

WCVA grant making policy

INTRODUCTION

WCVA aims to provide high quality services to our members and to other agencies and individuals in the voluntary sector in Wales. As part of our aim to achieve 'a future where the third sector and volunteering thrive across Wales, improving wellbeing for all', we manage funds on behalf of other bodies (eg Welsh Government, Big Lottery, trusts and foundations) and distribute them through grants.

WCVA is committed to maintaining high ethical and moral standards, promoting the highest possible standards of openness, probity and accountability in order to ensure the proper use of public funds. WCVA will adhere to the principles of integrity, objectivity and honesty in the way that it conducts its business.

This grant making policy (the policy) establishes WCVA's objectives in this respect and sets out a cohesive framework to manage effectively the funds entrusted to us and maximise the benefits to the third sector and the people of Wales.

WCVA reserves the right to review or amend its policy position to take account of changing circumstances or where the context of a specific funding scheme is particularly complex.

WCVA is increasingly recognised by Central and Local Government as an effective conduit for channelling funds efficiently and effectively into the third sector.

The assessment and monitoring process for all funds are the same unless <u>funders</u> request specific procedures. All applications received by WCVA are

processed according to the grant making procedures set out in this document, except where changes are expressly requested or required by <u>funders</u>.

GRANTS ADMINISTERED AS AT MAY 2023

Comic Relief Community Fund in Wales, Funder – Comic Relief

Landfill Disposals Tax Communities Scheme, Funder – Welsh Government

Wales and Africa Small Grants Scheme, Funder – Welsh Government

Volunteering Wales Grants, Funder – Welsh Government

AIMS

This document relates to grant making activity within WCVA and sets out relevant policy and procedures.

In awarding grants, WCVA aims to be fair, efficient, professional and proactive. The aim of this policy is to explain the processes and procedures relating to our grant making. Our grant making criteria must be clear and consistent, but also remain flexible in order to ensure that they are proportionate to the size of grant and that <u>funders</u>' objectives can be incorporated. This document sets out the procedures and the lines of responsibilities of WCVA staff, trustees and advisory panel ('Project Board') members.

General principles

WCVA may award funding through full or partial grants; restricted or <u>unrestricted grants</u>; <u>repayable grants</u>; loans; and contracts. Contracts are covered through the procurement section of WCVA's Financial Procedures; loans are covered by separate policies and processes: all other forms of grant funding are covered by this policy.

WCVA grant funding will support the third sector and civil society in Wales. Whilst the majority of grant schemes will focus on funding the third sector, WCVA will also manage schemes that provide funding to private and public sector organisations, where a clear philanthropic result is the aim, support for the third sector and/or volunteering is evidenced, and the grant monies are restricted to the operation of the funded activities.

WCVA is committed to being a responsible and sustainable organisation and our approach to delivering grants will reflect this.

WELSH LANGUAGE STANDARDS

Since 2017 WCVA has been subject to the Welsh Language Standards. All of WCVA's grant schemes are administered in both Welsh and English, with Welsh being treated no less favourably than English.

Furthermore, WCVA is committed to promoting the use of the Welsh Language in alignment with the Wellbeing of Future Generations Act Goal of Creating a Wales of Vibrant Culture and Thriving Welsh Language. This encourages diversity and inclusivity in the grant making process, making WCVA's grants more accessible.

In relation to grant making and social investments, the following Welsh Language Standard is applicable and WCVA has been working to this standard since 2017:

'Standard 90: You must produce and publish a policy on awarding grants (or, where appropriate, amend an existing policy) which requires you to take the following matters into account when you make decisions in relation to the awarding of a grant — (a) what effects, if any (and whether positive or negative), the awarding of a grant would have on— (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh language no less favourably than the English language; (b) how the decision could be taken or implemented (for example, by imposing conditions of grant) so that it would have positive effects, or increased positive effects, on— (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh language no less favourably than the English language; (c) how the decision could be taken or implemented (for example, by imposing conditions of grant) so that it would not have adverse effects, or so that it would have decreased adverse effects on— (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh language no less favourably than the English language; (d) whether you need to ask the applicant for any additional information in order to assist you in assessing the effects of awarding a grant on— (i) opportunities for persons to use the Welsh language, and (ii) treating the Welsh language no less favourably than the English language.'

PROVISION OF A BILINGUAL GRANT ADMINISTRATION SERVICE

WCVA operates a fully bilingual grant administration service, applications are made via our Multipurpose Application Portal (MAP), which is available for use in both English and Welsh.

Once an applicant has made an application in Welsh or contacted us in Welsh, all contact from that point on will be conducted in the medium of Welsh.

GRANT APPLICATIONS

WCVA will publicise the opportunity to apply for funding through its website, social media and networks. When advertising grant schemes on its website, WCVA will ensure that information is available bilingually and all general information about each scheme will be released simultaneously in Welsh and English.

When applications for a grant are invited, they will state that applications may be submitted in Welsh and that any application submitted in Welsh will be treated no less favourably than an application submitted in English.

In keeping with Welsh Government's 'Minimum Standards for Grant Funding', there should be a period of twelve weeks between the date of opening a grant scheme for applications and the deadline date for submissions.

WCVA will aim to use an online application process for all schemes that it manages, where this is appropriate. WCVA's Multi Application Portal (MAP) has been designed to process grant applications and this is the method that is currently used.

In this way, consistency, openness and fairness may be demonstrated and the need for paper records avoided, as a full <u>audit trail</u> will be maintained.

RESTRICTED GRANTS

All grant applications for project funding (<u>restricted grants</u>) will consist of two elements: **eligibility** and **project** description. Each scheme will set out its requirements for eligibility and any applicant failing to meet these will not be considered for an award.

The eligibility element of the application will be concerned with the organisation's suitability for funding, according to pre-set criteria; the project

element of the application will be concerned with what the grant will be funding. Questions asked in the eligibility element will not be repeated in the project element.

ELIGIBILITY

Each fund will have its individual criteria, subject to the requirements of the funders, but in general, WCVA will not fund activities that are party political; replace statutory provision; or that provide religious activities such as evangelism or proselytising. However, within the terms and conditions of each grant scheme, faith-based organisations will be as eligible to apply as any other organisation.

WCVA may require proofs of eligibility to be provided such as governing documents, audited accounts and organisational policies. These will vary according to the individual grant schemes but in general, will include an organisation's governing document, equal opportunities policy, other policies appropriate to the funding, eg safeguarding; and at least one year's accounts, or forecasts in the case of new organisations audited to the level appropriate to the applicant.

PROJECT

Each fund will have its individual criteria, subject to the requirements of the <u>funders</u>, but in general, WCVA application forms will address the following issues:

- Project description: what it will do, when, where and how it will operate; how many people it will benefit; its 'fit' with the aims of the grant scheme and its own organisation's aims; how it will be promoted; how it will consider people's needs; how volunteers will be involved
- Welsh language: what use will be made of the Welsh language and what opportunities there will be to use it within the project; how the needs of Welsh speakers will be met; how it will be ensured that the Welsh language will be treated no less favourably than the English language; and the use of Welsh language promoted
- Demonstration of the need or opportunity for funding: how this was identified; how the project will avoid duplication and be supported by

its community; who will be helped and how; how it will develop volunteering

- Sustainability: what the benefits of the project will be to those it has helped, ie the economic, social, environmental and cultural wellbeing benefits; how its activities will be maintained after the funding has ended
- Impact: what targets the project will have; what longer term difference will be made and how that will be measured
- Value for money: the project's budget, including any <u>match funding</u> and the cost of ensuring an appropriate use of Welsh

WCVA supports the principle of full cost recovery. In an application for a restricted grant, eligible project costs may include a reasonable, proportionate contribution towards an organisation's overhead costs as well as funding the direct costs of the project such as dedicated staff salaries, materials and venue hire. Inflation may also be included in projected costs where project funding is for more than a year.

WCVA is a 'Living Wage Friendly funder' and expects all salaries included within grant application budgets to reflect the <u>Living Wage Foundation rate</u>, where possible. This covers any posts to be funded in full, part contributions to a staff post, sessional workers, interns or apprentices. Where this is expressly ineligible through the terms of the scheme, grant recipients will be encouraged to ensure that where a participant is subsequently successful in securing sustainable employment, it is at the <u>Living Wage Foundation rate</u>.

UNRESTRICTED GRANTS

Grant applications for general or core funding (<u>unrestricted grants</u>) may or may not include an eligibility element, or may have only eligibility elements, depending on the provisions of the scheme. Each scheme will set out its requirements and any applicant failing to meet these will not be considered for an award.

WCVA will publish clear, specific guidance with each round of applications for funding. Each question asked in a WCVA application form will have an explanatory note that makes it clear how the question relates to the scoring process. This guidance may be either in a separate document published

simultaneously with the application round, or in notes alongside each question or section of the application form. All guidance will be published simultaneously in Welsh and English.

WCVA will give grant applicants clear information about the Welsh language provision required in the guidance and in supplementary information such as on the WCVA website, explaining how those requirements will be considered within the grant assessment process. Where an application is received in Welsh it will be treated no less favourably than one that is received in English.

WCVA will ensure that each question asked in an application form:

- is clear, appropriate and proportionate;
- has a guidance note explaining what is expected;
- states whether or not it is scored.

Applicants will be required to sign the application form either in hard copy or with a password protected digital signature; or to submit it through a secure login process. They will be required to state that the information is true to the best of their knowledge and that they are entitled to sign on behalf of their organisation, if representing an organisation.

WCVA recognises that the information provided may include private details such as personal addresses and contact numbers; or supporting information about clients or services that could be sensitive, or commercially sensitive. Each application form will include an up to date Privacy Notice recognising these elements and explaining that WCVA is the data controller and how WCVA will use the data provided for the purposes of assessing, publicising and monitoring the awards, and reporting to <u>funders</u>, in line with WCVA's Data Protection policy.

Each applicant should also be provided with, or given access to WCVA's standard terms and conditions of grant, which are available from WCVA's website; and WCVA's Complaints policy.

GRANT ASSESSMENT AND AWARD

WCVA's Board of Trustees has ultimate responsibility for all grant-making decisions in line with WCVA's charitable purposes and any restrictions agreed with the partners and <u>funders</u> of each scheme.

Each grant scheme will be supported by an advisory panel, of which the chair will be a WCVA trustee, appointed by WCVA's Board of Trustees. If the panel has a vice chair, they must also be a WCVA trustee. Other members of the panel will be independent of WCVA and appointed by invitation or election, according to the individual panel's terms of reference, and selected for their expertise, knowledge and experience in the field of interest of the scheme.

The chair, or in their absence, vice chair of the panel will have the delegated authority from WCVA's Board to approve grant awards jointly with WCVA's Chief Executive.

WCVA will employ staff to carry out detailed assessment and scoring of all grant applications and present their findings to the advisory panel, with recommendations for award, part award, or rejection, making it clear whether rejection should be on the grounds of eligibility, score, availability of funds, or any combination of these.

A clear scoring guide for assessors will be drawn up for each fund, linked to the application questions and guidance. In the interests of fairness and transparency, no other factors should be taken into account.

At least 10% of all assessments conducted by staff should be quality checked by another member of staff with the appropriate knowledge and experience.

For some grant schemes, WCVA may carry out visits or interviews with applicants to clarify points of their application. The criteria for selecting which organisations will be clear, fair and transparent: for example, all those that have passed the eligibility part of the application; or those that have scored above a certain amount.

If a grant application has been received in Welsh and it is necessary to interview the applicant, WCVA will either use a Welsh speaking member of staff to conduct the interview, or offer to provide a simultaneous translation service from Welsh to English.

WCVA staff will carry out financial appraisals and due diligence on each grant application. As a minimum, WCVA will require evidence of a grant applicant organisation's financial standing through one year's accounts, audited to the appropriate level, or forecasts in the case of new organisations; and will cross-reference other information provided by applicants with the records of appropriate regulatory bodies such as the Charity Commission or Companies House and its own grant records; and may use credit check software when required by <u>funders</u>, when the appropriate permission has been obtained from applicants.

WCVA's Anti-fraud and corruption policy addresses the risks associated with fraud and corruption involving Board members, staff or third parties and promotes the principles of sound corporate governance. Board members and advisory panel members are required to conduct themselves in accordance with requirements and procedures set out in the Code of Conduct (Board) for trustees and Code of Conduct (Project Board Panel) for advisory panel members. All WCVA staff, trustees and panel members are required to complete a Declaration of Interests form annually that records all significant connections with all bodies eligible for funding or contracts. This is reinforced through WCVA's Conflict of interest and Disciplinary policies. WCVA's Financial Procedures manual sets out WCVA's financial management framework and the authority and principles by which members of staff can commit WCVA to financial liability.

When all grant applications to a round of funding have been assessed by WCVA staff, the recommendations will be collated and sent to the advisory panel for consideration. The panel will usually meet to discuss the recommendations, although in some circumstances the discussion may be held via email or other digital means. The chair, or, in their absence, vice chair of the advisory panel will aim to achieve a consensus for the final opinions but in the event of a split, the chair or vice chair will decide.

The agreed list of recommendations for award and rejection will be jointly authorised in writing using the WCVA pro-forma agreed for that purpose, by the chair or vice chair of the advisory panel and WCVA's Chief Executive or, in their absence, the Director of Delivery and Development or the Director of Resources, on behalf of the WCVA Board of Trustees.

Once the grant awards have been approved by WCVA, formal offer or rejection letters will be issued. The letters will be issued in the preferred

language of applicants, in line with WCVA's Welsh Language policy. In some cases, there may be conditions to be met before an award may be offered. The offer letter will follow WCVA's standard template unless the funder requires another format to be used, for example, for European funds.

No applicants should be advised of the result in advance of the written notification, to avoid misunderstandings, and the letters offering grants or notifying of failure should all be issued simultaneously wherever possible.

Offer letters will vary according to each grant scheme, but as a rule will include the following:

- Amount awarded
- Details of the scheme and funder
- Purpose of grant
- Terms and conditions, including use of Welsh language
- How and when the grant will be paid
- Start and end date of project
- How the project will be monitored

Two copies of each offer letter will be sent. The authorised representative of the grant recipient will be required to sign a copy of the letter and return it to WCVA as confirmation that the grant and its terms and conditions are accepted.

WCVA will use its standard terms and conditions of grant except where required to use those provided by the funder. Where other terms and conditions are used, these will be checked for consistency with WCVA's aims, objectives and practices before acceptance. Any additional conditions specific to the grant scheme or the recipient will be stated in the offer letter.

The offer letter will make it clear that the project details and budget submitted in the grant application will form the basis of the grant and that the applicant will be monitored to ensure that it complies with what was approved.

Where a grant application has been rejected, the letter issued will state the reason, which may be for reasons of eligibility, score, availability of funds, or any combination of these. The letter will detail the reasons for failure, linked to the application questions and guidance provided. Where possible, contact details will be provided for more detailed feedback from WCVA and sources of support for future funding applications, for example, from county voluntary councils (CVCs).

If further feedback is offered, this may be by email, telephone or face-to face. If the applicant submitted an application in Welsh, or indicates that they would like to conduct a conversation in Welsh, WCVA will either use a Welsh speaking member of staff to give the feedback, or offer to provide a simultaneous translation service from Welsh to English.

For all of WCVA's grant schemes, the decision of the panel is final: there is no appeals process. However, if applicants wish to complain about the administration of a scheme, they will be supported through WCVA's Complaints policy.

PAYMENT OF GRANT

In accordance with what has been agreed with individual grant scheme <u>funders</u>, WCVA may make advance payments of up to 100% of the grant value, to aid grant recipients with cash flow. The percentage and amount will be determined using a risk based approach and will be agreed with <u>funders</u> when setting up the grant scheme.

The amount and provisions of the advance payment will vary according to the grant scheme and may be optional, by request only, or at the discretion of WCVA. Advance payments must not be paid unless the signed acceptance of offer letter has been received.

The payment will form part of the total grant award and subject to the same terms and conditions. If a project does not start, fails to deliver the agreed activities, or to spend the full amount of grant awarded, the advance payment must be refunded in full or part to WCVA.

The grant offer will set out the payment arrangements of each grant scheme and, except where 100% of the grant award is paid in advance, these will usually involve claims being submitted at regular intervals. The payment dates and conditions should be made known to the grant recipient in

advance, preferably as part of the offer of grant. For example, payments may be made in arrears based on actual amounts spent on the project; at predetermined points such as half way through a project on receipt of a progress report; or when key milestones are reached.

Grant recipients should be provided with all the forms and requirements for claiming payments in good time before the first claim is due. WCVA will keep clear records of payment schedules and payments made in order to be able to monitor and report on the fund effectively.

When a claim is made to WCVA, staff will check that it complies with the conditions of the relevant fund. The request for payment should be made using the WCVA pro-forma agreed for that purpose, and authorised by the WCVA budget holder or their authorised alternate for the grant scheme. All requests for payment will be processed by WCVA finance staff according to the provisions of WCVA's Financial Procedures.

GRANT MONITORING

WCVA aims to have a long term relationship with grant recipients beyond the life of the actual grant. In carrying out monitoring visits, project reviews, etc, opportunities will be sought to include other relevant information such as training opportunities, events, information sheets, links to other organisations, other grants information, etc, and identify ways in which WCVA can help.

WCVA templates, adapted to suit grant schemes, are available for monitoring visits, project reports and final reports and these should be used wherever possible, to ensure consistency with applications, assessments and data collection requirements. The monitoring and report forms should form part of a coordinated package with grant forms, *ie* if a target is identified in an application form, its progress should be measured and the outcome evaluated and reported.

For monitoring visits, the grant recipient should be contacted in advance to arrange the meeting, to set out what will be monitored and to make any arrangements necessary should they wish the meeting to be conducted in Welsh, such as using a Welsh speaking member of WCVA staff to conduct the visit, or offering to provide a simultaneous translation service from Welsh to English.

For some grant schemes, WCVA will use its dedicated Project Data System (PDS), a secure online database that can be used to manage and record financial claims, project reports and participant data. PDS is a completely bilingual site and grant recipients can, when accessing it, switch between Welsh and English at any point.

Monitoring visits and project reports will be used to evaluate grant recipients' compliance with the terms and conditions of the grant and to offer constructive solutions and support where there are any weaknesses. Further conditions, action plans and re-profiles may be offered or imposed in order to bring the project to the standard required.

Grant recipients will be required to publicise their projects, using the WCVA logo and other logos as required by the funder. They should also be encouraged to produce case studies illustrating their use of the funding.

Where the grant scheme's funding permits or requires, an independent evaluation of the fund will be commissioned using the appropriate procurement processes as outlined in WCVA's Financial Procedures Manual. The evaluation will be expected to identify results, performance and impact, linking where possible to WCVA's Strategic Framework and the Wellbeing of Future Generations Act 2015.

No increases to the grant awarded may be made without a further award process through the advisory panel, and due authorisation of the funding as set out previously. If a reduction of grant is made, then an amendment to the original award schedule must be authorised by the advisory panel chair and WCVA's Chief Executive. Any changes must be recorded and the grant recipient advised in writing.

In some cases, it may become apparent that a grant recipient is failing to carry out the requirements of the grant or has significantly failed to comply with the conditions of grant funding. If this appears to be due to fraud or other criminal activities, then WCVA's Anti-fraud and corruption policy will be used. Otherwise it may be necessary to withdraw, cease or demand repayment of the grant, as set out in WCVA's standard terms and conditions of grant and/or other terms imposed by the funder.

PROJECT CLOSURE

Each project funded through a WCVA grant scheme will have a designated end date, by which time the grant recipient will be expected to have carried out all the agreed activities of the grant.

WCVA staff will satisfy themselves that the project has been brought to an appropriate close: this may include continuing the activities through the grant recipient's own resources. For most schemes, a final report and account will be required from grant recipients and a final check carried out by WCVA staff to the appropriate level, which might be, for example, a full examination of all project financial records and data; or a final visit to check that work has been carried out.

Once all available information has been supplied by the grant recipient, any unspent monies have been returned and all claims have been paid by WCVA, a final 'project closure' letter should be issued by WCVA to confirm that the project has been closed and to give a brief final verdict on its success or otherwise. Grant recipients should first be given the opportunity to comment on a draft of the letter to correct any inaccuracies or add any relevant matters to be taken into consideration.

The project closure letter should be based only on factual evidence related to the grant itself such as whether the project met all of its agreed targets or spent all of the allocated funding appropriately.

LETTERS OF SUPPORT

From time to time, WCVA may be asked to provide letters of support for organisations and such requests should always be referred to the scheme manager or to WCVA's senior management team. Where the request is from a current or previous grant recipient, or from a third party with the grant recipient's permission, information about the organisation in relation to WCVA grants should be strictly limited to what is in the project closure letter.

BEST PRACTICE

As the national membership body for the third sector in Wales, WCVA will constantly work to achieve and lead in best practice in grants administration for the sector, sharing and disseminating this information with <u>funders</u>, partners, members and grant recipients.

LIVING WAGE FOUNDATION EMPLOYER

WCVA is an accredited Living Wage Foundation employer and a 'Living Wage Friendly funder', committed to funding salaries at the <u>Living Wage Foundation</u> rate. Details of the current <u>Living Wage Foundation rate</u> may be found at https://livingwage.wales/what-is-it/.

Review

May 2023 (Review date: May 2024)

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DEFINITIONS

Audit trail A system that traces the detailed transactions

relating to any item.

Evangelism Preaching or spreading religious beliefs.

Funders Organisations providing funds for WCVA to

distribute and manage.

Grant A financial award to support a general or specific

purpose.

Living Wage Foundation rate

The recommended minimum rate, independently calculated each year based on what employees and their families need to live. See

https://livingwage.wales/what-is-it/

Match funding

The contribution to project costs made by the grant recipient, either from its own resources; in kind donations of time, services or goods; or from another funder.

National Living Wage and Minimum Wage

The Government's National Living Wage applies to all working people aged 25 and over. The current National Minimum Wage for those under the age of 25 still applies. It is illegal to pay people at less than these rates.

Proselytising

Trying to convert people to one's own belief or religious views.

Repayable grant

A financial award that must be returned to the funder when a designated threshold or milestone has been reached

Restricted grant

A grant limited to a specific purpose, often referred to as 'project funding'. Charitable audited accounts are required to report on the specific income and expenditure relating to the funds.

Unrestricted grant

A grant that is not limited to a specific purpose, often referred to as 'core funding'.