

**Code of Conduct and  
Safeguarding and People  
Policy Pack – Anti-bullying  
and Harassment Policy**

July 2023

# Introduction and Principles

Agulhas provides evidence-based consultancy and advice to help our clients achieve their objectives in a world of increasing insecurity, inequality and interdependence. In doing so, we commit to providing the utmost levels of professionalism and integrity, operating in compliance to the highest international standards where possible. Our organisational principles, policies and guidelines have been established to help us to do this. All Agulhas people commit to six core principles:

<b>Integrity</b>	We will conduct ourselves in a way in which we can be proud. We will be honest with each other, our clients and ourselves. We will provide challenge where it is needed and praise where it is due.
<b>Respect</b>	We will treat each other and our clients, contractors and communities with respect. We will take the time to listen to others, look for the best in people and strive to empower others to be their best.
<b>Equity</b>	We will be mindful of power imbalances in everything we do. Our approach will continuously evolve, recognising our collective responsibility to unlearn biases and re-learn what it means to be equitable, inclusive and just.
<b>Openness</b>	We will share ideas and good practice. We will raise concerns quickly and deal with them fairly.
<b>Commitment</b>	We will always keep in mind Agulhas's goal of harnessing knowledge and learning for sustainable development.
<b>Effectiveness</b>	We will strive to deliver the highest quality work in the areas where we can use our skills to make the greatest impact. We will continually look for ways to do better: individually; together; and with clients, contractors and communities.

These principles underpin the way we work and the policies included in this pack. Agulhas commits to provide adequate and appropriate resources and training to implement these policies and will ensure they are communicated and understood by all relevant staff and contractors. Agulhas' Directors commit to leading by example and fostering an environment that supports implementation of the policies and of continuous improvement. Agulhas aspires to be a workplace leader by providing clear, practical and proportionate policies developed with the participation of all staff members and made publicly available.

Agulhas will review these policy statements at least annually and more frequently if necessary to reflect new legal and regulatory developments and ensure good practice. Each policy has an assigned a Responsible Officer, to ensure they are up to date and compliant with benchmarks including FCDO and HMG guidelines. The company Risk Register is reviewed quarterly by the Directors. The Directors are:

Lauren Pett (CEO): [lauren@agulhas.co.uk](mailto:lauren@agulhas.co.uk)  
Nigel Thornton (CFO): [nigel@agulhas.co.uk](mailto:nigel@agulhas.co.uk)  
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Marcus Cox: [marcus@agulhas.co.uk](mailto:marcus@agulhas.co.uk)

Please send any comments and suggestions for improving our policies to the operations team at [sanum@agulhas.co.uk](mailto:sanum@agulhas.co.uk)

# Our Responsibility

At the heart of Agulhas’s policies is a responsibility to our clients, our community, our people and our environment. We take that commitment seriously and strive to have a positive impact where we work and to be consistent with global standards of integrity and social responsibility. We operate in accordance with the B Corp framework, ensuring our policies and procedures take into account all stakeholders as far as is possible – our Governance structure, People, Customers, Partners, our Community and the Environment. In certifying as a [B Corporation](#), we are using internationally recognised standards and best practice throughout our business operations. This aligns with our Employee Ownership structure and ethos. We certified participants of the [UN Global Compact](#) and as a supplier of services to FCDO, we apply the [FCDO Supplier Code of Conduct](#).

## B Lab framework for B Corporation certification



The rigorous BCorp process ensures that Agulhas is meeting high standards of verified performance, accountability, and transparency on sustainability factors including environmental stewardship, employee benefits, charitable giving, supply chain practices and [client] social impact.

## Anti-bullying and Harassment Policy

<b>Previous Versions</b>	December 2021
<b>Last Updated</b>	July 2023
<b>Next Update</b>	July 2025 (or on an ad hoc basis if legal or operational changes require a revision of the policy)
<b>Responsible Person</b>	The responsible person is the CEO. This policy is managed by the Operations Manager.
<b>Scope</b>	This policy applies to all Agulhas employees and associated personnel.

### Introduction

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 and code of conduct.

### Definition

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
- sexual harassment (see section below)
- 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.

### Reporting bullying or harassment

Agulhas acknowledges that reporting bullying or harassment can be distressing and difficult and will ensure to support those affected by behavioural misconduct, whether the complaint was raised formally or informally. Agulhas encourages any staff member with a concern to raise this internally with their line manager or a Director, to discuss how best to resolve the issue.

- **Informal resolution:** where possible, safe and appropriate, Agulhas will look to support the complainant in resolving the concern informally, by talking in private with the person the complaint is about, to restore a professional relationship and allow for mutual understanding between both sides.
- **Mediation:** If the complainant does not feel comfortable informally addressing the situation, a mediation may be conducted. A mediation is held by a neutral person (a 'mediator') who is

impartial, has no conflict of interest, and can lead to a resolution in a structured, confidential manner. Mediation is voluntary and must be agreed to by all parties.

- **Formal grievance procedure:** If informal efforts to resolve the issue have been unsuccessful or, where the issue warrants an immediate formal approach, it may be dealt with through the whistleblowing procedure. Formal procedures will be confidential and conducted with an appropriate level of independence following advice from Agulhas's external HR advisors.

All allegations of harassment or bullying will be dealt with in a robust and timely manner with fairness and sensitivity.

### Sexual harassment

Sexual harassment is unwanted behaviour of a sexual nature, that violates someone's dignity or creates a hostile environment for them. The law (Equality Act 2010) protects the following people against sexual harassment at work:

- employees and workers
- contractors and self-employed people hired to personally do the work
- job applicants

Examples of sexual harassment include:

- flirting, gesturing or making sexual remarks about someone's body, clothing or appearance
- asking questions about someone's sex life
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content
- touching someone against their will, for example hugging them
- sexual assault or rape

Complaints of sexual harassment will be handled with the utmost seriousness, and support will be given to the victim/survivor, regardless of whether a formal internal response is carried out.