

**Code of Conduct,
Safeguarding and People
Policies**

November 2024

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.

Code of Conduct for Staff and Sub-contractors

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 and Senior Risk Advisor.
Scope	This Code of Conduct applies to all Agulhas employees and associated personnel, including volunteers, interns, sub-contractors and clients.

Agulhas employees commit to providing the utmost levels of professionalism and integrity, operating in compliance to the highest international standards. Staff and sub-contractors should conduct themselves in a manner that is consistent with Agulhas’s policies and procedures including the Agulhas Code of Conduct set out below, which staff are contractually obliged to adhere to. The Code of Conduct sets out expected behaviour that both protects the individual, surrounding team and the reputation of Agulhas, our stakeholders and the communities we serve.

The Code of Conduct is relevant to all staff and sub-contractors working for Agulhas and outlines personal responsibility to:

- acknowledge, understand and follow all written policies, guidelines and security procedures that are provided as part of the contract and other agreements with Agulhas
- adhere to UK law at all times, and to national laws when deployed by Agulhas to work overseas (see later section)
- ensure due care for their own personal health, safety and security and be aware of their colleagues’ health and safety
- report any health issues experienced at work in a timely manner to a Director or the CEO
- adhere to the safeguarding against sexual exploitation and abuse policy, and the associated conduct requirements
- ensure a professional impression; for example, Agulhas frequently meets clients and hosts external meetings in the London office space and all staff and sub-contractors are expected to dress smartly and professionally whilst at the office or when undertaking Agulhas business
- at all times conduct themselves in a manner which reflects positively on Agulhas, and be sensitive to their colleagues and the culture in which they are working
- embody the Agulhas core value of Equity in our professional dealings and uphold the principles of anti-racism
- provide information of any pre-existing medical conditions to Agulhas prior to travel in the confidential Personal information Form (PIF)
- report any behaviour, incidents or actions that contravene Agulhas’s policies and procedures to the CEO or an Agulhas Director

Whilst travelling on Agulhas business, both while working and in their own time, staff and sub-contractors are expected to follow Agulhas’s policies and conduct themselves in accordance with the national law and specific local regulations in-country. Staff and sub-contractors are expected to:

- be sensitive to their colleagues and be mindful of the culture in which they are working taking particular care for example, on greeting and eating customs
- dress conservatively and with respect to local culture and norms – this may mean covering areas of the body such as arms or hair in certain circumstances
- show respect and sensitivity to partners, team members and national counterparts
- avoid face-to-face confrontations and, if a situation is escalating, apologise and walk away
- avoid association with anyone involved in illegal or disreputable activities, including those selling illegal goods and substances
- avoid any form of sexual exploitation and abuse, including any services provided by sex-workers regardless of whether or not this is prohibited by local law – report any instances where you have reason to believe another team member may have breached this regulation
- avoid behaviour which may result in an actual or perceived conflict of interest, such as close relationships with employees of a client or party under evaluation – report any instances where you have reason to believe another team member may have breached this regulation
- be aware of personal deportment and do not overindulge in alcohol.

Agulhas has a zero-tolerance policy towards the use of drugs or other illegal substances under UK law. Any staff and sub-contractors involved in allegations of misconduct will be subject to further investigation.

Social media

Avoid sharing social media communications that could be construed in a way that could damage the reputation of Agulhas or of our clients. If required or permitted to use social media sites in the course of performing Agulhas duties, ensure it complies with the standards set out in this policy. Staff must not use social media in a way that violates client obligations while working for Agulhas and afterwards, including the disclosure of any information that is not approved for external communication.

Posting on social media: Staff should make it clear in personal postings that they are speaking on their own behalf, e.g. writing in the first person and using a personal e-mail address. If you disclose that you are an Agulhas employee, you must state that your views do not represent those of your employer. For example, you could state, “the views in this posting do not represent the views of my employer”.

Travelling: When travelling, be discreet on social media e.g. do not make any statements that advertise your travel plans and do not post pictures or details of yourself or your location while in-country. Refrain from any public criticism of the authorities and avoid engaging in conversations on sensitive or controversial topics, including government policies. Make sure to delete all applications that are not authorised by the government or that are seen as communication tools for political opponents/dissent (e.g. the ByLock messenger application in Turkey).

Communications and data management

Unless specific arrangements are made to the contrary, staff and sub-contractors are responsible for providing their own mobile phones, laptop computers and flash drives. Agulhas will provide access to email, Dropbox and all relevant project documentation and this should be stored and viewed as per instructions from the company. All computers, tablets and mobile phones must be password protected and have up to date anti-virus software. The management of data must comply with Agulhas' Information Security Management Policy and the associated Information Management Guidelines.

This policy forms a core element of staff and consultant contracts – when signing these, individuals are agreeing to adhere to the terms included. Sub-contractors may also be required to sign the Agulhas Consultant Declaration as part of our central due diligence process.

Ethical research

Agulhas is commissioned to carry out research and evaluation on behalf of a wide range of clients, many of which have their research ethics policies and requirements. We are contractually obliged to follow our clients' standards. Agulhas is strongly committed to adhering to the highest possible ethical standards in our research activities, and has a Research Ethics standards & guideline document that sets out the ethical standards and processes to follow when conducting research and evaluation work.

The guidelines form a part of our Code of Conduct for staff, sub-contractors and sub-contracting organisations, and set out the minimum standards to be applied across all our work. It governs research activities with human subjects, applying whenever we are engaging with people, whether in person or electronically, such as beneficiaries of or participants in an aid programme.

The key principles guiding all Agulhas research and evaluation activities can be found in the Ethical Research Standards and Guidelines alongside our approach to:

- gender equality and social inclusion
- ensuring voluntary and informed consent
- ensuring the confidentiality of data
- additional considerations for IT-based engagement
- processes for ensuring ethical research.

Training and induction of Agulhas staff and sub-contractors

- All Agulhas staff will receive training on research ethics and processes, including a detailed initial introduction and an annual refresher course.
- External associates and sub-contractors must receive an induction, including copies of this and other applicable Agulhas policies and reminding them of the core requirements.
- When engaging national research teams, we usually prefer to work with trusted partners where we have verified that they have appropriate ethical research policies and protocols in place and documented experience with delivering similar research.
- When working with new partners, or for high-risk assignments, consideration should be given to obtaining a criminal records check or personal reference for individual researchers as per the due diligence policy.

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 neglect.

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:

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 conduct of staff or personnel associated with Agulhas
- 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 Agulhas policies.

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 (regardless of the legal age of consent)
- sexually abuse or exploit children
- subject a child to physical, emotional or psychological abuse, or neglect
- engage in any commercially exploitative activities 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.

Agulhas, in line with any contractual obligations, may be required to confidentially report any suspicions or allegations of safeguarding violations to the FCDO Safeguarding Unit (SGU) at reportingconcerns@fcdo.gov.uk or +44 (0) 1355 843 747.

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.

Anti-slavery 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 and clients.

Introduction

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.

Definitions

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 number of employees may be from time to time based abroad, including in South Africa. We do not hire staff on a seasonal basis or work in hazardous conditions which could 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 ensure that any staff member involved in procurement of goods or services are aware of the risks of Modern Slavery and are aware of the appropriate action to take if they suspect a case of slavery or human trafficking.
- 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 and guidance used by Agulhas:

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

Equity Diversity & Inclusion Policy

Previous Versions	December 2021
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	This policy is managed by the CEO, in consultation with the Co-owners Forum.
Scope	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.

Anti-Bullying and Harassment Policy

Previous Versions	December 2021
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 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 grievance 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.

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 manner, and this is reflected through our Whistleblowing Policy. Our Policy is in line with the Public Interest Disclosure Act 2020, which 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, contract 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.

Stress Management and Positive Mental Health Policy

Previous Versions	May 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 in consultation with the Co-Owners Forum.
Scope	This policy applies to all Agulhas staff, full-time or part-time, including interns. This policy is supported by a Stress Management Guideline and Support Plan.

Introduction

Good mental health is the foundation of our wellbeing, providing us with the ability to cope with everyday pressures, manage changes in our lives and help us to bounce back from difficult challenges. Agulhas recognises that the work environment can have significant impacts both positively and negatively on our mental health. We are therefore committed to identify ways to support wellbeing, good mental health and provide a positive working environment for everyone.

Agulhas's work can often touches on difficult and stressful topics where we may be confronted with instances of human suffering. Work related to fragile and conflict-affected contexts and where climate change continues to cause increasingly negative impacts presents us all with professional and personal challenges. Sometimes, team members may work in or visit insecure environments, which can expose us to extreme levels of stress. In addition, external incidents and issues can add to our collective and individual levels of stress and anxiety.

Agulhas has signed up to and commits to the 6 standards of the ‘[Mental Health at Work Commitment](#)’, created by Mind, which consists of a simple, holistic framework based on the [Thriving at Work](#) standards, using up-to-date research [from UK employers and mental health experts](#).

Agulhas commits to:

1. prioritising mental health in the workplace by developing and delivering a systematic programme of activity
2. proactively ensuring work design and organisational culture drive positive mental health outcomes
3. promoting an open culture around mental health
4. increasing organisational confidence and capability
5. providing mental health tools and support
6. increasing transparency and accountability through internal and external reporting.

General work pressures and challenging deadlines are a particular feature of consultancy which can have an adverse effect on an individual’s well-being. It can sometimes be hard to achieve a healthy work / life balance or to take annual leave. At Agulhas we aspire to build a culture of openness where problems can be discussed and addressed without fear of judgement or reprimand. We encourage our staff to manage their own time and trust them to deliver the work– but it is important for the whole team to help each other navigate and share challenging workloads where they can.

Supporting this policy, Agulhas’s Stress Management and Supporting Positive Mental Health Guidelines go through some of these challenges, suggest practical methods to support each other and set out how the company can help staff members who are experiencing stress or mental health problems. It provides practical tips and encouragement to staff members to identify and use their own techniques to recognise and manage their own stress and that of our colleagues. This includes guidance on:

- a stress management support plan that provides staff with the awareness, tools and support to manage stress and enable early intervention mechanisms to minimise unhealthy levels of stress
- annual leave management and making time for proper rest
- hybrid working between office and work-from-home
- stress awareness training, informal self-help stress management techniques and, where necessary, access to psychotherapy support.

Agulhas provides:

- a subsidy for health apps – such as Calm or Headspace – of one third of the annual price to be paid through the normal expenses route
- the Cycle to Work scheme allowing staff to purchase a new bike at a subsidized price and pay for it through salary sacrifice contributions
- training sessions for the team at regular intervals (every 1-2 years) on recognizing and managing

stress, and handling mental health issues

- one-to-one counselling service from a provider specialising in supporting those involved with global development work

Staff are encouraged to review the Stress Management and Supporting Positive Mental Health guidelines, to support their own wellbeing and the wellbeing of their teams and direct reports. If you are concerned about your own or a colleague’s mental health, stress burden or wellbeing, you should raise this with a senior staff member discretely and confidentially. All discussions of this nature will be treated with the utmost confidentiality, taking into account the safety of the individual involved.

The Co-Owners Forum

An important part of Agulhas life is our collective role as Co-Owners of the company. The Co-Owners Forum (COF) provides an opportunity to discuss and work on company challenges, raise issues to the Leadership Team (this can be done anonymously through the COF) or work together to solve them.

Currently, the COF has a working group on wellbeing which is a safe space to raise and discuss concerns. It may also be appropriate to use the COF to establish peer group support/spaces to open the opportunity for all members of the team to talk about well-being and positive mental health at Agulhas.

Menstrual and Menopausal Health Policy

Previous Versions	None (new policy)
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 in consultation with the Co-Owners Forum.
Scope	This policy applies to all Agulhas employees and associated personnel.

Agulhas recognises the varying degrees of impact that menstrual and menopausal health problems can have on someone’s working life and is committed to building an inclusive environment that supports the health and wellbeing of all staff, including those suffering from symptoms.

Currently, there is no UK law that enforces a statutory right of menstrual leave for employees and there is no expressly protected characteristic of menstruation or menopause. However the 2022 Women’s Health Strategy for England highlights that improved workplace provisions and policies can better support staff who suffer from symptoms and create a workplace that is conducive to maintaining good health at work³.

Agulhas is committed to:

- staying abreast of developments in UK law, and applying existing health and safety policies to the areas of menstrual and menopausal health

³ [2022 Women’s Health Strategy for England](#)

- offering a contractual sick pay scheme above and beyond statutory sick pay entitlement, enhanced family leave policies and a supportive policy on assisted conception
- keeping informed by best practice for employers in regard to menstrual health, for example, Bloody Good Period and the 2023 BSI 30416 guidance on menstrual and menopausal health in the workplace. This may include:
 - creating employee-led spaces for discussion on these topics
 - building awareness of the symptoms of Women's health issues amongst line managers and project leaders
- considering potential workplace adjustments, such as appropriate heating and cooling, that improve the experience of office working for those experiencing symptoms.
- updating Agulhas health, wellbeing and HR policies when appropriate, and with consultation from the Co-owners forum and communicating these across the Organisation
- providing access to menstrual products in the Agulhas office bathroom facilities
- creating a compassionate and positive environment where people experiencing general health issues and women's health issues such as period problems, endometriosis, fertility treatment, miscarriage and menopause feel supported.