

RSM UK FOUNDATION

GRANT MAKING POLICY

Approved by the Trustees on 21 November 2023

1. Introduction

- 1.1 This policy applies to RSM UK Foundation (the “**Foundation**”), a charity registered in England and Wales and in Scotland.
- 1.2 The objects of the Foundation are, for the benefit of the public, to advance such exclusively charitable purposes in any part of the world as the Trustees may decide from time to time (the “**Objects**”).
- 1.3 The Foundation is governed by its charity trustees (the “**Trustees**”) who have a duty, acting at all times in the best interests of the Foundation, to apply the Foundation'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 Trustees when they make grants to further the Objects. It also provides information about the Foundation's grant-making process to anyone who is applying to the Foundation, or would like to apply to the Foundation, for a grant.
- 1.5 In this policy references to persons who are "connected" with a Trustee has the meaning set out in paragraph 12.

2. Our funding priorities

- 2.1 The 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 Trustees have decided that they wish to support The Duke of Edinburgh's Award (charity number 1072490), Anthony Nolan (charity number 803716), The Woodland Trust (charity number 294344), Leadership Through Sport and Business (charity number 1147616) and EDGA, formerly the European Disabled Golf Association (registered as a not for profit association in The Hague, the Netherlands) together, the “**Core Charities**”). Each core charity will be reviewed every three years to ensure they continue to meet the objects of the Foundation. It is the Trustees' hope to provide grants to each core charity totalling at least £150,000 over each three-year period although the Trustees are not hereby bound by this intention, which is only indicative and by no means a contractual commitment.
- 2.2 The Trustees intend to support other charities in addition to the Core Charities and their current funding priorities are to make grants to charities established for:
 - (a) environmental protection or improvement;
 - (b) advancement of community development; or
 - (c) advancement of education.

2.3 The Foundation will make grants to organisations which are not clients of the RSM Group (as defined in the articles of association of the Foundation) as well as to those which are. The Foundation has the discretion to make grants without influence from the RSM Group (save that the Trustees will adhere to any reasonable conditions on funding received from the RSM Group).

2.4 The Trustees will not normally support grants towards:

- (a) individuals, but they occasionally may do so, only in exceptional circumstances and at their sole discretion; or
- (b) projects in those countries where another RSM Group corporate or charitable foundation is based.

2.5 The 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 Foundation's funds.

2.6 The 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 Trustees will usually only award grants to organisations that:

- (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; 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; or
- (c) are registered with a regulatory body equivalent to the Charity Commission of England and Wales in another jurisdiction; or
- (d) qualify as a charity in another jurisdiction, but are not required to register with that body.

3.2 The Trustees will not usually award grants to an applicant that has previously submitted a proposal where the applicant failed the Trustees' due diligence checks and the issues identified at that time have not been addressed.

3.3 The Trustees will not usually award grants to an applicant that has previously submitted a proposal within the previous two years.

4. What we will fund

4.1 Other than grants to the Core Charities (where the amount per grant shall be at the Trustees' discretion), the Trustees will usually make grants of up to £20,000 per grant applicant, per financial year.

4.2 The Trustees will award grants to fund up to 100% of the cost of a proposal.

4.3 If a grant covers part of the cost of a proposal, the 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 grant proposals must be made by email to info@rsmukfoundation.com.

- 5.2 Applications will be considered at the formal meetings of the Trustees throughout the year.
- 5.3 Applications will not usually be considered in between formal Trustee meetings, except in exceptional circumstances, at the discretion of the Trustees.
- 5.4 Proposals must explain in detail how the grant will be used and put forward a strong case for support. In particular, a proposal must:
- (a) demonstrate how the activities funded by the grant will benefit the intended beneficiaries and advance one or more of the funding priorities;
 - (b) set out how use of the grant will be managed;
 - (c) give details of the key individual(s) who will be responsible for the management of the grant and delivering the proposed activities;
 - (d) provide a budget for the proposed activities;
 - (e) provide a proposed timescale for use of the grant; and
 - (f) give details of any other funding that has been awarded or that is being sought for the activities to be funded by the grant.
- 5.5 If the application is made by or on behalf of an organisation, the following must also be provided with the proposal:
- (a) a complete, up-to-date copy of the organisation's governing document;
 - (b) 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; or
 - (ii) if it is a charity under the law of England and Wales that is not required to register with one of the UK charity regulators, evidence of its charitable status (such as an HMRC reference number);
 - (c) if the organisation is a charity established outside the UK, evidence:
 - (i) of its charitable status. This might, for example, include evidence of registration with a non-UK charity regulator and/or written confirmation from an appropriately qualified professional that the organisation is established as a charity in the relevant jurisdiction; and
 - (ii) 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
 - (d) the organisation's most recent set of accounts.
- 5.6 If the application is made by or on behalf of an individual, the proposal does not need to include the information set out in paragraphs 5.4 and 5.5. However, the proposal must be in writing, explain in detail how the grant will be used and put forward a strong case for support. In particular, the proposal must:
- (a) include a full description of the proposed activity to be funded by the grant and the need it will meet for the individual;
 - (b) (if relevant) include a description of the timescale or dates involved in the activity or in meeting the need identified;

- (c) set out how the individual will benefit from receiving a grant;
- (d) explain how anyone associated with the individual may receive a benefit from the grant;
- (e) include a budget for the activity or need to be funded; and
- (f) include details of any other funding that has been awarded or that is being sought for the activity or need to be funded.

5.7 Grants to individuals are means tested, and, as such, the Trustees shall take such steps as they consider necessary to satisfy themselves of the charitable need of the individual who will benefit from the grant, prior to any award being given.

6. How we make decisions about grants

6.1 The 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 Trustees may delegate certain functions in accordance with the Foundation's articles of association. In particular:

- (a) individual Trustees and/or members forming a grant advisory committee may be asked to review grant proposals and make recommendations to the Trustees; and
- (b) before making a decision to award a grant, the 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.

6.3 In all cases where a recommendation is made to the Trustees to award a grant, the 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 Foundation's policies or interests.

6.4 The Trustees will meet to consider grant proposals and decide if they will award a grant or not.

6.5 The Trustees will only inform applicants of their decision if a grant is awarded.

6.6 If an applicant is awarded a grant, the 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.

6.7 If the Trustees decide not to award a grant for a proposal the Trustees are not obliged to give the applicant reasons for their decision.

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

7. Conflicts of Interest

7.1 The Trustees are mindful that they have a legal duty to act in the best interests of the Foundation and to ensure that the Foundation's affairs are not affected by private interests or any competing duties of loyalty to others.

- 7.2 In fulfilment of their duty, the 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 Foundation. Situations in which a conflict of interest may arise include where:
- (a) a Trustee (or a person connected to them) stands to benefit from a grant from the Foundation; or
 - (b) a Trustee has a duty of loyalty to a third party that conflicts with their duty to the Foundation.
- 7.3 Any such conflict of interest must be declared and managed by the Trustees in accordance with the Foundation's articles of association and Conflict of Interests policy.

8. Match Funding

- 8.1 It is the Trustees' policy to make available £120,000 of the Foundation's funds each year to support the charitable fundraising activities of RSM Group LLP members, consultants and employees and the fundraising activities of RSM Group offices through match-funding (including the RSM Together programme).
- 8.2 The Foundation will support fundraising activities by providing funds to match monies raised up to the value of £250. The Foundation will provide match-funding for monies raised by individual LLP members, consultants or employees up to once each year, and for funds raised by offices up to four times each year.
- 8.3 Match funding will only be given for funds raised by RSM Group LLP members, consultants, employees or offices and not for activities carried out by those who are not part of the RSM Group.
- 8.4 Applications for match funding are considered on an ongoing basis at the discretion of the trustees. The application should include:
- (a) the registered charity number(s) of the organisation to be supported by the match funding, 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; or
 - (b) 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, evidence of its charitable status (such as an HMRC reference number)¹; and
 - (c) evidence of funds raised by the LLP member, consultant, employee or office, as applicable.
- 8.5 Match funding monies will be paid by the Foundation directly to the organisation to be supported by the fundraising activities of the relevant RSM Group LLP member, consultant, employee or office.

9. Due diligence

- 9.1 When the Trustees are considering a grant proposal, they will undertake due diligence checks on the applicant. The checks that are undertaken will vary according to the Trustees' assessment of any risks associated with the proposal or the applicant.
- 9.2 Due diligence may include requesting details of, and taking such steps as the Trustees consider to be reasonable to scrutinise, any of the following:

¹ Note to the reader: it is the Trustees' policy that match funding will be available only for charities registered in or subject to the laws of the UK.

- (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;
- (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.

9.3 In cases where the applicant will receive support from another funder, or works with a partner, the Trustees may undertake due diligence on that funder or partner.

9.4 If the application is made by or on behalf of an individual, due diligence may include requesting details of, and taking such steps as the Trustees consider to be reasonable to scrutinise, any of the following:

- (a) evidence of the applicant's need and consideration of whether this is a charitable need within the Objects;
- (b) evidence that the activity to be funded meets the need identified;
- (c) the budget;
- (d) evidence of the applicant's personal financial circumstances; and
- (e) any external risk factors including consideration of the risks associated with making grants to individuals.

9.5 The Trustees will keep a written record of any due diligence that they undertake.

9.6 Due diligence will be carried out on each of the Core Charities at every review, at least triennially .

10. Reporting requirements and monitoring

10.1 The 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 (and will be more onerous in the case of grants given to an individual), but the Trustees will always seek to ensure that the arrangements are appropriate and proportionate.

10.2 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) a final written report on completion of the work or activity funded by the grant, showing how funds have been spent, evaluating where the work or activity has been successful and identifying lessons that can be learnt; and
- (d) information about any proposed changes to the proposed activities.

10.3 If appropriate, the Trustees may also visit grant-funded activities and interview individuals involved in running those activities or individuals in receipt of funds from the Foundation.

10.4 Basic monitoring requirements will be set out in the grant agreement. However, the Trustees may take any additional steps to monitor the use of grant funds that they consider appropriate.

10.5 The core charities will be monitored through the production of a social impact report which will be provided to the Trustees on an annual basis.

11. Clawback and repayment

11.1 The Trustees may require repayment of the grant in whole or part 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.

11.2 Details of the circumstances in which grants may be repayable will be set out in the grant agreement.

12. Definition of a person connected to a Trustee

In this policy a person connected to a Trustee means:

12.1 a child, parent, grandchild, grandparent, brother or sister of a Trustee;

12.2 the spouse or civil partner of a Trustee or of any person falling within paragraph 12.1 above;

12.3 a person carrying on business in partnership with a Trustee or with any person falling within paragraph 12.1 or 12.2 above;

12.4 an institution which is controlled:

- (a) by a Trustee or any connected person falling within paragraph 12.1, 12.2 or 12.3 above; or
- (b) by two or more persons falling within sub-paragraph 12.4(a), when taken together;

12.5 a body corporate in which:

- (a) a Trustee or any connected person falling within paragraphs 12.1 to 12.3 has a substantial interest; or
- (b) two or more persons falling within sub-paragraph 12.5(a) who, when taken together, have a substantial interest,

and sections 350 to 352 to the Charities Act 2011 apply for the purposes of interpreting the terms used in this paragraph 12.

13. Reviewing and amending this policy

13.1 This policy will be reviewed by the Trustees at least annually.

13.2 The Trustees may vary the terms of this policy from time to time.