

# Wasafiri Policies

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Here you will find our corporate policies.

These are policies we have developed to ensure we comply with basic requirements with regards to specific areas of ethical and legal best practice. What you won't find is a comprehensive 'how to' list for every ethical decision that might be required to be taken. This is because we expect everyone who is part of Wasafiri to behave in a way that is legally and ethically sound, and as such these policies provide a minimum standard for a limited range of issues.

At Wasafiri one of our 'Simple Rules' is to act with the intent of transparency; when making a decision which feels uncertain a simple test we should all always apply is '*Is this an action I would be willing to be transparent about with my colleagues, clients and those I care about?*'.

## **About these policies:**

Policies included:

1. Anti-Corruption and Bribery
2. Safeguarding
3. Money Laundering and Funding of Terrorism
4. Anti-Slavery and Human Trafficking Policy
5. Conflict of Interest
6. Harassment and Anti-Bullying
7. Whistle blowing
8. Data Protection
9. Health, Safety and Security (HSS) Policy

## **Who do these policies apply to?**

Everyone! Whether you are a member of staff, a consultant, board member, or are in some other capacity working for or representing Wasafiri, these policies apply to you (and me).

## **When do they apply?**

All the time. Whether you are on 'work time' or not, Wasafiri expects you to live up to a certain level of ethical and legal behaviour. Breaching these policies will be viewed as gross misconduct and could lead to dismissal and potentially the involvement of relevant law.

## **What are my responsibilities?**

1. To read and ensure you understand the policies, and ask any questions you may have.
2. To stick within the requirements of these policies all the time, every time.
3. Help hold all of us accountable to maintain these policies, including reporting any concerns you may have about intentional or unintentional breaches of these policies.
4. To provide feedback on these policies to help us grow and ensure these policies remain fit for purpose.
5. To seek support, a second opinion, and share with others when you need support with a decision.



Dr. Kate Simpson, Managing Director, Wasafiri Consulting Ltd

# Anti-Corruption and Bribery Policy

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## 01 Overview

Wasafiri Consulting is committed to conducting all our activities in an ethical and legal way. We have a zero tolerance approach to bribery and corruption, and ask and expect all our employees and consultants to act at all times with the highest degree of ethical and legal integrity.

We are committed to upholding all relevant laws on countering bribery and corruption. Our UK registered company is bound by the laws of the UK including the Bribery Act 2010, in respect to conduct both in the UK and abroad. We demand that our subsidiary companies operate to the same standards, as well as according to any laws applicable in their country of registration.

This policy document cannot define all the parameters of 'ethical and legal behaviour', however it offers basic guidance on Wasafiri's expectations with regards to specific situations. If you are ever unsure about whether a course of action is ethical or legal we ask and expect that you will have a conversation with a member of the leadership team.

This policy does not form part of an employee's or consultant's contract and can be changed at any time. However, employees and consultants will be notified of any substantive changes to the content.

## 02 Policy Issues

### **Bribery**

Bribery is defined as "*giving someone a financial or other advantage to encourage that person to perform their function or activities improperly or to reward that person for having already done so*"<sup>1</sup>. Wasafiri is totally opposed to any action of this kind, and has a zero tolerance approach to consultants or employees engaging in such action.

### **Facilitation payments**

We do not make and will not give facilitation payments. These are defined as "*payments to induce officials to perform routine functions they are otherwise obliged to perform*"<sup>2</sup>. Such payments are illegal under UK law and against Wasafiri Policy. Note this does not cover officially required administration fees or officially provided fast track services. Whenever such 'official' services are offered, it is essential to request and obtain an official receipt that details the service provided, and if in any doubt about the authenticity of the offered service seek guidance from a member of the Wasafiri Leadership Team.

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<sup>1</sup> The Ministry of Justice (UK) The Bribery Act 2010  
<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf>

<sup>2</sup> As above

### **Hospitality**

This policy does not prohibit normal and appropriate hospitality or the giving or receiving of gifts. Normal and appropriate can be defined as:

1. Is not made with the intention of influencing a decision maker.
2. Is not made with the intention of retaining or winning business, or of influencing a third party to do this on our behalf, or to reward a client or third party on the provision or retention of such business.
3. Complies with local law.
4. Is given in Wasafiri's name and not in your name.
5. Is appropriate to the circumstance, e.g. in the UK it is customary to exchange small gifts at Christmas time.
6. Is given openly and not in secret.
7. Taking into account the reason for the gift is given at an appropriate time, is of an appropriate type and value.
8. Is not offered to or accepted from government officials, their representatives or to political parties or politicians.

### **Donations**

We do not make donations to political parties.

## **03 Responsibilities**

### **Employees and Consultants**

1. Read and comply with this policy.
2. Notify your line manager if you detect or suspect a breach or a potential breach of this policy and do so as soon as possible.
3. Notify your line manager as soon as possible if you are offered, asked to offer, or suspect you might be offered a bribe.
4. Let your line manager know of any gifts or hospitality received – this can be done by email.
5. Submit all expenses for gifts or hospitality offered clearly to your line manager, including to whom they were offered and why.
6. You are invited to offer any comments on this policy at any time, please discuss with a member of the Leadership Team.
7. Any employee or consultant who breaches this policy will face disciplinary action and potential dismissal.

We aim to encourage openness through this policy, so we will support anyone who raises an issue or concern in good faith, even if it turns out to be mistaken. We strongly encourage you to discuss any issues, uncertainties or risks with regards to this policy and its application with any member of the Leadership Team.

### **Wasafiri Management**

The Leadership Team is responsible for the content of this policy, including to:

1. Review if any issues occur, and at least every two years.
2. Ensure this policy is communicated to all employees and consultants.
3. Take seriously and make the time for proper consideration of any issues raised.

# Safeguarding Policy and Procedures

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## 01 Policy Overview

Wasafiri Consulting is committed to conducting all our activities in an ethical and legal way. We have a zero-tolerance approach to any form of exploitation or abuse and are committed to safeguarding the welfare of all people in our work, including children and vulnerable adults.

We are committed to upholding all relevant laws, and beyond our legal responsibility we recognise and uphold a moral responsibility to all those with whom we work. We will take positive action to ensure any children or vulnerable adults with whom we work are protected and take stringent measures against any Wasafiri staff and/or consultant who abuses or behaves inappropriately towards children or vulnerable adults, or other people. Where laws are broken we are committed to engaging local law enforcement.

This policy applies to all staff, consultants and board members. We will also require that subcontractors agree to this policy.

This policy document cannot define all the parameters of 'ethical and legal behaviour', however it offers basic guidance on Wasafiri's expectations with regards to specific situations. If you are ever unsure about whether something poses safeguarding risks, then we ask and expect that you will have a conversation with a member of the leadership team.

This policy does not form part of an employee's or consultant's contract and can be changed at any time; employees and consultants will be notified of any substantive changes to the content. The Board is responsible for reviewing and approving the policy. This policy will be reviewed either once every three years, or when there is a change in legislation or if an incident occurs which highlights a need for change.

## 02 Policy Terms

### **What is safeguarding?**

Effective safeguarding is embedding practices throughout the organisation to ensure the protection of all people, particularly children and vulnerable adults, wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

### **Who is a child?**

A child is anyone under the age of 18.

### **Who is a vulnerable adult?**

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This may include a person who: Is elderly and frail, has a mental illness including dementia has a physical or sensory disability, has a learning disability, is illiterate, has a severe physical illness, is a substance misuser, is destitute or homeless. An adult may be vulnerable at a particular time or in particular circumstances rather than because they have an underlying or continuing vulnerability.

### **The Disclosure and Barring Service (DBS)**

DBS helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). DBS only applies in the UK.

## **03 Policy Issues**

### **Inappropriate conduct**

Wasafiri considers any activity which demeans or exploits another person totally unacceptable. Example of such activity include, but are not limited to:

1. Sexual activity with a child.
2. Engaging in any form of non-consensual, coerced or exploitative sexual activity.
3. Exploitation of children or vulnerable adults for any purpose.
4. Any form of abuse (e.g. sexual, financial, emotional, physical etc).

If such activity occurs Wasafiri will take disciplinary action and also, if a law has been broken, engage with relevant law enforcement.

### **Keeping children and vulnerable adults safe**

We are committed to ensuring the physical and emotional safety of all children and vulnerable adults with whom we may work. The following practice must be followed to mitigate safeguarding risks:

1. Where children or vulnerable adults are participating in Wasafiri activities then due consideration must be given to the ethics consent, consent sought from a relevant responsible adult.
2. Where possible and practical follow the 'two-adult' rule, wherein two or more adults supervise all activities where children/vulnerable adults are involved and are present at all times.
3. Where consultants or staff are visiting project areas overnight, they must not stay alone overnight with one or more children or vulnerable adults benefiting from Wasafiri projects who are not part of their immediate or extended family.
4. Consultants or staff should not place themselves in compromising or vulnerable positions and should take care not to discriminate against, show differential treatment towards or favour particular beneficiaries to the exclusion of others.
5. Any complaints or issues of a safeguarding nature raised must be reported and will be taken seriously.

### **Disclosure and Barring Service (DBS) checks in the UK**

In accordance with the UK Safeguarding Vulnerable Groups Act 2006 and the UK Protection of Freedoms Act 2012, where we are engaging in activities which require UK staff or consultants to have a Disclosure and Barring Service (DBS) check we will ensure that these are carried out. Persons who are on the DBS Barred Lists cannot work in regulated activity in relation to children or vulnerable adults and accordingly we will not employ such persons. Where we become aware that any current staff member may pose a risk to these groups we will comply with the legislation in respect of referring that staff member to the DBS. Where feasible background checks will be sought for staff in other countries.

### **Reporting process**

Everyone has a duty to promptly report any safeguarding concerns. Failure to do so may result in disciplinary and even legal action. Reporting procedures are as follows:

1. **If a child/vulnerable adult is in immediate danger**, notify the nearest police or local authorities immediately. Staff should also report disclosed abuse to the relevant authorities in accordance with the local law. A Wasafiri Director should be notified as soon as practically possible.
2. **If any consultant or staff member has a safeguarding concern** they should raise it as soon as practically possible with their line manager, or if they are not comfortable to do that, then with any Wasafiri Director or Board member.
3. **Any Wasafiri staff / Board member receiving a report of a potential safeguarding issues** has a responsibility to raise it with the leadership team and ensure it is full investigated.

#### **Subcontractors and other partners**

Wasafiri requires that all partner and subcontractors as a minimum work to the same ethical and legal standards as we do. We will provide all partners with a copy of this policy and require that they agree to work to its requirements.

#### **Contact person on safeguarding issues**

The MD is the contact person on safeguarding issues and responsible for ensuring that this policy is understood internally, reviewed and updated as detailed above.

## **04 Responsibilities**

#### **Employees and Consultants**

1. Read and comply with this policy.
2. Be alert to potential safeguarding issues.
3. Promptly report any concerns with regards to safeguarding.

#### **Wasafiri Management**

As above plus:

1. Ensure all consultants and staff have access to this policy.
2. Ensure any safeguarding concerns are effectively investigated.
3. Ensure documentation of all incidents are investigated are kept.
4. Ensure that confidentiality is respected throughout any investigation and all information treated sensitively. (Note depending on the incident confidentiality cannot be guaranteed.)
5. Report any legal breaches to the relevant authorities.
6. Ensure this policy is updated in line with any incident and or changes to legal requirements.

#### **References**

<https://www.nspcc.org.uk/preventing-abuse/safeguarding/writing-a-safeguarding-policy/>  
[www.gov.uk](http://www.gov.uk)

# Anti-Terrorism & Money-Laundering

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## 01 Overview

Wasafiri Consulting is committed to conducting all our activities in an ethical and legal way. We ask and expect all our employees and consultants to act at all times with the highest degree of ethical and legal integrity.

We are committed to upholding all relevant laws on countering terrorism and money-laundering. Our UK parent company is bound by the laws of the UK regarding Money Laundering and Terrorist Financing, in respect to conduct both in the UK and abroad. We demand that our subsidiary companies operate to the same standards, as well as according to any laws applicable in their country of registration.

This policy document cannot define all the parameters of 'ethical and legal behaviour', however it offers basic guidance on Wasafiri's expectations with regards to specific situations. If you are ever unsure about whether a course of action is ethical or legal we ask and expect that you will have a conversation with a member of the leadership team.

This policy does not form part of an employee's or consultant's contract and can be changed at any time. However, employees and consultants will be notified of any substantive changes to the content.

## 02 Policy Issues

### **Money laundering**

Money laundering is concealing the transformation of profits from illegal activities and corruption into ostensibly "legitimate" assets. Wasafiri's funding comes almost entirely from large international organisations, so our risk exposure to money-laundering is very low. If we ever receive funds from entities that are not independently audited, then we will consider the risk from money-laundering and undertake additional due diligence if required.

### **Terrorism financing**

Terrorism financing refers to activities that provides financing or financial support to individual terrorists or terrorist groups. The nature of our operations requires that Wasafiri will sometimes work in areas where known terrorist organisations operate and in challenging, volatile and conflict affected areas. These areas increase the risks of misappropriation of funds and resources that could support terrorist activities. We are conscious of our obligations in ensuring that monies and funds received from all clients and donors must not be misappropriated or utilised to support or fund terrorist groups or activities.

Wasafiri is committed to ensuring that resources and funds will not be misappropriated, and our staff will not become involved or associated with terrorist activities. Prior to the undertaking of work, we will assess the potential risks of our staff, consultants and sub-contractors, and potential involvement with terrorism. Wasafiri will implement proportionate measures to mitigate and manage all identified risks. Our internal risk assessments are conducted in addition with our compliance to our Due Diligence procedures.

Specifically, Wasafiri is committed to ensuring that:

1. We have robust and real time intelligence on the countries that we operate in regarding terrorism risks.
2. Our Due Diligence checks in such countries take a more robust stance regarding any potential threats of any partners or affiliates being capable of managing appropriately funds for which they will be responsible.
3. Money is not released by Wasafiri unless staff/consultants complete documentation confirming expenses are for legitimate project or business costs.
4. We confirm that our staff or consultants are not listed on any terrorism lists, financial sanctions lists or other regulatory compliance lists.
5. In contexts with significant risks of terrorism financing, we will undertake due diligence on any sub-contractors to ensure they meet or exceed our own policies.

## 03 Responsibilities

### Employees and Consultants

1. Read and comply with this policy.
2. Notify your line manager if you detect or suspect a breach or a potential breach of this policy and do so as soon as possible.
3. You are invited to offer any comments on this policy at any time, please discuss with a member of the Leadership Team.
4. Any employee or consultant who breaches this policy will face disciplinary action and potential dismissal.

We aim to encourage openness through this policy, so we will support anyone who raises an issue or concern in good faith, even if it turns out to be mistaken. We strongly encourage you to discuss any issues, uncertainties or risks with regards to this policy and its application with any member of the Leadership Team.

### Wasafiri Management

The Leadership Team is responsible for the content of this policy, including to:

1. Review if any issues occur, and at least every two years.
2. Ensure this policy is communicated to all employees and consultants.
3. Take seriously and make the time for proper consideration of any issues raised.

# Anti-Slavery and Human Trafficking Policy

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## 01 Overview

Wasafiri is committed to enforcing anti-human trafficking and anti-slavery practices worldwide. Wasafiri will only engage with suppliers, consultants, subcontractors, grantees, and clients who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. In accordance with the UK's Modern Slavery Act of 2015:

- a. **Slavery** – Exercising powers of ownership over a person.
- b. **Servitude** – The obligation to provide services is imposed by the use of coercion.
- c. **Forced or compulsory labour** – Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- d. **Human trafficking** – Arranging or facilitating the travel of another person with a view to their exploitation.

## 02 Policies and Procedures

Wasafiri expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery and human trafficking:

1. **Wasafiri's Code of Conduct** – Wasafiri is committed to maintaining strong ethical and legal standards in all we do. All employees and consultants are required to review and sign Wasafiri's Code of Conduct, which describes the principles of behaviour we expect of all Wasafiri staff and consultants.
2. **Wasafiri Safeguarding Policy** – We have a zero-tolerance approach to any form of exploitation or abuse and are committed to safeguarding the welfare of all people in our work, including children and vulnerable adults. The prevention, detection and reporting of modern slavery in any part of our organisation or associated partners is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
3. **Wasafiri Whistleblowing Policy** – Wasafiri is committed to the highest standards of transparency, integrity and accountability. This policy sets out the framework for dealing with allegations of illegal and improper conduct. This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.
4. **Due Diligence** – Because Wasafiri is responsible for complying with requirements from various governments, we exercise due diligence on all aspects of our work. We consider the nature and the business practices of every party we engage with to ensure that vulnerable workers are not being trafficked or enslaved into filling positions of low or unskilled labour along the supply chain. Wasafiri also embeds due diligence and safeguarding in our recruitment and hiring procedures.

5. **Assessing and Managing Risk** – Wasafiri recognises that cultivating an organisational culture that prioritises safeguarding is one that is endorsed by leadership, reinforced through training, and supported by accountability and protection measures. Our Project Management Team leads by example, ensures that all employees are trained and aware of expectations for behaviour, and supports a work environment that is knowledgeable about assessing and managing risk, and an openness in reporting potential violations without fear of retaliation. Safeguarding, modern slavery and human trafficking are included in pre-project risk assessments, inductions and briefings.
6. **This policy does not form part of an employee’s or consultant’s contract and can be changed at any time** – Employees and consultants will be notified of any substantive changes to the content. The Board is responsible for reviewing and approving the policy. This policy will be reviewed either once every three years, or when there is a change in legislation or if an incident occurs which highlights a need for change.

## 03 Reporting

Reporting an incident or suspicion of modern day slavery and human trafficking can be made orally or in writing to any of the below:

1. Wasafiri Line Manager
2. Project Director
3. Wasafiri Managing Director
4. Chairman of the Board

## 04 Responsibilities

### **The Managing Director and The Board**

The MD and Board have overall responsibility for the operation of this policy and for determining the administrative processes to be followed and the format of the records to be kept.

### **Wasafiri Management**

The Leadership Team is responsible for the content of this policy, including to:

1. Review if any issues occur, and at least every two years.
2. Ensure this policy is communicated to all employees and consultants.
3. Take seriously and make the time for proper consideration of any issues raised.

# Conflict of Interest Policy

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## 01 Overview

This policy outlines the rules regarding conflict of interest and the responsibilities of employees and the company in resolving any such discrepancies.

## 02 Scope

This policy applies to all prospective or current employees (including those employed on a fixed term or consultancy basis) of the company.

## 03 Policy

Conflict of interest arises whenever the personal, financial or political interests of an employee is likely or could appear to interfere with their objective judgement to act in the best interests of Wasafiri. All employees are required to act in good faith towards Wasafiri. All employees are expected to declare and discuss any potential conflicts of interest.

As individuals, employees may have private interests that from time to time conflict, or appear to conflict, with their employment with Wasafiri. Employees should aim to avoid being put in a situation where there may be a conflict between the interests of Wasafiri and their own personal or professional interests, or those of relatives or friends. Where such a conflict occurs (or is perceived to occur), the interests of Wasafiri will be balanced against the interests of the staff member and, unless exceptional circumstances exist, resolved in favour of Wasafiri.

### **What is a conflict of interest?**

It is impossible to define all potential areas of conflict of interest. If an employee is in doubt if a conflict exists, they should raise the matter with their line manager. Examples may include:

- a. Employees' ability to use their position with the company to their personal advantage.
- b. Employees engaging in activities that will bring direct or indirect profit to a competitor.
- c. Employees owning shares of a competitor's stock.
- d. Employees using connections obtained through the company for their own private purposes.
- e. Employees using company equipment or means to support an external business.
- f. Employees acting in ways that may compromise the company's legality (e.g. taking bribes or bribing representatives of legal authorities).
- g. Employees take part in any political or public activity which compromises, or might be seen to compromise their impartiality.

## 04 Responsibilities

### Employees and Consultants

1. Declare to management any potential, actual or perceived conflicts of interest that exist on becoming employed by Wasafiri.
2. Declare any potential, actual or perceived conflicts of interest that arise or are likely to arise during employment.
3. Avoid being placed in a situation where there is potential, actual or perceived conflict of interest if at all possible.
4. Disclose any other employment. Where there are external involvements that do not represent a conflict of interest, these must not affect performance or attendance whilst working at Wasafiri. If such involvement does affect performance or attendance, it will be considered a conflict of interest.
5. Not set up or engage in private business or undertake other employment in direct or indirect competition with Wasafiri using knowledge and/or materials gained during the course of employment with Wasafiri.

If an employee declares such an interest, Wasafiri will review the potential areas of conflict with the employee and mutually agree on practical arrangements to resolve the situation.

### Disciplinary consequences

Failure to declare a potential, actual, or perceived conflict of interest or to take remedial action agreed with Wasafiri, in a timely manner, may result in performance improvement or disciplinary proceedings including termination.

### Wasafiri Management

The Leadership Team is responsible for the content of this policy, including to:

1. Review if any issues of potential, actual or perceived conflicts of interest.
2. Ensure this policy is communicated to all employees and consultants.
3. Take seriously and make the time for proper consideration of any issues raised.

# Harrassment and Anti-Bullying Policy

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## 01 Overview

Wasafiri Consulting is committed to providing a working environment free from bullying and harassment. We aim to ensure that all staff and consultants are treated, and treat others, with dignity and respect. This policy covers bullying or harassment which occurs at work and outside of the workplace, including on work trips or at work-related events or social functions. All this contributes to a workplace environment in which individuals feel safe and can work effectively, competently and confidently. This policy applies to all staff, consultants and board members.

### Key principles

- 1. Wasafiri will provide and sustain a safe working environment** in which everyone is treated with dignity and respect. Those working or dealing with Wasafiri must not encounter harassment, intimidation or victimisation on the basis of gender, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background or any other personal characteristic.
- 2. Everyone carries a personal responsibility for their own behaviour** and for ensuring that their conduct is in accordance with the principles set out in this policy. Everyone in Wasafiri and those who have dealings with Wasafiri has a responsibility to maintain good working relationships and not use words or deeds that may harm the wellbeing of others.
- 3. Everyone has a responsibility to report any instance of bullying or harassment** which they experience, witness or which comes to their attention. Employees have a responsibility to act as role models, pro-actively addressing instances of bullying and harassment. Managers should also make themselves aware of their responsibility.
- 4. Any breaches of this policy will be dealt with in accordance with our line management and disciplinary procedures.** Where there is evidence that harassment has occurred, prompt and action will be taken, including disciplinary action where appropriate. Serious cases of bullying or harassment may amount to gross misconduct resulting in dismissal. Where laws are broken Wasafiri is committed to engaging local law enforcement.
- 5. Confidentiality will be observed throughout** and the need for any disclosure of the details of the case will be discussed and agreed. No employee will be victimised or suffer detriment for making a complaint of harassment or bullying.
- 6. This policy does not form part of an employee's or consultant's contract and can be changed at any time;** employees and consultants will be notified of any substantive changes to the content. The Board is responsible for reviewing and approving the policy. This policy will be reviewed either once every three years, or when there is a change in legislation or if an incident occurs which highlights a need for change.

## 02 Policy Terms

### What is harassment?

Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. A person may be harassed even if they were not the intended "target". Harassment also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Wasafiri deems it inappropriate (it is unlawful under the UK Equality Act 2010) to harass a person because of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. It also includes conduct of a sexual nature (sexual harassment). Harassment is unacceptable even if it does not fall within any of these categories. Examples of harassment include, but are not limited to:

- a. unwanted physical contact including touching, pinching, pushing and grabbing;
- b. unwelcome sexual advances or suggestive behaviour;
- c. offensive e-mails, text messages or social media content or the display of offensive materials;
- d. unwanted jokes, banter, mocking, mimicking or belittling a person.

### What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media. Examples of bullying include:

- a. physical or psychological threats;
- b. overbearing and intimidating levels of supervision;
- c. inappropriate derogatory remarks about a person or their performance;
- d. persistently picking on people in front of others or in private;
- e. blocking promotion and training opportunities;
- f. regularly and deliberately ignoring or excluding staff from work activities or work related social events;
- g. setting a person up to fail by overloading them with work or setting impossible deadlines;
- h. regularly making the same person the butt of jokes.

**Legitimate and reasonable criticism of a staff member's or consultant's performance or behaviour, or reasonable management instructions, do not amount to bullying.**

## 03 Reporting

Reporting procedures are as follows:

1. An employee who feels that he/she has experienced, witnessed or been made aware of harassment or bullying may **attempt to resolve the matter informally in the first instance**. In some cases, it may be possible and sufficient for him/her to explain clearly to the person(s) engaged in the unwanted activities that the behaviour is unwelcome, that it

offends or makes him/her uncomfortable. It can be helpful to explain the situation and describe the event so the other person is clear about the concerns. Use the opportunity to ask the person to change or stop their behaviour.

2. Where the steps outlined above are unsuccessful or inappropriate, **the complainant must raise the matter informally and in confidence with his/her line manager**. Alternatively, the matter may be raised with another manager or director, particularly if the person in question is the complainant's line manager.
3. When a complaint of harassment or bullying is brought to the attention of a manager at any level, whether informally or formally, **prompt action must be taken to investigate the matter**.

### **Subcontractors and other partners**

Wasafiri requires that all partner and subcontractors as a minimum work to the same ethical and legal standards as we do. We will provide all partners with a copy of this policy and require that they agree to work to its requirements.

## **04 Responsibilities**

### **Employees and Consultants**

1. Read and comply with this policy.
2. Be alert to potential harassment and bullying issues.
3. Promptly report any concerns with regards to harassment and bullying.

We aim to encourage openness through this policy, so we will support anyone who raises an issue or concern in good faith, even if it turns out to be mistaken. We strongly encourage you to discuss any issues, uncertainties or risks with regards to this policy and its application with any member of the Leadership Team.

### **Wasafiri Management**

As above, plus:

1. Ensure all consultants and staff have access to this policy.
2. Ensure any harassment and/or bullying concerns are effectively investigated.
3. Ensure documentation of all incidents and investigations are kept.
4. Ensure confidentiality is respected throughout any investigation and all information is treated sensitively. (Note: depending on the particulars of the incident, confidentiality cannot always be guaranteed).
5. Report any breaches to the relevant authorities.
6. Ensure this policy is updated in line with any incidents and/or changes to legal requirements.

### **References**

<http://www.human-resource-solutions.co.uk/HR-Policy-Pages/Harassment-Bullying/Harassment-Bullying.htm>

<https://www.aig.co.uk/content/dam/aig/emea/united-kingdom/documents/Financial-lines/PrivateEdge/epl/bullying-and-harassment-policy.pdf>

# Whistleblowing Policy

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## 01 Overview

Wasafiri is committed to the highest standards of transparency, probity, integrity and accountability.

This policy sets out the framework for dealing with allegations of illegal and improper conduct. This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the complaints procedure, the Grievance and Misconduct Policy, the Bullying and Harassment Policy and other specifically laid down statutory reporting procedures.

This policy is intended to ensure that Wasafiri complies with its duty under the UK Public Interest Disclosure Act 1998.

## 02 Scope

This procedure applies to all employees, including consultants.

This procedure does not replace other policies or procedures. For example, if an employee has a grievance about their working conditions, they should use the Grievance and Misconduct Policy or, if they felt that their manager or a colleague was treating them unfavourably, they should use the Harassment and Anti-Bullying Policy. Similarly, if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their line manager, or if that is not possible, with the Managing Director (MD).

This procedure applies to, but is not limited to, allegations about any of the following:

- a. Conduct which is an offence or breach of the law.
- b. Alleged miscarriage of justice.
- c. Serious Health, Safety and Security risks.
- d. The unauthorised use of funds.
- e. Possible fraud and corruption.
- f. Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or community members.
- g. Abuse of authority.
- h. Other unethical conduct .

## 03 Policy

### Reporting

Reporting an allegation can be made orally or in writing to any of the below:

1. Wasafiri Line Manager
2. Project Director
3. Wasafiri Managing Director – Kate Simpson, kate@wasafirihub.com
4. Chair of the Board – Ian Randall, ian@wasafirihub.com
5. Third Party Whistleblowing Hotline (provided on some projects such as DFID and USAID)

We recognise that the decision to make an allegation can be difficult. However, Wasafiri will take appropriate action to protect whistleblowers who make serious allegations in the reasonable belief that it is in the public interest because they are doing their duty either to Wasafiri and/or Wasafiri's wider community.

### Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. Wasafiri will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone so long as it does not hinder or frustrate any investigation.

### Anonymous allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the MD.

In exercising discretion to accept an anonymous allegation the factors to be taken into account are:

1. The seriousness of the issue raised;
2. The credibility of the allegation; and
3. Whether the allegation can realistically be investigated from factors or sources other than the complainant.

### Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so, even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

### Procedure for making an allegation

It is preferable for allegations to be made to an employee's immediate Line Manager. However, if this is not possible or appropriate then the whistleblower may make an allegation directly to the MD, the Chair of the Board, or any other Board member.

If any of the above receive an allegation he/she will consider the allegation and may discuss with the Board, Line Manager, or others as appropriate. If deemed appropriate, and in

consultation with the whistleblower an investigation will be conducted, the relevant person will be appointed as 'investigator' to lead this process.

### **Allegation**

Whether a written or oral report is made it is important that relevant information is provided including:

1. The name of the person making the allegation and a contact point;
2. The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
3. The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation. Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation.

### **Action on receipt of an allegation**

The Line Manager (or other) may decide to record details of the allegation gathering as much information as possible, including:

- a. The record of the allegation;
- b. The acknowledgement of the allegation;
- c. Any documents supplied by the whistleblower.

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

### **Support**

We will take steps to minimise any difficulties which may be experienced as a result of making an allegation. We accept that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

### **Monitoring**

The MD will report annually to the Board of Trustees on the operation of the Policy and on the whistleblowing allegations made during the period covered by the report.

## **04 Responsibilities**

### **The Managing Director and The Board**

The MD and Board have overall responsibility for the operation of this policy and for determining the administrative processes to be followed and the format of records to be kept.

### **Wasafiri Management**

The Leadership Team is responsible for the content of this policy, including to:

1. Review if any issues occur, and review the policy at least every two years.
2. Ensure this policy is communicated to all employees and consultants.
3. Take seriously and make the time for proper consideration of any issues raised.

# Data Protection Policy

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## 01 Overview

Wasafiri is committed to protecting personal information and data. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

## 02 Scope

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us. Employees of our company and its subsidiaries must follow this policy. Contractors, consultants and our partners are also covered. This policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

## 03 Principles

### **Our data will be:**

1. Collected fairly and for lawful purposes only.
2. Accurate and kept up-to-date.
3. Protected against any unauthorised or illegal access by external parties.

### **Our data will not be:**

1. Communicated informally.
2. Transferred to organisations, states or countries that do not have adequate data protection policies.
3. Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities).

Wasafiri has direct obligations towards people to whom the data belongs. Specifically, some of the actions we will take are to:

1. Have provisions in cases of lost, corrupted or compromised data.
2. Allow people to request that we modify, erase, reduce or correct data contained in our databases.

### **Data breaches:**

1. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Wasafiri shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to any other authority as required by the relevant regulations held by the jurisdiction we are operating in.

People Wasafiri hold data on, including employees, are entitled to make a formal request for a copy of information we hold about them by making a written request to [enquiry@wasafirihub.com](mailto:enquiry@wasafirihub.com). Wasafiri may apply a small administration fee to process this request.

## 04 Responsibilities

### Employees and Consultants

1. Employees, contractors, consultants and our partners shall follow this policy.
2. Notify your line manager if you detect or suspect a data breach and do so as soon as possible.
3. You are invited to offer any comments on this policy at any time, please discuss with
4. a member of the Leadership Team.
5. Any employee or consultant who breaches this policy will face disciplinary action and potential dismissal.

### Wasafiri Management

The Leadership Team is responsible for the content of this policy, including to:

1. Review the policy in the event of any issues occur, and at least every two years.
2. Ensure this policy is communicated to all employees and consultants.
3. Take seriously and make the time for proper consideration of any issues raised.

# Health Safety and Security Policy (HSS)

## 01 Overview

This document sets out Wasafiri Consulting's approach to the management of Health, Safety, and Security (HSS) at both the institutional and project level. This policy applies to all staff, consultants, Board members and subcontractors.

Wasafiri Consulting places a premium on the continuity of our business and the management of Health, Safety and Security (HSS) for our staff and consultants, our clients, and our organisation. Our approach combines institutional contingency planning and HSS frameworks with field security management systems tailored to the specific project context. Regarding HSS, Wasafiri aims to:

1. Provide adequate management of the health and safety risks of our activities.
2. Consult with our employees and consultants on matters affecting their health, safety and wellbeing.
3. Maintain safe and healthy working conditions.
4. Provide and maintain HSS Frameworks and supporting resources and tools.
5. Provide adequate information, instruction and supervision of employees.
6. Ensure all employees are competent to safely do their tasks and to provide adequate support systems to enable them to do so.
7. Ensure reasonable measures are in place to reduce the likelihood of accidents and cases of work-related ill health.
8. Ensure all employees and consultants review and adhere to Wasafiri's Code of Conduct.
9. Review and revise HSS policy, framework and practices as necessary at regular intervals.

## 02 Adaptive HSS Management Framework

Wasafiri Consulting takes a holistic and adaptive approach to the management of risk at both the institutional and project levels. Wasafiri's HSS Framework consists of interlinking organisational stages and lines of effort that direct our HSS infrastructure and decision-making:

### Organisational Stages

Wasafiri has divided our HSS infrastructure into four phases to ensure we address everything in the HSS cycle, which includes:

1. **Effective Preparation** – Integrating HSS into planning and implementation levels of our business and projects is the best way to prepare for HSS challenges.
2. **Threat Awareness and Avoidance** – Employing a variety of risk assessments and briefings helps us understand the environment, identify potential threats and formulate mitigation protocols.
3. **Effective Response** – Ensuring all staff and consultants have the knowledge and skills of the Wasafiri HSS infrastructure to provide efficient and effective responses when incidents occur.
4. **Learning and Adaptation** – HSS is a dynamic and iterative process. Wasafiri incorporates several management functions to ensure that risk related learning is captured and applied to the strengthening of our HSS framework.

### Lines of Effort

Wasafiri streamlines our resources and thinking by establishing HSS Lines of Effort that must be accounted for and managed, displayed below:

1. **Project Risk Management** – Effective management and oversight of each project team is critical to risk identification and mitigation, including financial, security, and conflict sensitivity management. Additional risk mitigation protocols are established for high risk projects.
2. **Travel Management** – Incidents during travel are consistently deemed Wasafiri’s highest risk at the field, project and corporate levels; thus, requiring travel to be an independent line of effort for managing HSS.
3. **Incident Response Management** – Wasafiri has developed a collection of procedures aimed at identifying, investigating and responding to potential incidents in a way that minimises impact and supports rapid recovery. This includes the documentation and review of ‘near misses’ as well as incidents.
4. **Wellbeing Management** – The emotional and psychological wellbeing of consultants is just as important as physical security. To that end, and to the extent possible, Wasafiri will monitor stress levels and working patterns, provide appropriate office equipment, emphasise communication and access to psychological support.
5. **Corporate Risk Management** – As a multi-national company with operational offices in the UK, US and Kenya, there is a need to examine the political, reputational, legal and physical risks of operating in multiple countries.

## 03 Responsibilities

### Employees and Consultants

1. Read and comply with this policy.
2. Understand individual responsibilities within the HSS Framework.
3. Promptly report any HSS concerns with regards to line managers or the Operations Manager.

### Wasafiri Management

As above plus:

1. Ensure all consultants and staff have access to this policy.
2. Ensure any HSS concerns are effectively investigated,
3. Ensure documentation of all incidents and near misses are investigated and kept.
4. Ensure that confidentiality is respected throughout any investigation and all information treated sensitively. (Note depending on the incident confidentiality cannot be guaranteed).
5. Report any legal breaches to the relevant authorities.
6. Ensure this policy is updated in line with any incident and or changes to legal requirements.

ROLE	HEALTH, SAFETY, AND SECURITY (HSS) RESPONSIBILITY
Board of Directors	<ul style="list-style-type: none"> <li>• Review and approval of all HSS related policies</li> <li>• Review HSS Workplan &amp; progress in Quarterly/Annual Reports</li> </ul>
Leadership Team & Executive Team	<ul style="list-style-type: none"> <li>• Ensures adherence to HSS framework and application of lessons learned</li> <li>• Makes HSS decisions at the corporate level</li> </ul>
Operations Manager	<ul style="list-style-type: none"> <li>• Day-to-day responsibility for implementation of HSS Framework across Wasafiri</li> <li>• Reviews and revises institutional HSS framework as required</li> <li>• Monitors and tracks indicators within HSS framework</li> <li>• Reviews Project Threat Assessments for all projects</li> <li>• Provides HSS guidance, support and accountability to all Project Management teams</li> <li>• Leads on all HSS trainings and inductions</li> </ul>
International Risk Advisor (where relevant)	<ul style="list-style-type: none"> <li>• Advises management team on HSS approach</li> <li>• Supports project related HSS as required</li> </ul>
Project Director	<ul style="list-style-type: none"> <li>• Overall and final responsibility for HSS at project level</li> <li>• Performs Project Threat Assessments</li> <li>• Assess HSS capacity within Project Management Team</li> <li>• Reviews HSS requirements and shortfalls in client contract</li> <li>• Default primary incident manager in response to any project related incident (unless unavailable then role is taken by most senior Wasafiri staff member linked to project / incident)</li> </ul>
Team Leader / Lead Consultant	<ul style="list-style-type: none"> <li>• Performs Risk Assessments for Medium-to-High Risk projects</li> <li>• Day-to-day responsibility for implementation of HSS Framework at the project level</li> <li>• Ensures team follows HSS Framework and Project Risk Assessments</li> <li>• Leads on all HSS inductions and trainings at project level</li> </ul>
Project Coordinator	<ul style="list-style-type: none"> <li>• Supports day to day operations of HSS Framework, particularly all travel and updating the Project, Security and Logistics Plan</li> <li>• Supports HSS inductions and trainings at project level</li> </ul>

### **Institutionalised Learning Process**

Effective HSS is a dynamic and iterative process. Wasafiri Consulting incorporates a number of management functions to ensure that risk related learning is captured and applied to the strengthening of our HSS framework.

**Annual:**

1. Review of insurances
2. Review of HSS Incidents and Near Misses
3. A simulated incident response and organisational 'stress-test'

**Quarterly:**

1. Review of HSS during each Quarterly Board Meeting;
2. Project Management Forum, which includes HSS trends, near misses, and incident learning.

**Monthly:**

1. Standing agenda on HSS at monthly Leadership Group meetings;

**Weekly:**

1. Weekly HSS meeting led by Operations Manager and selected team members;

**Project Level:**

1. HSS included in all medium and high risk project inductions and briefings;
2. Wasafiri's Code of Conduct is reviewed and agreed to by employees and consultants;
3. For high risk projects, HSS reviewed before every field trip or on a monthly basis;
4. Standing agenda on HSS for Project Closedown Review.

# Climate & Environment

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## 01 Our Position

Wasafiri recognises that the world is facing significant climate and ecological breakdown. We believe that we all have a responsibility to act, that business can be a force for positive impact and that we can make a positive contribution, both through how we run Wasafiri as a business and also through the impact we generate through our work. We are committed to doing our part to tackle climate and ecological breakdown.

## 02 Corporate Action

1. **We will add our voice to the acknowledgment of a *climate emergency*** - In doing so we acknowledge that fundamental change is required to respond to the scientific predictions of global warming and biodiversity loss. In practical terms we will adopt the commitments and principles laid out by B-Corp:

### Commitment:

- a. **Tell the truth** – acknowledge this is an emergency and treat it as one
- b. **Act now** – take radical steps to halt biodiversity loss and reduce greenhouse gas emissions to net zero by 2025
- c. **Stronger together** – work with others to create new solutions together

### Principles:

- This issue is urgent and we must act now
- We do not blame anyone. We take a positive approach
- Every institution is on their own journey. We must all step up our commitment to addressing the climate breakdown

2. **Achieve Net-Zero for the financial year 2019/20 and beyond** - We will achieve this by a progressive approach to reducing our carbon footprint and use offsetting / balancing for those emissions that we do incur.
3. **Minimise our carbon emissions** - As a service-based business our carbon emissions are relatively modest. However, we take seriously our responsibility to reduce these emissions as far as possible. We will focus on the following three priority areas.
  - a. **Travel** – We will minimise travel and especially flights. We will invest in and use virtual technologies where we can. When travel is essential we will seek ways to minimise the amount of travel needed. We will actively seek non-flight travel methods (e.g trains) and use these whenever possible even if they are more expensive. When using flights we will select direct flights where possible to minimise the increased impact of additional take off and landings.
  - b. **Offices and venues** – We will review our current offices and discuss with landlords ways to reduce associated carbon emissions, including requesting the use of green energy suppliers. When hiring venues for events etc. we will review the venues

environmental approach and prioritise venues with a reduced footprint. We will also consider travel requirements for events and actively seek venues which minimise travel needs and / or have low carbon travel options.

- c. **Other procurement & resource use** – We will review current key resource use and where possible seek options that minimise environmental impact. With future procurement needs we will consider environmental impact alongside and equal to issues such as cost, availability, quality etc.
- d. **Support staff to take action** - Wasafiri’s greatest resources and power is its people. We will support staff & consultants to challenge and improve the organisation’s environmental impact. Where possible and practical we will support staff to take action outside of work. We will encourage one another to acknowledge, talk about and take action on our shared climate emergency. We will develop HR policies that encourage and incentivise climate positive action.
- e. **Work with clients and partners to develop new solutions** - Our greatest impact will be through the work we do. We are well positioned to help others develop the collaborations and solutions that the climate emergency demands of us. We will build climate considerations into the work we do and the way we do it, we will proactively seek clients and support clients seeking to tackle our<sup>3</sup> climate emergency.

## 03 Individual action

In addition to our collective corporate action, as a member of Wasafiri we all individually, (whilst at work) will:

1. Recognise the importance of minimising our environmental impact
2. Take reasonable steps within our work to minimise impact
3. Raise concerns, share ideas and be open to suggestions from others about ways to develop solutions to our environmental impact

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<sup>3</sup> See

[https://www.dropbox.com/s/193wufkdpbssjmw/Climate\\_Emergency\\_Playbook\\_for\\_Business\\_by\\_B\\_L\\_ab\\_UK.pdf?dl=0](https://www.dropbox.com/s/193wufkdpbssjmw/Climate_Emergency_Playbook_for_Business_by_B_L_ab_UK.pdf?dl=0)