MOVING MOUNTAINS
CHANGING LIVES

Moving Mountains Financial Controls and Procurement Policy

1. Purpose and Scope

This policy ensures robust financial management, transparency, and anti-fraud measures for Moving Mountains Trust. It governs all financial transactions and procurement activities within the UK and during international operations with Non-Governmental Organizations (NGOs) in Kenya and Nepal.

This policy applies to all trustees, employees, volunteers, and downstream partners.

2. Legal and Regulatory Framework

The charity operates under the jurisdiction of Northern Ireland and complies with:

- The Charities Act (Northern Ireland) 2008.
- Charity Commission for Northern Ireland (CCNI) guidance for charities with incomes under £250,000.
- HMRC regulations for UK charity tax and Gift Aid.
- UK Anti-Bribery Act 2010 and Criminal Finances Act 2017.
- Local statutory requirements for registered NGOs in Kenya (NGOs Co-ordination Board) and Nepal (Social Welfare Council).

3. Financial Controls and Governance

3.1 Segregation of Duties

No single individual shall have the sole authority to initiate, authorize, and execute any financial transaction.

- **Initiator:** Staff member or volunteer requesting funds.
- **Authorizer:** Line manager or Trustee approving the need.
- **Executor:** Treasurer or designated Trustee processing the payment.

3.2 Banking and Signatory Thresholds

- All primary bank accounts must be held with **CAF** in the registered name of the charity.
- Dual authorization is mandatory for all electronic transfers and cheque payments.
- **Financial Thresholds for Approvals:**
    - Up to £500: Approved by the Chairman or Treasurer.
    - £501 to £5,000: Approved by the Treasurer and one Trustee.
    - Over £5,000: Approved by the Chairman, Treasurer and one Trustee.

3.3 Cash Management and Foreign Currency

- Cash handling must be kept to an absolute minimum.
- Petty cash floats in the UK are capped at £100 and must be reconciled monthly.
- Standard physical cash couriering abroad is strictly prohibited.

4. International Remittance and Transfer Controls

4.1 Approved Transfer Mechanisms

- All international fund transfers to Kenya and Nepal must originate from the **Ulster Bank, CAF** or **Wise** accounts.
- **Wise** is authorized as the primary digital platform for foreign exchange and remittance to achieve cost-effective transfer rates.
- The **Wise** account must be linked directly to the **Ulster Bank** or **CAF** account and registered under the charity's legal name.

4.2 Remittance Authorization

- Setting up a beneficiary or initiating a transfer on Wise requires one authorized user.
- A second authorized Trustee must verify and approve the transfer via Ulster Bank/CAF/Wise dual-authorization controls before funds are released.
- Every transfer must map directly to an approved project budget line.

5. International Procurement Policy

5.1 Procurement Principles

All procurement must achieve value for money, transparency, fair competition, and ethical sourcing.

5.2 Thresholds for Purchasing Goods and Services

The following bands apply to individual purchases or single project contract values:

Band 1 (Under £1,000 / Local Equivalent): Direct purchase. Requires a single written quote or online price comparison to confirm value for money.

Band 2 (£1,001 to £5,000 / Local Equivalent): Two written competitive quotes required. Approved by the Treasurer.

Band 3 (Over £5,000 / Local Equivalent): Three written competitive quotes required. Approved by the Treasurer.

5.3 Restricted and Prohibited Purchases

Charity funds must never be used to purchase:

- Military or dual-use equipment.
- Goods from vendors utilizing forced or child labour.
- Any items that breach UK, Kenyan, Nepalese, or international trade sanctions.

6. International Partner Management (Kenya & Nepal)

6.1 Direct Implementation and Due Diligence

The charity operates an exclusive direct-implementation partnership model. Partner NGOs in Kenya and Nepal must execute projects directly using their own internal staff and resources. **Sub-contracting or onward-granting to smaller community groups or third parties is strictly prohibited** without prior written amendment from the Board of Trustees.

Before transferring any funds, the charity must:

- Conduct a formal due diligence assessment checking governance, local registration, and financial history.
- Sign a legally binding Memorandum of Understanding (MoU) or Project Partnership Agreement.
- Verify that the destination bank account matches the legal name of the registered NGO.

6.2 Fund Disbursement and Tranches

- Funds will be withheld until the partner provides satisfactory narrative and financial reports for at least 80% of the previous project milestones.
- Original receipts or certified digital copies for all local expenditures in Kenya (KES) and Nepal (NPR) must be submitted monthly by the implementing NGO.

7. Anti-Fraud, Bribery, and Counter-Terrorism Financing

7.1 Zero Tolerance Policy

The charity has zero tolerance for fraud, bribery, corruption, or nepotism. Paying "facilitation payments" to fast-track government processes in Kenya or Nepal is strictly illegal under the UK Bribery Act and is prohibited.

7.2 Sanction Screening

To comply with UK counter-terrorism legislation, the Treasurer must screen international partners, key personnel, and major vendors against the UK Office of Financial Sanctions Implementation (OFSI) consolidated list before any funds are sent abroad.

7.3 Reporting and Whistleblowing

Any suspected financial wrongdoing must be reported immediately to the Chair of Trustees. If material fraud occurs, the Board will immediately notify the Charity Commission for Northern Ireland (CCNI) via a Significant Incident Report.

8. Audit, Accounts, and Review

8.1 Reporting Threshold Compliance

As a Northern Irish charity with an annual income under £250,000, the charity will prepare its annual accounts on either an **accruals** or **receipts and payments** basis, as agreed by the Board.

Accounts must undergo an **Independent Examination** by a qualified independent person before submission to the CCNI, rather than a full statutory audit (unless required by specific governing documents or funders).

8.2 Document Retention

- Financial records, bank statements from Ulster Bank, Wise transaction logs, receipts, and partner reports will be maintained for a minimum of 7 years.
- This policy will be reviewed annually by the Board of Trustees.

9. Monitoring and Review

The Board of Trustees will review this policy every two years, or earlier if legislation, CCNI guidance or the charity's activities change.

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Recognised as a charity by HMRC under reference XR62512 and by the Charity Commission for Northern Ireland under reference 100742