

Moving Mountains Whistleblowing Policy

1. Purpose

Moving Mountains Trust is committed to the highest standards of honesty, integrity, accountability and transparency.

This policy encourages trustees, volunteers, employees, consultants and anyone acting on behalf of the charity to report genuine concerns about wrongdoing without fear of retaliation.

The charity will take all concerns seriously and investigate them fairly, promptly and confidentially wherever possible.

2. Scope

This policy applies to:

- Trustees
- Employees
- Volunteers
- Consultants
- Contractors
- Members of committees or advisory groups
- Individuals working with or on behalf of the charity
- Where appropriate, representatives of partner organisations in Kenya and Nepal

3. What is Whistleblowing?

Whistleblowing is the reporting of concerns about suspected wrongdoing that affects the charity, its beneficiaries, staff, volunteers, partners or the public.

Examples include:

- Fraud or financial misconduct
- Theft or misuse of charity funds
- Corruption or bribery
- Serious breaches of the charity's policies
- Abuse of authority

- Conflicts of interest that have not been declared
- Safeguarding concerns
- Serious health and safety risks
- Criminal offences
- Deliberate concealment of wrongdoing
- Serious misconduct by trustees, volunteers or staff
- Misuse of donor funds or restricted grants
- Serious misconduct by an overseas partner organisation acting on behalf of the charity

This policy is not intended for routine complaints, employment grievances or personal disagreements unless they involve serious wrongdoing.

4. Principles

The charity is committed to ensuring that:

- concerns can be raised without fear of victimisation;
- reports are treated seriously and investigated appropriately;
- confidentiality is respected wherever possible;
- individuals who raise concerns in good faith are protected from retaliation;
- malicious or knowingly false allegations may result in disciplinary or other appropriate action.

5. Raising a Concern

Concerns should normally be reported as soon as possible.

Reports should include, where available:

- what happened;
- where and when it occurred;
- who was involved;
- any evidence available;
- whether the matter has already been reported elsewhere.

Concerns may be raised verbally or in writing.

6. Reporting Procedure

Where possible, concerns should be reported to:

- the Chair of Trustees; or
- another trustee if the concern involves the Chair.

If the concern involves the entire Board or there is no confidence that the matter will be handled impartially, concerns may be reported directly to the appropriate external authority.

Safeguarding concerns should always be dealt with in accordance with the charity's Safeguarding Policy and referred immediately to the designated safeguarding lead.

7. Overseas Partners

As the charity works with partner organisations in Kenya and Nepal, concerns relating to overseas programmes are covered by this policy.

This includes concerns regarding:

- misuse of project funds;
- safeguarding failures;
- fraud;
- corruption;
- discrimination;
- abuse or exploitation;
- breaches of donor conditions;
- unethical conduct.

The charity recognises that cultural and legal differences may affect how concerns are reported and will seek to ensure that overseas partners can raise concerns safely and confidentially.

8. Confidentiality

The charity will make every reasonable effort to protect the identity of anyone raising a concern.

Information will only be shared where necessary to investigate the matter or where required by law.

Anonymous reports will be considered where sufficient information is provided, although investigation may be more difficult.

9. Investigation

The Chair (or another trustee where appropriate) will determine how the concern should be investigated.

Depending on the nature of the allegation, this may include:

- reviewing relevant documents;
- interviewing those involved;
- obtaining information from partner organisations;
- seeking professional or legal advice;
- referring the matter to statutory authorities.

The individual raising the concern will normally receive acknowledgement of their report and, where appropriate, be informed when the investigation has concluded, subject to confidentiality obligations.

10. Protection from Retaliation

No trustee, volunteer, employee or other person acting in good faith will suffer disadvantage, harassment or retaliation for raising a genuine concern.

Any attempt to victimise someone who has raised a concern will itself be treated as a serious matter.

11. Malicious Allegations

Reports made honestly, even if mistaken, will not result in any penalty.

However, deliberately false, malicious or vexatious allegations may result in appropriate action.

12. Record Keeping

The charity will maintain confidential records of:

- concerns raised;
- investigations undertaken;
- actions taken;
- lessons learned.

Records will be retained in accordance with the charity's Data Protection and Privacy Policy.

13. Related Policies

This policy should be read alongside the charity's:

- Conflict of Interest Policy
- Safeguarding Policy
- Anti-Bribery and Anti-Corruption Policy
- Financial Controls and Procurement Policy
- Code of Conduct
- Data Protection and Privacy Policy
- Complaints Policy
- Serious Incident Reporting Procedure (where applicable)

14. Responsibilities

Board of Trustees

The Board is responsible for:

- promoting a culture of openness and accountability;
- ensuring concerns are investigated appropriately;
- protecting those who raise concerns in good faith;
- taking appropriate action where wrongdoing is identified.

Chair of Trustees

The Chair is responsible for:

- receiving whistleblowing reports where appropriate;
- ensuring investigations are proportionate and impartial;
- reporting significant matters to the Board.

All Trustees, Volunteers and Staff

Everyone is responsible for:

- reporting genuine concerns promptly;
- cooperating with investigations;
- maintaining confidentiality.

15. 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.