The Chacegrove Family Foundation

Foundation Policies

June 2026

Approved by the Board of Trustees:

Date: ____________________

Contents

Policy 1: Complaints Handling Policy and Procedures

Policy owner	Trustees / Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically, or following a significant complaint

1. Purpose

The Chacegrove Family Foundation (the Foundation) is committed to operating openly and accountably. We value feedback and take complaints seriously as an opportunity to improve our work. This policy sets out how we handle complaints from any person who has concerns about the Foundation's activities, decisions, or conduct.

2. Scope

This policy applies to complaints received from:

- Grant applicants and current or former grant recipients
- Members of the public with a legitimate interest in the Foundation's work
- Partners, contractors, or suppliers
- Trustees or employees of the Foundation

This policy does not cover employment grievances raised by Foundation staff (which are governed by the Foundation's separate HR procedures) or disagreements with a funding decision where no improper conduct is alleged.

3. What is a Complaint?

A complaint is any expression of dissatisfaction — whether written or spoken — about the Foundation's actions, omissions, decisions, or the conduct of those acting on its behalf. A complaint is distinct from a routine query, a request for information, or a funding appeal.

4. Our Commitments

When handling complaints, the Foundation will:

- Treat all complainants with courtesy and respect
- Acknowledge complaints promptly
- Investigate complaints fairly and impartially
- Maintain confidentiality to the extent possible, consistent with our duty to investigate properly
- Communicate outcomes clearly and in plain language
- Learn from complaints to improve our work

5. How to Make a Complaint

Complaints may be submitted in writing (by post or email) or verbally. Where a complaint is made verbally, the Foundation will offer to record it in writing and share that record with the complainant for their agreement.

Complaints should be directed to the Chair of Trustees in the first instance, or — if the complaint concerns the Chair — to any other Trustee. Contact details are available on the Foundation's website and grant correspondence.

6. Procedure

Stage 1 — Acknowledgement

The Foundation will acknowledge receipt of a complaint within ten working days. The acknowledgement will confirm who will handle the complaint and provide an expected timeframe for a response.

Stage 2 — Investigation

The person handling the complaint (normally the Chair of Trustees, or a designated Trustee) will:

1. Review all relevant information and documentation
2. Speak with relevant parties where appropriate
3. Consider whether any immediate action is needed while the investigation is ongoing
4. Prepare a written response within 20 working days of acknowledgement

If the investigation will take longer than 20 working days, the complainant will be informed of the reason for the delay and given a revised timeframe.

Stage 3 — Response

The written response will explain the outcome of the investigation and, where the complaint is upheld, what action the Foundation will take. Where a complaint is not upheld, the Foundation will provide clear reasons.

Stage 4 — Appeal

If a complainant remains dissatisfied with the outcome, they may request that the matter be reviewed by the full Board of Trustees within 10 working days of receiving the Stage 3 response. The Board's decision is final.

Escalation to the Charity Regulator

If a complainant believes the complaint raises a matter of serious regulatory concern (such as mismanagement of charitable funds or a breach of trustee duties), they may report their concerns to the relevant charity regulator — for example, the Charity Commission for England and Wales — independently of this procedure. However, complainants should first raise the matter with the trustees to ensure, wherever possible, that facts are mutually agreed

7. Record-Keeping

The Foundation will maintain a confidential log of all complaints received, the outcome of each investigation, and any remedial action taken. This log will be reviewed by the full Board at least Periodically.

8. Learning and Improvement

The Foundation will use complaints as a source of learning. The Board will consider patterns and themes in complaints as part of its annual review and will take reasonable steps to address any systemic issues identified.

9. Review

This policy will be reviewed periodically by the Trustees or sooner following a significant complaint or change in regulatory guidance.

Policy 2: Conflicting Interests Policy

Policy owner	Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically

1. Purpose

Trustees of The Chacegrove Family Foundation must act in the best interests of the charity at all times. This policy helps trustees identify, declare, and manage conflicts of interest — real, potential, or perceived — so that decisions are made impartially and the Foundation's integrity is protected.

2. Scope

This policy applies to all Trustees and, where relevant, to any employees, consultants, or volunteers acting on behalf of the Foundation.

3. What is a Conflict of Interest?

It is fully recognised that trustees may, by virtue of their personal and professional backgrounds, have other interests in a matter also relevant to the Foundation. For example, a trustee may work professionally in subject matters concerned with climate change or sustainable use of land. Such interests do not necessarily present a conflict as the Foundation wants trustees who know about the areas in which the Foundation has an interest.

A conflict of interest causes concern when a trustee's personal, financial, or professional interests — or those of a person or organisation connected to them — could influence, or appear to influence, their decisions as a trustee **and** when such interests are not declared. Examples where a declaration of interest would be appropriate include:

- A trustee who is also an employee, volunteer, or director of a grant applicant
- A trustee who has a close family or personal relationship with a grant applicant or their representatives
- A trustee who stands to receive a financial benefit from a Foundation decision
- A trustee whose professional employer has a business relationship with the Foundation

A conflict of interest may be direct (the trustee personally benefits) or indirect (a connected person or organisation benefits). It may be actual, potential, or only perceived — all three types must be declared.

4. Duty to Declare

Every trustee has a duty to:

- Declare any conflict of interest — actual, potential, or perceived — as soon as they become aware of it
- Complete and maintain an up-to-date entry in the Register of Interests (see Section 6)
- Declare any new interest that arises between scheduled register reviews

Declarations must be made at the start of any Board meeting where a relevant matter is to be discussed, or at the earliest opportunity if a conflict arises mid-discussion.

5. Managing Conflicts

When a conflict is declared, the remaining trustees (or the Chair if the conflict is raised outside a meeting) will determine the appropriate response recognising that the Foundation is a small, relatively informal organisation and Relies on the knowledge and experience its trustees bring. Options include:

- The relevant trustee having declared their interest, noting it in the minutes but other trustees being satisfied the trustee remains impartial in decision making
- Allowing the trustee to provide factual information but not to vote (if the matter is subject to a vote)
- Asking the conflicted trustee to recuse themselves from the discussion and decision
- In very rare cases where all trustees have a conflict, seeking independent legal or regulatory advice before proceeding

The conflicted trustee must not seek to improperly influence the outcome. If in doubt about whether a conflict exists, trustees should declare and let the Board determine how to proceed. All declarations and the action taken must be recorded in the minutes of the relevant meeting.

6. Register of Interests

The Foundation maintains a Register of Interests. Each trustee should complete their entry when they are appointed and update it whenever their circumstances change, and at least periodically. The register records:

- Trusteeships, directorships, or senior roles in other organisations
- Significant financial interests in organisations that may have dealings with the Foundation
- Close personal or family relationships with individuals connected to Foundation work
- Any other interest that could reasonably give rise to a conflict

The Register of Interests is a confidential working document held by the Chair and made available to all trustees. A summary may be disclosed to regulators on request.

7. Gifts and Hospitality

Trustees should not accept gifts, inappropriate level of hospitality, or other benefits from grant applicants, recipients, or suppliers where this could give rise to a conflict or the perception of one. Any gift or hospitality received in connection with their role as trustee that has a value above a nominal amount (generally taken as £25) should be declared to the Chair or, to the case of the chair to another trustee.

8. Consequences of Failure to Declare

Failure to declare a conflict of interest is a breach of trustee duties and may expose a trustee to personal liability, as well as potentially rendering the relevant decision invalid. In the unlikely event of a serious breach, the Board may be required to refer it to the relevant charity regulator.

9. Review

This policy and the Register of Interests will be reviewed Periodically by the Board of Trustees.

Policy 3: Financial Reserves Policy and Procedures

Policy owner	Trustees / Treasurer
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically, at time of accounts preparation

1. Purpose

This policy sets out The Chacegrove Family Foundation's approach to holding financial reserves. It helps trustees demonstrate that reserves are held for clear reasons, are at an appropriate level, and are regularly reviewed — as required by charity law and good governance practice.

2. What are Reserves?

For the purposes of this policy, reserves are those unrestricted funds of the Foundation that are freely available — that is, funds that are not committed to a specific grant award, restricted by a donor condition, or designated by the Board for a particular purpose and Are typically held as cash or as readily tradeable securities. Reserves do not include:

- Restricted funds (held for a specific purpose defined by the donor eg for a gated grant subject to periodic targets being achieved)
- Designated funds (set aside by the Board for a planned expenditure)
- Fixed assets

3. Why We Hold Reserves

The Foundation holds reserves to:

- Manage short-term fluctuations in income or investment returns so that grant-making commitments can be honoured
- Cover unanticipated operational costs or emergency expenditure
- Allow time for an orderly wind-down of activities if the Foundation were to close
- Provide a buffer against unexpected legal, regulatory, or compliance costs

4. Target Reserves Level

The Board has determined that a prudent level of free cash for the Foundation is sufficient to cover approximately six months of anticipated operational expenditure (excluding grant commitments). This reflects the Foundation's modest scale and the relatively predictable nature of its income.

The Board will calculate and record the target reserves figure as part of the annual accounts preparation process and will document its reasoning. Where the actual level of free reserves falls significantly above or below the target range, the Board will consider and minute the reasons and any planned action.

5. Maintaining and Investing Reserves

Reserves should be held in a form that is accessible at short notice (typically a current or notice deposit bank account or As a readily tradeable security). Where reserves significantly exceed the target level, the Board may consider whether some funds should be designated for a specific future purpose or added to the Foundation's investment portfolio, subject to the Foundation's Investment Policy.

It is acceptable that reserves remain invested with the investment manager so long as the trustees satisfy themselves that the requisite amount can be realised in cash within ten working days

Reserves must be held in the Foundation's name with an authorised financial institution. The Treasurer is responsible for monitoring reserve levels and reporting to the Board at least quarterly.

6. Using Reserves

Reserves may be drawn in relation only to a purpose or grant of the Board of Trustees. Any use of reserves must be documented, at least once drawn, in the Board minutes with a clear explanation of the purpose and expected timeframe for replenishment (if applicable).

7. Reporting

The level of free reserves, the target range, and any material variation will be disclosed in the Foundation's annual accounts in line with Charity Commission guidance (SORP requirements). The relevant trustee will include a brief reserves update in each regular financial report to the Board.

8. Review

This policy will be reviewed periodically by the Board of Trustees, normally at the same time as the annual accounts are approved. The target reserves level will be reconsidered if there is a material change in the Foundation's income, expenditure profile, or risk environment.

Policy 4: Internal Charity Financial Controls Policy and Procedures

Policy owner	Treasurer / Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically

1. Purpose

Strong financial controls protect The Chacegrove Family Foundation's assets, ensure accurate and complete financial records, and provide assurance to trustees, donors, and the public that charitable funds are managed properly. This policy sets out the controls the Foundation operates and the responsibilities of those involved.

2. Roles and Responsibilities

The Board of Trustees has collective responsibility for the financial management of the Foundation. Within that:

- The Treasurer (or in absence of Treasurer a designated trustee) takes day-to-day oversight of finances, monitors budgets, prepares management accounts, and reports to the Board
- All trustees share responsibility for approving significant expenditure and for reviewing financial reports
- Any paid staff or volunteers handling funds operate under the supervision of the Treasurer

3. Segregation of Duties

Wherever possible, no single individual should be responsible for all stages of a financial transaction — initiating, authorising, processing, and recording. In practice, for a small foundation, this means:

- An invoice or request for payment should relate to a previously board-authorised grant
- Bank reconciliations should be reviewed by a trustee who has not made the payments being reconciled
- At least two trustees should have access to bank accounts or financial records

Where the Foundation's small size makes full segregation impractical, compensating controls will be applied — for example, requiring dual trustee sign-off on all payments above a defined threshold.

4. Bank Accounts and Payments

4.1 Authorised Signatories

The Foundation's bank accounts will require a minimum of two authorised signatories for any payment, transfer, or withdrawal above the normal level of operating expense or normal grant level. The list of authorised signatories will be reviewed by the Board at least Periodically and updated promptly whenever a trustee joins or leaves.

4.2 Payment Authorisation Thresholds

The following authorisation thresholds apply:

- Running expenses: Payments up to £1,000: authorised by any one trustee two trustees (or two trustees if the Treasurer is the payee)
- Running expenses: Payments £1,001 to £5,000: authorised by the Treasurer and the Chair
- Running expenses: Payments above £5,000: requires a resolution of the full Board of Trustees
- Grants: Payments may be made by one trustee where the amount is within clear defined authorisation of the relevant project by the Board.

4.3 Online Banking

Where electronic banking is used, at least two trustees will have access to the account. Login credentials must not be shared. Any change to online banking arrangements must be approved by the Board.

4.4 Cash Handling

The Foundation will minimise the handling of physical cash. in the unlikely event cash is received or disbursed, it will be counted by two people, recorded immediately, and banked promptly.

5. Income

All income received by the Foundation must be recorded promptly in the Foundation's accounting records, paid into the Foundation's bank account within five working days of receipt, and attributed to the correct fund (restricted or unrestricted) in line with any donor conditions. Donation receipts or acknowledgements will be issued to donors upon request.

6. Expenditure

All expenditure must be:

- Supported by a valid invoice, receipt, or grant agreement before payment is made
- Authorised in accordance with the thresholds in Section 4.2
- Coded to the correct budget heading and fund in the accounting records
- Paid by bank transfer rather than cash wherever possible

Expenses claimed by trustees must be reasonable, supported by receipts wherever possible, and approved by a trustee other than the claimant before reimbursement.

7. Grant Payments

Grant payments will only be made against a signed grant agreement specifying the purpose, amount, and reporting requirements, and paid to the bank account of the named grantee organisation (verified by the Foundation before first payment). Multi-year or instalment grants will be subject to a satisfactory progress report before each subsequent payment.

8. Budget and Financial Planning

The Treasurer will prepare an annual budget for approval by the Board before the start of each financial year. The budget will cover anticipated income, operational costs, and planned grant commitments. Material variances against budget will be reported to and discussed by the Board.

9. Financial Records and Accounting

The Foundation will maintain complete and accurate accounting records tracking receipts, invoices, running expense payments and grant payments

The Foundation's accounts will be prepared annually in accordance with the Charities Statement of Recommended Practice (SORP) applicable to its size and submitted to the relevant charity regulator within the required deadline.

10. Independent Examination or Audit

The Foundation's annual accounts will be subject to independent examination (or statutory audit if required by its income threshold) by a qualified and independent examiner or auditor appointed by the Board. The examiner or auditor must have no conflict of interest with the Foundation.

11. Fraud Prevention and Response

Trustees and any staff or volunteers must report any suspected fraud, theft, or financial irregularity immediately to the Chair (or, if the Chair is implicated, to any other trustee). The Board will investigate promptly and, where fraud is confirmed, will take steps to recover any losses, report to the police where appropriate, and notify the relevant charity regulator as a serious incident.

12. Review

The Board of Trustees will review this policy periodically and following any significant financial incident, change in personnel, or regulatory guidance.

Policy 5: Risk Management Policy and Procedures

Policy owner	Chair of Trustees / Treasurer
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically, or following a significant risk event

1. Purpose

The Chacegrove Family Foundation recognises that all charitable activity involves an element of risk. Effective risk management does not mean avoiding risk altogether, but identifying, understanding, and managing risks so that the Foundation can pursue its charitable objectives with confidence. This policy sets out the Foundation's approach to identifying, assessing, monitoring, and mitigating risk.

2. Scope

This policy applies to all activities of the Foundation, including grantmaking, financial management, governance, and any operational activities carried out by trustees, employees, volunteers, or agents acting on the Foundation's behalf.

3. Risk Management Principles

The Foundation's approach to risk is guided by the following principles:

- Risk management is a core governance responsibility, not a separate administrative function
- Risks are managed proportionately to the Foundation's size and resources
- The Board of Trustees takes collective responsibility for risk oversight
- Risk management is integrated into planning, decision-making, and regular Board review
- The Foundation aims to be open about risks and to learn from near-misses and incidents

4. Risk Categories

The Foundation identifies risks across the following broad categories:

- Governance risks — including trustee conflicts of interest, succession, regulatory non-compliance, and reputational damage
- Financial risks — including loss of income, investment underperformance, fraud, excessive expenditure, or insolvency
- Grant making risks — including grants made to ineligible or unsuitable organisations, failure by grantees to deliver intended outcomes, or misuse of grant funds
- Legal and regulatory risks — including failure to comply with charity law, data protection obligations, or employment law

- Operational risks — including loss of key personnel, failure of IT or data systems, or inability to maintain adequate financial records
- External risks — including economic conditions affecting investment returns or the broader charitable sector, or reputational risks arising from external events

5. The Risk Review

In view of its modest scale, The Foundation manages risks by an annual risk review as its primary risk management tool. The risk review will record:

- A description of each identified risk under The six headings in para 4 above
- An assessment of the likelihood of the risk occurring (scored 1 to 5, from rare to almost certain)
- An assessment of the potential impact if the risk materialises (scored 1 to 5, from negligible to severe)
- A combined risk score (likelihood x impact), giving a rating of Low (1 to 5), Medium (6 to 12), or High (13 to 25)
- The controls or mitigating actions currently in place
- Any further action planned, with the responsible trustee and target date
- The residual risk score after controls are applied

A designated trustee is responsible for maintaining the Risk Register between Board meetings.

6. Risk Appetite

The Foundation has a low risk appetite in relation to:

- Legal and regulatory compliance — the Foundation will not knowingly breach charity law, tax obligations, or data protection requirements
- Financial probity — the Foundation will not tolerate fraud, misappropriation of funds, or material financial irregularity
- Reputational matters — the Foundation will not make grants or enter partnerships that could bring it into disrepute

The Foundation has an open to moderate risk appetite in relation to the success of its grant making — it is prepared to support innovative or early-stage charitable work where the potential impact justifies the risk, subject to appropriate due diligence and monitoring.

However, in relation to due diligence Of the probity and integrity of recipients, its risk appetite is only moderate

7. Risk Assessment Procedure

7.1 Identification

Risks are identified through regular Board discussion and horizon-scanning, review of financial management information, feedback from grantees and other stakeholders, and review of sector guidance, regulatory updates, and external risk events.

7.2

7.3 Mitigation

For each risk, the Board will consider appropriate responses, which may include avoidance (ceasing an activity that gives rise to the risk), reduction (putting controls in place), transfer (for example through insurance), or acceptance (where the risk cannot be practically mitigated and the potential impact is manageable).

7.4 Monitoring

The Risk Review will be undertaken by the full Board at least annually. Any change or concern inHigh and Medium risk categories will be reviewed at every Board meeting, or more frequently if circumstances warrant. The Treasurer will flag any new or escalating risks to the Chair between meetings.

8. Serious Risk Events and Incidents

Where a significant risk event occurs (such as a suspected fraud, a regulatory investigation, a large unexpected financial loss, or serious reputational damage), the trustee who becomes aware of it must notify the Chair immediately, or in case where the Chair becomes aware, they will notify all other trustees promptly. The Board will convene promptly to agree a response.

Where the event constitutes a serious incident under charity law, the Foundation will report it to the relevant charity regulator within a reasonable timeframe as required by regulatory guidance.

9. Insurance

The Foundation may maintain appropriate insurance to transfer certain risks, including trustee indemnity insurance and, where relevant, employers' liability insurance. The Treasurer will review the adequacy of insurance cover at least periodically.

10. Review

This policy and the Risk Review will be considered annually by the Board of Trustees, or sooner following a material risk event or change in the Foundation's activities.

Policy 6: Investing Charity Funds — Investment Policy and Procedures

Policy owner	Treasurer / Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically, or following a material change in investment arrangements

1. Purpose

The Chacegrove Family Foundation may hold funds that are not immediately required for grant payments or operational expenditure. This policy governs how those funds are invested to protect their real value, generate reasonable returns, and support the Foundation's long-term charitable mission — while complying with the trustees' legal investment duties.

2. Legal Framework

Trustees have a legal duty to invest charity funds prudently. In England and Wales, the relevant duties are set out in the Trustee Act 2000, which requires trustees to exercise reasonable care and skill in making investment decisions, have regard to the suitability of investments and the need for diversification, obtain and consider proper investment advice before making significant investment decisions, and review investments from time to time.

3. Scope

This policy applies to all funds held by the Foundation other than current operating funds held in bank current accounts for day-to-day use, and grant reserves held in short-term deposit accounts pending disbursement (which are governed by the Financial Reserves Policy).

4. Investment Objectives

The Foundation's investment objectives, in order of priority, are:

- Preservation of capital — protecting the real value of invested funds against inflation over the long term
- Income generation — producing a reasonable level of income to supplement the Foundation's grant making capacity
- Long-term growth — where the investment horizon permits, growing the value of the fund to increase future grant expenditure

The Foundation recognises that these objectives involve trade-offs and that some risk of short-term capital loss is inherent in seeking long-term growth.

5. Ethical and Responsible Investment

The Foundation is committed to ensuring that its investments do not conflict with its charitable purposes or bring it into disrepute Well recognising the foundation does not have control over funds it which the investment manager invests under a discretionary mandate. Accordingly, the Foundation will:

- Avoid direct investment in the shares of individually companies whose primary activity is the production or distribution of tobacco or weapons
- Give consideration to environmental, social, and governance (ESG) factors when selecting investment managers
- Engage with investment managers on their stewardship and voting practices

The Board will review the Foundation's ethical investment position at least periodically and may extend or amend the list of exclusions over time.

6. Asset Allocation, Diversification and Risk and Return

The Foundation’s principal investment decisions will be will seek that its selected investment manager appropriately diversifies its investments across asset classes, geographies, and sectors to reduce the risk of a single investment or market event causing significant harm to the fund.

As long term growth of the foundations asset base is the highest priority (para 4), The normal 1- 7 scale of equity risk in a portfolio, the foundation's assets are normally expected to be at least at level 5. The foundation explicitly recognises this may bring short term volatility in return for expected higher long term growth.

These ranges are indicative. The Board will agree and document any material departure from them when appointing or instructing an investment manager.

The Foundation adopts a balanced risk profile — seeking moderate long-term growth while avoiding excessive volatility. Trustees acknowledge that investment values can fall as well as rise, and that past performance is not a reliable guide to future returns. The Foundation will not make speculative investments, use leverage, or invest in complex or illiquid instruments unless the Board has received and considered specific independent advice.

7. Investment Managers

7.1 Appointment

The Foundation may appoint one or more professional investment managers to manage invested funds on a discretionary or advisory basis. Any Change to the initial appointment of Canaccord must be approved by the full Board of Trustees. Before appointing a manager, the Board will consider at least two candidates, confirm the manager is regulated by the Financial Conduct Authority or equivalent, check for any conflicts of interest, and agree a written investment management agreement consistent with this policy.

7.2 Investment Management Agreement

The investment management agreement will specify, as a minimum:

- The investment objective and risk profile
- Any ethical exclusions or ESG requirements

- The asset allocation parameters
- Reporting requirements (see Section 9)
- Fee structures and any performance arrangements
- Termination provisions

7.3 Review and Termination

The performance of any appointed investment manager will be reviewed by the Board at least periodically against agreed benchmarks. If performance is materially below benchmark over a sustained period, or if the manager ceases to meet the Foundation's criteria, the Board will consider terminating the arrangement.

8.

8. Monitoring and Reporting

The foundation will receive and review quarterly valuation and performance reports from any investment manager, report investment performance to the Board at least once per year (including a comparison against the agreed benchmark), and review any significant change in portfolio value, manager, or market conditions to the Chair promptly. The Board will conduct a full investment review at least annually.

10. Investment Advice

Given the Foundation's modest scale, the Board will take independent investment advice before making any significant change to the investment strategy or asset allocation, before appointing or changing an investment manager, and when market conditions or the Foundation's circumstances change materially. The source and substance of any investment advice taken must be recorded in the Board minutes. At the current time the Foundation is advised by Canaccord

11. Conflicts of Interest

Trustees must declare any conflict of interest in relation to investment decisions in accordance with the Foundation's Conflicting Interests Policy. It is noted in this context that the appointment of Canaccord And managerson beneficial terms reflected that Canaccord advised the founder(s) on wider family investments with the reduced fees benefiting the foundation

12. Record-Keeping

The Foundation will retain records of all investment decisions made by the Board (with the rationale), investment manager agreements and correspondence, quarterly and annual performance reports received, and any investment advice obtained. Records will be retained for at least six years.

13. Review

This policy will be reviewed periodically by the Board of Trustees, or sooner if there is a material change in the Foundation's financial position, investment arrangements, or applicable law or regulatory guidance.

Policy 7: Safeguarding Vulnerable Beneficiaries Policy and Procedures

Policy owner	Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically, or following a safeguarding incident

1. Purpose and Commitment

The Chacegrove Family Foundation (the Foundation) is committed to the safety, dignity, and welfare of all people who may be affected by its work, with particular attention to vulnerable adults and children. We recognise that, while the Foundation does not directly deliver services to beneficiaries, the organisations we fund may do so. This policy sets out how the Foundation promotes safeguarding and how it responds to safeguarding concerns.

For the purposes of this policy, a vulnerable beneficiary is any child (a person under 18) or any adult who may be at risk of abuse or neglect by reason of disability, age, illness, or other circumstances.

2. Scope

This policy applies to all trustees and any employees, volunteers, or consultants acting on behalf of the Foundation. It also sets out the Foundation's expectations of grant recipients in relation to safeguarding.

3. Legal and Regulatory Framework

The Foundation operates in accordance with applicable legislation and regulatory guidance, including:

- The Children Act 1989 and 2004
- The Care Act 2014 (adults at risk)
- Working Together to Safeguard Children (HM Government, current edition)
- The Charity Commission's guidance on safeguarding and protecting people

Trustees are aware that safeguarding failures by funded organisations may constitute a serious incident that must be reported to the Charity Commission.

4. Safeguarding in Grant making

When assessing grant applications from organisations that work with vulnerable beneficiaries, the Foundation will:

- Ask applicants to confirm they have a safeguarding policy in place and that it is regularly reviewed

- Ask applicants to confirm that relevant staff and volunteers are appropriately vetted (for example, through Disclosure and Barring Service checks where required)
- Consider any known safeguarding concerns or regulatory action against an applicant as part of due diligence

The Foundation reserves the right to withhold or recover a grant where a recipient organisation has failed to maintain adequate safeguarding arrangements.

5. Safeguarding Expectations for Grant Recipients

As a condition of grant funding, organisations working with vulnerable beneficiaries are required to:

- Have and operate a current safeguarding policy compliant with relevant legislation and sector guidance
- Ensure that all staff and volunteers in regulated roles have appropriate DBS checks
- Report to the Foundation without delay any safeguarding incident or concern that arises in connection with the funded work
- Cooperate fully with any investigation by the Foundation or statutory agencies

6. Responding to Safeguarding Concerns

Any trustee, employee, or volunteer who receives information that raises a safeguarding concern — whether about a beneficiary of a funded organisation or in any other context connected to the Foundation's work — must:

5. Record the concern in writing as soon as possible, including the date, nature of the concern, and the names of those involved
6. Report the concern immediately to the Foundation's Safeguarding Lead (see Section 7)
7. Not attempt to investigate the concern themselves or share it beyond those who need to know

Where there is an immediate risk of harm to a child or vulnerable adult, the police or local authority children's or adult safeguarding services should be contacted without delay, before notifying the Safeguarding Lead.

7. Safeguarding Lead

The Chair of Trustees acts as the Foundation's Safeguarding Lead. The Safeguarding Lead is responsible for:

- Receiving and recording all safeguarding concerns raised within the Foundation
- Deciding whether a concern should be referred to statutory services (police, local authority, Disclosure and Barring Service)
- Determining whether the concern constitutes a serious incident requiring notification to the Charity Commission
- Keeping a confidential record of all concerns and the action taken
- Ensuring that any member of the Foundation team who raised a concern is supported and updated on the outcome, subject to confidentiality

8. Confidentiality

Safeguarding concerns will be handled with appropriate confidentiality. Information will only be shared on a need-to-know basis and, in line with data protection law, will be kept securely. Confidentiality is never used as a reason to prevent the appropriate referral of a concern to statutory authorities.

9. Training and Awareness

All trustees will familiarise themselves with this policy. The Board will consider whether additional safeguarding training is appropriate, having regard to the nature of the Foundation's grantmaking activities.

10. Review

This policy will be reviewed Periodically by the Board of Trustees, or immediately following any safeguarding incident or change in relevant legislation or regulatory guidance.

Policy 8: Trustee Conflicts of Interest — Detailed Procedures

Policy owner	Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically

This document supplements Policy 2 (Conflicting Interests Policy) by setting out the step-by-step procedures trustees follow in practice. It should be read alongside Policy 2.

1. Purpose

This procedures document provides practical guidance to trustees on how to identify, declare, and manage conflicts of interest in day-to-day Foundation business, including at Board meetings, during grantmaking decisions, and in their wider activities.

2. Maintaining Your Register Entry

Each trustee is responsible for keeping their own entry in the Register of Interests up to date. The following procedure applies:

8. On appointment, complete the Register of Interests form in full and return it to the Chair within 14 days
9. Whenever a new interest arises (for example, taking on a new trustee role elsewhere, or a family member joining an organisation that may apply for a grant), notify the Chair in writing within 14 days
10. At each Annual General Meeting (or equivalent annual Board review), confirm in writing that your entry remains current, or submit an updated entry

The Chair is responsible for maintaining the Register and for reminding trustees of this obligation at least once per year.

3. Before Each Board Meeting

The agenda for each Board meeting will include a standing item: Declarations of Interest. Trustees should:

- Review the agenda in advance and consider whether any item gives rise to a conflict
- Arrive prepared to declare any relevant interest at the start of the meeting
- Notify the Chair in advance if they anticipate a significant conflict, so that appropriate arrangements can be made

4. At a Board Meeting — Declaration Procedure

The following procedure applies when a conflict is declared at a Board meeting:

11. The trustee declares their interest clearly, stating the nature of the conflict and the relevant agenda item
12. The Chair notes the declaration for the minutes
13. The remaining trustees agree how the conflict will be managed (see Section 5)
14. If the trustee is to withdraw, they leave the room before discussion of the relevant item begins and do not return until the item is concluded
15. The minutes record the declaration, the names of the trustees present for the decision, and the outcome

5. Managing the Conflict — Decision Framework

Use the following framework to determine how to manage a declared conflict:

- Minor or indirect interest (e.g. a distant connection): trustee declares, remains in the room, does not vote; this is recorded in the minutes
- Significant interest (e.g. trustee is on the board of the applicant organisation): trustee declares, leaves the room for the relevant discussion and decision, takes no part in the vote
- All trustees have a conflict: pause the decision; take independent legal or regulatory advice before proceeding; consider whether additional independent trustees should be co-opted

When in doubt, the more cautious approach (withdrawal) should be taken. The Chair has the casting vote on how a conflict is to be managed if trustees cannot agree.

6. Conflicts Outside Board Meetings

A conflict may arise outside a formal meeting — for example, when a trustee is asked to comment on a grant application informally, or when correspondence is circulated for decision by email. In such cases:

- The trustee must notify the Chair (or another trustee if the Chair is the conflicted party) immediately by email or telephone
- The Chair will determine whether the decision should be deferred to a formal meeting, or whether the remaining trustees can proceed without the conflicted trustee
- All such declarations and outcomes will be recorded and tabled at the next Board meeting for noting in the minutes

7. Gifts and Hospitality — Procedure

Where a trustee receives a gift or hospitality that must be declared under Policy 2:

16. Notify the Chair in writing within five working days, describing the nature and approximate value of the gift or hospitality and the person or organisation from whom it was received
17. The Chair will record the declaration and determine whether any further action is required
18. The declaration will be tabled at the next Board meeting for noting in the minutes

The Chair's own declarations of gifts or hospitality should be notified to another trustee (for example, the Treasurer) who will follow the same process.

8. Record-Keeping Summary

The following records must be maintained:

- Register of Interests — updated at least Periodically; held by the Chair; available to all trustees on request
- Meeting minutes — recording all declarations made, the management decision taken, and the trustees present for each affected agenda item
- Gifts and hospitality log — recording all declarations made under Section 7, held alongside the Register of Interests

9. Review

These procedures will be reviewed Periodically alongside Policy 2 (Conflicting Interests Policy).

Policy 9: Trustee Expenses Policy and Procedures

Policy owner	Treasurer / Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically

1. Purpose

Trustees of The Chacegrove Family Foundation give their time voluntarily and may not be paid for their services as trustees. However, the Foundation may reimburse trustees for legitimate out-of-pocket expenses incurred in the course of their trustee duties. This policy sets out what expenses are reimbursable, how claims should be submitted, and how they will be processed.

The foundation may pay appropriate fees and expenses to the Secretary of the Foundation for services rendered

2. Legal Position

Trustees may only be reimbursed for expenses that are properly incurred in connection with their trustee duties. Reimbursement of expenses is not the same as payment for services and does not require specific authorisation in the Foundation's governing document. However, the Foundation's governing document should be checked if there is any doubt about what is permissible, and any unusual or contested expense claim should be approved by the full Board.

3. Reimbursable Expenses

The following categories of expense may be reimbursed, subject to the conditions in this policy:

- Travel — reasonable costs of travel to and from Board meetings, site visits, and other Foundation business (see Section 4)
- Subsistence — reasonable costs of meals and refreshments when necessarily away from home in connection with Foundation business
- Accommodation — reasonable costs of overnight accommodation where travel to Foundation business would otherwise require an impractical journey (requires prior approval from the Chair)
- Postage, printing, and stationery — minor costs directly related to Foundation business
- Telecommunications — a reasonable contribution to the cost of calls or data charges where a trustee's personal device is used for Foundation business, where the cost is material and identifiable

4. Travel

Where travel by public transport is practical and safe, trustees should use it in preference to other modes. Where car travel is necessary, the cost of car travel will be reimbursed at levels not exceeding HMRC's approved rates

Travel by taxi should only be used where public transport is not reasonably available. Air travel requires prior approval from the Chair and should be booked in economy class.

5. What Cannot Be Claimed

The following are not reimbursable:

- Fines or penalties (for example, parking tickets)
- Alcohol, except as a minor element of a meal claimed under the subsistence category
- Personal items or entertainment unconnected with Foundation business
- Any expense incurred by a family member or guest who is not on Foundation business
- Expenses that have already been or will be reimbursed by another source

6. How to Submit a Claim

Trustees wishing to claim reimbursement should:

19. Send an expenses spreadsheet to the Secretary to the Foundation.
20. Attach all original receipts (or equivalent evidence of expenditure) to the claim form
21. For mileage claims, record the date, destination, purpose, and number of miles travelled
22. Submit the completed claim to the Secretary within three months of the expenditure being incurred

Claims submitted more than three months after the date of expendituremay not normally be reimbursed..

7. Authorisation and Payment

Expense claims must be authorised by a trustee other than the claimant before payment is made.

Authorised claims will be paid by bank transfer to the trustee's nominated account within 14 days of authorisation.

8. Record-Keeping

The Secretary to the Foundation will maintain a record of all expense claims received, authorised, and paid. This record will be reviewed by the full Board as part of its regular annual financial reporting cycle and will be made available to the Foundation's independent examiner or auditor.

9. Transparency

Total trustee expenses paid during the year will be disclosed in the Foundation's annual accounts in accordance with Charity Commission requirements..

10. Review

This policy will be reviewed periodically by the Board of Trustees..

Policy 10: Data Protection and GDPR Policy

Policy owner	Chair of Trustees
Version	1.0 (Draft)
Date adopted	Pending Board approval
Review date	Periodically, or following a significant data incident or legislative change

1. Purpose

The Chacegrove Family Foundation (the Foundation) processes personal data in the course of its activities — for example, information about grant applicants, recipients, donors, and trustees. This policy sets out the Foundation's commitment to processing personal data lawfully, fairly, and transparently, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope

This policy applies to all trustees and any employees, volunteers, or contractors who process personal data on behalf of the Foundation. It covers all personal data held in any format, including electronic files, email, paper records, and data held by third-party processors.

3. Data Protection Principles

The Foundation processes personal data in accordance with the following principles (as set out in the UK GDPR):

- Lawfulness, fairness, and transparency — data is processed on a lawful basis and individuals are informed about how their data is used
- Purpose limitation — data is collected for specified, explicit, and legitimate purposes and not processed in a manner incompatible with those purposes
- Data minimisation — only the minimum data necessary for the stated purpose is collected
- Accuracy — personal data is kept accurate and in so far as practicable up to date; inaccuracies are corrected or erased without delay
- Storage limitation — data is not kept for longer than necessary; see the Retention Schedule in Section 8
- Integrity and confidentiality — data is processed securely, with appropriate technical and organisational measures to protect against loss, destruction, or unlawful processing
- Accountability — the Foundation can demonstrate compliance with these principles

4. Lawful Bases for Processing

The Foundation relies on the following lawful bases for processing personal data:

- Legitimate interests — processing grant applications, conducting due diligence on applicant organisations and their representatives, and managing grant relationships
- Legal obligation — maintaining accounting records, complying with charity regulatory requirements, and meeting tax obligations
- Consent — for any optional communications such as newsletters or event invitations, where consent is explicitly sought and can be withdrawn at any time
- Contract — processing data necessary to administer a grant agreement

Special category data (for example, data about health, ethnicity, or religion) will only be processed where there is a specific lawful basis and explicit consent or another applicable condition under the UK GDPR. The Foundation will avoid collecting special category data unless it is strictly necessary.

5. Data We Hold

The Foundation may hold the following categories of personal data:

- Grant applicants and recipients: names, contact details, professional roles, and information provided as part of the grant application and reporting process
- Trustees: names, contact details, declarations of interest, identification documents, and correspondence
- Donors: names, contact details, and donation records (where donors give to the Foundation directly)
- Employees and volunteers: names, contact details, payroll information, and employment records

6. Data Subject Rights

Individuals have the following rights under UK GDPR, which the Foundation will honour:

- Right of access — to receive a copy of personal data held about them (a Subject Access Request), normally within one month
- Right to rectification — to have inaccurate data corrected
- Right to erasure ('right to be forgotten') — to have data deleted where there is no longer a lawful basis for processing it
- Right to restriction — to limit processing in certain circumstances
- Right to object — to processing based on legitimate interests
- Right to data portability — to receive data in a commonly used, machine-readable format where processing is based on consent or contract

Requests to exercise any of these rights should be directed to the Chair of Trustees in writing. The Foundation will respond within one month and will not charge a fee unless a request is manifestly unfounded or excessive.

7. Data Security

The Foundation takes appropriate technical and organisational measures to protect personal data, including:

- Storing electronic data in password-protected systems with access limited to those who need it

- Ensuring paper records containing personal data are kept securely and not left unattended in public places
- Using encrypted email or secure file transfer where sensitive personal data must be shared electronically
- Ensuring that any third-party service providers who process data on the Foundation's behalf (data processors) operate under a written agreement that includes appropriate data protection safeguards

8. Retention Schedule

Personal data will not be retained longer than necessary. The Foundation operates the following retention schedule:

- Grant application records (successful and unsuccessful): seven years from the end of the grant or the decision date
- Financial records (including grant payments): six years from the end of the relevant financial year, in line with accounting obligations
- Trustee records: for the duration of trusteeship plus six years
- Donor records: seven years from the last gift, unless the donor requests earlier deletion
- Correspondence and general data: three years, unless specifically required to be retained longer

Data that has reached the end of its retention period will be securely deleted or destroyed. Paper records will be shredded; electronic data will be permanently deleted from all systems and backups.

9. Data Breaches

A personal data breach is a security incident that leads to the accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of, or access to, personal data. Any trustee, employee, or volunteer who becomes aware of or suspects a data breach must notify the Chair immediately.

The Chair will assess the breach and, where it is likely to result in a risk to the rights and freedoms of individuals, will report it to the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it. Where the breach is likely to result in a high risk to individuals, those affected will also be notified without undue delay.

10. Privacy Notices

The Foundation provides a privacy notice to individuals at the point their data is collected (or as soon as practicable thereafter) explaining who we are, what data we collect, why, how it is used, how long it is kept, and how they can exercise their rights. The Foundation's privacy notice is available on request.

11. Third-Party Processors

Where the Foundation uses third-party service providers who process personal data on its behalf (for example, cloud storage providers, accountancy software, or email platforms), it will ensure that a written data processing agreement is in place that requires the processor to implement appropriate security measures and to process data only on the Foundation's instructions.

12. International Transfers

The Foundation will not knowingly transfer personal data outside the EU or UK unless appropriate safeguards are in place in accordance with UK GDPR requirements, noting that the Foundation has no control over where established data centres and software providers (eg Microsoft) store information

13. Accountability and Training

The Chair of Trustees acts as the Foundation's data protection contact. All trustees and anyone else processing personal data on behalf of the Foundation will familiarise themselves with this policy. The Board will review compliance with data protection obligations as part of its annual governance review.

14. Review

This policy will be reviewed periodically by the Board of Trustees, or sooner following a data breach, a significant change in the Foundation's activities, or a change in applicable law or ICO guidance.