



Funding Accountability
Grant Management Policy

Policy Version Control

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Funding Accountability: Grant Management Policy

The purpose of this policy is to ensure that ASPE's grant granting is conducted transparently, lawfully and in a way that advances the charity's objects and delivers public benefit. The policy explains how ASPE designs funding opportunities, assesses applications, makes awards, manages payments, monitors delivery, and responds where grant conditions are not met. It reflects the Executive Committee's responsibilities as charity trustees to steward public and donor funds prudently, to manage risk proportionately and to safeguard the charity's reputation and beneficiaries.

Scope and Principles

This policy applies to all discretionary awards, research and project grants, commissioned activity and any other form of financial support provided in ASPE's name or in association with ASPE. It applies to applicants, grantees, partner organisations, assessors, consultants, members, trustees and volunteers involved in grants administration. ASPE will manage grants in line with the principles of public benefit, fairness, transparency, proportionality and value for money. Grants must further the charity's stated objects and be consistent with legal and regulatory obligations, including Charity Commission guidance.

Roles and Responsibilities

The Executive Committee holds ultimate authority and accountability for grant strategy, approval of awards and oversight of grant-making activity. Trustees must ensure that awards further ASPE's charitable purposes, that risks are identified and mitigated, and that decisions are recorded and defensible. The Secretariat carries out the operational administration of calls, receives applications, coordinates assessment processes, performs due diligence checks, drafts funding agreements, processes payments and maintains grant records. Where external expertise is required (for example, technical peer review, specialist safeguarding advice or financial assurance) the Executive Committee may commission independent advisers to inform decision making. All individuals involved in decision making must declare relevant conflicts of interest and act to preserve impartiality and public confidence.

Strategy and Eligibility

Grants will be offered only where they align with ASPE's strategic priorities and charitable objects. For each funding round ASPE will publish clear objectives, eligibility criteria, expected outcomes, assessment criteria and timelines. Eligibility criteria will set out permitted applicant types, geographic limits and any institutional requirements. ASPE will ensure that donor restrictions are compatible with the charity's objects and will not accept conditions that would prevent ASPE from acting in the public interest.

Application Requirements

Applicants must submit complete and accurate applications using the formats specified in the call documentation. Typical application requirements include a project description, workplan and timetable, itemised budget, ethical statement and risk mitigations, safeguarding and access arrangements where relevant, letters of institutional support if required, and bank or institutional details for payment. ASPE reserves the right to reject incomplete or ineligible applications without further consideration.

Assessment and Decision Making

The Executive Committee undertakes grant decisions. Where specialist assessment is needed, the Secretariat will commission external peer review or technical advice and present a written summary to the Executive Committee. Assessments will be made against the published criteria, considering quality, feasibility, value for money, ethical and safeguarding robustness, capacity to deliver, and public benefit. The Executive Committee will document reasons for funding and for refusal, and where awards are conditional these conditions will be recorded. Applicants will be notified of outcomes in writing and provided with feedback where practicable.

Due Diligence and Compliance Checks

Before an award is confirmed, ASPE will carry out proportionate due diligence appropriate to the grant size, complexity and risk. Due diligence may include verification of institutional status, evidence of ethics approvals, confirmation of appropriate insurance, verification of bank account details, checks on financial standing and, where lawful and appropriate, identity and right

to work checks for key personnel. Where projects involve children or adults at risk, ASPE may require evidence of safer recruitment practices and institutional safeguarding arrangements. The Executive Committee may require further assurances or independent checks before confirming an award.

Funding Agreements and Conditions

All grants will be governed by a written funding agreement signed by an authorised representative of the Executive Committee and the grant recipient. Funding agreements will specify the purpose of the grant, approved budget, permitted uses of funds, payment schedule, reporting requirements, monitoring arrangements, record-keeping expectations, data protection obligations, intellectual property and publication expectations, dissemination expectations, arrangements for audits, and ASPE's rights to suspend, terminate or recover funds in specified circumstances. Agreements will require compliance with ASPE policies including Safeguarding, Research Governance and Ethics, Conflict of Interest, Data Protection and Whistleblowing.

Payments and Financial Management

Payments will be made in accordance with the funding agreement and may be staged against milestones or paid on a scheduled basis. Grants are restricted funds and must be used only for the purposes set out in the agreement unless ASPE provides prior written consent for reallocation. Grant recipients must maintain accurate financial records, retain supporting documentation and make records available to ASPE on request. ASPE will not make payments to personal bank accounts except where expressly agreed and justified in writing.

Monitoring, Reporting and Evaluation

Grant recipients must submit progress and financial reports in the formats and timescales set out in the funding agreement. Reports must honestly reflect progress, challenges and use of funds and must notify ASPE promptly of any adverse events, safeguarding incidents, ethical breaches or material project changes. ASPE may undertake monitoring visits, remote checks or independent evaluations and may require grantees to submit anonymised outputs or datasets subject to confidentiality and data protection constraints. Findings from monitoring and evaluation will be used to inform future funding, learning and public reporting.

Safeguarding, Ethics and Research Governance

All funded activity must comply with ASPE's Safeguarding Policy, Research Governance and Ethics Policy and applicable legal requirements. Grant recipients must include safeguarding contacts in participant materials, ensure appropriate vetting and supervision of staff working with vulnerable participants, and report safeguarding concerns immediately to ASPE and to statutory agencies as required. ASPE will cooperate with partner institutions and statutory bodies in investigations and may require the pausing or suspension of activity pending enquiries.

Changes, Rebudgeting and Transfer of Funds

Material changes to project scope, key personnel, timelines or budget re-allocations require ASPE's prior written approval. Routine minor adjustments should be noted in monitoring returns. Unauthorised reallocation of funds, major deviations from agreed methodology, or transfer of funds to third parties without prior consent may constitute a breach of the funding agreement and may trigger remedial action.

Suspension, Termination and Recovery of Funds

ASPE may suspend payments, place projects on hold, require remedial measures, or terminate funding where there is misuse of funds, material breach of agreement terms, failure to deliver agreed outputs, serious safeguarding or ethical breaches, insolvency of the grantee, or material reputational or legal risk to ASPE. Funding agreements will set out the circumstances in which ASPE may require repayment (clawback) and the process for determining sums due. ASPE will take proportionate steps to protect beneficiaries and public funds and will follow fair procedures when invoking sanctions.

Intellectual Property, Publication and Acknowledgement

Grant recipients are expected to acknowledge ASPE's support in publications and outputs and to respect participants' confidentiality. Intellectual property arising from funded work will be dealt with in accordance with the funding agreement, which will normally permit academic publication while protecting participant anonymity and complying with legal obligations.

Conflicts of Interest

Individuals involved in assessing or deciding upon grants, including trustees and volunteers, must declare any relevant conflicts of interest in accordance with ASPE's Conflict of Interest Policy. Where a conflict exists the conflicted person will be recused from relevant discussion and decision-making and the recusal will be recorded.

Data Protection and Confidentiality

Grant recipients must comply with applicable data protection laws and ASPE's Privacy Policy. Personal data collected during projects must be processed lawfully, stored securely and shared only as permitted by the funding agreement and legal obligations. Grant recipients must report data breaches affecting project data to ASPE without delay and cooperate in any required investigation.

Appeals, Complaints and Dispute Resolution

Applicants who believe a decision was affected by procedural error, undisclosed conflict of interest or significant administrative irregularity may request a review in line with the process and timeframe specified in the call documents. Contractual disputes will be managed in accordance with dispute resolution clauses in funding agreements and may include mediation prior to legal remedies.

Record Retention and Access

Grant recipients must retain financial, ethical and project records for the retention period specified in the funding agreement and in accordance with statutory requirements. Access to sensitive records will be limited to authorised personnel and any third-party requests for archived material will be handled in accordance with data protection and confidentiality obligations.

Learning, Evaluation and Policy Review

ASPE is committed to continuous learning and will use monitoring and evaluation findings to improve grant design and administration. Lessons from incidents and audits will be reported, in anonymised form where necessary, to the Executive Committee and used to refine policy and practice.



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