



# Grant Making Policy

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## Content

Introduction

Grant Making Process

Guidance to Applicants

- Funding Criteria
- Funding Statutory Services
- Funding Priorities
- Reporting
- Grants to Individuals
- Grants to Organisations
- Ethics
- Use of Funds
- Finance
- Compliance
- Safety
- Property/Assets Created
- Intellectual Property
- Grants to Organisations Outside the UK
- Submission of Applications

Grant Management

- Systems and Procedures
- Trustee Decision Making
- Remedies
- Notification
- Data Protection
- Safeguarding
- Checks and Due Diligence

Promotion

## Introduction

This policy lays out our aims and principles in awarding grants and also a range of specific checks. Which will be applied to any given grant will depend on the nature of the grant application and will be decided on a case for case basis.

Inevitably, these will be more robust for any overseas grants, in order to comply with HMRC and Charity Commission guidelines on the transfer and management of funds for overseas projects.

## Grant Making Process

We can only fund projects and activities that are exclusively charitable and fall within the objects of the charity, which are the:

The Charity's objects are only for the public benefit generally and in particular (but without limitation) members of the Chinese and East and South East Asian Community, both in the UK and overseas, to:

- (a) advance the public's knowledge on the story and legacy of Frank Soo, the first player of Chinese origin to play in the English Football League;
- (b) promote and encourage community participation in healthy recreation in the sport of football and other sports capable of improving health;
- (c) advance young people in life through their involvement in football and/or other sport for the public's benefit;
- (d) promote and encourage equality and diversity in football, sports and society generally; and
- (e) further such other lawful purposes incidental to the objects above for the benefit of the public as the directors may decide from time to time.

## Guidance to Applicants

### Funding Criteria

The charity will consider all applications that fall within our charitable purposes and meet our funding criteria and, for which, the due diligence process has not identified any unacceptable issues.

- **Charities** - organisations must have a written constitution, with exclusively charitable aims, and be run by a minimum of at least 2 trustees.
  - In making grants, trustees will comply with [Charity Commission guidance](#), to ensure that it is in the charity's best interests, check that any money is used as it is expected it to be and the decision recorded in the minutes.
- **Governmental Agencies** - support will only be considered where there is either no, or inadequate statutory provision.
- **Other Organisations** - in the event that the trustees wished to support an organisation that isn't a charity, they are aware of and would comply with the [Charity Commission's guidance on doing so](#).
  - In particular, they would ensure that the grant is only to further the charity's purposes, any funding of support costs would be limited to the specified activities, services or outcomes, the grant agreement requires the above be complied with, there is no more than incidental [personal benefit](#) and the trustees can demonstrate that the decision is in the charity's best interests.

The charity does not set any limits on the amount of funding that may be made available, but please note that our funding is limited and, inevitably, we are able to only make small grants. In exceptional circumstances, we may make repeat grants. Grants will be made based on the funding available and solely on merit.

### Funding Statutory Services

Whilst there is no general legal prohibition on charities funding public services, we would only consider doing so if there was either no, or inadequate provision.

Were we to do so, we would follow [Charity Commission CC37](#) guidelines and only subsidise public services where there was a clear justification for doing so. We would:

- Ensure that decisions were based on the law and in the interests of the charity's beneficiaries.

- Ask questions and challenge assumptions about what public authorities are prepared to fund or have a duty to fund.
- Use such considerations to inform grant-making policies.

## **Funding Priorities**

The number of good applications is likely to exceed the funding available, so the trustees use the following criteria to help them in making decisions on how best to allocate funding.

- East and South East Asian communities.
- Those most in need, particularly excluded groups such as the disabled community.
- The most vulnerable, such as children and older people.
- UK based
- Areas with historical connections to Frank Soo and his story.
- Any other priorities that the trustees may from time to time decide.

## **Reporting**

All grantees will be required to provide a report on how their grant was used and the impact this has had. The content and nature of information to be reported will be appropriate for the size and type of grant awarded. The charity will monitor such reports to not only ensure that grants are being used for the purposes intended, but also to assess the impact grants have made. This learning will be used to inform future decision making and policy to maximise the charity's impact.

## **Grants To Individuals**

We may make small grants to individuals to meet a particular need, or in response to a crisis or disaster. For example, grants for bedding, clothing or essential domestic appliances, or for energy or water bills, or repairs. We may make grants to individuals whose work or education supports our charitable objectives.

We don't wish to pry into peoples' lives unnecessarily, or make it more difficult for them to apply. However, sadly, there are many fraudsters out there and their techniques can be very effective. Equally, some individuals may not understand their own needs (e.g. medically) and supporting them in taking an inappropriate course of action may potentially be detrimental to their wellbeing.

Therefore, we may require the beneficiary to submit your application through an organisation that has relevant expertise and is familiar with the beneficiary's circumstances, and/or provide supporting information to support their application. For example, we may ask for:



- Details of why an item or service is needed, the cost and why the beneficiary cannot afford it. For example, by providing details of their monthly income and expenditure.
- An invoice, bank statement or similar and/or.
- Specific recommendations from a trustworthy 3<sup>rd</sup> party, such as a debt counsellor, doctor or school, as appropriate.

We may ask for supporting evidence, such entitlement to specific benefits, and/or make payments directly to suppliers on the beneficiary's behalf. For grant payments directly to individuals, we ask them to provide receipts.

## **Grants To Organisations**

Listed below is confirmation and/or information that the beneficiary will be required to submit with their application, in order to be considered for a grant. Not all will apply in all circumstances and they should seek guidance from us, if they are unsure.

### **Ethics**

Confirmation that neither the company, directors nor senior management have been the subject of regulatory censure, criminal or civil court action (other than trivial offences), currently, or within the last 3 years.

### **Use of funds**

Confirmation that funding will be used for exclusively charitable purposes, no bribes, facilitation fees or similar will be paid and that no payments will be made to related parties, such as family members or business associates.

### **Finance**

Submission of the latest audited accounts or, if not available, latest company/management accounts, with an explanation as to why audited accounts are unavailable.

An explanation of any material finance related issues that the grantor may reasonably wish to be aware of. These include, but are not limited to a recently modified or qualified audit opinion, or emphasis of a matter statement in their most recent accounts, potential loan default, action by creditors to recover debts, cash flow (liquidity) issues, major financial risks, or concerns over longer term sustainability.

### **Compliance**

Details of company/NGO registration, professional and/or trade body membership, including registration/membership numbers.

Confirmation that any regulatory permissions, licenses or approvals required for the project have been obtained, or an explanation of what action is/will be taken to do so.

## **Safety**

**Safeguarding** – Applications are to include details of the procedures used to ensure people are kept safe from harm and how management ensures these are applied consistently. These must comply with the charity’s safeguarding policy and legislation, and any regulation specific to the activity.

**Health & Safety at Work (H&SW)** – the organisation has a robust H&SW framework and management oversight, with adequate policies that are consistently applied and training that is undertaken by everyone who needs to and is up-to-date.

**Insurance** - Details of insurances held, with a certified true copy of the insurance policy.

## **Property/Assets Created**

Confirmation that any assets, intellectual property or other material of financial value created will not be disposed of at any point, without confirmation that any proceeds will be used for an approved charitable purposes and the prior written permission of the trustees. In the event this is not forthcoming, the asset is to be disposed of in accordance with the trustees’ instructions.

## **Intellectual Property**

Ownership of copyright or other IP, licensing of use. Any new Intellectual Property rights created will be owned by the Donor, to the fullest extent permitted by law.

If the grantee wishes to use anything that is created, a request may be submitted to the charity for consideration to grant a non-exclusive licence to use it for non-commercial purposes, either in perpetuity, or for a set time period.

## **Grants To Organisations Outside The UK**

### **Anti-Bribery**

The Bribery Act 2010 is applicable globally and it is illegal to offer, promise, give, request, agree, receive or accept bribes, even if doing so in an overseas country where is legal.

Confirmation that the grantee has robust anti-bribery procedures that are consistently applied, to ensure that the risk of bribery or corruption is minimised.

## Submission of Applications

- We require submissions to be made using our application form and these may not be considered, if the word count limits are exceeded.
  - However, the beneficiary may include relevant supporting documents, such as a programme plan or budget.
- Applications may be sent to us by post or as an e-mail attachment.
- Check the submission to ensure that the beneficiary has included the following:
  - How the beneficiary meets our funding criteria.
  - And our funding priorities.
  - Information on the organisation/individual.
  - Project/bid details, such as amounts, numbers, timetable.
  - Budget.
  - Evidence of the need and impact the funding would have.

## GRANT MANAGEMENT

### Systems and Procedures

This grant making policy ensures that the trustees have appropriate systems and procedures in place. Specifically, it:

- Allows trustees to set priorities for funding, which they may change or depart from at their discretion.
- Requires sufficient detail in the grant application, and monitoring procedures, to enable the trustees to identify and assess risks and make informed decisions.
- Enables the charity to carry out appropriate due diligence on organisations applying for grants
- Ensures grants are authorised by the trustees, or within a framework of delegation that ensures appropriate oversight and scrutiny.

### Trustee Decision Making

Applications will be considered by our trustee board, who work to the [Charity Commission C27](#) guidelines on trustee decision making. If appropriate, the trustees may accept referrals from suitably professional organisations and, if necessary, seek independent specialist advice on technical aspects of applications. However, decision making rests at all times with the trustees, grants are awarded entirely at their discretion and their decision is final.

## Remedies

In the event that the grantee fails to comply with our grant policy or other instructions in their grant agreement, action that may be taken, such as

- (a) Rescinding the grant agreement; or.
- (b) Refusing to accept the provision of any further services and to require the immediate repayment of some/all sums previously paid.
- (c) Requiring the grantee without charge to the charity, to carry out such additional work as is necessary to make good the failure.

## Notification

All applicants will be notified of the outcome of their bid and successful applicants will have funding made available, once they have signed a grant agreement.

For organisational grants, we have a formal grant agreement.

For small grants and any to individuals, we advise applicants of their award and include their obligations in receiving it.

- Confirming receipt.
- It may only be spent for the purposes for which it was given.
- Any unused portion of the grant is to be returned to the charity.
- Reporting back on how the grant was spent.
- Reporting back on the impact the grant had.
- Any supporting evidence required, such as receipts.
- Including any deadline for doing so.

## Data Protection

Applicants' data will be held in accordance with data protection legislation. It will be held securely, disclosed if subject to an access request, treated as confidential, only used for the purpose for which it has been provided and destroyed, once no longer needed.



## Safeguarding

In making grants to or working with other organisations we will comply with [Charity Commission guidance](#) by carrying out relevant due diligence and having a written agreement that sets out:

- Our relationship.
- The role of each organisation.
- Monitoring and reporting arrangements.

## Checks and Due Diligence

The charity will carry out sufficient due diligence on grant applicants to confirm the identity of the applicant and that.

- Any funding will be applied in accordance with the charity's charitable purposes.
- Funds will not be knowingly used for illegal purposes, such as money laundering, bribery or financing terrorism.
- The applicant does not hold views or have any involvement in activities contrary to the charity's values and charitable purposes.

We have a robust, risk based Due Diligence procedure.

## Promotion

Often those we are trying to reach are the least able to be able to research and find us and to make effective applications. Consequently, it is important to ensure that those we are seeking to reach are made aware and that the application process is kept as simple as possible.

Ways in which people can be made aware include promotion:

- Via websites, such as funders, local community groups and foundations.
- Social media – either groups relevant to our activity, or local town/village/community groups.
- Posters in public places such as community centres, schools, places of worship, and shops etc.
- Through networks of those who come into contact with potential beneficiaries, such as relevant statutory services and charities.

For some groups, we may provide information a different way, such as an additional language, or to make these accessible to people who have disabilities.



## Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1.0	Board	27/08/25	Initial draft approved	Annually