

Moving Mountains Safeguarding Policy

1. Purpose and Scope

This policy outlines the principles and procedures to protect children and vulnerable adults from harm, abuse, and exploitation. It ensures compliance with Northern Irish statutory frameworks while establishing clear operational safeguards for our work alongside direct-implementation NGO partners in Kenya and Nepal.

This policy applies globally to all trustees, employees, volunteers, and consultants who work in the UK or travel internationally on behalf of the charity.

2. Legal and Regulatory Framework

This policy is aligned with standard international development safeguarding benchmarks and complies with:

- **Northern Ireland:** The Children (Northern Ireland) Order 1995, the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, and the Charity Commission for Northern Ireland (CCNI) guidance on safeguarding.
- **Kenya:** The Children Act 2022 and Protection Against Domestic Violence Act 2015.
- **Nepal:** The Act Relating to Children 2018 and National Child Policy.
- **International Standards:** The UK Foreign, Commonwealth & Development Office (FCDO) Enhanced Due Diligence Safeguarding Standards.

3. Safer Recruitment and Personnel Vetting

3.1 UK Personnel Vetting

- All staff, trustees, and volunteers based in the UK or travelling overseas must undergo a relevant background check prior to engagement.
- For roles involving direct or unsupervised contact with children or vulnerable adults, an Enhanced background check with barred list checks is mandatory.
- At least two professional references must be obtained and verified for all personnel.

3.2 International Partner Accountability

- As our partners in Kenya and Nepal implement projects directly, they must provide evidence of their own safer recruitment processes.
- Partners must verify that their staff have clear local police records (e.g., a valid Certificate of Good Conduct in Kenya or a Police Clearance Certificate in Nepal).
- Annual due diligence checks will confirm that partner staff have received updated safeguarding training.

4. Risk Mitigation during International Site Visits

4.1 Fieldwork Conduct Protocols

When UK staff or volunteers visit project sites in Kenya or Nepal, they must strictly adhere to the following rules:

- **The Two-Adult Rule:** Personnel must never be alone in a room, vehicle, or isolated space with a child or vulnerable beneficiary.
- **No Private Visits:** Visits to beneficiaries' homes must always be pre-arranged, explicitly approved by the local partner NGO, and accompanied by a local staff member.
- **Financial Separation:** Personnel must never distribute personal cash gifts, individual sponsorships, or tokens directly to beneficiaries, as this creates harmful dependencies and increases exploitation risks.

4.2 Safe Accommodation and Communication

- Visiting personnel must stay in commercial lodging pre-vetted for safety by the partner NGO.
- Under no circumstances may a beneficiary stay overnight in a volunteer's or staff member's accommodation.
- Personnel must not connect with minor beneficiaries on personal social media platforms or exchange private phone numbers.

5. Media, Photography, and Data Protection

5.1 Informed and Documented Consent

- Before taking any photograph or video for marketing, fundraising, or reporting, explicit written or recorded verbal consent must be secured from the individual (or a parent/guardian if the child is under 18).
- Beneficiaries must be clearly informed that they have the right to refuse or withdraw consent at any point without any impact on the aid they receive.

5.2 Dignity in Representation

- Images must depict individuals with dignity. Images showing children who are inappropriately dressed or in distressing states are strictly prohibited.
- To protect children and vulnerable adults from tracking, published materials must only use real names alongside specific, identifiable local villages or schools if permission is granted.

6. Reporting Mechanisms and Responding to Concerns

[Concern Identified/Disclosed]



[Document immediately using clear, factual language]



[Report to Charity Designated Safeguarding Lead within 24 hours]



↓
[In UK]
Report to Social
Services / Police

↓
[In Kenya or Nepal]
Report to local Partner DSL,
Local Authorities & CCNI

6.1 Identifying and Documenting Concerns

- Any representative who observes, suspects, or receives a disclosure of abuse must write a factual report within 24 hours. The report must contain exact dates, times, and verbatim statements, without personal speculation.

6.2 Reporting Pathways

- **Inside UK:** The Designated Safeguarding Lead (DSL) will immediately refer the matter to Social Services or the Police.
- **Inside Kenya or Nepal:** The matter must be reported immediately to the local partner's Safeguarding Officer and local protective services (e.g., the Child Helpline 116 in Kenya or Child Helpline 1098 in Nepal). The charity's UK DSL must be notified simultaneously.
- **Regulatory Reporting:** The Board of Trustees will submit a Significant Incident Report to the Charity Commission for Northern Ireland (CCNI) within 48 hours of any serious safeguarding breach.

7. Governance and Review

- The Board of Trustees holds ultimate accountability for safeguarding compliance.
- Safeguarding will be a standing agenda item at every quarterly board meeting.
- This policy must be translated or clearly communicated to partner organizations in Kenya and Nepal, and reviewed annually.