

**Code of Conduct and
Safeguarding and People
Policy Pack – Safeguarding
against SEA 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:

Integrity	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.
Respect	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.
Equity	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.
Openness	We will share ideas and good practice. We will raise concerns quickly and deal with them fairly.
Commitment	We will always keep in mind Agulhas's goal of harnessing knowledge and learning for sustainable development.
Effectiveness	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
Nigel Thornton (CFO): nigel@agulhas.co.uk
Catherine Cameron: catherine@agulhas.co.uk
Marcus Cox: marcus@agulhas.co.uk

Please send any comments and suggestions for improving our policies to the operations team at 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.

Safeguarding Against Sexual Exploitation and Abuse Policy

Previous Versions	December 2022
Last Updated	July 2023
Next Update	July 2025 (or on an ad hoc basis if legal or operational changes require a revision of the policy)
Responsible Person	The responsible person is the CEO. This policy is managed by the Operations Manager.
Scope	This policy applies to all Agulhas employees and associated personnel, including sub-contractors.

Introduction

Agulhas believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Whilst SEAH is a form of gender-based violence, it can occur against any individual regardless of their sex, gender, or sexual orientation. Therefore, safeguarding applies consistently and without exception across our programmes, partners, and staff. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation and abuse and having mature, accountable, and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centered and also protect those accused until proven guilty.

Definition

In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse and neglect¹.

In our sector, we understand Safeguarding to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or work, and in particular, the abuse of power that leads to sexual abuse and exploitation and harassment (SEAH).

Policy purpose and scope

Agulhas will not tolerate abuse and exploitation by staff or associated personnel. Whilst we are a small organisation and our work does not involve direct implementation of development programming, our evaluative, research and knowledge-based activities can also bear the risks of harm.

This policy is based on the FCDO principles of safeguarding² and the commitments Agulhas has signed up to proposed by UK private sector supply partners who work with FCDO to tackle sexual exploitation and abuse, and sexual harassment in the international aid sector.

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with Agulhas. This includes harm arising from:

- The conduct of staff or personnel associated with Agulhas

¹ NHS 'What is Safeguarding? Easy Read' 2011

² <https://www.gov.uk/guidance/safeguarding-against-sexual-exploitation-and-abuse-and-sexual-harassment-seah-in-the-aid-sector#fcdo-safeguarding-standards>

- The design and implementation of Agulhas' evaluation and research programmes and activities

This policy does not cover:

- Safeguarding concerns in the wider community not perpetrated by Agulhas or associated personnel

The policy lays out the commitments made by Agulhas and informs staff and associated personnel of their responsibilities in relation to safeguarding. It is structured through 3 pillars of prevention, reporting and response, and should be read in conjunction with other related policies within the policy pack.

Prevention

Agulhas commits to:

- ensuring all staff have access to, are familiar with, and know their responsibilities within this policy and associated policies
- in line with our Ethical Research Policy, standards and guidelines, designing and undertaking all its programmes and activities in a way that protects children and adults from any risk of harm that may arise from their coming into contact with Agulhas. This includes the way in which information about individuals in our programmes is gathered and communicated.
- implementing stringent safeguarding procedures and safe recruitment practices when hiring, managing and deploying staff and associated personnel.
- undergoing appropriate due diligence of our downstream partners, and where appropriate, supporting the capacity building of partner organisations to bolster their safeguarding capacity in line with client requirements.
- ensuring staff receive training on safeguarding at a level commensurate with their role in the Organisation
- follow up on reports of safeguarding concerns promptly and according to due process.

Agulhas staff and associated personnel are obliged to:

- Contribute to creating and maintaining a culture and environment that prevents safeguarding violations
- Promotes the implementation of the Safeguarding Policy in internal operations and programme delivery
- Report any concerns or suspicions regarding safeguarding violations by an Agulhas staff member or associated personnel via the appropriate channels as laid out in this policy.

Agulhas staff and personnel must not:

Child Safeguarding

- engage in sexual activity with anyone under the age of 18
- sexually abuse or exploit children
- subject a child to physical, emotional or psychological abuse, or neglect
- engage in any commercially exploitative activities with children including child labour or trafficking

Adult Safeguarding

- sexually abuse or exploit at-risk adults
- subject an at-risk adult to physical, emotional or psychological abuse, or neglect
- exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Reporting

Reporting safeguarding concerns of sexual abuse, exploitation can be difficult and daunting. Agulhas will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we interact with.

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the Agulhas Safeguarding Focal Point or line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a Director, senior manager or a member of the Operations Team.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Agulhas' Whistleblowing Policy.

Agulhas will also accept complaints from external sources such as members of the public, partners and official bodies, via the reporting channels provided.

Response

Agulhas will follow up safeguarding reports and concerns according to the guidance of the safeguarding focal point, and legal and statutory obligations. Where a concern is deemed to warrant an investigation, an independent investigator will be hired to undergo the investigation, which will be managed by our safeguarding focal point and overseen by our CEO.

Whilst Agulhas will respect confidentiality, the protection of children and adults will take precedence and may require information to be disclosed to relevant and necessary parties.

Agulhas will treat any breach of this policy very seriously and will apply appropriate disciplinary measures to staff found in breach of policy, which could lead to dismissal.

Agulhas will offer support to victim/survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor, and will be informed by best practice as advised by Agulhas' safeguarding focal point.