



PARTNERSHIPS CODE
(TO BE EFFECTIVE FROM 1ST JUNE 2009)

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1. INTRODUCTION

- 1.1 Increasingly policy development and service delivery across the City of Southampton is being co-ordinated within a ‘partnership framework’. This is because the government is continually promoting partnership working nationally and at a local level, complex quality of life outcomes can only be achieved by the public, private and community and voluntary sectors working together in partnership. Over recent years, there has been a significant increase in the use of ‘partnerships’ to deliver the City Council’s core business and contribute to the achievement of the City’s priorities.
- 1.2 Given this significant increase in partnership working, and the subsequent increases in formalised partnership arrangements, this Partnership Code and the supporting Toolkit has been developed to ensure that where the City Council leads a partnership and/or co-ordinates its work, it will do so ensuring sound governance is in place, but within a flexible, efficient and robust approach to such engagement. This forms an important element of the Council’s overall framework for partner and partnership engagement.

2. WHO SHOULD USE THIS CODE?

- 2.1 All City Council Members and Officers currently involved in ‘partnership’ working or considering establishing a new partnership within which to develop policy and/or deliver a service or an initiative. In addition, all existing arrangements should be reviewed by the Council as and when appropriate in light of this Code. Appendix 1 outlines the types of partnership.

3. PARTNERSHIP DEFINITION

- 3.1 The terms “partnership”, “partnering” and “partnership working” are some of the most overused and misunderstood concepts in local authorities at the present time. For the purposes of this Code and Toolkit, the term “partnership” means:

A RELATIONSHIP WHERE TWO, OR MORE, ORGANISATIONS WORK TOGETHER WITH TRUST, OPENNESS AND HONESTY TO DELIVER MUTUALLY AGREED BENEFICIAL OUTCOMES THEY CANNOT ACHIEVE ALONE

Source: Local Government Partnering Framework, adopted by Southampton City Council in 2007

4. TYPES OF PARTNERSHIPS COVERED BY THIS CODE AND TOOLKIT

- 4.1 This Code covers key partnerships established by Southampton City Council that have been charged with developing specific strategies or plans and are ‘held to account’ for the delivery of those strategies or plans. In addition these partnerships might also be responsible for delivering key initiatives to realise improvements in quality of life outcomes and might also come under some form of audit/inspection regime. This Code applies equally to Government initiated ‘statutory’ partnerships as well as nationally required and/or locally determined ‘non-statutory’ partnerships. An example of this (as at May 2009) includes the Children and Young People’s Trust which is a nationally prescribed statutory partnership and the Health and Wellbeing Partnership which is a locally determined non-statutory partnership.

- 4.2 A list of the key partnerships covered by this Code is listed in the Toolkit (Appendix 1) and it is reviewed and updated on an annual basis.
- 4.3 For those partnerships which the City Council does not establish, but is invited to join, this Code and Toolkit should be used to form part of the considerations into making the decision as to whether the City Council becomes a member of that partnership.
- 4.4 It is important to note that this Code does not cover every partnership and the following list provides examples of those not covered as they have differing arrangements. For further information on the types of partnership expected to adhere to the Code and those which are exempt from it, contact the Solicitor to The Council in the first instance. Partnerships not covered by the Code are encouraged to still consider the Code and its application:
- groups where the City Council has direct control and ultimate decision-making over budgets or decision making (eg citizens panel);
 - informal groups set up to discuss and consider specific topics (consultation groups);
 - appointments and / or financial commitments to outside bodies where the City Council has no strategic or policy function (eg where Council provides grants and requires a place on the Board);
 - “commercial partnerships” with a view to making a profit, which are subject to the Partnership Act 1890;
 - commercial or contractual agreements, even when the governance aspects are underpinned by what may be called “partnership”, eg SSP, PFI, etc; and
 - legally defined arrangements where (eg) money is pooled and governance arrangements are defined by law or (eg) joint arrangements governed by other legislation (eg PUSH / TfSH).

5. ASSESSING THE NEED FOR A PARTNERSHIP ARRANGEMENT

- 5.1 Successful partnerships are characterised by a shared vision or purpose, where all partners agree to modify their own activities and resources to achieve the overall partnership goal within new working arrangements. A flow chart of the steps to follow to test the need for a partnership, a partnership arrangement and a partnership sign-off procedure and form are provided at Appendices 2 and 3 respectively.

It is important to recognise that the establishment of some forms of partnerships, especially those with contractual or budget pooling characteristics, will need to be underpinned by a procurement process as set out in the Council’s Contract Procedure Rules. This is because this area can be extremely complex and legal challenges can arise and, as such, the view of the Council’s Corporate Procurement Unit should be sought before any discussions are held with potential partners

Where it is deemed beneficial to work in partnership with private contractors in order to deliver improved services, works or goods, forms of incentive can be incorporated into the contractual relationship. Often this is referred to as ‘partnership working’ which covers the manner in which the client and contractor relate to each other and is about processes and behaviours which are in place once the procurement process to appoint the contractor has been completed. As such, the spirit of this Code may help shape those arrangements. If in doubt, seek advice from the Head of Corporate Procurement and/or the Solicitor to the Council in the first instance.

6. TEMPLATE FOR PARTNERSHIP AGREEMENTS

<p>ALL PARTNERSHIPS NEED A WRITTEN, SIGNED AGREEMENT BETWEEN ALL PARTNERS</p>
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- 6.1 A Partnership Agreement is like a rulebook or a guidebook. It should define how partners will work together, who will be responsible for what, who will report to whom, how services will be provided, how decisions will be made, how the funding will be shared etc. Any financial relationship with a partner must be fully documented and legally binding. The formal agreement will bind together all of the issues of concern including the financial arrangements, governance and exit strategy.
- 6.2 The Council's partnership arrangements are categorised as either "Major" or "Minor" and reviewed on an annual basis. Greater governance requirements are placed on Major partnerships. The categorisation regime is set out in Section 15. This categorisation then determines how this Code is applied. This is laid out in Sections 16 and 17.
- 6.3 The Council's decision-making framework for approving the entering into of a partnership is contained within the Council's Constitution. Part 3 contains the roles and responsibilities of the Executive and the terms of reference of the committees and sub-committees. Part 10 contains the Scheme of Delegation for Officers. Reference should be made to the Constitution to establish what level of decision-making is appropriate for the type, nature and significance of any individual partnership proposed to be entered into.
- 6.4 The template at Appendix 4 provides a tool to help develop new partnership agreements, review existing partnership agreements or develop constitutions where necessary into partnership agreements. It shows the areas that would be expected to be covered by the Agreement. In addition, where a procurement exercise is required to select the partner then specific forms of contract developed for the purpose of partnership working should be considered.
- 6.5 The resulting Partnership Agreement may comprise a short document or something more substantial, depending on the nature of the partnership in question and the complexity of the issues raised by it.
- 6.6 Partnership Agreements for Major partnerships (as defined by this Protocol) should be reviewed at least annually and amended where agreed and appropriate.
- 6.7 For all Major new Partnership Agreements, advice and guidance must be sought from the Solicitor to the Council at the earliest opportunity.

7. ROLE OF COUNCILLORS

- 7.1 There are increasing numbers of bodies that can impact on the lives of local people. Councillors can play an important role in communicating local views to key public and private agencies and in influencing decision making.
- 7.2 It is easy for significant partnerships to allot decisions between powerful agencies and to forget the local public. Councillors play a vital community leadership and representational role in ensuring that local people, individually and collectively, are

not left out of partnership arrangements. It is equally important to involve the service users at the earliest opportunity and at subsequent stages.

- 7.3 There are many types of cross-agency partnership arrangements at a neighbourhood level and councillors will need to represent local views and the interests of citizens and users effectively to the relevant partnerships.
- 7.4 Importantly, a councillor might well be the only person in a partnership with democratic accountability and thus has a duty to be very careful about what public money is used for.
- 7.5 Generally, it is members who will sit on partnerships, not officers.
- 7.6 The general roles of Members (and officers) who are assigned to Partnerships are detailed at Appendix 5. In addition, the Solicitor to the Council provides guidance for Members sitting on outside bodies. More specific advice should be sought from the Solicitor to the Council where deemed appropriate.

8. OFFICER SUPPORT

- 8.1 It is important for the right level of support to be available for partnerships and for Members who are involved in partnerships on behalf of the City Council.
- 8.2 The initial point of contact for a Member who requires any support in their partnership role is the relevant Chief Officer or Head of Service.
- 8.3 Officer support can come in three forms:

TRAINING	ADMINISTRATIVE SUPPORT	ADVICE & GUIDANCE
<ul style="list-style-type: none"> • Skills development • Advice and guidance on training needs and accountability issues* when working as part of a partnership. 	<ul style="list-style-type: none"> • Updating Partnership Register • Circulating documentation • Writing up minutes and agendas • Organising meetings, venues etc (as appropriate per agreement) 	<ul style="list-style-type: none"> • Specialist knowledge • Advice on legal issues and personal liabilities • Mentoring • Helping with the decision making • Information gathering

*In view of the potential for conflict regarding Members roles (i.e. for the Council as opposed to the Partnership) it is essential that Members are aware of this issue.

9. PARTNERSHIP REGISTER

- 9.1 The Council’s Assistant Chief Executive (Strategy) will hold an online Partnership Register on the Intranet of all partnerships as defined by Section 3 of this Protocol, which is maintained as a comprehensive live record of the Council’s involvement in all partnerships, ie Major or Minor. The Register is to be updated by each Policy Co-ordinator on behalf of their Portfolio(s) and Directorate.

9.2 The purpose of the Register is:

- to allow the Council to monitor and evaluate its involvement in partnerships and identify potential risk and benefits;
- to ensure that the partnerships it is engaged in contribute to the Executive's Strategic Priorities;
- to ensure the partnerships align to quality of life outcomes;
- to be a valuable reference point when entering into new partnership initiatives;
- to reduce the risk of duplication;
- to ensure that appropriate reporting procedures are in place; and
- to enable the Council to direct advice and guidance on training for Members and Officers.

10. FINANCIAL MATTERS

10.1 There is a range of financial issues to consider when setting up a partnership and a number of them are covered below. A flowchart of the specific financial issues to be considered is shown at Appendix 6.

Finance

10.2 Generally, if no finance is directly involved then, in most circumstances, this section of the Guidance could be dispensed with. However, if there is the possibility of the "partnership" committing either City Council Funds or Services or other resources then the implications of this must be considered, eg:

- budget implications and formal approval to incur expenditure against the commitment;
- where any finance is to be exchanged then it is essential, from the outset, that there is delegated authority to spend;
- agree budget monitoring arrangements and reporting; and
- the partnership will also need to establish what happens to overspends and underspends.

Accountable Body

10.3 Normally, where projects are funded by grants, the funding body requires that one of the partners takes on the role of Accountable Body (sometimes this is referred to as 'Host Authority'). The Accountable Body is responsible for the financial administration of the grant and any agreed deliverables / outputs. Accountable Body status can only be granted to an entity which has a "legal personality" for example, a company registered at Companies House, a local authority or health trust.

10.4 If the City Council takes on the role of Accountable Body it "cash flows" (bankrolls) the projects pending receipt of the grant. This generates a small cost to the Council. More importantly, it represents a risk to the Council in the event of the project incurring costs which are not reclaimable from the grant funding body.

10.5 The Accountable Body also implements the partnership's reasonable decisions. This means it will do things like securing and signing contracts or service level agreements and paying out funds. This involves:

- administering and taking responsibility for the funding;

- providing resources (eg staff, facilities) to carry out the obligations of the partnership (Inc. procurement, finance, information systems support);
 - ensuring that the grant allocated is spent according to the agreed plan; and
 - establishing and maintaining effective systems for monitoring and auditing spend.
- 10.6 In order to qualify as, or be appointed, an Accountable Body, the organisation must be:
- nominated to act on behalf of the partnership;
 - a legal entity; and
 - capable of meeting legal obligations.
- 10.7 An Accountable Body may either be the partnership itself (if it has formed a company limited by guarantee) or one of the members of the partnership acting on behalf of the rest of the partners
- 10.8 In principle, the City Council will consider being the Accountable Body subject to a risk assessment of the responsibilities applying to being Accountable Body.
- 10.9 Before taking on the role of Accountable Body there must have been prior approval of the Executive Director for Resources and Solicitor to the Council, and Cabinet where deemed appropriate.

Pooled Budget

- 10.10 A “pooled budget” is purely an amount of money placed in a common fund comprising contributions made by each partner. However, where partnerships include a partner from a health trust then reference is sometimes made to two types of pooled budget:
- ‘Parallel Budget’ with discretely identifiable resources – where contributions made to the “pool” do not lose their identity to the funding partners, i.e. expenditure is separately accounted for against each individual contribution to the pool.
 - Pooled Budget – where on pooling, all resources will lose their identity to the funding partner.

In most cases ‘pooled budgets’ tend to be of the macro type as referred to above.

- 10.11 From the outset, agreement must be reached on each partner’s financial contribution to the partnership as well as deciding who will administer the pooled budget, including authority to agree and authorise expenditure.

Financial Reporting

- 10.12 It is essential that regular monitoring reports are produced and reported to the Policy Co-ordinator and/or Lead Executive Director for the particular partnership as an aid to good financial management; your Finance Manager will determine the frequency and style of reports and therefore consultation with him/her is essential. This is particularly important where the City Council is the Accountable Body.

Procurement Procedures

- 10.13 The selection of partners/stakeholders/voluntary organisations to participate in a partnership usually needs to be underpinned by a procurement process as set out in the Council’s Contract Procedure Rules. Examples of scenarios where this is not required are:

- where there is no exchange of funds or other resources (eg information sharing only);
- where the Council is providing grant (eg this would not apply where funding depends upon detailed specified requirements); and
- where it is permitted, required or encouraged by law (eg joint committees, pooled budgets and Integrated Services with Health Trusts).

As this area can be complex and legal challenges can arise, the view of the Council's Corporate Procurement Unit should be sought before any discussions are held with potential partners.

- 10.14 As any funds from the Council are public money then the procurement framework of the partnership should be comparable to the Council's. The proposed arrangements must be agreed with the Council's Head of Property and Procurement. Where the Council is the Accountable Body the Council's Contract Procedure Rules must be complied with (regardless of funding source).

VAT

- 10.15 VAT is a complicated area and advice must be sought from the VAT Team and Executive Director for Resources. Without proper adherence to VAT legislation the "partnership" may find that its funding is less than expected, and if VAT rules are not followed this might mean that interest and penalties have to be paid. Again, seek advice from your VAT team.

Audit Requirements

- 10.16 From the outset, the "partnership" agreement must provide both internal and external auditors with full rights of access to documents. The wording should read:

'The City Council's external auditors may conduct audits at any time in accordance with any relevant statutory powers including the Audit Commission Act 1998. The Partnership will ensure that external auditors are given access at all reasonable times to premises, personnel, documents and assets which the external auditors consider necessary for the purposes of their work.'

The City Council's internal auditors may conduct audits in accordance with their responsibilities. The Partnership shall ensure that internal auditors are given access at all reasonable times to premises, personnel, documents and assets that the auditors consider necessary for the purposes of their work.'

The Partnership will ensure that auditors are provided with any information and explanations that they seek in the course of their work.'

The City Council shall use its reasonable endeavours to ensure that the conduct of any audit does not unreasonably disrupt the Partnership or delay the provision of its Services.'

Document Retention

- 10.17 It will need to be established who is going to be responsible for holding documents and for that party to be aware of the legal requirements of retaining documents for various statutory and grant body requirement periods. The ownership of documents at the end of the partnership must also be established. Seek advice from your Finance Manager and the Solicitor to the Council as necessary.

Grants

- 10.18 Quite often, grants form the main funding for partnership arrangements and the terms and conditions of those grants, including document retention, must be clear.
- 10.19 It is important, also, to consider who is to become the Accountable Body as referred to above and the possibility of mainstreaming the service should the service continue beyond the grant funding period (in such cases, there is the possibility that Members should be consulted in advance). It is also necessary to avoid the potential claw back of any grant monies. In this respect seek advice from your Finance Manager.

Limiting Liabilities

- 10.20 Throughout the planning and implementation stages of the partnership, there must be thorough and comprehensive attention to the liability issues for the City Council.
- 10.21 In the first instances, legal advice must be sought. Considerations include:
- infringement of legislation by staff or members of the partnership;
 - if staff are paid from petty cash, this is a contravention of Inland Revenue regulations;
 - the City Council needs to be indemnified against any actions that a partner (or partnership) may take; and
 - personal liability of officers and members.

Liability

- 10.22 Invariably, partnership arrangements are often set up as a result of Government initiatives, and funding is usually by way of a grant for, say, three or four years. Upon cessation of the grant, central Government often expects local authorities or other organisations to mainstream these projects (if evaluation indicates successful outcomes) into its normal day-to-day business and the City Council must be fully aware, therefore, of any potential funding shortfalls, loss of assets, etc.
- 10.23 In addition to the above, a clear exit strategy needs to be in place for both the planned and unplanned cessation of a partnership arrangement. Seek appropriate advice from the Solicitor to the Council and Executive Director for Resources.
- 10.24 In terms of accountability, it is essential that a Budget Holder is appointed to the “partnership” with clearly defined duties and responsibilities.

11. EMPLOYMENT AND SECONDMENT OF STAFF FOR THE PARTNERSHIP

- 11.1 When employing staff both part-time and full-time, there are many issues which need to be handled carefully; it is therefore essential that the Head of Organisational Development and directorate HR teams are consulted at the outset.
- 11.2 When a partnership (which is not a legal entity) ‘employs’ staff, one partner should act as the employer. This should be detailed in the Partnership Agreement and confirmation should be obtained from the “employer” that their insurances extend to cover the actions of the “employee” in connection with the partnership.
- 11.3 Where the Council is to be the Employer then the Council’s Human Resources Policies and Procedures must be followed (eg recruitment and selection) and the

employee will be required to comply with the Council's policies and procedures, eg health and safety, etc.

- 11.4 Where Council staff are deemed as an "in-kind contribution" from the Council to the partnership (which is not a legal entity) and to those contributing as part of their duties, a clear agreement needs to be drawn up between the Council and the partnership clarifying the line management arrangements and the services to be provided by the officer(s).
- 11.5 The flowcharts at Appendix 7 and 8 will help to ensure that the Partnership Agreement covers the appropriate issues linked to the employment and secondment of staff.
- 11.6 In the case of volunteers, a lead organisation or body must be appointed to take responsibility for matters such as insurance, training and support, as well as being overall legally responsible for the activities and management of any volunteers.
- 11.7 For employed staff and volunteer staff – security checks with the Criminal Records Bureau must be carried out by the lead employer if working with children and vulnerable adults.

Specific Issues re the Secondment of Staff

- 11.8 In the case of seconding staff to the partnership, a clear agreement must be drawn up between partner organisations. Secondment agreements can be complex and give rise to liabilities – advice must be sought from HR in the first instance. The flowchart at Appendix 8 is designed to ensure these issues are considered properly, however this is a complex process, and all stages must involve your HR team.

12. INFORMATION SHARING

- 12.1 Information is an asset and it is important that responsibility for information is assigned and appropriate controls are put in place. This section only applies to partnership arrangements which involve the sharing, storing, generating, analysing or collecting of information.
- 12.2 The Solicitor to the Council provides guidance on aspects such as:
 - legal compliance - Data Protection Act, Freedom of Information Act (disclosure), Copyright - software licensing, databases;
 - information standards - to facilitate sharing;
 - records management - creating an inventory, managing the lifecycle of records from creation to disposal;
 - security - classification of information including risk management, business continuity; and
 - the Council's Information Management Strategy
- 12.3 When developing Information Sharing Codes, consideration should be given to:
 - working codes will need to be specific to the particular operational requirements arising from the client group concerned and should be developed with the support of relevant professionals and representatives of the client group;

- the partnership may choose to develop the code themselves or to commission someone to draft the code for their comment;
- the person or group responsible for developing the protocol should consult with all partners and stakeholders with a view to the adoption of a common format and common or integrated procedures where appropriate;
- reviewing codes developed for the same user group elsewhere or for other user groups can shorten the development process, but should be done with a clear understanding of the local requirements and environment; and
- a flowchart for identifying the operational circumstances which influence information exchange is at Appendix 9.

13. COMMUNICATION

- 13.1 All partnerships should designate an organisation to lead on communications. Communication plans should be developed to support the effective promotion of the outcomes of the partnership and the benefits this has on the community. All Communication should have reference to the local authority publicity code. A Communications Strategy Planning Template is at Appendix 10.

14. BRANDING AND IDENTITY

- 14.1 The City brand of creativity and innovation should be embedded into all partnership work. Promotion of how the partnership is contributing to the overall city brand should be considered and used as appropriate.
- 14.2 Some partnerships require a new identity to establish it as separate from the organisations within it. If this is the case then the established Southampton City identity elements of font and colours should be used. More information is available from the Graphics Manager on Ext. 2720.

15. RISK MANAGEMENT

- 15.1 Effective risk management is a 'discipline for dealing with uncertainty' and is one of the principle elements of good Corporate Governance. It is concerned with both the positive and negative aspects of risk and comprises a framework and process to enable a partnership or an organisation to manage uncertainty in a systematic, effective and efficient way.
- 15.2 In all types of partnerships there is the potential for events and outcomes to take the form of threats that may have a significant adverse effect on the success of the partnership or of opportunities that may be able to be exploited.
- 15.3 Risk management is not about being risk averse but is concerned with ensuring that significant risks are identified and understood thereby enabling the partnership to make informed decisions regarding how risks should be treated.
- 15.4 There may be organisational risks regarding partnership activities (strategic) as well as risks in the partnership itself (operational) and it is important that both types of risk are understood and managed.
- 15.5 The purpose of risk management in relation to partnership working is to:

- ensure that all partners are aware of and understand the nature and extent of the key risks that they face both individually and as part of the partnership; and
- that there is a shared commitment to effectively manage the key risks to ensure the partnership’s objectives are achieved.

15.6 Appendix 11 contains more detailed guidance in this area.

16. CATEGORISATION SYSTEM

- 16.1 The Council’s partnerships are categorised as either “Major”, or “Minor” as specified by Solicitor to the Council, the Risk and Assurance Manager and the Strategic Partnerships Manager. This categorisation is reviewed on an annual basis.
- 16.2 The “Major” partnerships are listed in Appendix 1 of the Toolkit to this Code. Major partnerships are identified as those charged with developing specific strategies or plans and are ‘held to account’ for the delivery of those strategies or plans. In addition, these partnerships might also be responsible for delivering key initiatives and come under some form of audit/inspection regime. These “Major” partnerships will be subject to the Code in 2009/10.
- 16.3 A “Minor” partnership will considered to be all other partnerships falling outside of the list in Appendix 1..
- 16.4 The Solicitor to the Council and the Risk and Assurance Manager may re-categorise partnerships regardless of the above to reflect complicated or high-risk partnerships.
- 16.5 Any categorisation may be varied from time to time to reflect changing circumstances

17. APPROVAL ARRANGEMENTS

- 17.1 The Chief Officer leading on each partnership shall be responsible for ensuring that the Governance Requirements are met.
- 17.2 Partnerships must adhere to the Council’s Code of Corporate Governance in the absence of any statutory or other alternative provisions relating to them. Depending upon their nature, circumstances and size the Code of Corporate Governance will be applied consistently but proportionately, again depending upon the above criteria.

18. APPROVAL PROCESS

- 18.1 The terms “Partner Approval Checklist” means the Partnership Need Checklist in Appendix 2, the Risk Assessment Checklist in Appendix 11 and the Detailed Assessment in Appendix 3.

Where?		Minor	Major
		Appendix 2	Partnership Approval Checklist – partnership need
Appendix 11	Partnership Approval Checklist – risk assessment	✓ at a basic level	✓

Where?		Minor	Major
		Appendix 3	Partnership Approval Checklist – Detailed assessment and other considerations
Appendix 3	Partnership Approval Checklists require approval by relevant Head of Service	✓	✓
Appendix 3	Partnership Approval Checklists require approval by Executive Director		✓
Appendix 3	Partnership Approval Checklists require clarification of membership, frequency of meetings, delegation and decision making arrangements		✓
Appendix 3	Partnership Approval Checklists require approval by Executive Director for Resources (Section 151 Officer) or nominated representative and Solicitor to the Council (Monitoring Officer) or nominated representative		✓
Appendix 3	Partnership Approval Checklists may require approval by the Southampton Partnership (City of Southampton’s local strategic partnership) as directed by the Assistant Chief Executive (Strategy)		✓
Appendix 3	Partnership Approval Checklists may require approval by the Executive or, if required constitutionally, by Full Council as determined by the Solicitor to the Council (Monitoring Officer)		✓
Data Quality Policy & Strategy	Compliance with requirements in Data Quality Policy and Strategy relating to partnerships by self-assessment	✓	
Data Quality Policy & Strategy	Compliance requires approval by Executive Director		
Data Quality Policy & Strategy	Compliance requires approval from the Assistant Chief Executive (Strategy)		✓