





## **THE COMMUNITY OF ALL HALLOWS**

Registered Charity No. 230143 (England & Wales) and SC048259 (Scotland)

### **GRANT-MAKING POLICY**

**Adopted by the Charity Trustees on 17 March 2020**

**[Last reviewed on 17 March 2020]**

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## 1. About this policy

1.1 This policy applies to The Community of All Hallows (**Charity**), a charity registered in England and Wales (number 230143) and in Scotland (SCO number 48259)

The charitable objects of the Charity (**Objects**) are the service of God in the faith of their Lord and Master Jesus Christ by prayer and worship, by humility and love, and by using their gifts in charitable works such as the following:-

- (a) the training and support of others in the Christian life and working with others to forward the unity and mission of the Christian Church;
- (b) the provision of facilities and teaching for promoting the general education, on Christian principles, of persons of all ages in the United Kingdom and abroad; and
- (c) the care and relief of persons who are sick, infirm or in conditions of need, hardship and distress..

1.2 The Charity is governed by a corporate trustee of the Charity (**Charity Trustee**) which has 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.

1.3 The purpose of this policy is to set out the principles and procedures that guide the Charity Trustee when it is 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.

1.4 In this policy references to persons who are "connected" with the Charity Trustee mean:

- (a) a child, stepchild, grandchild, parent, brothers or sister of a director of the Charity Trustee;
- (b) the spouse, unmarried partner or civil partner of a director of the Charity Trustee or of any person falling within paragraph (a) above;
- (c) any person who is in a business partnership with a director of the 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 director of the Charity Trustee (or any other person connected to it) has an interest as a beneficiary or through ownership, control or influence.

## 2. Our funding priorities

2.1 The Charity Trustee is 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 Trustee currently maintains two funds, a General Grants Fund (**GGF**) and a Medical Grants Fund (**MGF**). The Charity Trustee's current funding priorities are:

## **GGF** – support for

- (a) Other Religious communities or retreat houses in need of additional funding
- (b) Christian organisations with environmental concerns, especially for specific projects
- (c) Christian organisations involved with education in its broadest sense especially to benefit those with limited resources (e.g. music/drama/arts pursuits)
- (d) Projects to benefit the poor and needy (e.g. refugees, immigrants and inner cities)

**MGF** - support for the relief of persons of either gender, without regard to either race or creed, while suffering from any terminal or life-threatening illness, or from any disability or disease, attributable to old age or from any other physical or mental infirmity, disability or disease, in such ways as the Charity Trustee shall from time to time think fit

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

2.3 The Charity Trustee 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 Trustee welcomes proposals that support their funding priorities from organisations and individuals, although the Charity Trustee is particularly keen to support other charities.

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

- (a) are registered as charities with the Charity Commission for England and Wales, the Office of the Scottish Charity Regulator and/or the Charity Commission for Northern Ireland; and/or
- (b) qualify as charities under the law of England and Wales, but are not required to register with the Charity Commission for England and Wales.

However, the Charity Trustee will also consider proposals from charities that are established outside the UK and non-charitable organisations that are established either in the UK or elsewhere.

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

- (a) previously submitted an unsuccessful proposal to the Charity
- (b) previously received a grant from the Charity

### **4. What we will fund**

4.1 The Charity Trustee usually makes grants of up to £5,000.

4.2 Grants can be used either to cover costs that are directly connected to carrying out the charitable activities that the Charity Trustee has agreed to fund or to fund expenditure on the following

- (a) salary costs;

- (b) capital expenditure, provided the applicant is able to demonstrate that the expenditure is essential to the charitable activities that the Charity Trustee has agreed to fund and that any assets acquired using grant money will be used for similar purposes after the end of the proposed activities;
  - (c) contributions to the cost of overheads, provided that the applicant is able to demonstrate that such overhead costs are essential for, and directly linked to, the charitable activities that the Charity Trustee has agreed to fund; and
- 4.3 The Charity Trustee will award grants to fund up to 100% of the cost of a proposal. However the Charity Trustee:
- (a) will consider funding part of the cost of a proposal where the total cost is shared with one or more other funders; and
  - (b) encourage applicants to seek additional sources of funding for their proposal.
- 4.4 If a grant covers part of the cost of a proposal, the Charity Trustee 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 made in writing. 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 and advance one or more of the funding priorities;
  - (b) set out how use of the grant will be managed;
  - (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;
  - (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; and
- 5.2 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) if the organisation is a charity established outside the UK, evidence:

- (i) of its charitable status. This might, for example, include evidence of registration with a non-UK charity regulator and/or written confirmation from an appropriately qualified professional that the organisation is established as a charity in the relevant jurisdiction; and
- (ii) 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.

(d) the organisation's most recent set of accounts; and

5.3 If the applicant is a non-charitable organisation the proposal must also:

- (a) provide evidence that the organisation has a bank account with at least two unrelated signatories; and
- (b) 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 Trustee has ultimate responsibility for all grant-making decisions and for ensuring that all funds awarded are used to advance the Objects.

6.2 A director of the Charity Trustee must declare the nature and extent of any interest, direct or indirect, which could, or could be seen to, prevent it 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 director of the Charity Trustee (or a person connected to them) stands to benefit from a grant from the Charity (see paragraph 7 (Grants to Charity Trustees or connected persons)); or
- (b) a director of the 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 Trustee in accordance with the Charity's conflicts of interest policy.

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

- (a) the Charity Trustee has appointed a grants committee to review grant proposals and make recommendations to it;
- (b) an individual director of the Charity Trustee and/or members of the Charity's staff may be asked to review grant proposals and make recommendations to the Charity Trustee; and
- (c) before making a decision to award a grant, the Charity Trustee may ask anyone it considers has relevant expertise or experience to provide it with information and to join in its discussions, but not to take any part in the final decision.

6.4 In all cases where a recommendation is made to it to award a grant, the Charity Trustee may (in its absolute discretion) refuse to approve that recommendation, particularly if it considers 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 Trustee may take up to six months to consider grant proposals and decide if it will award a grant or not.
- 6.6 The Charity Trustee will inform applicants of its decision in writing.
- 6.7 If an applicant is awarded a grant, the Charity Trustee 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 Trustee decides not to award a grant for a proposal the Charity Trustee is not obliged to give the applicant reasons for its decision.
- 6.9 The Charity Trustee's decision whether to award a grant is final.

## **7. Grants to charity trustees or connected persons**

- 7.1 Nothing in the Charity's articles of association authorises a Charity Trustee or any person connected to them to receive a benefit from the Charity as a beneficiary of the Charity.
- 7.2 If an application for a grant is made to the Charity by a director of the Charity Trustee, or a person connected to them, the non-conflicted directors of the 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 director of the Charity Trustee, or a person connected to them, applies for a grant the conflicted director of the Charity Trustee must:
- (a) absent themselves from any discussion of the grant application by the non-conflicted directors of the Charity Trustee; and
  - (b) have no vote and not be counted as part of the quorum in any decision of the non-conflicted directors of the Charity Trustee on the grant and
  - (c) follow the procedures set out in article 7 of the charity's articles of association authorising a director of the Charity Trustee or any person connected to it to receive a benefit from the Charity as a beneficiary of the Charity.

## **8. Due diligence**

- 8.1 When the Charity Trustee is considering a grant-funding proposal, it will undertake due diligence checks on the applicant. The checks that are undertaken will vary according to the Charity Trustee's 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 Trustee considers 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, for example, in relation to safeguarding children and vulnerable adults, and on equality and diversity;
- (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 Trustee may undertake due diligence on that funder or partner.

8.4 The Charity Trustee will keep a written record of any due diligence that it undertakes.

## **9. Reporting requirements and monitoring**

9.1 The Charity Trustee 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 Trustee 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 Trustee 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 Trustee may take any additional steps to monitor the use of grant funds that it considers appropriate.

## **10. Clawback and repayment**

The Charity Trustee 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 Trustee at least annually.

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

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