

**Code of Conduct and  
Safeguarding and People  
Policy Pack – Equity,  
Diversity and Inclusion**

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)  
Catherine Cameron: [catherine@agulhas.co.uk](mailto:catherine@agulhas.co.uk)  
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.

## Equity, Diversity & Inclusion 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>	This policy is managed by the CEO, in consultation with the Co-owners Forum.
<b>Scope</b>	This policy applies to all Agulhas employees.

### Introduction

As an Employee-Owned company, our people are meaningfully involved in all our principles and activities. We strive to be equitable and mindful of power imbalances in everything we do. Our approach is constantly evolving, as we seek to unlearn biases and re-learn what it means to be inclusive, equitable and just. All of Agulhas' recruitment, staff and performance management and remuneration follow our approach to Equity, Diversity and Inclusion.

### Definitions

**Diversity** – Inclusive of people from a broad range of backgrounds and experiences, including but not limited to; socioeconomic background, gender, religion, race, age, sexual orientation, education, ethnicity.

**Inclusion** – The active practice of ensuring that work, information, communications and spaces are accessible to all, including but not limited to processes that ensure; spaces and materials are accessible to those with different needs; communications that can be understood in multiple formats; knowledge can be shared with openness and transparency.

**Equity** – While there is no one definition of equity, equity accounts for existing power imbalances and structural barriers that lead to exclusion and discrimination, whether equality of opportunity and rights exists or not. Being equitable means actively ensuring that equal rights and opportunities can be fairly utilised, by accounting for these power imbalances.

**Anti-racism** – The active practice to be conscious of, and endeavour to work against, power imbalances, discrimination and structural barriers based on race, both in personal and professional settings.

### Commitments

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, maternity and paternity, 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 and our London office is accessible to people with disabilities.

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](#)**.
- [The Women Empowerment Principles, to which we are signatories](#)

Equity based commitments:

- Reviewing our progress against the Equity Index Assessment, every two years
- A commitment to operating according to the BLab UK standards, as a BCorporation, reporting and monitoring against Equity, Diversity and Inclusion indicators set out in the assessment. Agulhas certified in July 2023.

## **Responsibilities**

### **Leadership**

Leadership is accountable for ensuring that every staff member adheres to the policy and acts within the spirit of equity, and that staff performance incorporates targets and commitments to equity.

### **All staff**

All staff are responsible for ensuring that they implement and monitor progress against Agulhas' EDI commitments and proactively address gaps identified, through their operational and technical roles. Staff contribution to furthering equity will be recognised through the competency framework. A commitment to enabling a culture where the team are empowered to make internal organisational contributions outside of commercial work delivery.

### **Co-Owners Forum (COF)**

The COF responsible for creating an inclusive space for action-based discussion on areas of EDI, through mechanisms of working groups, COF meetings and ad hoc discussions.

## **Internal equity, diversity and inclusion**

### **Recruitment and remuneration**

We proactively seek to recruit individuals with diverse backgrounds and profiles to our team. We 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](#)) and encouraging our staff to share opportunities through alternative channels. 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 and create an inclusive environment that is conducive to ensuring a diverse workforce can thrive
- building a workplace culture that embodies anti-racist principles and creating an environment of continuous learning
- ensuring that there is no unjustified discrimination in its recruitment, selection, other processes

- treating all individuals (staff, sub-contractors, clients, community members) 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
- ensuring that the multiplier of the salary of the highest paid full-time individual is no more than 5x the lowest paid full-time worker
- working with our suppliers to encourage them to use the Real Living Wage
- providing options for a workplace pension under an ethical scheme.

### **External equity, diversity and inclusion**

Acknowledgement of the north-south divide and power imbalances within our sector and our responsibility as a values-driven organisation to shift power towards the communities which our clients serve. Agulhas commits to:

- fostering equitable partnerships – in fair distribution of technical work, Ensuring partners have opportunities to participate in meetings, including with clients.
- ensuring partnerships benefit from transparent commercial arrangements based on mutual trust and our commitment to equity
- commitment to ensuring Agulhas creates opportunities for open and honest feedback on partnerships and peer-to-peer learning
- working with suppliers to consider how they embed equity principles within their Organisation

This policy should be read and implemented alongside all other policies, as equity is a key Agulhas principle.