



GRANT-MAKING POLICY

JORDAN SINNOTT FOUNDATION TRUST

A registered charity in England and Wales number 1196831

Adopted by the Charity Trustees on 22 November 2021



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1. About this policy

1.1 This policy applies to Jordan Sinnott Foundation Trust (**Charity**), a charity registered in England and Wales, registered number **1196831**.

1.2 The charitable objects (Objects) of the Charity are:

The relief of those who are in need, particularly children and young people, by reason of sickness or disability, financial hardship or social and economic circumstances, including by the provision of grants to fund items such as sports equipment, club membership or training facilities for those who cannot afford them.

To help young people, by means of sport and healthy recreation, to develop their capabilities and fulfil their potential as individuals and members of society.

1.3 The Charity is governed by the charity trustees of the Charity (**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:

- (a) Individuals, in order to fund access to sports and to enable them to further their progress in sport where they cannot afford it.
- (b) Grass-roots sports teams for young persons, as long as they are organisations that are registered charities or CASCs.

- (c) Projects that enable social inclusion for young persons in need through sport and heathy recreation.

2.2 The Charity Trustees will not normally support:

- (a) Any activity that does not fall within the Objects;
- (b) Sports teams that are selective and do not allow access to those of limited means;
- (c) Privately-owned or profit-distributing entities;
- (d) Anything that risks damage to the reputation of the Charity.

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 at least every 3 years.

3. Who can apply for a grant

3.1 The Charity Trustees welcome proposals that support their funding priorities from, organisations individuals and other charities that further the Charity's Objects, although the Charity Trustees are particularly keen to support those outlined in 2.1

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

- (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; 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; or
- (c) are Community Amateur Sport Clubs (CASCs); or
- (d) are not-for-profit organisations directly furthering the Charity's Objects.

However, the Charity Trustees 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 Trustees will not usually award grants to an applicant that has:

- (a) previously submitted a proposal where the applicant failed the Charity Trustees' due diligence checks and the issues identified at that time have not been addressed;
- (b) not been able to demonstrate a level of need that fits within the Charity's Objects;
- (c) received a grant from the Charity at any time during the immediately preceding financial year of the Charity.

4. What we will fund

- 4.1 The Charity Trustees usually make grants of between of up to £500 for individuals and up to £5000 for clubs, teams, and groups.
- 4.2 Grants can be used either to cover costs that are directly connected to carrying out the charitable activities that the Charity Trustees have 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 Trustees have agreed to fund and that any assets acquired using grant money will be used for similar purposes after the end of the proposed activities; and
- 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 matched or additional sources of funding for their proposal; and
 - (c) consider the use of loans rather than grants in appropriate situations.
- 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 made in writing using the application form on the Charity's website. 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, including contact details;
 - (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.
- 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; 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 social enterprise or CASC:
 - (i) evidence of its registration with the relevant regulator; and
 - (ii) evidence of its tax status (such as an HMRC reference number).
- (d) 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; and
- (e) the organisation's most recent set of accounts.

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 and that they fall within the Charity's Objects.

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 paragraph 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 in accordance with the Charity's conflicts of interest policy.

6.3 The Charity Trustees may delegate certain decision-making responsibilities. In particular:

- (a) the Charity Trustees have appointed a grants committee of three Charity Trustees to review grant proposals and make recommendations to the main Board of Charity Trustees;
- (b) individual Charity Trustees and/or members of the Charity's staff may be asked to review grant proposals and make recommendations to the Charity Trustees; and
- (c) before making a decision 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 three months to consider grant proposals and decide if they will award a grant or not.

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 offer letter; and
- (b) ask the applicant to sign the grant offer 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 but may, if requested by the applicant, give the applicant such written feedback on the reasons for their decision as they consider appropriate.

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

7. Grants to charity trustees or connected persons

7.1 Clause 6 of the Charity's Constitution 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 a majority of the Charity Trustees do not benefit in this way.

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 may therefore consider making the grant in accordance with this policy.

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

- (a) absent themselves from any discussion of the grant application by the non-conflicted Charity Trustees; and
- (b) have no vote and not be counted as part of the quorum in any decision of the non-conflicted Charity Trustees on the grant; and

- (c) follow the procedures set out in the Constitution authorising a Charity Trustee or any person connected to them to receive a benefit from the Charity as a beneficiary of the Charity.

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 for an applicant organisation:
- (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 Trustees may undertake due diligence on that funder or partner.
- 8.4 For individual applicants the Charity Trustees shall carry out such due diligence as is appropriate, bearing in mind Data Protection legislation and the Charity's Safeguarding Policy.

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 and its size, 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 offer 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;
- (c) the grant is used for a purpose other than that which has been agreed; or
- (d) there is a suspicion or evidence of fraud in relation to the original application or the use of grant monies. The Charity reserves the right to inform relevant regulatory authorities of any suspicions in this respect.

11. Reviewing and amending this policy

11.1 This policy will be reviewed by the Charity Trustees at least [every three years].

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