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## **GRANT-MAKING POLICY**

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### **THE LENTONBROOK FOUNDATION**

A registered charity in England and Wales

(Charity Number: 1212919)

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Adopted by the Charity Trustees on 29 June 2025

Next review date: on or before 30 June 2026



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## 1. ABOUT THIS POLICY

- 1.1 This policy applies to the Lentonbrook Foundation (the **Charity**), a charitable incorporated organisation registered in England and Wales (with registered charity number: 1212919).
- 1.2 The Charity's objects are to advance such charitable purposes according to the law of England and Wales as the charity trustees see fit from time to time (**Objects**).
- 1.3 The Charity is managed and administered by its 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 who 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.
- 1.5 In this policy references to persons who are **connected** with a Charity Trustee means:
  - 1.5.1 a child, stepchild, grandchild, parent, brother or sister of a Charity Trustee;
  - 1.5.2 the spouse, unmarried partner or civil partner of a Charity Trustee or of any person falling within paragraph 1.5.1 above;
  - 1.5.3 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 1.5.1 or 1.5.2 above; and
  - 1.5.4 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 will determine the priorities for grant-making from time-to-time.
- 2.2 The Charity's current funding priorities are to provide grant funding primarily to charities registered with the Charity Commission for England and Wales (**Registered Charities**), with a preference towards Registered Charities that are working to support underprivileged young people in Suffolk.



2.3 The Charity Trustees might occasionally award grants that fall outside the priorities stated in this policy, provided 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 determine and review the priorities for grant-making from time to time.

### 3. **WHO CAN APPLY FOR A GRANT**

The Charity Trustees will usually only award grant funding to Registered Charities, however, the Charity Trustees will consider proposals from non-charitable organisations provided that the charitable activities for which the non-charitable organisation is applying for grant funding fall within the Charity's current funding priorities.

### 4. **WHAT WE WILL FUND**

4.1 All grants awarded by the Charity must be used to cover costs that are directly connected to carrying out the charitable activities that the Charity Trustees have agreed to fund (**Funded Activities**). Unless the applicant can demonstrate that the expenditure is essential for, and directly linked to, the Funded Activities, grants must not be used to fund any of the following types of expenditure:

4.1.1 salary costs;

4.1.2 capital expenditure; and

4.1.3 contributions to the cost of overheads.

4.2 When providing grant funding to organisations in connection with a specific project, the Charity Trustees will award grants to fund up to 100% of the cost of the project. However, the Charity Trustees:

4.2.1 will consider funding part of the cost of a project where the total cost is shared with one or more other funders; and

4.2.2 encourage recipients to seek additional sources of funding for their project.

4.3 If a grant covers part of the cost of a project, the Charity Trustees may require the recipient 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. APPLICATION PROCESS

- 5.1 Organisations wishing to apply for grants from the Charity (a **Potential Recipient**) must submit an application by completing the Charity's Application Form and submitting it, together with any supporting evidence, to [Lentonbrook@birketts.co.uk](mailto:Lentonbrook@birketts.co.uk) or Lentonbrook Foundation, c/o Birketts Charities Team, Birketts LLP, Providence House, 141 – 145 Princes Street, Ipswich, Suffolk, IP1 1QJ.
- 5.2 Applications must explain in detail how the grant will be used and put forward a strong case for support. In particular, an application must include:
- 5.2.1 a description of the Potential Recipient's charitable objects;
  - 5.2.2 a summary of the activities carried out by the Potential Recipient to further its charitable objects for the public benefit;
  - 5.2.3 the purposes or specific project for which the grant funding is requested (the **Grant Purpose**), and how the Potential Recipient proposes to spend the grant monies for which it has applied;
  - 5.2.4 confirmation that the Grant Purpose is not already well-funded and that the Potential Recipient has limited or no other sources of income for the Grant Purpose;
  - 5.2.5 a summary of any risks that have been identified by the Potential Recipient in relation to the Grant Purpose, and an explanation of the way in which the Potential Recipient plans to manage and minimise those risks; and
  - 5.2.6 contact details of persons at the Potential Recipient who are available to answer any questions that the Charity Trustees might have when considering the application.
- 5.3 All applications must be accompanied by a copy of the governing documents and latest annual report and accounts of the Potential Recipient. In relation to any applications for funding for long-term projects, a copy of the project plan must also be submitted with the application.
- 5.4 All applications, regardless of whether the applicant has previously received grant funding from the Charity, will be considered on their own merits.



## 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 shall meet at least twice each year to consider all applications received and decide collectively those Potential Recipients to be awarded grant funding based on the Charity Trustees' assessment of the need for support, the anticipated impact of making the grant, and the outcome of any due diligence carried out in accordance with paragraph 8. The Charity Trustees may also consider any information that has been requested from the Potential Recipients to assist them in reaching their decision.

6.3 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:

6.3.1 a Charity Trustee (or a person connected to them) stands to benefit from a grant from the Charity (see paragraph 7); or

6.3.2 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 Constitution (**Governing Document**).

6.4 The Charity Trustees may delegate certain decision-making responsibilities. In particular, 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.

6.5 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 If a Potential Recipient is awarded a grant, the Charity Trustees will:

6.6.1 set out the key terms of the grant and any conditions that are attached to it in a grant agreement or letter from the Charity; and

6.6.2 ask the proposed recipient to sign the grant agreement or letter to indicate that they accept the terms and conditions.



6.7 If the Charity Trustees decide not to award a grant the Charity Trustees are not obliged to give the Potential Recipient reasons for their decision.

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

## **7. GRANTS TO CONNECTED PERSONS**

7.1 If an organisation connected to a Charity Trustee could potentially receive a grant, the conflicted Charity Trustee must:

7.1.1 absent themselves from any discussion of the grant by the non-conflicted Charity Trustees;

7.1.2 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

7.1.3 follow the procedures set out in clause 7 of the Governing Document on the management of conflicts of interest and conflicts of loyalty.

## **8. DUE DILIGENCE**

8.1 The Charity Trustees will undertake appropriate and proportionate due diligence checks on all Potential Recipients. The checks that are undertaken will vary according to the Charity Trustees' assessment of any risks associated with the proposal or the Potential Recipient.

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 if applicable:

8.2.1 the Potential Recipient's governing documents;

8.2.2 if applicable, the Potential Recipient's status as a Registered Charity;

8.2.3 the Potential Recipient's latest accounts, financial position and solvency;

8.2.4 the identity of the Potential Recipient's directors, trustees, executive committee or other key personnel, in particular, to establish whether they are authorised to act in that capacity;

8.2.5 the Potential Recipient's governance and operational structures and practices;

8.2.6 the Potential Recipient's internal financial controls;



8.2.7 relevant operational policies and procedures that the Potential Recipient has in place, for example, in relation to whistleblowing, anti-fraud, safeguarding children and vulnerable adults, and on equality and diversity; and

8.2.8 any external risk factors that might affect the proposal.

8.3 In cases where the Potential Recipient 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 it 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:

9.2.1 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;

9.2.2 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;

9.2.3 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

9.2.4 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 or 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**

- 10.1 The Charity Trustees may require repayment of all or any part of the grant if:

- 10.1.1 the project or purpose for which it was awarded does not proceed;
- 10.1.2 part of the grant remains unused when the activities that the grant was intended to fund have been completed; or
- 10.1.3 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.
- 11.2 The Charity Trustees may vary the terms of this policy from time to time.