

GRANT-MAKING POLICY

1. Purpose

- 1.1 This purpose of this policy is to set out the principles, criteria and processes that govern how the Clockwork Charitable Trust ("Clockwork") makes grants.
- 1.2 A grant is defined as a financial award that Clockwork makes from its funds to support charitable activities, usually to registered charities or charitable community groups, but also to other bodies or to individuals.
- 1.3 The Trustees of Clockwork may award a grant at their discretion in accordance with the charitable purposes of the charity and in accordance with this Grant-Making Policy. Any decision whether to award a grant remains solely the responsibility of the Trustees.

2. Introduction

- 2.1 Clockwork is a registered charity (number 1181923) operating in the Surrey area. It is governed by a board of Trustees.
- 2.2 The Trustees ensure proper governance of Clockwork's grant-making in three ways.
 - Through grant-making principles which ensure that, even where there is donor or funding partner involvement, decisions are ultimately made by Clockwork's Trustees. These principles clarify that funds given are Clockwork's asset, albeit with possible degrees of restriction on their use, and that, where they are involved, donors are *recommending* grants, not *awarding* them.
 - Through grant-making criteria which set out the activities the trustees wish to support in furtherance of Clockwork's charitable objectives. The Trustees accept that they will on some occasions make grants outside the criteria but that in all such cases the activity supported will be charitable in law.
 - Through grant-making processes and administration which set out how decisions are reached for awarding grants.

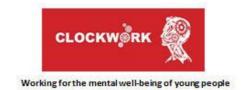
3. Principles

In awarding grants, the Trustees will apply the following principles:

- 3.1. The Trustees will consider any requests or known situations that are eligible for consideration from the geographical area covered by the charity, from organisations and individuals alike.
- 3.2. Each request or situation will be considered on its own merits.
- 3.3. The Trustees will carry out sufficient due diligence to ensure that the request or situation meets and will further the charitable purposes of Clockwork, is in accordance with this Policy and would not damage the reputation of Clockwork.
- 3.4. As a registered charity, Clockwork may only make grants to support activity which is charitable in law.

4. Grant-making criteria

- 4.1 Clockwork's Trustees may award grants that further the charitable objectives of the charity subject to the terms of this Policy.
- 4.2 As a registered charity, CLOCKWORK can only make grants to support activity which is



charitable in law. Grants will always be restricted for a specific charitable purpose.

- 4.3 Trustees expect that grants will be used in furtherance of Clockwork's charitable objectives.
- 4.4 The Trustees will carry out sufficient due diligence on any potential beneficiary to ensure:
 - The identity of the beneficiary;
 - That funds are applied in accordance with the charity's charitable purpose;
 - That funds are not knowingly used for:
 - Money laundering in accordance with the operative Money Laundering
 - regulations;
 - Terrorist financing in accordance with the Terrorist Act 2000;
 - Bribery in accordance with the 2010 Bribery Act.
- 4.5 In cases where the charity is not the only supporter of the work or project, and to protect its reputation, the Trustees may choose to extend any due diligence beyond the proposed beneficiary to include other partner supporting organisations.
- 4.6 The Trustees will adopt a risk rated approach to due diligence. Risk factors will include the size of the grant, the geographical location in which the grant will be applied, and the nature of the relationship between the charity and the beneficiary, particularly in relation to any possible conflicts of interest.
- 4.7 The results of any due diligence will not last indefinitely. In cases where beneficiaries are supported for a significant period of time, additional due diligence will be undertaken on a change of circumstances that might impact the beneficiary, or in any case after a period of one year.

5. Administration

- 5.1. For smaller grants, requests may be made informally and where specific needs or situations are known or identified, grants may be made at the discretion of the Trustees without any form of request.
- 5.2. For larger grants, Trustees must be confident:
 - Of the purpose of the proposed grant including an understanding of the work and the way in which the grant will be managed and applied;
 - Of the person(s) responsible for the management of the grant and, where applicable, for overseeing the work;
 - That all local applicable laws and working practices associated with the work are fully and properly applied;
 - That suitable safeguarding policies are in place in cases where the grant will give rise to interaction with children or vulnerable adults.
 - That sufficient reporting will be available on a timely basis recording expenditure, progress and achievements and detailing any changes to the conditions upon which the grant was made.
 - That any beneficiary agrees to Clockwork maintaining, where appropriate, details of the beneficiary and the details of the grant and its progress in accordance with Data Protection legislation.

The Clockwork Charitable Trust

Registered Charity No. 1181923



5.3. Where the grant is for a specified project or purpose, and in situations where that purpose does not proceed or where any grant or part thereof remains unused, unused funds must be accounted for and returned.

6. Decision making

- 6.1. The decision of the Trustees on whether to award a grant is final.
- 6.2. The award of any grant by Clockwork requires the unanimous approval of all the Trustees or of a Board appointed by the Trustees to oversee grant applications.
- 6.3 The Trustees are not obliged to provide an explanation to applicants in the event that an application for a grant is not successful.
- **7.** The Trustees may vary the terms of this policy from time to time.