

GRANT-MAKING POLICY

THE TWEED FAMILY CHARITABLE FOUNDATION

A charity in England and Wales pending registration by the Charity Commission

1. About this policy

- 1.1 This policy applies to **THE TWEED FAMILY CHARITABLE FOUNDATION** (the “**Charity**”), a charity pending registration in England and Wales.
- 1.2 The charitable objects of the Charity are for the public benefit to advance young people up to the age of 30 in life by providing grants of financial assistance to organisations which act as a resource for young people by providing advice and assistance and organising programmes of physical, educational and other activities as a means of:
- (a) advancing in life and helping young people by developing their skills, capacities and capabilities to enable them to participate in society as independent, mature and responsible adults;
 - (b) advancing education;
 - (c) relieving unemployment; and
 - (d) providing recreational and leisure time activity in the interests of social welfare with a view to improving their conditions of life.

(the “**Objects**”).

- 1.3 The Charity is governed by the charity trustees of the Charity (the “**Charity Trustees**”) who have a duty, acting at all times in the best interests of the Charity, to apply the Charity's assets to advance the Objects and have ultimate responsibility for all grant-making decisions.
- 1.4 The purpose of this policy is to set out the principles and procedures that guide the Charity Trustees when they are making grants to further the Objects. It also provides information about the Charity's grant-making process to anyone who is applying to the Charity, or would like to apply to the Charity, for a grant.
- 1.5 In this policy references to persons who are "connected" with a Charity Trustee mean:
- (a) a child, stepchild, grandchild, parent, brothers or sister of a Charity Trustee;
 - (b) the spouse, unmarried partner or civil partner of a Charity Trustee or of any person falling within paragraph (a) above;
 - (c) any person who is in a business partnership with a Charity Trustee or any person who is in a business partnership with any person falling within paragraph (a) or (b) above; and
 - (d) any company, business, trust or organisation in which a Charity Trustee (or any other person connected to them) has an interest as a beneficiary or through ownership, control or influence.

2. Our funding priorities

- 2.1 The Charity Trustees are keen to support activities that advance the Objects in an effective way. However, they recognise that a limited amount of funds is available to distribute each year. The Charity Trustees' current funding priorities are to provide support for organisations (see clause 3 below) which, in the Charitable Trustees' opinion, are established and well organised and can demonstrate that they are making a positive difference to the advancement of education of

individuals under the age of 30, with greater weight being given to organisations who support teenagers.

2.2 The Charity Trustees will not normally support:

- (a) individuals or organisations applying on behalf of specific individuals;
- (b) statutory bodies including but not limited to universities, colleges, schools, nurseries, playgroups or creches;
- (c) one-off events such as holidays, festivals and concerts;
- (d) the promotion of charitable purposes which fall outside the advancement of education.

2.3 The Charity Trustees will occasionally award grants that fall outside the priorities stated in this policy, provided that they are satisfied that the grant will further the Objects and is an appropriate use of the Charity's funds.

2.4 The Charity Trustees will review the grant-making priorities and principles set out in this policy annually.

3. Who can apply for a grant

3.1 The Charity Trustees welcome proposals that support their funding priorities from organisations.

3.2 The Charity Trustees will only award grants to organisations based in the United Kingdom (the "UK") that either:

- (a) are registered as charities with the Charity Commission for England and Wales or qualify as charities under the law of England and Wales, but are not required to register with the Charity Commission for England and Wales; and
- (b) have an annual income of less than £1,000,000.

However, the Charity Trustees will also consider proposals from non-charitable organisations that are established in the UK.

3.3 The Charity Trustees will not usually award grants to an applicant that has:

- (a) previously submitted an unsuccessful proposal to the Charity; or
- (b) received a grant from the Charity at any time during the immediately preceding financial year of the Charity; or
- (c) already incurred the costs for which it is seeking a grant.

4. What we will fund

4.1 The Charity Trustees usually make grants of between £5,000 and £30,000.

4.2 All grants awarded by the Charity must be used to cover costs that are directly connected to carrying out the charitable activities that the Charity Trustees have agreed to fund (the "**Funded Activities**"). Unless the applicant is able to demonstrate that the expenditure is essential for, and directly linked to, the Funded Activities, grants must not be used to fund any of the following types of expenditure:

- (a) salary costs; and/or
- (b) capital expenditure (the applicant must also be able to demonstrate that any assets acquired using grant monies will be used for similar purposes after the end of the Funded Activities); and/or
- (c) contributions to the cost of overheads.

4.3 The Charity Trustees will award grants to fund up to 100% of the cost of a proposal. However, the Charity Trustees:

- (a) will consider funding part of the cost of a proposal where the total cost is shared with one or more other funders;
- (b) encourage applicants to seek additional sources of funding for their proposal; and
- (c) will consider funding on-going grants (to be paid in instalments) to support the organisation for an agreed period of up to three years. Such instalments will cease if any of the conditions outlined in clause 10 below apply.

4.4 If a grant covers part of the cost of a proposal, the Charity Trustees may require the applicant to provide details of the other funder(s) and the funding that they have secured or applied for (including any loans or other commercial funding).

5. How to apply for a grant

5.1 All grant proposals must be submitted using a short online form that can be accessed through the Charity's website (www.tweedfamilycharitablefoundation.org.uk).

5.2 Proposals which the Charitable Trustees feel warrant further consideration (because they advance one or more of their funding priorities) will be sent an application form to complete and return by email by a particular date (the "**Closing Date**"). The Closing Date will be advertised on the Charity's website.

5.3 Proposals must explain in detail how the grant will be used and put forward a strong case for support. In particular, a proposal must:

- (a) demonstrate how the activities funded by the grant will benefit the intended beneficiaries;
- (b) set out how use of the grant will be managed and how the benefits will be measured;
- (c) give details of the key individual(s) who will be responsible for the management of the grant and delivering the proposed activities;
- (d) provide a budget for the proposed activities; and
- (e) give details of any other funding that has been awarded or that is being sought for the activities to be funded by the grant.

5.4 If the application is made by or on behalf of an organisation, the following must also be provided with the proposal:

- (a) a complete, up-to-date copy of the organisation's governing document;
- (b) if the organisation is a UK charity:

- (i) its registered charity number(s) as issued by the Charity Commission for England and Wales, the Office for the Scottish Charity Regulator and/or the Charity Commission for Northern Ireland; and/or
 - (ii) if it is a charity under the law of England and Wales that is not required to register with the Charity Commission for England and Wales (because it is either an exempt or excepted charity, or has income below the registration threshold), evidence of its charitable status (such as an HMRC reference number);
- (c) the organisation's most recent set of accounts.

5.5 If the applicant is a non-charitable organisation the proposal must also demonstrate that all of the activities in the proposal will qualify as being charitable for the public benefit if they are undertaken by an organisation that is registered as a charity in England and Wales.

6. How we make decisions about grants

6.1 The Charity Trustees have ultimate responsibility for all grant-making decisions and for ensuring that all funds awarded are used to advance the Objects.

6.2 The Charity Trustees must declare the nature and extent of any interest, direct or indirect, which could, or could be seen to, prevent them from making a grant decision only in the best interests of the Charity. Situations in which a conflict of interest may arise include where:

- (a) a Charity Trustee (or a person connected to them) stands to benefit from a grant from the Charity (see clause 7 (Grants to Charity Trustees or connected persons)); or
- (b) a Charity Trustee has a duty of loyalty to a third party that conflicts with their duty to the Charity.

Any such conflict of interest must be declared and managed by the Charity Trustees.

6.3 The Charity Trustees may delegate certain decision-making responsibilities in accordance with the Charity's scheme of delegation. In particular:

- (a) individual Charity Trustees may be asked to review grant proposals and make recommendations to the Charity Trustees; and
- (b) before deciding to award a grant, the Charity Trustees may ask anyone they consider has relevant expertise or experience to provide them with information and to join in their discussions, but not to take any part in the final decision.

6.4 In all cases where a recommendation is made to them to award a grant, the Charity Trustees may (in their absolute discretion) refuse to approve that recommendation, particularly if they consider that a grant would not be an effective way to further the Objects, or would conflict with the Charity's policies or interests.

6.5 The Charity Trustees may take up to six months to consider grant proposals and decide if they will award a grant or not. The Charity Trustees intend to hold two meetings per annum during which they will consider applications for grants.

6.6 The Charity Trustees will inform applicants of their decision in writing.

6.7 If an applicant is awarded a grant, the Charity Trustees will:

- (a) set out the key terms of the grant and any conditions that are attached to it in a grant letter; and
- (b) ask the applicant to sign the grant letter to indicate that they accept the terms and conditions.

6.8 If the Charity Trustees decide not to award a grant for a proposal the Charity Trustees are not obliged to give the applicant reasons for their decision.

6.9 The Charity Trustees' decision whether to award a grant is final.

7. Grants to charity trustees or connected persons

7.1 Clause 28 of the Charity's trust deed authorises a Charity Trustee or any person connected to them to receive a benefit from the Charity as a beneficiary of the Charity, provided that the benefit is permitted by sub-clause 28.2 of the trust deed (a loan at a reasonable and proper rate) or authorised by the Charity Commission.

7.2 If an application for a grant is made to the Charity by a Charity Trustee, or a person connected to them, the non-conflicted Charity Trustees must therefore either:

- (a) reject the application; or
- (b) if they consider that it is in the best interests of the Charity to make the grant, seek authorisation from the Charity Commission before making it.

7.3 If a Charity Trustee, or a person connected to them, applies for a grant the conflicted Charity Trustee must:

- (a) declare the nature and extent of any interest, direct or indirect, which he or she has in a proposed grant;
- (b) absent themselves from any discussion of the grant application by the non-conflicted Charity Trustees; and
- (c) have no vote and not be counted as part of the quorum in any decision of the non-conflicted Charity Trustees on the grant.

8. Due diligence

8.1 When the Charity Trustees are considering a grant-funding proposal, they will undertake due diligence checks on the applicant. The checks that are undertaken will vary according to the Charity Trustees' assessment of any risks associated with the proposal or the applicant.

8.2 Due diligence may include requesting details of, and taking such steps as the Charity Trustees consider to be reasonable to scrutinise, any of the following:

- (a) the applicant's governing documents;
- (b) if applicable, the applicant's status as a charity, including (where it is required to do so) evidence that the applicant has been registered with a charity regulator;
- (c) the applicant's latest accounts and financial position;

- (d) the identity of the applicant's directors, trustees, executive committee or other key personnel, in particular, to seek to establish whether they are authorised to act in that capacity;
- (e) the applicant's governance and operational structures and practices;
- (f) the applicant's internal financial controls;
- (g) relevant operational policies and procedures that the applicant has in place;
- (h) the applicant's aims and values; and
- (i) any external risk factors that might affect the proposal.

8.3 In cases where the applicant will receive support from another funder, or works with a partner, the Charity Trustees may undertake due diligence on that funder or partner.

8.4 The Charity Trustees will keep a written record of any due diligence that they undertake.

9. Reporting requirements and monitoring

9.1 The Charity Trustees will take steps to monitor the use of the grant and verify that the grant is used for the purposes that have been agreed. The arrangements for monitoring will vary according to the nature of the grant, but the Charity Trustees will always seek to ensure that the arrangements are appropriate and proportionate.

9.2 Arrangements for monitoring use of the grant may include asking the recipient to provide any of the following:

- (a) copies of formal records such as receipts, invoices, bank statements and management accounts to show that funds have been used for the purpose for which they have been awarded and in accordance with the terms of the grant;
- (b) regular written or verbal updates showing progress to date, summarising key achievements or problems encountered, indicating whether targets have been met and giving reasons for any delay in implementing work funded by the grant;
- (c) a final written report on completion of the work funded by the grant, showing how funds have been spent, evaluating where the work has been successful and identifying lessons that can be learnt; and
- (d) information about any proposed changes to the proposed activities.

9.3 If appropriate, the Charity Trustees may also visit grant-funded activities and interview individuals involved in running those activities.

9.4 Basic monitoring requirements will be set out in the grant letter. However, the Charity Trustees may take any additional steps to monitor the use of grant funds that they consider appropriate.

10. Clawback and repayment

The Charity Trustees may require repayment of all or any part of the grant if:

- (a) the project or purpose for which it was awarded does not proceed;
- (b) part of the grant remains unused when the activities that the grant was intended to fund have been completed; or

(c) the grant is used for a purpose other than that which has been agreed.

11. Reviewing and amending this policy

11.1 This policy will be reviewed by the Charity Trustees at least annually.

11.2 The Charity Trustees may vary the terms of this policy from time to time.