

**Safeguarding and
People Policies**

May 2021

We are committed to creating an equitable environment to build a diverse team and allow individuals to flourish whilst working in the Agulhas family. The company is an [employee owned](#) organisation meaning shares in the company are held in a Trust which works in the interests of the shared owners. Agulhas encourages a high level of staff engagement in company matters and shares rewards of our success with everyone.

We believe that the people we work with are the core to our success in bringing insight and expertise to the fore; we seek to listen to and empower each other. Clarity and transparency in adhering to Agulhas's values demonstrated through all our work is an essential element in ensuring people (clients, staff and partners) are able to invest their trust in us. Agulhas therefore strives to reach a gold standard in safeguarding and people policies, and we subscribe to the UN Global Compact.

We have introduced guidelines to protect and safeguard all individuals we work with, recognising that sometimes we work with vulnerable people, and policies to provide our staff and consultants with both security and an appropriate code of conduct within which to operate.

All policies are managed by Lauren Pett, Director and COO.

Accreditations and Guidance we follow:

- The [UN Global Compact](#) Principles 3, 4, 5 and 6
- The [ILO Declaration of Fundamental Principles and Rights at Work](#)
- The [Modern Slavery Act 2015](#) (incl. 2018 [Section 54 update](#))
- We are an accredited [Living Wage Employer](#)
- Advisory, Conciliation and Arbitration Service (ACAS) [Code of Practice on Disciplinary and Grievance Procedures](#)
- ACAS [Bullying and Harassment at Work Guidelines](#)
- The [United Nations Convention on the Rights of the Child \(UNCRC\)](#) 1989

Safeguarding Policies

Child and vulnerable adult safeguarding

We believe that the protection of children and vulnerable adults requires everyone to take responsibility and that every child matters. We recognise that the care, protection and welfare of children and vulnerable adults is paramount and that all children and vulnerable adults have the right to be protected from all types of harm without exception or discrimination.

While Agulhas does not work directly with children or vulnerable adults, many of our clients and partners do, and there are occasions where we may interact with children or vulnerable adults, such as when conducting field work. In addition, our recommendations may impact on programming for children and vulnerable adults. In all such cases, we recognise that we have a fundamental duty of care towards all children and vulnerable adults.

Agulhas is committed to:

- Assessing safeguarding risks where we plan to, or it is likely that we will, interact with children or vulnerable people or communities, and putting proportionate measures in place which may include, for example, training and/or vetting staff and adhering to our clients' safeguarding practices
- Consider the impact on children and vulnerable adults when making recommendations to clients
- Valuing and respecting children and vulnerable adults and listening to their views where applicable to our work
- Ensuring compliance with UK child protection laws, relevant laws in the countries where we operate.

All Agulhas staff must report any concerns relating to safeguarding in a timely manner to the partner/organisation responsible for the programme and notify an Agulhas Director (Nigel Thornton, Catherine Cameron, Marcus Cox and Lauren Pett). If the staff member has reason to believe that the partner/organisation responsible will not appropriately deal with the concern, or that reporting to them may further endanger others, they should report this immediately to a Director in accordance with our Whistleblowing Policy.

Anti-slavery policy

At Agulhas, we take the issues of modern slavery and human trafficking very seriously. We are committed to embedding practices to combat slavery and human trafficking in our business and in our supply chain. We will submit our policies and procedures annually to UK Government for their supplier Modern Slavery Assessment tool which has designated our business as low risk. The assessment report is used to set a pathway to improvement including the instatement of key performance indicators to continually improve our corporate approach to modern slavery.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Organisation's structure and supply chain

Agulhas Applied Knowledge Ltd. (Agulhas) is a private limited consulting firm registered in the UK. Its headquarters as well as most of its staff are based in the UK. A small proportion of its employees are based abroad including in France and South Africa. We do not hire staff

on a seasonal basis or work in hazardous conditions which would expose people to exploitative employment practices. We are a research-based consultancy company which helps public, private and third sector clients in their international development work. Our core business includes helping clients with organisational development and learning and advising on policy. We also help with the evaluation of international development portfolios and with accountability.

Our supply chain involves professional advisory services, office supplies and IT. Agulhas operates worldwide: our staff travel often in developing countries and we occasionally hire temporary support (interpreters, drivers, researchers) in developing countries. While the nature of our business, as advisers, does not have significant direct exposure to modern slavery risks, some of our supply chains may operate in riskier environments for modern slavery and human trafficking. In addition, we sometimes work in countries where there is a high risk of modern slavery and our analysis and recommendations may impact on anti-slavery and anti-trafficking programming.

Our Principles in relation to forced and bonded labour, modern slavery and human trafficking

- We are committed to ensure that we are conducting our business in a lawful and ethical manner
- We do not tolerate human-trafficking, bonded labour and modern slavery practices in our business – this includes ensuring freedom of movement, freedom to terminate employment, prohibiting threats of violence, harassment and intimidation, debt bondage, obligation to work as a disciplinary measure and compulsory overtime as set out in our People and Safeguarding policies
- We will collaborate with contractors and suppliers in our supply chain to mitigate the risks and address cases of human trafficking, bonded labour and modern slavery through the Agulhas Suppliers Code of Conduct and our Due Diligence Process
- We will require all new contractors and suppliers to act in accordance to our values and to this policy, and to the Suppliers Code of Conduct
- We will mandate the reporting of suspicion, incidents or risks of modern slavery or human trafficking observed during the course of our work, including by third parties, to a Director to consider appropriate further action
- Wherever examples of modern slavery are discovered in our work we will endeavour to facilitate access to remedy, compensation and justice either directly or through the relevant authorities
- We will not retaliate, discharge, suspend or discriminate in any manner any person who will report or make an ethics complaint about our practices
- We will consider the impact on slavery and trafficking risks when making relevant recommendations to clients due to the course of our work

Risk assessment and management

Our risk management processes aim at ensuring that particular areas of risk in our business and supply chains are identified and impact assessments undertaken before projects start. In cases where a specific ethical concern has been raised, including those related to forced

labour, slavery and human trafficking, it will be reported to the company Directors who are responsible for determining the appropriate course of action.

Effective action and way forward

Agulhas has always sought to operate ethically and lead by example. This includes being a Living Wage Employer (see www.livingwage.org.uk) and always paying interns a fair wage. It also includes having procedures to escalate any ethical concerns and issues to the Directors and freedom of employees to terminate employment. Under no circumstances will Agulhas tolerate enforced, debt related or bonded labour or any form of worker-paid recruitment fees or utilise a disciplinary measure including an obligation to work.

We display this Anti-Slavery Policy on the Agulhas website and will report annually any recorded incidences of non-compliance internally or via our suppliers.

In acknowledgment of the relevance of these issues, we are taking steps to increase awareness of modern slavery and human trafficking in our supply chain and in our business. We have attended sector-specific workshops, provided a training forum for our employees and commit to continuously improving our system.

Resources:

- Online published policy, [link](#).
- Modern Slavery Act 2015 supporting documents, [link](#).

People Policies

Agulhas provides a set of standard HR Policies to its employees as follows:

- Agulhas – Absence Policy
- Agulhas – Employee Behaviour and Conduct Policy
- Agulhas – Disciplinary Procedure
- Agulhas – End of Contract Policy
- Agulhas – Starting Employment Policy
- Agulhas – Grievance Procedure

We highlight the following policies to provide additional guidance and clarity on key issues.

Agulhas upholds the principles of freedom of association and recognises the right to collective bargaining for staff members.

The London office is fully accessible to people with disabilities.

Diversity and Equality (including recruitment, pay and performance management)

Agulhas is committed to ensuring that there is **no discrimination** without a legally legitimate aim in the recruitment, retention, remuneration, training and development of staff on the basis of age, nationality, disability, gender including transgender, HIV/AIDS status, marital status including civil partnerships, pregnancy and maternity, political opinion, race/ethnicity, religion and belief, sexual orientation, socio-economic background, spent convictions, trade union activity or membership, work pattern, on the basis of having or not having dependants or on any other grounds which are irrelevant. We proactively promote **diversity** in our teams. We aim to follow both the letter and the spirit of equality legislation.

Standards we comply with

- 2010 Equality Act
- Agulhas is an **accredited [Living Wage company](#)**.

We proactively seek to recruit individuals with diverse backgrounds and profiles to our team and ensure that our recruitment processes allow a broad range of candidates to apply for our positions by advertising on different platforms (for example on [diversifying](#)). We are committed to paying our staff and contractors a fair wage that is based on their contribution. We will never require employees to perform compulsory overtime. All pay and promotion decisions will be communicated clearly and openly with each member of staff.

Agulhas is committed to:

- understanding, valuing and working with diversity to enable fair and full participation in its work and activities
- striving to build a diverse workforce
- ensuring that there is no unjustified discrimination in its recruitment, selection, performance management and other processes
- treating individuals with whom we work with fairness, dignity and respect
- never paying less than the Real Living Wage, including for internships, as defined by the Living Wage Foundation
- giving opportunities for all staff to develop and providing honest and fair feedback on their performance
- working with our suppliers to encourage them to use the Real Living Wage
- providing options for a workplace pension under an ethical scheme.

Performance of employees will be measured against mutually agreed key performance indicators / terms of reference formally on an annual basis and quarterly on an informal basis with the employee's line manager.

Disciplinary procedures are based on UK guidance and the Acas Code of Practice. Where possible, performance or behaviour issues should be raised informally in the first instance by the employee's line manager.

In serious cases, the Agulhas disciplinary procedure will be followed:

- 1) A letter setting out the issue will be provided to the employee
- 2) A meeting will be arranged to discuss the issue. A second representative (trade union or colleague) may attend this meeting along with the employee, line manager and a Director level representative
- 3) A disciplinary decision will be made and communicated in writing
- 4) An opportunity to appeal the decision within a specified time frame will be provided

The Equality, pay, recruitment and performance management policy is managed by Lauren Pett.

Anti-Bullying and Harassment Policy

Agulhas does not tolerate the harassment or bullying of employees, volunteers or employees of contractors whilst at work, at Agulhas related events or whilst carrying out Agulhas business. We note that harassment is unlawful as per the Equality Act 2010, and that bullying and harassment in all forms are fundamentally discordant with Agulhas' core values. Agulhas understands bullying and harassment to constitute actions that are offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Specific behaviours that Agulhas will not tolerate include:

- spreading malicious rumours, or insulting someone by word or behaviour
- copying memos that are critical about someone to others who do not need to know
- ridiculing or demeaning someone – picking on them or setting them up to fail
- exclusion or victimisation
- unfair treatment, overbearing supervision or other misuse of power or position
- unwelcome sexual advances – touching, standing too close, display of offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
- making threats or comments about job security without foundation
- deliberately undermining a competent worker by overloading or constant criticism without being constructive or providing justification
- preventing individuals' progress by intentionally blocking promotion or training opportunities.

Any incidents of bullying or harassment should be raised with a Director. All allegations of harassment or bullying will be dealt with in a robust and timely manner with fairness and sensitivity, and regardless of whether the complaint accords with a standard definition i.e. "unwanted conduct related to a relevant protected characteristic, which has the purpose or

effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.”

Whistleblowing and complaints

Agulhas is committed to the highest degree of professionalism and integrity and to operating in an ethical and lawful matter.

Where staff, contractors or clients have concerns involving Agulhas staff, contractors or management they should be reported to one or more of our Directors. Concerns that should be reported include, but are not limited to:

- Suspicions of theft, bribery or corruption, including by third parties
- Suspicions of other financial crime, such as money laundering, including by third parties
- Suspicions of forced labour / modern slavery, human trafficking and exploitation or abuse of children or vulnerable adults, including by third parties
- Bullying, harassment or discrimination of any form
- Health or safety breaches
- Criminal activity or failure to comply with legal obligations
- Breaches of Agulhas policies
- Deliberate concealment of information relating to the above

Complaints relating to the quality of our work or the conduct of our staff or contractors should also be reported to one or more of the Directors.

Agulhas is committed to:

- Taking seriously and investigating any concerns or complaints
- Protecting against the unnecessary disclosure of the identity of those raising concerns or complaints
- Ensuring no-one implicated in the complaint has a supervisory role in any investigation into it
- Protecting staff and contractors from retaliation regardless of whether the complaint or concern is upheld
- Reporting serious abuses to the authorities (e.g. police or HMRC).

If any staff member, consultant or partner is not sure whether an incident constitutes a violation of policy, the law or Agulhas' ethical integrity the Directors encourage them to raise the concern in good faith with them directly and without fear of judgement or repercussion.

Health and Safety

Agulhas acknowledges its duty of care to ensure a safe place to work for our staff, clients and visitors. We aim to achieve this through compliance with the safety laws in each of the

countries in which we operate as well as the relevant policies in this pack, such as the duty of care policy.

Health and safety is everyone's responsibility as well as being a responsibility for all levels of management. Agulhas expects everyone to be aware of their role in workplace safety.

Where Agulhas works in hostile and high-risk regions, enhanced measures are put in place to ensure the health, safety and security of staff and contractors (see Agulhas Safety and Security Overseas Guidelines and the Duty of Care Policy). All staff and contractors should feel comfortable with any work travel. No member of staff or contractor is expected to travel to any region where they feel unsafe. Any staff member who decides not to travel due to health, safety or security concerns will not be discriminated against in terms of pay, promotion or future opportunities.

Agulhas is committed to:

- achieving and maintaining good practice standards in its health and safety performance
- reviewing its systems and procedures to ensure their suitability, adequacy and effectiveness
- providing suitable and sufficient information, instruction, training and facilities to ensure all staff are aware of, and equipped to carry out, their health and safety responsibilities competently
- Carrying out occupational health assessments
- ensuring that staff and contractors are aware of, and satisfactorily discharge, their health and safety roles and responsibilities
- providing relevant health, safety and hostile environment training to any staff travelling to high-risk regions
- providing specialist safety and security advice, plans and support to any staff travelling to high-risk regions

The London office operates in accordance to all relevant UK Health and Safety legislation and guidance. There is a First Aid box in the top cupboard above the microwave in the kitchen with corresponding incident book and fire extinguishers on each level. The fire evacuation point is outside the Rosemary Branch pub. A full risk assessment has been undertaken and self-categorised the workplace to be low risk.

First Aiders: Lauren Pett, Nigel Thornton, Catherine Cameron, Marcus Cox.

Fire Wardens: Nigel Thornton, Lauren Pett.

Stress Management Policy

Agulhas recognises that at times, staff may experience stress caused by, or exacerbated by work life (both content and intensity). We also recognise that some of the issues we deal with and situations we witness in the field can be upsetting. As responsible employers we

strive to support our team to manage acceptable stress and mitigate the risk of exposure to unacceptable stress.

- **Rest and Recuperation:** Complete breaks from work are important to stay healthy and productive in the professional environment. As such regular leave must be **planned in advance** and **taken evenly** across the year. Individuals should not engage with email in any way whilst on leave or attend meetings unless specifically called in an emergency by one of the Directors.
- **Stress awareness:** Understanding the symptoms of stress is a key skill in working life. Agulhas will provide stress management training and subsequent refresher sessions to ensure all staff are aware of their own stress burden and able to recognise and provide support for other colleagues affected by stress.
- **Work from home:** Agulhas operates a trusting and transparent work culture which allows for flexible working hours. Core hours are 10am-4pm daily, and whilst staff are encouraged to spend time with their colleagues in the office environment, working from home is acceptable with permission from one of the Directors.

Any staff member feeling the effects of stress should speak to one of the Directors. All discussions will be treated in the strictest confidence and without risk of discrimination. Where appropriate a mutually agreed workplan will be designed to support the staff member to manage their stress burden.