



## Grant Making Policy

A registered charity in England and Wales 1191010  
Adopted by the Charity Trustees on 1st January 2021  
Last reviewed on 20<sup>th</sup> May 2025



# Policy Statement

## 1. About this policy

- 1.1 This policy applies to THE CLARE MILNE TRUST (**Charity**), a charity registered in England and Wales (number 1191010).
- 1.2 The charitable objects of the Charity are:
- (a) for the public benefit, to relieve the needs of people living with any physical, learning, mental or sensory disability, or from any other injury or other physical impairment in such ways as the charity trustees see fit from time to time; and
  - (b) such other purposes which are charitable in accordance with the law of England and Wales as the trustees may adopt (**Objects**).
- 1.3 The Charity is governed by the Charity Trustees (**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) To help smaller effective registered charities and other not-for-profit organisations (for example Community Interest Companies (CICs) or community amateur sports club with a constitution) which have good volunteer support (**Recipient Organisations**) in their work in so far as it falls within the Objects defined at clause 2 above. Examples of grants the Charity Trustees have agreed to fund are;



- (i) Buildings projects (including major building projects) provided that the organisation will continue to make use of the building for a number of years.
  - (ii) The provision of facilities, for example, treatment facilities, improvements to residential or day care facilities (including adapted ensuite bedrooms and bathrooms), accessible toilets (in particular Changing Places facilities), access ramps, stair lifts, hearing loops.
  - (iii) The provision of facilities (including where applicable virtual facilities) to enable participation in activities including, for example, wheelchair dancing, wheelchair sports and competition, theatre, music and arts events.
  - (iv) The purchase of equipment, including, for example, wheelchairs, wheelchair adapted boats and vehicles (including cars and coaches) and sports equipment.
  - (v) Employment, educational and vocational training.
  - (vi) Training events, for example, sailing and animal husbandry.
  - (vii) Bursary funding including, for example, for sailing trips, holidays, community transport, dial-a-ride, hospital transport.
- (b) Projects within Devon or Cornwall, however, the Charity Trustees will consider supporting projects centred either nationally or in the wider South West (i.e. to include Dorset and Somerset) if the applicant organisation can demonstrate that there are or will be beneficiaries within Devon and Cornwall.
  - (c) Typically, grants are for part funding, with building project grants usually by way of pledge, conditional on full funding being secured.

2.2 The charity trustees will not normally support:

- (a) Small grants of under £5,000. Such grant applications are referred, as appropriate, to Devon Community Foundation (DCF) and Cornwall Community Foundation (CCF). The Charity makes annual donations to both DCF and CCF to fund smaller grants with awards being made by DCF and CCF in accordance with the charitable objectives of the Charity.
- (b) Grants to individuals, although the Charity will consider applications from organisations which, in turn, make equipment available to individuals.
- (c) Applications from organisations where a high proportion of income (i.e. in excess of 10%) is spent on fundraising. If fundraising is high, the Charity Trustees will require an explanation, including whether there is a likelihood that it will reduce.
- (d) National charities, unless the funding applied for is intended to be used for the benefit of beneficiaries in Devon or Cornwall and the applicant has personnel and resources on the ground able to deliver.
- (e) Medical research projects and alternative medicine.
- (f) Applications for the provision of NHS facilities unless it can be demonstrated that it is for something which would not otherwise be funded and is specifically for the benefit of those with a disability.
- (g) Community based projects such as church halls or mainstream schools with SEN departments unless it can be established that the number of beneficiaries is sufficiently high.



- (h) Applications intended solely to relieve the socially disadvantaged, for example the unemployed, ex-offenders, financial hardship, or care of the elderly.
  - (i) Applications from large organisations or for projects with large budgets.
  - (j) Grants of £15,000 or more to a not-for-profit organisation.
- 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, although the Charity Trustees are particularly keen to support applications from well-managed, effective, small, registered charities and non-charitable bodies based in Devon or Cornwall.
- 3.2 The Charity Trustees will usually 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.
- 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; or
  - (b) received a grant from the Charity within the previous two years.

### 4. What we will fund

- 4.1 The Charity Trustees usually make grants of between £5,000 and £25,000, or, for building projects, £30,000 to £50,000.
- 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;
  - (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 Trustees have agreed to fund.



- 4.3 The Charity Trustees will consider awarding grants to fund up to 100% of the cost of a proposal. However, the charity trustees preference is to:
- (a) fund 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 matched funding for their proposal.
- 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 proposals must be made on the form that can be accessed through the Charity's website and submitted together with a budget, covering letter on headed notepaper and any supporting documentation.
- 5.2 If the application is made by or on behalf of an organisation, the following must also be provided with the proposal:
- (a) 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).
  - (b) If the applicant is a non-charitable organisation the proposal must also:
    - (i) provide evidence that the organisation has a bank account with at least two unrelated signatories; and
    - (ii) 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
    - (iii) A copy of the most recent set of accounts.

## 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.
- 6.3 Any such conflict of interest must be declared and managed by the charity trustees in accordance with the Charity's conflicts of interest policy.
- 6.4 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 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.
  - (c) Following consideration of a grant application at a trustee meeting where the Charity Trustees have agreed in principle to a grant subject to obtaining clarification of an issue or issues, the Charity Trustees may authorise the chair of trustees to make a final decision on whether to grant an award once such clarification has been obtained.
- 6.5 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.
- 6.6 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 agreement; and
  - (b) ask the applicant to sign the grant agreement 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 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.

## 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 and procedures;
  - (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 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) An end of grant 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 agreement. However, the Charity Trustees may take any additional steps to monitor the use of grant funds that they consider appropriate.

## 10. Clawback and repayment

10.1 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.

### Policy Review

V1 3<sup>rd</sup> August 2021

V1.2 24<sup>th</sup> March 2023

V1.3 20<sup>th</sup> May 2025

