



OXFAM GB SPEAK UP POLICY (WHISTLEBLOWING POLICY)

POLICY DETAILS

POLICY NUMBER:	COCR019
POLICY OWNER:	Director of Integrity
POLICY AUTHOR:	Head of Speak Up
SLT SPONSOR:	Chief Executive Officer

APPROVAL INFORMATION

AUTHORITATIVE VERSION:	Here.
APPROVED BY:	Safeguarding & Ethics Committee
APPROVAL DATE:	20 July 2026
EFFECTIVE FROM:	20 July 2026
SUPERSEDES:	Version dated July 2024
DATE OF REVIEW:	June 2029
FREQUENCY OF REVIEW:	Every 3 years or sooner if applicable

CONSULTATION AND IMPLEMENTATION

EQUALITY IMPACT ASSESSMENT	-
STAKEHOLDERS CONSULTED:	☒ Board Committee ☐ Country Director(s) ☐ Governance team ☐ HR team ☐ InfoSec team ☒ Integrity team ☐ International Ops ☐ Legal team ☐ Risk & Assurance ☒ SLT ☐ Trustee Board ☐ Union ☐ Other
DATE(S) OF CONSULTATIONS:	SLT 30 June 2026; Trustees via Safeguarding & Ethics Committee 20 July 2026
DESCRIPTION OF CONSULTATIONS:	Meetings for above groups

IMPLEMENTATION OWNER:	Director of Integrity
IMPLEMENTATION PLAN:	Engagement with Internal Communications team for updates and information to all Oxfam GB staff via relevant comms channels (eg Staff Newsletter; Retail staff comms and country programme comms groups, Engage digital comms channel.) Direct email comms to Country Directors, country programme HR leads, International HR, UK People & Culture team, GHT HR, EA Node HR Advisors, Heads of Business Operations, Compliance Leads

SCOPE AND CONFIDENTIALITY

GEOGRAPHICAL SCOPE:	Worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed.
SECURITY CLASSIFICATION:	☒ Public ☐ Internal ☐ Confidential
CIRCULATION:	Integrity Department; People & Culture/HR teams in UK and all country programmes; EA Node HR, Business Operations and Compliance staff

1. INTRODUCTION

1.1 BACKGROUND

The policy sets out the means by which concerns about misconduct or wrongdoing can be reported and the legal protections for whistleblowers in certain circumstances. Whistleblowing is the term used for reporting wrongdoing by Oxfam or people connected with Oxfam which the reporter believes is ongoing, has already happened, is about to happen or which Oxfam is covering up in some way.

The Public Interest Disclosure Act 1998 (amended 2026) provides legal protection against dismissal, victimization or mistreatment by an employer for "blowing the whistle" on workplace wrongdoing in certain circumstances. This protection applies from day one of employment.

Oxfam GB extends the legal protection to all reporters against dismissal, victimization or mistreatment for reporting a concern.

1.2 PURPOSE

The purpose of this policy is to outline how Oxfam GB will:

- Provide a means for reporters to disclose information that they reasonably believe amounts to misconduct, unethical conduct, or illegal practices in the workplace. A danger to someone's health and safety should be reported [here](#).
- Ensure reporters who disclose such information will not be penalised for reporting and will be protected from victimization as a result of reporting their concerns.
- Extend the principles of the UK Public Interest Disclosure Act 1998 to all those reporting concerns even if they are based outside the UK.
- Communicate the obligation on all Oxfam GB employees and non-employees to report misconduct or suspicions of misconduct that has or is about to occur, without delay.
- Take all reports of misconduct seriously and respond appropriately and effectively to disclosed incidents.

1.3 SCOPE AND APPLICABILITY

The policy is applicable to all the groups below in all countries and regions where Oxfam GB is the legal entity, acting as Executing Affiliate (EA). This includes all Oxfam GB activity across the global community, Oxfam GB operations in the UK and Oxfam GB's Retail operations.

- Trustees
- Employees
- Contingent workers¹
- Workers
- Programme participants
- People in the communities where we work
- Partner organisation staff and service providers

¹ Contingent workers covers contractors (individuals & businesses), consultants (employed by a third party or self-employed), temporary staff engaged via an agency, and self-employed freelancers.

2. POLICY STATEMENT

2.1 THE WHISTLEBLOWING (SPEAK UP) POLICY

All those involved in Oxfam's work are expected to abide by the standards of conduct outlined in the One Oxfam Code of Conduct. This policy sets out arrangements for reporting misconduct or suspicions or misconduct that occurs in both a professional and private capacity and which potentially breaches the Code of Conduct.

3. RELATED DOCUMENTS

3.1 GUIDANCE DOCUMENTS

- One Oxfam Code of Conduct (2024)
- One Oxfam Case Management Standard Operating Procedure

4. POLICY CONTENTS

4.1 DEFINITIONS

4.1.1 Misconduct

Misconduct is defined in this policy as conduct relating to sexual, financial, or HR concerns which breach the Code of Conduct. A detailed list of definitions regarding misconduct can be found in Appendix 1.

4.1.2 Report

A report is a concern that has been raised through a reporting channel.

4.1.3 Reporter

A reporter refers to the person raising the report of misconduct. The reporter may or may not be the victim/survivor of the misconduct reported.

4.1.4 Subject of Complaint

Subject of complaint refers to the person who is suspected of or alleged to have committed misconduct.

4.2 REPORTING CONCERNS

Misconduct concerns must be reported via one of the methods below:

- The Speak Up [Webform](#)
- Email: speakup@oxfam.org.uk

The reporting channels are available to all, and webform reports can be made in any language. Reporters can remain completely anonymous when making their report and also request to remain anonymous outside the Speak Up teams. All reports will receive a response within one working day of their submission. Reporting channels are monitored between 9-5pm UK time Monday-Friday.

Reports or concerns can also be raised with Safeguarding Focal Points, Anti-Corruption Champions, a line manager and/or the Human Resources Team.

Where the concerns relate to the matters set out in Appendix 1, these reports must be referred to Speak Up either by using the online misconduct webform or email set out above.

4.2.1 Providing information

When reporting misconduct or suspected misconduct, providing as many details as possible will help in the initial review, risk assessment and any subsequent investigation (if required).

All forms of misconduct can be reported via Speak Up even if the reporter is unsure what type of misconduct has taken place.

Victim-survivors of sexual exploitation, abuse or harassment are not obliged to report their own abuse. The Safeguarding Team can be contacted directly to support and give guidance to victim-survivors or persons wishing to report on someone's behalf.

Reports of misconduct should be made if there is a suspicion that misconduct has taken place, is taking place or is about to take place. A 'suspicion' is the belief, opinion, or impression that an act of wrongdoing has occurred or has been attempted. The suspicion should be reasonably held (i.e., there should be some objective grounds for the suspicion – the person reporting should be able to explain why they are suspicious), but it might involve limited or no formal evidence.

The person making a report should reasonably believe that the information disclosed, and any allegations contained in it, are true at the time of the submission.

Reporters should not undertake investigations into misconduct reported to Speak Up themselves unless instructed and authorised to do so by members of OGB's Anti-Corruption, HR Investigations or Safeguarding Teams.

5 STANDARDS

5.1 CASE MANAGEMENT STANDARDS

Case management standards are reported regularly to Senior Leadership Team and Trustees.

6 ROLES AND RESPONSIBILITIES

6.1 ROLE AND RESPONSIBILITIES FOR REPORTING CONCERNS

6.1.1 Reporting concerns

The One Oxfam Code of Conduct stipulates that all Oxfam employees will, to their best endeavors, report misconduct through recognised confidential reporting systems.

Employees, volunteers, trustees, and contractors have a duty to report through Speak Up

reporting channels if they suspect misconduct has occurred, is occurring or might occur.

Managers have an individual responsibility to ensure that allegations of misconduct are reported to Speak Up.

6.2 ROLE AND RESPONSIBILITIES FOR RESPONDING TO REPORTS

6.2.1 Responding to reports

The Speak Up team will respond to all reports made through the Speak Up system webform or to the Speak Up email address

6.2.2 Support and investigation

The Speak Up team will risk assess all reports in conjunction with the Speak Up investigation teams (Anti-Corruption, HR Investigations, Safeguarding) to ensure timely support for victims/survivors and appropriate investigation under the One Oxfam Case Management Standard Operating Procedure. Where appropriate, reports may also be referred onwards to relevant operational teams for resolution.

6.3 ROLE AND RESPONSIBILITIES FOR OVERSIGHT

6.3.1 Senior management and Trustee oversight

Oxfam GB's Senior Leadership Team and Trustees will receive regular reports to ensure appropriate oversight at senior staff and Board level. Case information is anonymised.

6.3.2 External oversight

In certain circumstances, Speak Up reports are also referred to the UK Charity Commission under regulatory reporting requirements.

7 CONSEQUENCES OF NON-COMPLIANCE

7.1 Making an untruthful report

Individuals who intentionally raise a concern that they know to be untrue, or who are involved in deliberately spreading false information may face investigation and disciplinary action.

No measures will be taken against staff reporting a genuine concern that later proves to be mistaken or misguided.

7.2 Not raising a concern

Under the One Oxfam Code of Conduct, it is a requirement to report a misconduct concern. Where this is knowingly not reported, this may be considered a matter for management action, including potential disciplinary action.

7.3 Subjecting a reporter to detriment

It is an offence under the Public Interest Disclosure Act to subject a reporter to victimization or detriment as a result of reporting a concern. It is also a breach of this policy and will be considered to be a matter for management action including potential disciplinary action.

8 APPENDICES

APPENDIX 1 – MISCONDUCT DEFINITIONS

Misconduct Category	Misconduct Type	Misconduct Type Description
Sexual Misconduct	Child Abuse	A child is defined as anyone under 18 years old. Child abuse can be physical (violence towards or deliberate injury of a child), emotional (behaviour which attacks a child's self-esteem), sexual (using a child for sexual stimulation or gratification), neglect (persistent failure to meet a child's basic physical/psychological needs) or involve any other sort of harm to a child, including possessing and/or the distributing of indecent images of children.
	Vulnerable Adult Abuse	A Vulnerable Adult or Adult at Risk is defined as someone "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation". This can include people experiencing certain conditions (for instance physical or mental disability or illness) or certain types of vulnerability (for instance domestic abuse or displacement from their homes)
	Sexual Assault	Sexual assault is any unwanted physical contact of a sexual nature, including rape and attempted rape
	Sexual Harassment	Sexual Harassment is unwanted conduct of a sexual nature. It can happen to any gender, and can be physical (e.g. touching), verbal (e.g. offensive comments or phone calls), or non-verbal (e.g. display of offensive materials).
	Sexual Exploitation	Sexual Exploitation is the actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes. This includes any sexual relationship with beneficiaries and/or any the exchange of money, offers of employment, employment, goods or services for sex or sexual favours, or any forms of humiliating, degrading or exploitative behaviour. It can also include undeclared or unbalanced sexual relationships between staff, particularly those in the line of management.
	Other	Other PSEA, Safeguarding Children or Adults policy violation, breach of safeguarding policy & practice, FGM, forced labour, bonded labour, trafficking in persons, forced marriage, domestic slavery
Financial Misconduct	Fraud	An act or omission that attempts to intentionally mislead to obtain a benefit or to avoid an obligation. It can also involve an abuse of position. Examples might be forging/altering an invoice, or inflating a receipt submitted for expenses, or a third-party supplier deliberately providing sub-quality products, or providing less product than agreed.
	Theft	Dishonestly taking another's property without their consent, and with the intent to permanently deprive them of it. A possible example might be when an Oxfam GB office is broken into and Oxfam GB property taken, or where an employee deliberately fails to return their Oxfam GB laptop computer when they leave the organisation.
	Bribery	Where an individual improperly offers, gives or promises (or requests, agrees to receive or accepts) any form of material benefit or other advantage, whether in cash or in kind, to another in order to influence their conduct in any way.
	Nepotism	Favouritism granted to associates regardless of merit. Possible examples might include a manager awarding a contract to a

		company owned by a family member or friend on the basis of that relationship alone.
	Money Laundering	The process of turning proceeds of crime into property or money that can be accessed legitimately without arousing suspicion.
	Terrorist Financing	Activities that provide financing or financial support to individual terrorists or terrorist groups.
	Other	Other financial misconduct or breach of financial policy
HR Misconduct	Bullying	Bullying is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment undermining the confidence and self-esteem of the recipient(s). It could be an abuse or misuse of power that humiliates or injures the recipient(s).
	Harassment	Harassment means verbal, non-verbal or physical conduct which meets the following three criteria: Is related to a person's characteristics, whether they are actual or perceived, which include: Age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Is unwanted. Has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive work environment for that person.
	Discrimination	An unlawful act against people at work because of any of the following areas: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
	Breach of policy	A serious breach of Oxfam GB policy having a detrimental effect

VERSION CONTROL

VERSION NUMBER	DATE	AUTHOR	BRIEF DESCRIPTION OF CHANGES
5	Jul 2026	Head of Speak Up	Policy reviewed, no changes needed, transferred to corporate template
4	Jul 2024	Head of Speak Up	Policy condensed for ease of reading.
3	Jul 2021		Review
2	Jul 2020		Updated in line with Charity Commission Action Plan, safeguarding SOP and reporting concerns.
1	Nov 2016		

APPROVAL HISTORY

VERSION NUMBER	DATE APPROVED	REVIEWED/APPROVED BY	COMMENTS
5	Jul 2026	Safeguarding & Ethics Committee	

4	Jul 2024		
3	Jul 2021		
2	Jul 2020	Council	
1	Nov 2016	LT Sponsor	