

# 1. The Objects of the Covid Reflections ("the CIO")

1.1 Under the terms of the Trust Deed dated 30<sup>th</sup> April 2021, the objects of the CIO are:

"For the public benefit, the relief of those in need in the UK, by reason of ill-health, financial hardship or other disadvantage following the impact of the Covid-19 pandemic through the provision of grants to individuals in need and/or charities, or other organisations working to lower the impact of Covid-19."

1.2 The Trustees will apply the funds of the CIO at their discretion and in accordance with the charitable purposes and objectives of the charity. They encourage bids for grants from across the UK.

## 2. Priorities for support

- 2.1 The number of projects which can be supported by the Charity is, of necessity, limited to the amount of funds available for distribution in any year. The Trustees have determined that the current priorities for funding are:
  - Supporting charities, voluntary organisations and Community Interest Companies who will help those most in need of support as a result of the Covid-19 pandemic.
- 2.2 The priorities for support will be reviewed by the Trustees every year and may be changed depending upon circumstances and the perceived effectiveness of the application of funds. Any change to these priorities must still fulfil the charitable purpose and objectives of the charity.

## 3. Grant Making Principles

- 3.1 The CIO aims to develop a grant-making programme which is guided by the following principles:
  - 3.1.1 Informed by local information;
  - 3.1.2 Targeted to meet community needs, priorities and aspirations;
  - 3.1.3 Focused to achieve maximum efficiency and effectiveness;
  - 3.1.4 Enhancing charitable and voluntary activity;
  - 3.1.5 Encouraging best practice among charitable and voluntary groups;
  - 3.1.6 Implemented, monitored and evaluated to ensure optimum achievement and lessons for the future.



3.2 In awarding grants, the CIO aims to be pro-active, fair, efficient and professional. The grant making criteria are clear and consistent, but will also remain flexible in order to ensure that donors' wishes can be incorporated and that changing needs can be addressed.

# 4. Grant Making Criteria

- 4.1 The CIO may make grants to support charities, voluntary organisations or Community Interest Companies that will provide relief and assistance to people in need following the Covid-19 pandemic.
- 4.2 In exceptional circumstances any other charitable purposes may be considered
- 4.3 All grants will always be subject to paragraph 5 below.

#### 5. Exclusions

- 5.1 Grants are usually made to organisations, rather than individuals, whose activities fall within and are consistent with the CIO's own objects.
- 5.2 The CIO will not support the following:
  - 5.2.1 Political promotion including political party activity;
  - 5.2.2 The support or promotion of a religious doctrine; mission; proselytism or promotion of the beliefs of a particular faith beyond basic religious/cultural awareness raising);
  - 5.2.3 Statutory or other governmental agencies in the discharge of their statutory duties;
  - 5.2.4 Retrospective or deficit funding;
  - 5.2.5 Any project or organisation which contravenes the Equality Act 2010:
  - 5.2.6 Organisations that cannot demonstrate public benefit as defined by the Charity Commission;
  - 5.2.7 Organisations requesting funding towards reserves or which have significant financial reserves, except in exceptional circumstances; or
  - 5.2.8 Any project or organisation which conflicts with the objects or values of the CIO or which may damage the reputation or business of the CIO.

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#### **Covid Reflections Grant Making Policy**

# 6. Publicity

6.1 Details of the grant making programme will be publicised on the CIO's website, and through any other appropriate medium.

#### 7. Grants Committee

- 7.1 The Trustees of the CIO may, in accordance with its constitution, delegate to a committee the power to recommend that the CIO approve specific grants.
- 7.2 The committee shall comprise at least five members of whom a majority shall be Trustees and may include, for example, specialists in managing grant programmes, or others whom the trustees believe will enhance the scrutiny of grant recommendations.
- 7.3 Any recommendation by the committee shall be subject to the approval of the Trustees

#### 8. Consideration

8.1 The CIO is aware that fraud and mismanagement can take place in all stages of grant funding. Trustees will always request a copy of a potential recipient's current governing document and its latest annual report and accounts as well as any safeguarding policy, where applicable.

The Trustees will also look for the following potential indicators:

- 8.1.1 Applicant unknown to local umbrella organisations or other local groups;
- 8.1.2 Very new groups;
- 8.1.3 Very few trustees, directors or committee members or familial relationships;
- 8.1.4 Applicant only having a mobile phone number and/or PO Box address;
- 8.1.5 Discrepancies between financial information provided to the CIO and that in the accounts or on the Charity Commission's website;
- 8.1.6 Failure to file annual accounts or reports on time.
- 8.2 Such indicators may lead the CIO to carry out more rigorous investigation of a particular potential recipient.



- 8.3 The CIO will judge each case for a grant on its merits and in accordance with the principles and criteria set out at paragraphs 3 and 4 above. It will assess the details of the project or initiative, including timescales for implementation and the means of obtaining value for money. It will consider whether the organisation is capable of undertaking the project and has a satisfactory financial position.
- 8.4 All grants must be able to demonstrate their charitable purpose and public benefit in order to be considered. The Charities Act 2011 defines a charitable purpose as one which falls within the list of thirteen "descriptions of purposes" set out in section 3(1) and is for "the public benefit". The Charity Commission has published guidance on its interpretation of the law in 'Charitable Purposes and Public Benefit' available at <a href="http://www.charitycommission.gov.uk/detailed-guidance/charitable-purposesand-public-benefit/">http://www.charitycommission.gov.uk/detailed-guidance/charitable-purposesand-public-benefit/</a>.
- 8.5 Any grant offered may be conditional on the availability of funding from other sources.
- 8.6 The trustees' decision shall be recorded in the minutes.

#### 9. Awards

- 9.1 Once a grant is approved, the CIO will notify the relevant party. This letter will be accompanied by the grant agreement setting out various conditions of the grant including the specification and/or management of the project, monitoring and reporting requirements, promotional activities, future use and so on.
- 9.2 To accept a grant award, the recipient will first have to sign the grant agreement and return it to the CIO. The grant may be released by the CIO once the signed grant agreement has been received.

# 10. Monitoring and Reporting

- 10.1 The CIO will monitor any narrative and financial reports provided by a grant recipient to ensure that the grant is being appropriately spent.
- 10.2 Forms and evidence of expenditure (e.g. copies of receipts and invoices) must be received by the CIO promptly in accordance with the grant agreement. If not, the CIO will contact the recipient requesting further information.
- 10.3 In the event that the CIO considers a recipient has breached the grant agreement, the CIO reserves the right to request the return of the total grant awarded. No future funding will be provided to any recipients in breach for a minimum of two years, and then only if the organisation is able to provide evidence of action taken to prevent fraud and strengthen management capacity.



- 10.4 The CIO will expect grant recipients to submit a report on the progress and the effectiveness of grants twelve weeks after the award of the grant. If no report is received by twenty weeks after the award of the grant, the CIO reserves the right to request the repayment of the grant.
- 10.5 The CIO may, on discussion with grant recipients, extend the reporting period if the timescales of a specific project make this unrealistic.
- 10.6 Following the initial report to the CIO, grant recipients will be expected to submit updates to the CIO on a six monthly basis for the duration of their project.
- 10.7 It is a condition of all grants from the CIO that the recipient will provide a case study and photograph relating to the grant for the CIO's publicity purposes, and agrees for their project to be used as a case study. If there is any sensitivity about the use of the project, it is the recipient's responsibility to inform the CIO. A case study and photograph should be provided as soon as possible to the CIO or by the latest in the twelve week progress report.

# 11. Future Policy

11.1 This policy, approved by the trustees of the CIO on 10<sup>th</sup> April 2021, will be reviewed annually to ensure that it continues to meet the objects of the CIO.