, *Reporting of Injuries, Diseases and Dangerous Occurrences*, Health and Safety Executive.


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56 The predecessor organisation in government to the Office of the Third Sector.


### People consulted

We are grateful to all who gave us help and assistance with this work.

<table>
<thead>
<tr>
<th>Organisation</th>
<th>People</th>
</tr>
</thead>
<tbody>
<tr>
<td>Association of Chief Executives of Voluntary Organisations</td>
<td>Nick Carey, Policy Officer</td>
</tr>
<tr>
<td>Audit Commission</td>
<td>Marilyn Lister, Senior Manager</td>
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<tr>
<td>Capacitybuilders</td>
<td>Jon Fox, Director of Strategy and Policy</td>
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<tr>
<td>Charities Evaluation Services</td>
<td>Dr Jean Ellis, Senior Consultant</td>
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<tr>
<td></td>
<td>Colin Nee, Chief Executive</td>
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<tr>
<td>Charity Commission</td>
<td>Neal Green, Senior Policy Adviser</td>
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<tr>
<td>Chartered Institute of Public Finance and Accountancy</td>
<td>Richard Harris</td>
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<td></td>
<td>Steve Strutt, Health &amp; Third Sector Policy Manager</td>
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<tr>
<td>Commission for the Compact</td>
<td>Richard Williams, Policy Adviser</td>
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<tr>
<td>Community Development Foundation</td>
<td>Debbie Ladds, Director of Programmes</td>
</tr>
<tr>
<td>Community Matters – the National Federation of Community Organisations</td>
<td>David Tyler, Chief Executive</td>
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<td>Department for Communities and Local Government</td>
<td>Jackie Westlake, Head of the Third Sector and Social Enterprise Unit</td>
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<td>Department for Children, Schools and Families</td>
<td>Diane Barrington, Lead Officer for Third Sector Grant Making Programme</td>
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<td>Janet Moore, Team Leader Third Sector Commission and Market Management</td>
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<td>Dr Steve Feast, Senior Advisor, Health and Well Being</td>
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<td></td>
<td>Carolyn Heaney, Deputy Director – Third Sector Partnership Unit</td>
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<td></td>
<td>Steve Shaw, Strategic Commercial Advisor</td>
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<td></td>
<td>Martin Sutton, Better Regulation team</td>
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<td>Department for Transport</td>
<td>Marvin Antah, Finance Officer</td>
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<td>Derby City Council</td>
<td>Katy Wing, Voluntary and Community Sector Partnerships Manager</td>
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<td>Improvement and Development Agency (lDeA)</td>
<td>Sarah Wood, Director of the National Programme for Third Sector Commissioning</td>
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<tr>
<td>Local Government Association</td>
<td>Sally Cooke, Third Sector Policy Consultant</td>
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<td>Organisation</td>
<td>People</td>
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<td>------------------------------------------------</td>
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</tr>
<tr>
<td>Ministry of Justice</td>
<td>Carol Buckland, Head of VSU NOMS</td>
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<tr>
<td></td>
<td>Spencer Draper, Policy Manager in the Partnership Unit</td>
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<tr>
<td></td>
<td>Baljit Wirk, Third Sector Liaison Officer</td>
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<tr>
<td>National Council for Voluntary Organisations</td>
<td>Francesca Cignola, Sustainable Funding Public Policy Officer</td>
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<td>National Association for Voluntary and</td>
<td>John Dawson, Local Commissioning and Procurement Adviser</td>
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<tr>
<td>Community Action</td>
<td></td>
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<tr>
<td>National Council for Voluntary Youth Services</td>
<td>Faiza Chaudury, Head of Policy and Communications</td>
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<td>NHS Confederation</td>
<td>Jo Webber, Deputy Policy Director</td>
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<td>New Philanthropy Capital</td>
<td>Lucy Heady, Head of Measurement</td>
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<td>Clare Yeowart, Analyst</td>
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<td>Office of Government Commerce</td>
<td>Vanessa Carpenter</td>
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<td></td>
<td>David Gigg</td>
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<tr>
<td>Office of the Third Sector</td>
<td>Ben Harrison, Policy Manager, Charity Law &amp; Regulation</td>
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<tr>
<td></td>
<td>Mia Spreadbury, Policy Advisor</td>
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<tr>
<td>HM Treasury</td>
<td>Kim Collins, Invest to Save Budget Programme Manager</td>
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<tr>
<td></td>
<td>Sue Gamble</td>
</tr>
<tr>
<td>Voice4Change – England</td>
<td>Jemma Grieve, Policy &amp; Research Officer</td>
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</tbody>
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