

OXFAM GB STATEMENT ON MODERN SLAVERY

For the financial year 2024/25



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This is Oxfam GB's eleventh annual statement under the UK Modern Slavery Act (MSA) 2015,¹ covering the reporting period April 2024 to March 2025.

The Act requires organizations with a turnover of more than £36m to make an annual public statement. These statements are approved by the Board, signed by the CEO and can be accessed via the home page of our website. Oxfam GB's statements can also be downloaded from: <https://www.oxfam.org.uk/about-us/plans-reports-and-policies/modern-slavery-act-statement/>. We report the key steps taken to identify and prevent modern slavery and human trafficking across our direct operations, supply chains and business relationships.

For decades, Oxfam GB has actively campaigned and supported efforts to hold organizations accountable for:

- identifying the human and environmental impacts of their business and supply chains
- providing effective, survivor-centred redress when harm is done
- integrating learning into core business decisions in order to continuously improve. The initial aim is to prevent harm to individuals; but the longer-term goal is to transform how business is done, address structural inequalities and regenerate the environment.

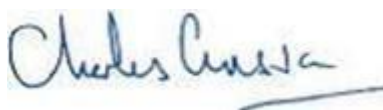
The MSA 2015 gives companies the opportunity to be transparent about how they can be held accountable for tackling the specific abuses of modern slavery and human trafficking, which often lie hidden in plain sight, tucked away behind discriminatory norms. Organizations can share the steps they have taken, what was learned and how that learning was used to inform business decisions and prevent harm. There is also a need to test strategies and share information about new ways forward, so that organizations can learn from each other about effective mechanisms to prevent slavery and interact in ways that enable everyone to thrive.

Oxfam GB's annual statements aim to be transparent – this is one way we play our part in enabling this learning about what works and what doesn't. We recognize that collective efforts are needed to end modern slavery and human trafficking, and strive to continuously improve the ways we identify, redress, mitigate and prevent harm so that we can contribute to locally embedded good practice.²

SIGNED



Halima Begum, CEO, Oxfam GB



Charles Gurassa, Chair of Trustees, Oxfam GB

FOREWORD

This statement outlines Oxfam GB's approach to keeping people safe from modern slavery and human trafficking and how it is integrated into our everyday work. In this reporting period, we found no cases of modern slavery or human trafficking in Oxfam GB operations, supply chains or business relationships. However, we recognize that these abuses are often hidden and that we do not know beyond doubt that no such harm was done.

Over this last year, we have witnessed communities facing multiple barriers to accessing their fundamental rights, as well as systemic failures that are increasing their vulnerability to various forms of harm. In recent years, Oxfam has welcomed acknowledgement from the international community that people who have been forcibly displaced, who face discrimination or who are not allowed to access paid work are more likely to be forced to marry or to accept an offer of work that turns out to be fake, or to be trafficked or held in other forms of modern slavery.

Oxfam's research has shown that at current rates it will take 230 years to end poverty; yet we could have our first trillionaire within 10 years.³ Oxfam has also noted that ever-increasing billions are being spent on security, defence and border controls while capital continues to move freely, both legitimately and illegitimately, flowing directly from the lowest-income parts of the world to the richest people in the wealthiest countries. But while capital seeks a return and is celebrated as foreign direct investment, by contrast, people who seek a future too often find themselves labelled as illegal immigrants.⁴

There have been dramatic cuts in overseas development assistance, which will put people already facing crises at greater risk in future. In Sudan, for the first time in the history of modern humanitarian response, a single country has reached over 30 million people in need of humanitarian assistance – more than half of its population. Over 600,000 people are living in famine, and 8 million more are on the cliff edge.⁵ Oxfam knows that it is local communities who are best placed to navigate their way towards peace, and how important that is for sustainably reducing their vulnerability to harm. That is why our humanitarian responses support and reinforce communities' peacebuilding efforts. But it's not just people in Sudan who are facing extreme conditions. A horrifying 116 million people across Ethiopia, Kenya, Malawi, Mozambique, Somalia, South Sudan, Zambia and Zimbabwe – 40% of the total population – currently lack access to drinking water.⁶ In Yemen, DRC, Myanmar, Ukraine, Gaza and too many other locations across the world, communities are facing violence, forced displacement, the impacts of climate change and the struggle for resources. These threats increase their vulnerability to other forms of harm.

Oxfam works across a range of challenging contexts and often alongside people who have suffered serious harm and discrimination, which increases their vulnerability to further harm. Our humanitarian work provides crisis relief, in tandem with our protection work which seeks to keep people safe from others. Our safeguarding work prevents and responds to harm caused by the people delivering Oxfam's work. It is complemented by our wider approaches to decolonizing, transferring power and resources, managing risk, keeping people safe across our programmes and our role in enabling a radically better world to emerge and flourish.

In this statement we are reporting against our three-year priority objectives for addressing modern slavery. We have made improvements in how we keep people in our supply chains safe and are collaborating with Oxfam Brazil and external partners to address colonial dynamics of exploitation, which touch on issues of modern slavery. We have been sharing our learning widely, including at the roundtable on loss and damage at COP29 in Baku. We also identified areas where Oxfam GB needs to improve and are striving to more consistently centre the voices and experiences of the communities most impacted by the climate crisis.

We believe that these steps, alongside continued efforts to deepen our understanding and to better articulate how racial and climate injustices are linked and reinforce each other, contribute to us becoming more effective at tackling modern slavery and human trafficking.

Halima Begum, CEO
Oxfam GB

Charles Gurassa, Chair of Trustees
Oxfam GB

1. ORGANIZATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

Oxfam GB is one of the independent affiliates that, together with the international secretariat Oxfam International (OI), make up the Oxfam confederation. In June 2025, Oxfam Philippines became the latest affiliate, bringing the total to 22 Oxfam affiliates internationally.

The descriptions of our organizational structure, business and supply chains have not significantly altered since previous statements. Nor has our intention to transform Oxfam GB into one part of a global network comprising equitable and interdependent organizations.⁷ Our structure and relevant updates are outlined in our Annual Report and Accounts⁸ and an up-to-date list of our retail suppliers can be found in the same place online ([here](#)).

Oxfam GB continues to both evolve and re-align its role within the confederation and contribute to developing approaches aimed at preventing harm across the confederation. Although the current framework does not explicitly address modern slavery and human trafficking, Oxfam has a confederation-wide approach to safeguarding, which includes addressing forced marriage and child labour. The framework below provides an overview of work that can contribute to identifying, providing redress for, mitigating and learning from harm across Oxfam teams. This enables us to reduce vulnerabilities to and prevent other forms of harm. Oxfam also has a confederation-wide approach to addressing fraud and corruption which allows signs of modern slavery to be recognized and investigated, for example through identifying wage theft, or payments to access work.

In this statement, we report on some of the most relevant approaches across safeguarding, safe programming and responsible sourcing. We focus on approaches developed for use in the UK as well as with colleagues from across the confederation.

Figure 1: Oxfam's confederation-wide Safe Programming Framework⁹

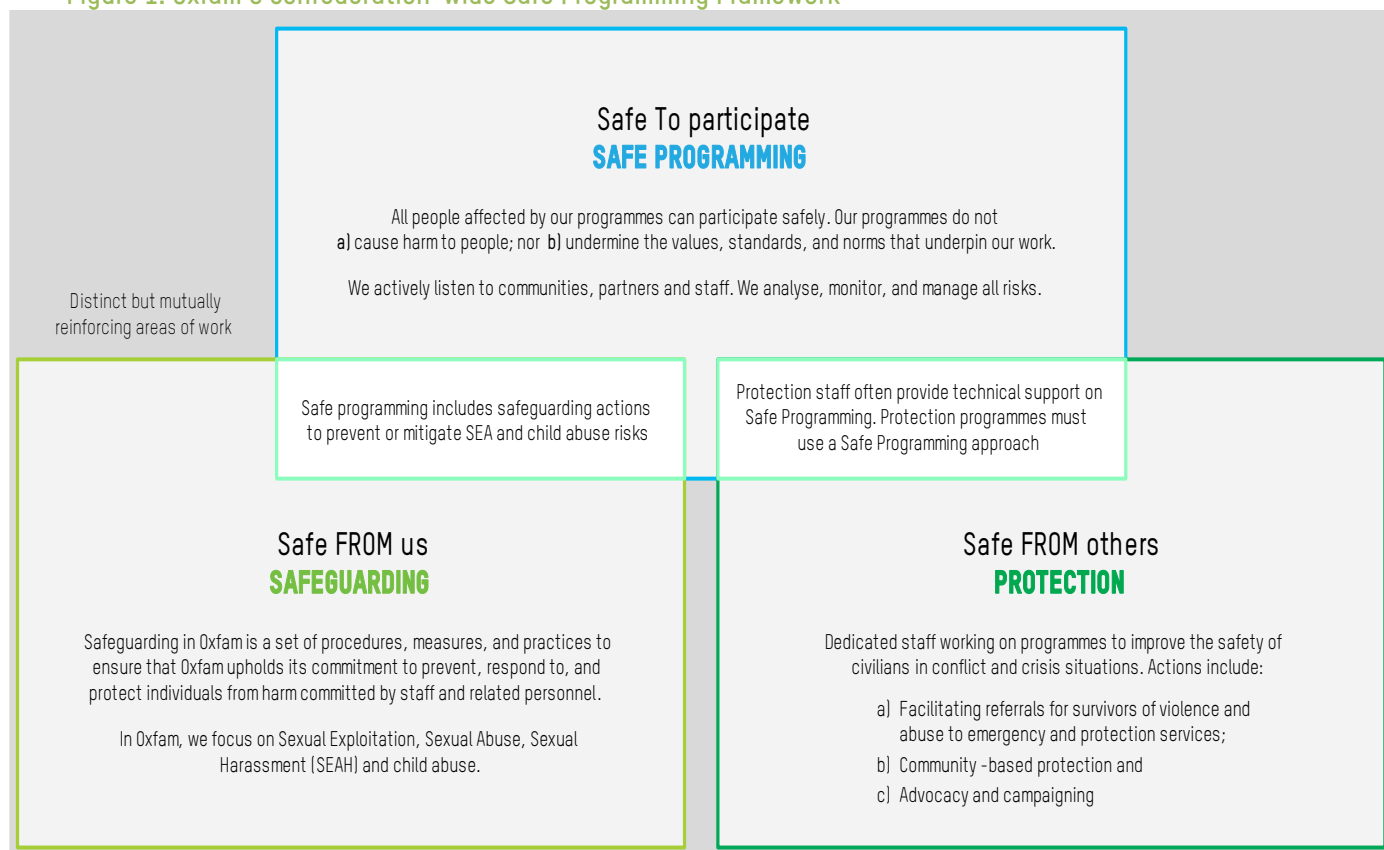


Table 1: Oxfam GB's procurement structure and spend 2024/25

Procurement category	Managed from	Value of spend	Approx. number of suppliers	Categories	Key sourcing countries
1. International Programmes	21 developing countries	£60m	3,900 (estimated)	Direct (e.g. office equipment, fuel, chickens) Indirect (e.g. utilities, legal advice)	All countries in which Oxfam GB works
2. Central Procurement	UK	£49.7m	1,627	Various – professional services, IT, accommodation, equipment, utilities, etc	UK, China
3. Property and Estates	UK	£4.5m	75	Construction, maintenance, surveying, government departments, software, data processing and legal.	UK
4. Sourced by Oxfam (retail)	UK	£7m	58	Food, everyday essentials, cards, Christmas ranges.	UK, India, China
5. Humanitarian: in 2024/5 Oxfam GB provided direct support in 13 emergency responses and reached 11.5 million people	UK	£3.6m	27	Water and sanitation, health and hygiene, shelter, vehicles, communications equipment. Held at the Oxfam Supply Centre in Bicester, Oxfordshire.	UK
Global total		£124.8m	5,745		

Oxfam GB is an accredited UK Living Wage Employer. This means that, at a minimum, we pay staff a wage that meets the real cost of living, according to the Living Wage Foundation's minimum criteria.¹⁰ An increase in this real living wage is officially announced once a year (usually in October). We inform staff of that increase within one month of the official announcement, and staff receive the increase within six months.

We recognize that compared with directly recruited and managed Oxfam GB staff, low-paid contingent workers may be more vulnerable to exploitation, especially if these roles are also insecure or unpredictable or have protected characteristics. Table 2 outlines what we do to manage those risks and vulnerabilities.

In addition:

- a) Oxfam GB aligns with its Living Wage Foundation commitment by applying these measures to all contingent workers who work:
 - two or more hours within a given week, or
 - eight or more consecutive weeks in a year.
- b) Oxfam GB's contract managers can seek specialist advice from the central Procurement Team or Ethics Team to ensure that the practices of labour providers or contractors align with its Ethical and Environmental Policy and Anti-Slavery Policy.

Table 2: Oxfam GB's contingent workers in the UK (2024/5)

Number of contingent workers per category	Current processes
<p>75 companies were contracted to work on Oxfam property or estates (e.g. shops, offices, warehouses)</p>	<p>Oxfam GB budget holders follow a standard procurement process that is tailored for work in Oxfam's offices, shops and warehouses. Decisions may be delegated to a contract manager or building surveyor, and the central Property and Estates Team track contractor implementation and advise decisions accordingly. Pre-approved contractors are used, all of which must be current members of the trade body Constructionline.</p> <p>Oxfam GB seeks the best value based on economy, efficiency and effectiveness, and requires contractor compliance with:</p> <ul style="list-style-type: none"> • Oxfam GB's Ethical and Environmental Policy • Oxfam GB's Anti-Slavery Policy • Oxfam GB's non-staff code of conduct (which includes information about how to report a concern) • paying staff who deliver Oxfam's work at least the real living wage.
<p>451 workers were hired through an agency, comprising:</p> <ul style="list-style-type: none"> • 425 self-employed fundraisers • 6 drivers • 31 warehouse workers • 8 in other categories (including team leads, health and safety coordinator, assistants) • 1 IT infrastructure engineer 	<p>Oxfam GB budget holders recruit agency workers following our standard staff requisition process and procurement guidelines (which include relevant enhanced checks, such as IR35). Pre-approved providers are contracted, and technical support can be sought from Oxfam GB's Recruitment Team.</p> <p>Agencies:</p> <ul style="list-style-type: none"> • are onboarded in line with the standard procurement process • complete a self-assessment questionnaire and provide supporting evidence to demonstrate how the systems they have in place would mitigate modern slavery and human trafficking • are required to sign their compliance with: <ul style="list-style-type: none"> ○ Oxfam GB's Ethical and Environmental Policy ○ Oxfam GB's Anti-Slavery Policy ○ Oxfam GB's non-staff code of conduct (which includes information about how to report a concern) ○ paying staff who deliver Oxfam's work at least the real living wage.
<p>190 consultants were contracted to provide professional advice or to deliver specialized services or projects.</p>	<p>Oxfam GB budget holders recruit consultants following our consultancy and freelancer procurement guidelines (which include relevant enhanced checks, such as IR35, DBS, etc).</p> <p>A supplier profile is set up on Oxfam's internal database, enabling traceability. Each consultant also signs their compliance with Oxfam's non-staff code of conduct (which includes information about how to report a concern).</p>

2. HUMAN RIGHTS DUE DILIGENCE

SUMMARY OF PROGRESS AGAINST ACTIONS PLANNED FOR OCTOBER 2023–MARCH 2026

This section outlines the progress made from 1 April 2024 to 31 March 2025 against our priority three-year objectives, which we set in September 2023.

Table 3: Summary of progress against planned actions, October 2023–March 2026

Supply chain	
Risk 1	<p>The increase in global numbers of people held in modern slavery, added to an increase in numbers of people on the move, indicates an increased risk of forced labour or other forms of harm in our international operations supply chain.</p> <p>An example of how this risk could happen:</p> <ul style="list-style-type: none"> Staff sourcing the goods and services required to carry out Oxfam’s programme work might not identify this risk or might not report their concerns about potential harm done in the supply chain. Under-reporting hampers clear oversight and increases risks that vulnerable people might fall through the gaps.
Objective	People sourcing the goods and services required to carry out Oxfam’s work have clear guidance regarding best practice in working responsibly with suppliers to manage and mitigate risk of harm in our supply chains and in how to raise concerns about potential harm done.
Planned action	<p>The Operations Improvement and Delivery (OID) Team and Ethics Team will work alongside other affiliates and country teams on the three actions below:</p> <p>1.1 Update the Supply and Logistics Manual that is used by most Oxfam affiliates,¹¹ ensuring alignment with Oxfam GB’s latest decolonial, anti-racist, ethical and environmental aims.</p>
Update <p>Over the last year, staff in the key roles leading this work have left Oxfam GB and not yet been replaced. Dramatic changes in context and budget cuts have created further delays. We have therefore deprioritized this work in favour of focusing our efforts on shifting towards decolonizing.</p>	
Planned action	1.2 Produce guidance on renting vehicles to contribute to improving how we address the risks to drivers employed by agencies (recruitment, terms and conditions of employment).
Update <p>This was achieved in the last period and the guidance is now available through Oxfam internal systems.</p>	
Planned action	1.3 Produce guidance outlining potential risks to agency workers , including information about the ‘employer pays’ principle. ¹²
Update <p>This year we focused on developing Oxfam GB’s new (internal) retail sustainability strategy, which was signed off at the end of March 2025. It includes Oxfam GB’s commitment to address this issue across our UK retail network. This task of developing Oxfam GB-wide guidance remains pending.</p>	
Risk 2	<p>Oxfam GB sources new products to sell in its shops and online. The business strategy of its Sourced by Oxfam (SbO) Team is based on an ethical and environmental framework.¹³ If we do not fully integrate ethical and environmental concerns into our everyday business decisions, we will not have the transformative impact we aspire to.</p> <p>One core risk is that dominant commercial norms mean we might rush through decisions which require a new approach. Undertaking due diligence involves mapping the potential impacts we may have and informs the action plans we define together with our suppliers.</p>

	While this takes time, it is necessary if we are to develop our understanding of our impacts on the environment and on people working in our supply chain – and to design improvements over time.
Objectives	<ol style="list-style-type: none"> 1. Ensure ongoing training, reflection and support for SbO retail staff to integrate ethical and environmental considerations into their everyday business decisions, in collaboration with suppliers. 2. Continuously improve and consolidate the design and implementation of commercially appropriate systems and track changes in impact over time.
Planned action	2.1 Recruit additional staff to support the Supply Chain and Sustainability Manager, Buying Manager and wider SbO Team's capacity to integrate ethical and environmental considerations into their everyday decisions, systems and incentives.
Update <p>The additional staff member was recruited two years ago. As of this year, that role – the Quality Assurance and Technical Executive – reports to the Ethical and Environmental (E&E) Manager, instead of the Buying Manager. This is a key structural change which has enhanced collaboration between roles that lead on sourcing decisions and those with a sustainability focus. As a result, E&E considerations are more deeply embedded into the SbO Team's everyday decisions.</p> <p>The executive now plays a more active role and is involved at an earlier stage in sourcing decisions, working alongside buyers from the initial product development stage. Everyday engagement ensures that the entire sourcing process for each product integrates Oxfam's Ethical and Environmental policy standards as well as the learning from the impact of previous sourcing decisions. Previously, this tended to occur at the final approval stage, when there's limited room for meaningful changes which genuinely integrate learning and good practice. The team continues to commercially incentivize suppliers to improve their business so that they can contribute to thriving communities and environmental regeneration. We also continue to encourage suppliers to engage with us, and ideally to co-create innovative solutions, as they inevitably face practical challenges to achieving those ideals.</p> <p>Thanks to the shift to earlier and more integrated conversations, in the past year, one of our suppliers, a small chocolate company, switched to Fairtrade-certified cocoa. The supplier is reassessing its sourcing commitments and raising its minimum trading standards, especially for sourcing cocoa. As the supplier told Oxfam:</p> <p style="padding-left: 40px;">'Ensuring sustainability within the cocoa supply chain has always been important to us. Working with Oxfam has enabled us to formally join the Fairtrade community and guarantee farmers are properly paid for their produce.'</p>	
Planned action	2.2 Develop senior-level championing of this commitment to integration.
Update <p>This year, the Retail Team developed a new E&E strategy using a collaborative approach across the retail division and with senior retail managers. Additionally, an agreement was reached that this strategy would form one part of the wider Retail Strategy, and a sustainability element was officially integrated into a newly designed Head of Retail Sustainability role, which was filled in this reporting period. This means these E&E objectives are now more fully integrated within operational and commercial objectives, as well as decisions across the retail division.</p> <p>Each of the E&E objectives has a key performance indicator (KPI) which clearly embeds these considerations into the SbO Team's product range development. Retail teams and senior leaders have also planned quarterly check-ins to assess progress and alignment with the agreed objectives. The process of developing the strategy enabled learning to be applied and has resulted in a deeper and more targeted collaboration so that the SbO Team and wider retail division, now have a clearer path to improving Oxfam's E&E impacts through integrating them into everyday operational and commercial decisions.</p> <p>During the process of defining this strategy, the SbO Team was more detailed in its description of how it operates, enabling the final agreed objectives to better reflect the complexities of its sourcing decisions. This demonstrated that the team's approach is becoming increasingly targeted and realistic, and as a result, it is better equipped to create solutions that are more practical to implement, and which incentivize more of the</p>	

right behaviours. The team has also made significant progress around developing its systems, which track progress while retaining the ability to adapt where necessary.	
Planned action	2.3 We will continue to use the Ethical and Environmental Framework, and in particular its human rights roadmap, ¹⁴ to work with retail suppliers and create joint action plans of mutual accountability with the aim of improving our ethical and environmental impacts. We will report on key areas of change and learning.
<p>Update</p> <p>In line with the Sourced by Oxfam Ethical and Environmental Framework and its human rights roadmap, in 2024 we commissioned a project to understand the impacts that our sourcing practices have on one of our highest-risk and highest-spend supply chains: Christmas cards sourced in China.</p> <p>We worked with a Chinese consultancy firm to fulfil two objectives. Firstly, to conduct a forensic audit to improve our understanding of the working conditions at the production site where our Christmas cards are manufactured. Secondly, to give robust feedback to Oxfam and the stakeholders along this supply chain on our joint action plan to align commercial incentives with outcomes for workers at the production site.</p> <p>The resulting joint action plan focuses on gender equality, improving industrial relations and encouraging women's career development.</p> <p>This worker-owned production site has been keen to support all its staff and to unlock the potential of the women who work there. It has also taken part in the UN's project 'Women in Motion: Enhancing Women Workers' Employment and Career Development Opportunities in Guangdong Province', which aims to equip women workers with the knowledge and skills needed for career development.</p> <p>Initial outcomes from this ongoing work include:</p> <ul style="list-style-type: none"> • allowing women access to higher paid roles that were previously assumed to be men's work • increasing the number of women operating machines from 12 to 20 • increasing the number of women managing machines from 1 to 8 • the salaries for women working with machines have risen by at least 9% and for some up to 38%. <p>These changes have already led to tangible improvements in gender equality within the factory. More women are in higher-paid roles, while managers understand how gender equality can help factory outcomes and what steps to take to achieve this.</p> <p>Moreover, the reduction in manual workload has increased job satisfaction among female workers. There are also newly created, separate spaces for workers to talk with each other without the presence of their managers. This is helping to ensure continued participation and improvements at the site.</p> <p>When workers can claim their rights – including to freedom of association, collective bargaining and non-discrimination – they are less likely to be vulnerable to other forms of harm, such as modern slavery or human trafficking.</p>	
Planned action	2.4 We will share learning on similar attempts at integration across other Oxfam teams.
<p>Update</p> <p>This year's focus has been engaging shop teams. However, we have continued to share good practice across the Oxfam confederation via our internal fair trade working group.</p>	
Programmes	
Risk 3	The impacts of the climate crisis will fuel further displacement. That displacement makes people more vulnerable to harm and is compounded by racism and other forms of discrimination, which make people more vulnerable to modern slavery and human trafficking. There is a risk that Oxfam does not adequately understand these increased threats and vulnerabilities.
Objective	1. Recognize and address internal as well as external values and systems that contribute to racial and climate injustice.

	<p>2. Underpin all climate justice efforts with an understanding of how displacement, discrimination and responses interact. This understanding can then be used by the Ethics and Procurement Teams to improve our impact.</p> <p>3. Promote and prioritize a reparative approach to addressing climate harms.</p>
Planned action	<p>3.1 Oxfam GB's Climate Justice Workstream will work in conjunction with the Research and Evidence and Racial Justice Teams and other partners to understand, build an evidence base and articulate how racial and climate injustices are linked and reinforce each other. This analysis and narrative will explore and inform external engagement and internal systems, approaches and practices, and will help map a way forward for Oxfam GB to address areas where climate and racial injustices may be embedded across our supply chains.</p>

Update

In March 2025 Oxfam GB published the policy briefing *Fast, fair, funded and feminist: a pathway to a just and transformative climate transition within and beyond the UK*¹⁵ It illustrated the importance of linking climate change and climate action with inequalities in the UK and beyond, and outlined key steps the UK government can take to lead the way toward a just and transformative transition – one that not only stabilizes the climate, but is grounded in justice and fairness.

Oxfam has started researching the interconnections between a just energy transition and climate colonialism. As part of this work, Oxfam GB is partnering with Oxfam Brazil, which has a strong focus on anti-racist adaptation. We are exploring what an anti-racist energy transition – which addresses the inequalities affecting racialized groups around the world – would look like. We are examining how renewable energy projects and the extraction of transition minerals can reproduce colonial dynamics of exploitation, including practices akin to modern slavery. This work has led to the development of a new Oxfam flagship report, which will be launched at the Conference of the Parties, COP 30, in Brazil in November 2025.

Oxfam GB worked with consultants Realife Learning to critically analyse our climate narrative and how effectively it communicates climate justice principles. This identified gaps such as the need to develop a communications framework to help ensure that we consistently centre the voices and experiences of the communities most impacted by the climate crisis.

Oxfam GB also partnered with Earthrise to produce informative materials about climate justice, illustrating how climate change intersects with other inequalities, namely gender, conflict, class inequality, health and colonialism. This narrative was communicated in a series of videos and social media messages.¹⁶

Additionally, the Racial Justice Team presented to 72 students at the University of Cambridge, who ranged from mid-career to senior business professionals and worked across a variety of regions, job functions and sectors. The students were exploring the challenges involved in achieving sustainability in global supply chains. Their feedback included how useful it was to learn new concepts and terminology such as colourism, and the relevance of how historical contexts inform the contemporary challenges in achieving justice and sustainability.

Planned action	<p>3.2 The Climate Justice Workstream on climate finance for both adaptation and loss and damage will integrate an aim to shift the narrative from climate finance being labelled as official development assistance, to it being understood as compensation and eventually as reparations. The Racial Justice Team will support this aim, especially on reparative approaches, both internal to Oxfam and externally.</p>
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Update

Oxfam GB has been leading the confederation's efforts, in coalition with other civil society organizations and Indigenous peoples. The aims are to ensure that the new Fund for Loss and Damage is set up in a way that:

- enables funding to reach marginalized people as directly as possible
- these people are able to participate and exercise leadership both in the:
 - a) management of the Fund
 - b) planning of learning and development solutions at the local level.

Oxfam GB has also been working with partners to support calls for climate reparations.

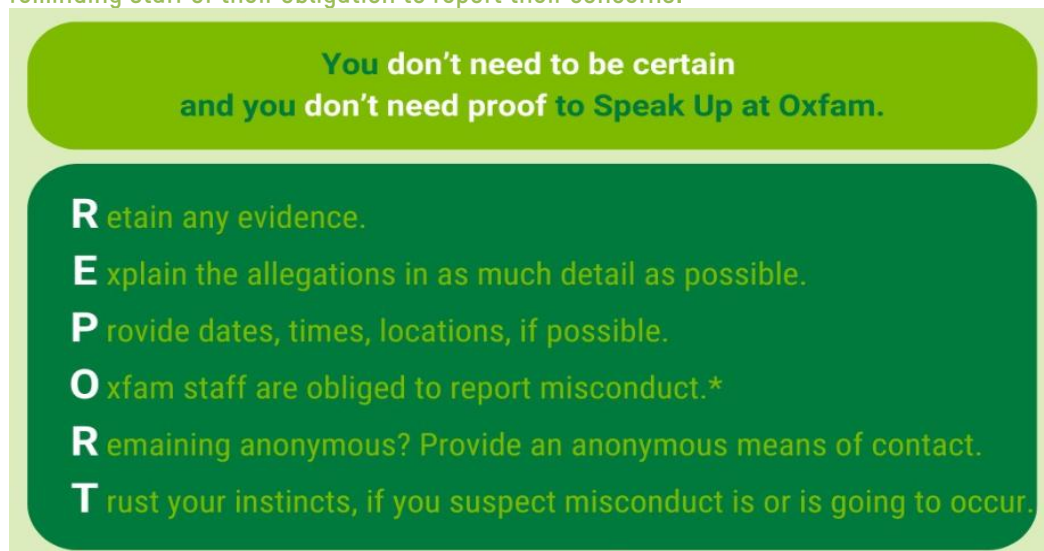
For example, a partnership with Oxfam in Kenya led to the production of a briefing from a locally led project in Kenya called *Communities in Charge: Lessons for the Global Fund for Responding to Loss and Damage*.¹⁷ This presented learning from a Scottish government-funded project, which aimed to generate learning to inform the development of the global Fund for Responding to Loss and Damage, which in turn emphasizes the importance of ensuring access to funding and decision-making for communities and local organizations.

Project learning was also shared at a roundtable on loss and damage at COP29 in Baku, through two blogs published by the Loss and Damage Collaboration,¹⁸ with Oxfam GB's supporters¹⁹ and we supported the creation of a short film.²⁰

IDENTIFICATION, REMEDY AND MITIGATION

In addition to previously reported Oxfam GB standard practices and the three priority areas outlined above which cover our supply chains, below we outline key updates on Oxfam GB's work to identify, remedy and mitigate modern slavery and human trafficking across our operations. Since Oxfam GB is committed to a survivor-centred approach,²¹ some of these details are deliberately topline so that we can protect anonymity.

Figure 2: Oxfam's confederation-wide Integrity Insights newsletter is circulated quarterly with this message, reminding staff of their obligation to report their concerns.



IDENTIFICATION

- **This year, no cases of modern slavery or human trafficking were reported or identified.**

Oxfam GB works with programme teams in 18 countries. The Safeguarding Team works closely with country safeguarding leads and focal points to support programme teams with their plans and policy implementation. Safeguarding covers sexual exploitation, abuse, harassment or child abuse, and we investigate any concern raised about Oxfam staff or associated personnel.

In this reporting period, 135 safeguarding concerns were raised to Oxfam GB's Global Safeguarding Team. Each concern undergoes a risk assessment and initial review before being allocated to a safeguarding specialist. Of the 135 concerns raised, 23 allegations required full investigation,²² but none identified any evidence of modern slavery or human trafficking.

Six of the concerns raised were related to the use of child labour by Oxfam contractors. While Oxfam does not directly employ anyone under 18 years old, in many contexts, including the UK, it is legal for children aged 16 and 17 years old to work certain hours. Oxfam GB's Global Safeguarding Team is working with colleagues across the confederation to review and update its child safeguarding policy, and ensuring countries receive the correct guidance related to child work versus child exploitation so that Oxfam always centres the best interest of the child.

- **Changes in data processing**

In October 2024 Oxfam GB's Integrity & Ethics Team mapped where our current work (on safeguarding, tackling corruption, wider risk management, human resources investigations and internal audit) might identify, redress, mitigate or apply learning to prevent modern slavery and human trafficking in Oxfam GB's operations, supply chains and business relationships.

To date, the main tangible outcome of that mapping exercise was a change in the way the Speak Up Team records incoming concerns. Under the old system, the team could only add one tag to each concern raised, but now a second tag for modern slavery or human trafficking can also be added where relevant. For example, forced marriage or child labour had previously only been tagged as a safeguarding issue, and wage theft or paying to access work had only been tagged as a corruption issue. Since these issues may also indicate modern slavery concerns, they are now given both tags.

This change improves Oxfam GB's oversight and can enable better targeting of further investigation to assure ourselves that modern slavery or human trafficking is not hiding in plain sight, even when the concern raised was not initially identified as such. It also improves our ability to search and extract confederation-wide data around instances where modern slavery or human trafficking was raised as a concern. This could improve our oversight of staff understanding of the issues raised, help target training and improve how we identify areas of concern.

- **Safeguarding**

Oxfam GB's global Safeguarding Team is committed to learning from every case. Our Learning and Accountability Framework includes regular case reviews and peer learning. We apply learning from safeguarding incidents to improve decision-making, processes and support, and to update the content of our training and workshops.

Since we know from our data that staff and community members are most likely to disclose a safeguarding incident to a trusted person, Oxfam GB's Global Safeguarding Team supports safeguarding focal points, who are integral to our safeguarding reporting mechanisms. We train focal points to receive sensitive disclosures, ensuring they have the knowledge to respond appropriately and offer support, and feel supported themselves throughout the process. While we know our reporting rate from community members about harm caused by Oxfam programmes remains low, we aim to increase trust and reporting through this locally focused support.

- **Safe Programming: confederation-wide toolkit – new section on preventing sexual violence**

This toolkit aims to deepen Oxfam's standard safe programming risk assessment and improve our ability to both identify specific risks and take action to mitigate harm. It outlines communal activities that are practical and accessible to all groups. It can be used with staff, communities, contingent workers or partners.

Oxfam GB's Safe Programming and Accountability Team is co-developing a new section of the toolkit with Gender Justice leads based in Oxfam in Jordan, Kenya and Bangladesh. In this initial phase we have focused on preventing sexual violence, but in future we hope to widen the toolkit to include other types of harm such as modern slavery, human trafficking, anti-fraud and corruption, racialized harm and data protection violations.

In the example of a power walk (in figure 2 below), the purpose is to identify which threats an individual faces in order to target those risks. In the process, each participant gains one point for every question answered affirmatively. The people with the fewest points after responding to all twenty questions are those who could be more vulnerable to sexual violence and other forms of harm.

For example, question 13 might identify whether a person is vulnerable to forced marriage, a form of modern slavery that disproportionately affects women and girls. The latest global figures from 2022 show that of all those in a forced marriage, 68% were women/girls and 32% men/boys. Those forced to marry when still children are also disproportionately more vulnerable to further forms of harm throughout their

lives. The latest global data found that 51.6% of women and 17.1% of men in a forced marriage were forced to marry when they were children.²³

Figure 2: Example power walk exercise

place your chosen profiles, and your own, on a flat surface

POWER WALK
Move a step forward if you agree, or this statement applies to your situation
there are 20 statements, click to reveal statements one at a time

[DOWNLOAD POWERWALK STATEMENTS PRINT](#)

1. I don't have to worry about household chores.
2. I feel safe while returning home alone at night.
3. I don't worry about harassment while wearing clothes of my choice.
4. I'm free to go anywhere without having to ask for permission.
5. I can take independent decisions about myself and my family.
6. I am not judged for enjoying a drink in public.
7. I can get a secure job and income.
8. I have independent access to money.
9. I will not be stigmatised for unwanted pregnancy.
10. I am not likely to face harassment at the workplace.
11. I am not worried much if I am stopped by the police on the street.
12. I have automatic right to inheritance of family property.
13. I am free to marry a person of my choice.
14. I can stay late at work without worrying about dinner.
15. I am safe and free of violence in my intimate relationships.
16. I am safe and free of violence in my intimate relationships.
17. I feel free to express myself fully in my intimate relationships.
18. I am not likely to be seen as different in public places.
19. I am not likely to be asked for identification by authorities.
20. I am not likely to take any work available.

Source: Oxfam's Safe Programming Toolkit. This power walk example was designed for Oxfam by Santayan Sengupta, Thoughtshop.
<https://thoughtshopfoundation.org/about.html>

REMEDY

Since no concerns were identified, no redress has been required. However, we focused on addressing the systemic issues driving child labour in Syria and supported staff there to hold contractors accountable. During that work we identified some children and families to whom we gave further support.

MITIGATION

The section explains the steps Oxfam GB has taken to mitigate harm.

- **Safe Programming: Oxfam GB's interaction with the Oxfam confederation**

The Strategic Oversight Group (SOG) continues to meet quarterly to ensure that measures to keep people safe across our programme work are integrated into confederation-wide strategic planning. In response to feedback, this year SOG membership expanded to include a wider range of stakeholders from across the confederation.²⁴

Last year, the confederation's Safe Programming Working Group (SPWG), in which Oxfam GB participates, commissioned a review of our approach to keeping people safe across our programmes. Those findings were finalized at the start of this year. They highlighted that it takes time for staff to learn and feel confident applying the Safe Programming approach. We found this works best when:

- ✓ There are strong relationships and engagement with community members.
- ✓ Staff listen to local actors and respond sensitively to the local context, infrastructure and culture.
- ✓ Risk to communities is consistently prioritized and at the forefront of everyone's minds.
- ✓ Country-level leadership demonstrates by example that keeping people safe is a priority and incentivizes people to do so (e.g. through clear messaging, direction, prompting and encouragement).
- ✓ Roles and responsibilities are clearly defined and accountability for Safe Programming is clear.

- ✓ The goal of keeping people safe is fully integrated into organizational and societal culture.

The SPWG shared these findings with the Oxfam confederation. This stimulated discussion in the confederation's Programme Forum about how to achieve cross-confederation governance, management and accountability for keeping our programmes safe. The initial result was the following:

Strategic Oversight Group's confederation-wide commitment:

- Ownership and leadership responsibility: We understand that keeping people safe in our programme work is a core responsibility for all leaders and managers, and should not be reduced to a checklist of activities to complete. Every team member should understand their role in keeping people safe.
- Coordination: We seek a unified approach across the confederation, which minimizes duplication and distinguishes clearly between different forms of harm. For example, safeguarding requires distinctive skills and responses, such as in relation to child labour or forced marriage (which are also forms of modern slavery).
- Training: Capacity building must be ongoing, and we aim to invest in tailored training to equip our staff and local partners with the necessary skills and knowledge to keep people safe in their respective contexts.
- Funding: We will advocate for our funding to become flexible and adapt to evolving needs.
- Community ownership: We will take steps to ensure local communities have a say in what constitutes harm and how to address it.
- Accountability: We will monitor our progress against the recommendations and keep everyone aligned with these objectives.

Oxfam has put together a detailed action plan to deliver this commitment, which includes actions such as integrating our approach to keeping people safe into our business support, systems and risk management. All Oxfam staff will be required to complete mandatory Safe Programming training (depending on context, this could include volunteers, partners and contingent workers). Collaborative working will be encouraged to deliver joined-up approaches across the confederation, reduce duplication and address any gaps.

3. POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

Oxfam has an overarching [Code of Conduct](#). All staff and non-staff who deliver Oxfam's work are required to align their behaviour to this code to ensure that Oxfam delivers its core mission, aims and values. Everyone implementing Oxfam's work is given information about how to [report a concern](#), and there are [additional options](#) for people working in our UK shops.

Oxfam also has a wide range of policies that could be relevant, depending on each specific instance of modern slavery or human trafficking. For example, these include:

- Confederation-wide Oxfam policies on [safeguarding](#) and [anti-fraud and corruption](#).
- Oxfam GB's policies on [anti-slavery](#); [survivors](#); [ethics and environment](#); [data privacy](#); [anti-terrorism financing and financial crime](#); and [conflict of interest and whistleblowing](#).

In this reporting period we have updated the following two relevant policies.

- **Whistleblowing Policy²⁵**

Oxfam GB recognizes the importance of ensuring its policies are accessible and understood by those who use them. This policy was amended to make it easier to use.

- **Anti-Slavery and Human Trafficking Policy²⁶**

Oxfam GB is committed to reviewing and updating this policy every three years. It outlines our commitment to 'act-as-if' modern slavery is present, so that our work is designed to centre the needs of those people who are most likely to be vulnerable to those forms of harm, regardless of whether they feel safe to disclose their circumstances. This year, we refreshed this policy commitment, making only minor updates to align with changes in international definitions. We are working to improve how we integrate these risks into wider assessments and responses across Oxfam GB.

Oxfam GB is committed to 'act-as-if' modern slavery is present, so that our work is designed to centre the needs of those people who are most likely to be vulnerable to those forms of harm, regardless of whether they feel safe to disclose their circumstances.

In addition, we made the following organizational updates, which inform how we address modern slavery and human trafficking:

- **One Oxfam Safeguarding Strategy for 2024-2028^[i]**

The confederation-wide Oxfam safeguarding strategy was launched in 2024, replacing Oxfam GB's own safeguarding strategy. Following this, the confederation-wide policy is now being reviewed.

- **Internal: Oxfam GB Justice Framework on Race**

Slavery is one of the biggest legacies of colonialism, and one red flag for modern slavery is discrimination. With this in mind, this year an internal framework on race was published for Oxfam GB's staff. It outlines how racial and societal dynamics show up at Oxfam, and how vital it is to proactively address them so that we can achieve a more racially just future within Oxfam as well as in our operations. The framework aims to embed our previous commitments to anti-racism, feminism and decolonial partnerships.²⁷ It is supported by our other publications outlining similar issues, such as the July 2024 briefing *There is No Them, Just Us*, which argues that:

*'We need a shift that sees the very project of "development" not as being one of rich industrialized countries helping "developing" countries to move along some path of progress. Rather it is about dismantling a centuries old process of accumulation, colonialism and under-development imposed by the Global North on the Global South, a process characterized by racism and patriarchy at every step. Neither should we ignore the very real poverty and inequality in high income countries, a poverty which has many of the same systemic roots. It is not about developing "them". It is about dismantling the system of poverty for us all.'*²⁸

- **Framework for business**

In March 2025 we published a second briefing²⁹ in the series under our overarching framework for business.³⁰ The briefing updates some of Oxfam's public policy recommendations, which we also aspire to attain internally. It explores how systemic business practices perpetuate gender inequality through informal work, particularly in feminized sectors with large numbers of women workers. In-depth case studies on the Kenyan tea and UK garments sectors have been published alongside this, revealing how patriarchal norms and inequitable practices exacerbate vulnerability to exploitation.

The report outlines the following steps that companies can take to reduce vulnerability, advance gender equality and promote decent work:

- address informal and precarious work
- ensure safe conditions
- tackle sexual and gender-based violence
- pay living wages
- pay fair corporate tax contributions to support public services, infrastructure and social protection
- create transparent, accountable, equitable and sustainable value chains.

4. TRAINING

This section explains the key training Oxfam GB has delivered – either directly, via other partners or in our supply chain. We outline how our training targets those most at risk of exploitation, who receives our training and what it involves. We also highlight what has changed since last year, based on learning from the impact of previous training.

- **Oxfam’s mandatory training**

All staff are required to complete a minimum of five compliance courses. A standard set of criteria are applied to decide what training should be mandatory. Those decisions are overseen by a senior manager, who is responsible for ensuring that all staff are trained to meet legally defined minimum standards and additional Oxfam standards. Current Oxfam GB mandatory courses cover:

- Oxfam’s Code of Conduct
- Safeguarding
- Anti-Fraud and Corruption
- Information Security
- General Data Protection Regulation (GDPR) / Why Data Rights Matter
- Health & Safety Foundations (for UK based colleagues only).

A decision was made to integrate Safe Programming elements into our mandatory Code of Conduct training. That updated course will begin next year. In the last year, the number of Oxfam GB staff who completed the above mandatory courses rose from 41% at the end of March 2024 to 88% at the end of March 2025. This increase was due to the following four improvements:

1. Data

In 2024, Oxfam GB launched a new Power BI report that matches current employment status against these courses. This means we now have up-to-date and more complete data, with the ability to accurately identify:

- i. compliance percentage by division and country
- ii. colleagues who were not yet compliant.

This new data system enabled Oxfam GB to establish that overall compliance at the end of March 2024 was very low at 41%.

2. Clear consequences for non-compliance

By January 2025, Oxfam GB decided that disciplinary action would be taken with staff who continually failed to complete mandatory training. New Oxfam GB colleagues will not pass a probationary period, while for existing Oxfam GB colleagues, failing to meet these ‘reasonable management expectations’ can result in dismissal for gross misconduct.

3. Better access to better data

From January 2025, changes to Power BI enabled the majority of colleagues to gain direct access to their personal training compliance status, including which of the mandatory courses they have not yet completed. Managers can also see which courses are outstanding for each of the people they manage and for the people at the next level, i.e. those managed by their direct reports.

4. Code of Conduct – course innovations

In 2024, it was agreed for the first time by Oxfam’s International Secretariat and its three largest affiliates, including Oxfam GB, that staff they manage should be required to complete the Code of Conduct training course annually. The aims are to:

- ensure Oxfam's minimum standards, behaviours and reporting requirements are continuously refreshed
- continuously update our expectations of how staff respond to changing contexts
- continuously embed these behaviours.

As a result, a new model for mandatory Code of Conduct training was developed. While the core structure of the annual training course will remain the same, the practical scenarios that colleagues work through to practice applying their understanding of the course content will be updated each year to reflect new trends, issues and themes. The scenarios are created by subject matter experts and agreed upon by Oxfam's largest affiliates and International Secretariat before they are used.

The first of these training courses was launched with a focus on harm prevention and how potential harm should be resolved and/or reported. The course included specific modern slavery scenarios for both UK shops and non-UK programmes. **By the end of March 2025, 96% of Oxfam GB's current staff had completed this first new-model course.**

Intersectionality: recognizes how different aspects of a person's identity, like race, gender, class and sexual orientation, combine to create unique experiences of both oppression and privilege. It acknowledges that these intersecting identities shape an individual's social position and their access to rights and opportunities.

In the last module of the training course, staff are invited to answer a series of questions. They are told this is not a test and that they will be recorded as having completed the module regardless of how they respond. They are also assured that their feedback will be used anonymously to help the course developers assess the impact of the course and make improvements. The results from the past year's course found that **98% of colleagues felt confident they know how to report a concern or seek early resolution for behaviour that does not meet the standards outlined in Oxfam's Code of Conduct.**

5. Safeguarding training

We use our Learning and Accountability Framework to learn from every case. This learning informs the content of our training, together with country-level plans and context. In the past year, Oxfam GB's Safeguarding Team supported a range of awareness-raising workshops with staff and partners. For example, we visited:

- Democratic Republic of Congo and South Sudan in response to specific concerns. While there, we supported the country safeguarding advisor to raise awareness and train staff, partner organizations and community members.
- the Philippines, to support the team to adapt their safeguarding processes and to establish the organization as a newly confirmed independent affiliate in the Oxfam confederation.

A Safeguarding Resource Library has been produced for staff in a format which can be exported for use by partner organizations. All resources and communications were developed with partner accessibility in mind, and include:

- a modular package of safeguarding training resources for the Oxfam confederation and its partner organizations. Modules include issues such as power, vulnerability and intersectionality. The training encourages people to think about their own power and vulnerabilities, and how they could address those issues to protect themselves and others through their daily work.
- a communications package around holding a Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) day of action. This reflects Oxfam's learning about the need to carefully manage power relations when communicating about such sensitive issues and how to tailor these discussions to the local context.

In addition, a comprehensive four-day training for regional safeguarding focal points was held for Middle East, North Africa and Asia regions. Each country program nominated a delegate to attend. This training supports focal points to:

- identify and analyse safeguarding risks and mitigations
- safely receive safeguarding concerns

- identify the most effective immediate support
- analyse power and vulnerabilities relevant to their context
- build relationships and mutual support between safeguarding staff.

- **Safe Programming training**

Our Safe Programming work aligns with our Anti-Slavery Policy to ‘act-as-if’ modern slavery is present, so that our work is designed by default to centre the needs of people who are most likely to be vulnerable to these forms of harm, regardless of whether they can safely disclose their circumstances. As part of our human rights due diligence, we take a pro-active approach to identifying harm and take steps to mitigate or prevent harm to people who come into contact with our work.

As reported in previous statements, a pool of approximately 50 Safe Programming trainers have been offering bi-monthly half-day training sessions. Trainers are volunteers who carry out this work in addition to their main role.

Last year’s review found that staff who had worked for Oxfam for five years or more reported being four times more confident in how to keep people safe than staff who had worked at Oxfam for between one and two years. This is partly due to training and an improved understanding of how to fully embed this approach into each person’s role and the organizational culture.

- **Safe Programming: quick training sessions**

Based on feedback that the half-day sessions required significant time investment from both facilitators and participants, this year, the SPWG collaborated with Oxfam GB’s global Safeguarding Team to organize and facilitate a series of 45-minute drop-in sessions for the Middle East, North Africa, Asia, Africa, and Latin America and the Caribbean regions. These sessions were open to everyone and were both shorter and more interactive. They focused on Oxfam’s Safe Programming approach and harm management process and responded to what participants most wanted to learn.

In the past year, approximately 230 people participated in these 45-minute sessions, which were conducted in Arabic, English, French, Spanish and Portuguese.

- **Safe Programming: training senior leaders across the confederation**

Additionally, the SPWG has adapted the standard training with the aim of improving how senior leadership engage. The training content remains intentionally the same for all staff, but we have started to pilot this different approach with Oxfam GB’s leadership to test how different staff interact with this training and to enable them to better embed these practices into everyday work.

NOTES

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² Other useful good practice guidance includes:

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- ⁵ Oxfam. (April 2025). *The Sudan crisis, two years on*. Oxfam International. <https://www.oxfam.org/en/research/sudan-crisis-two-years>
- ⁶ Dr H. Begum. (March 2025). *The Right To Water*. Oxfam GB. <https://www.oxfam.org.uk/oxfam-in-action/oxfam-blog/the-right-to-water/>
- ⁷ See previous Oxfam GB statements on modern slavery at: <https://www.oxfam.org.uk/what-we-do/about-us/plans-reports-and-policies/modern-slavery-act-transparency-statement>
- ⁸ For example, see *Oxfam GB Annual Report 2023/24*. A summary of our structure is presented on p54-55. <https://www.oxfam.org.uk/about-us/plans-reports-and-policies/annual-report-and-accounts/>
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- ¹⁰ The Living Wage Foundation. (Oct 2024). *What is the real Living Wage? The real Living Wage is the only UK wage rate that meets the cost of living*. <https://www.livingwage.org.uk/what-real-living-wage>
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Photo Credit (front cover): Ahmed Albasha, (2024), Gabreez/Oxfam. Nahla Abdo, a 25-year-old mobile phone technician, underwent a mobile maintenance workshop supported by Oxfam in Al-Ma'afer district, Taiz governorate, Yemen. Now she owns her mobile fixing shop, where she fixes phones and trains other women to fix phones.

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