

**Code of Conduct and
Safeguarding and People
Policy Pack –
Whistleblowing and
Complaints 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.

Whistleblowing and Complaints 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].

Introduction

Agulhas is committed to the highest degree of professionalism and integrity and to operating in an ethical and lawful matter, and this is reflected through our Whistleblowing Policy. Our Policy is in line with the Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. It applies to all Agulhas ‘personnel’, which includes employees, interns, external contractors, sub-contractors and suppliers, who disclose wrongdoing or concerns that are in the public interest.

Our Commitments

Raising a concern can be a difficult decision to make. Through this policy, Agulhas aims to ensure the protection from victimisation and retaliation. Agulhas is committed to:

- Taking seriously and investigating any concerns or complaints, and treating those raising complaints fairly and justly. Agulhas will never attempt to conceal evidence of unacceptable behaviour
- Protecting against the unnecessary disclosure of the identity of those raising concerns or complaints, respecting confidentiality.
- 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) where appropriate and not in direct conflict with the safety of those involved
- Ensuring that Agulhas staff and associated personnel are aware of the Whistleblowing policy and procedures through the contractual process and through annual email communications.

Types of Concerns

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, sexual harassment or discrimination of any form
- Health or safety breaches
- Danger to the environment or local community
- Criminal activity or failure to comply with legal obligations

- Breaches of Agulhas policies and procedures
- Unauthorised disclosure of confidential information
- Deliberate concealment of information relating to the above

Reporting a concern

Agulhas encourages any staff member with a concern to raise this internally with their line manager or a Director. Agulhas encourages any [non-staff Agulhas personnel] to raise concerns with their Agulhas counterpart, line manager, a Director or the Chief Executive Officer. Furthermore, 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.

Agulhas acknowledges that some people may prefer to disclose concerns anonymously. [Our Anonymous Feedback](#) Form provides a free, anonymous and confidential alternative platform for disclosing concerns or feedback. Concerns that are reported through this platform will be handled with the utmost importance and confidentiality, in line with our reporting and referral process, which is currently being reviewed.

Agulhas sub-contractors, contractors, suppliers, and associated person(s) involved in the Foreign, Commonwealth & Development Office funded business should immediately report any suspicions or allegations of aid diversion, money laundering or counter terrorism finance to the Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@fcdo.gov.uk or +44 (0) 1355 843 747.

Whistleblowing investigation procedure

Any concern of wrongdoing should be reported through the channels mentioned above, orally or in writing. If reported orally, the person to whom the concern is disclosed should take detailed notes for any subsequent investigations officer, respecting confidentiality and any request for anonymity.

- Where the complaint is against a member of the senior management team (SMT) or the leadership team (LT) an alternative Director or senior manager will be appointed to manage the process to ensure impartiality and free from conflict of interest
- The senior manager or director will embark on a factfinding exercise to determine if a formal investigation should take place. If it is considered that an investigation should take place, then an independent investigator will be hired to undertake the investigation
- The complainant may be required to cooperate with a factfinding mission and subsequent investigation. The complainant may be accompanied for support by an official, independent representative who will be bound by confidentiality and will not be able to answer questions on behalf of the complainant.
- Agulhas will aim to keep the complainant informed of progress, timelines and the outcome of the investigation with the appropriate detail to respect confidentiality. Any information given to the complainant should be treated as confidential. The complainant will be offered support where appropriate.
- Where the complaint is substantiated and justified, the subject of the complaint may then have disciplinary proceedings invoked against them. Where there is evidence of criminal activity, Agulhas may inform legal authorities and will cooperate with a criminal investigation. Where an allegation is considered unsubstantiated and the complainant is not satisfied with the result, they have the right to disclose the concerns to either the appropriate body ([which can be found](#)

[here](#)) or our Independent Trustee. Our current Independent Trustee is, Sue Lawrence, who can be contacted via email at sue.lawrence@directorsandtrustees.co.uk.