

OXFAM GB STATEMENT ON MODERN SLAVERY

Financial year 2025/26



OXFAM

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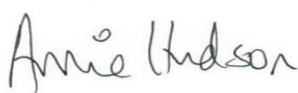
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This is Oxfam GB's eleventh annual statement under the UK Modern Slavery Act 2015 (The Act), covering the reporting period 1 April 2025 – 31 March 2026. The Act requires organizations with an annual turnover of more than £36m to make a public statement on steps being taken to identify and prevent modern slavery and human trafficking in their direct operations, supply chain and business relationships.

SIGNED



Richard Hawkes, CEO, Oxfam GB

Nana Afadzinu & Annie Hudson, Co-Chairs – Board of Trustees, Oxfam GB

This statement can be accessed via our home page and downloaded from
<https://www.oxfam.org.uk/about-us/plans-reports-and-policies/modern-slavery-act-statement/>

FOREWORD

This statement outlines Oxfam GB's approach to tackling modern slavery and human trafficking, including how it is integrated into our everyday work. Oxfam's work responding to crises and building more resilient futures amid climate breakdown routinely confronts us with harsh realities. We witness how the people who face the most discrimination or marginalization also encounter the most barriers to avoiding various forms of harm. Yet we also know that anyone, in any sector or location, could be vulnerable or deceived by the ever-evolving tactics used by the organized criminal networks that profit from modern slavery and human trafficking.

In the past year, we found no cases of modern slavery or human trafficking in Oxfam GB operations, supply chains or business relationships. However, since these abuses are often hidden under fear and social norms, we do not know beyond doubt that no such harm was done. We have risk management systems in place, a requirement for all staff to report concerns and a team of specialist investigators. We are also evolving our open dialogue approach to training, which improves the quality of our human rights' due diligence, meaning we are more likely to receive reports that raise concerns and to identify, remedy and mitigate these forms of harm in the future. We are in ongoing collaboration with others across the Oxfam confederation, as well as our local partners along our supply chains and a range of other stakeholders, so that we can continuously learn and improve the impact of our work and the quality of our everyday decisions.

As a humanitarian and international development charity, Oxfam also works alongside partner organizations and communities towards building system-wide changes that can reduce vulnerability to exploitation. For decades, Oxfam has found that supporting women's rights organizations (WROs) is one of the most effective ways to alleviate poverty. WROs have a more in-depth understanding of the daily realities faced by women and their families, play a crucial role in social development and reduce vulnerability to harm. In 2025, we were honoured that our Women's Rights Fund won an award for excellence.¹ This was only possible because the first cohort of female entrepreneurs were so successful. On average, by the end of the first year they had more than doubled the start-up investment they received from Oxfam. The entrepreneurs told us that our flexible, hands-off approach made all the difference, since it meant they were free to develop the business ideas they thought would work best in the place they live. We are witnessing how these women are using the opportunity to create stronger, more stable organizations that are better equipped to avoid harm and respond to shocks, and their endorsement has encouraged us to expand the programme.

The context faced by the people who Oxfam works alongside continues to be extreme and, in many cases, chronic. Many readers will be familiar with the horrific impact of wars in Gaza, Ukraine, Lebanon and the wider Middle East. Yet Oxfam also responds to far less widely reported crises: supporting some of the 28 million people across East Africa who are facing extreme hunger; assisting some of the 7 million people who have been displaced by conflict in the Democratic Republic of Congo and left without shelter, food or water, even before the Ebola outbreak began; and working in Myanmar, where 20 million people were already in need of humanitarian assistance before the earthquake struck in March 2025. Operating in such environments makes it particularly challenging to manage the complexity of fast-evolving risks – both to the people we support and to the people delivering that work. We work diligently to keep people safe in all scenarios, maintaining vigilance and strong safeguarding, integrity and ethics practices, building robust local relationships and knowledge that enables mitigation and offers clear channels to report concerns.

This statement outlines our intended approach and priorities to address modern slavery and human trafficking over the next three years. As we continue our journey to decolonize, we are realigning the decisions taken in our UK supply chains and operations, with feedback from communities, partners, other Oxfam affiliates and wider stakeholders. Our human rights due diligence over the last year has identified that our most salient risk in our UK supply chains and operations is to the lowest-paid workers who carry out Oxfam's work but are not on our payroll, for example agency workers in our UK warehouses. Although we are an accredited Living Wage Employer in the UK (which means we already ensure that the agency staff delivering Oxfam's work are paid this higher-than-minimum-wage rate), we recognize the need to go further. As a result, we are changing how we recruit and manage these workers and will be more explicit about what is needed to address those modern slavery and human trafficking risks across the organization.

Richard Hawkes,
CEO, Oxfam GB

Nana Afadzinu & Annie Hudson,
Co-Chairs, Board of Trustees, Oxfam GB

1. ORGANIZATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

Oxfam GB is one of 22 independent affiliates working in 79 countries that, together with the international secretariat Oxfam International, make up the Oxfam confederation.

All areas of the confederation have faced significant headwinds during this reporting period, including the demands of unfolding crises on our humanitarian teams, who operate in a context that included a sudden cut in USAID funding and subsequent cuts in overseas development assistance budgets by governments around the world. Oxfam GB also has 515 UK high street shops plus three warehouses, with the latter used to procure goods to service the humanitarian responses of both Oxfam and the wider sector and to store, sort and process the donated goods and new products we sell online, at festivals or via our shops. In the UK, the cost-of-living crisis and rise in national insurance contributions have significantly increased operational costs.

In April 2025, Oxfam GB began an internal restructure aimed at cutting costs and making the organization financially sustainable in this new context. The original plan put 258 jobs at risk, but by the end of 2025, after measures had been taken to limit redundancies, a total of 142 redundancies had been made. Oxfam GB's contributions to the confederation were also reduced and other affiliates made similarly difficult decisions.

In respect of the fundamental right to freedom of association and collective bargaining, Oxfam GB has a Recognition Agreement in place, which was last renewed in April 2024. Our structure and relevant updates are outlined in our [Annual Report and Accounts](#),² an up-to-date list of our retail suppliers can be found [here](#), and Table 1 below provides an overview of our procurement structure and spend.

Oxfam GB undertakes standard compliance processes across our business operations and supply chains, while checking for alignment with Oxfam's ethical and environmental policies, including our Anti-Slavery Policy.

UK-managed procurement

Oxfam's detailed guidance around procurement in our own operations is available to all staff on our intranet. The guidance details specific steps as part of our risk-based, proportionate approach, tailored to different categories and thresholds. It contains a self-assessment questionnaire designed to probe the suppliers' process and policies on labour and environmental standards, including questions about how suppliers manage those risks in their own supply chains.

Our contract template allows Oxfam audit rights and includes an ethical clause. In signing, the supplier commits to working in line with Oxfam GB's [Ethical and Environmental and Anti-Slavery policies](#).³ The contract also provides for Oxfam GB to require its suppliers to disclose evidence of ethical and environmental standards being upheld beyond tier 1 of their supply chain. It requires suppliers to notify us if something changes at any point during our business relationship, and outlines termination rights if the supplier refuses to work with Oxfam to remediate harm.

A central Procurement Advisory Team and an Ethics Team are also available to support decision-makers to implement these standards and processes across the organization. The most detailed due diligence occurs for purchases in categories which have high labour or environmental risks, or when we spend over £100,000, but internal guidance encourages all Oxfam staff to apply the highest ethical standards to all their procurement decisions and contracts. Standard terms for high-value contracts are three to five years and include periodic reviews.

Retail procurement

In addition to the standard processes outlined above, our retail buying team adheres to its own supply chain framework.⁴ An overview of this framework was given on pages 13–18 of our 2021 statement and examples of how our purchasing decisions link to human rights outcomes for workers are often reported in our annual modern slavery statements, for example in the mitigation section on pages 12–13 below.

International procurement

For procurement led by teams in Oxfam’s international programmes, we have agreed on one Supplier Code of Conduct. This includes the same labour standards as our Ethical and Environmental Policy and Anti-Slavery Policies and is explicit about tackling modern slavery and human trafficking, alongside other ethical, environmental and procurement risks. It sits within a wider management system, which is outlined on page seven of our 2024 annual statement. For spends of over €1,000, suppliers must sign contracts which require them to align with Oxfam’s Code of Conduct and include clauses that allow Oxfam to terminate contracts if the supplier breaches our standards. Contracts are rarely signed for more than one year, meaning that supplier reviews are frequent.

All suppliers entered onto our internal system, whether they supply our UK or international operations, are re-checked every two weeks for risks such as aid diversion and against updated sanctions lists. Oxfam staff follow up any concerns to ensure we are thorough in identifying and addressing issues as they arise.

Living Wage accreditation

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 criteria.⁵ 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 their role is also insecure or unpredictable, or if the people in those roles have one or more protected characteristics. Table 2 provides an overview of what we currently 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 our Ethical and Environmental Policy and Anti-Slavery Policy.

A contingent worker is anyone who delivers Oxfam’s work but is not on our payroll. For example: agency workers, contractors, consultants, freelancers or casual workers.

Table 1: Oxfam GB’s procurement structure and spend 2025/26

Procurement category	Managed from	Value of spend	Approx. no. of suppliers	Categories	Key sourcing countries
International Programmes	21 low-income countries	£48m	3,421	Direct (e.g. office equipment, fuel, chickens). Indirect (e.g. utilities, legal advice).	All countries in which Oxfam GB is the legally registered entity. (UK, Bangladesh, Indonesia, Myanmar,

					Nepal, the Philippines, Democratic Republic of Congo, Ethiopia, Kenya, South Sudan, Jordan, Lebanon, Syria, Yemen, Ghana, Mali, Malawi, Zambia, Zimbabwe, Poland, Ukraine.)
Central Procurement	UK	£49.3m	1,688	Various – professional services, IT, accommodation, equipment, utilities, etc.	UK, China
Sourced by Oxfam (retail)	UK	£5.9m	58	Food, everyday essentials, cards, handicraft and Christmas ranges.	UK, India, China
Property and Estates	UK	£4.5m	75	Construction, maintenance, surveying, government departments, software, data processing and legal.	UK
Humanitarian	UK	£1m	37	Water sanitation and hygiene items, vehicles and IT equipment. Held at the Oxfam Supply Centre in Bicester, Oxfordshire.	UK
Global total		£108.7m	5,279		

Table 2: Oxfam GB's contingent workers in the UK (2025/6)

Number of contingent workers per category	Current processes
75 companies were contracted to work on Oxfam property or estates (e.g. shops, offices, warehouses).	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 tracks contractor implementation and advises decisions accordingly. Pre-approved contractors are used, all of which must be current members of the trade body Constructionline. Oxfam GB seeks the best value based on economy, efficiency and effectiveness, and requires contractor compliance with: • 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.
A total of 96 workers were hired through an agency, comprising: • 89 warehouse workers	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-

• 1 driver • 1 senior project manager • 1 media officer • 1 communications consultant • 1 engagement executive • 1 accounts payable assistant • 1 finance business partner	approved providers are contracted, and technical support can be sought from Oxfam GB's Recruitment Team. Agencies: • are onboarded using our standard procurement process; • that are frequently used and higher risk must 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; • that have a higher cost and risk are required to sign their compliance with: ○ 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.
194 consultants were contracted to provide professional advice or to deliver specialized services or projects.	Oxfam GB budget holders recruit consultants following our consultancy process and checklist (which includes relevant enhanced checks, such as IR35, Disclosure and Barring Service [DBS] in England or Wales, Protecting Vulnerable Groups [PVG] in Scotland, etc). A supplier profile is set up on Oxfam's internal database. Each consultant is required to sign their compliance with Oxfam's Non-Staff Code of Conduct (which includes information about how to report a concern).

2. HUMAN RIGHTS DUE DILIGENCE

OVERVIEW

Human rights due diligence is the internationally accepted best practice approach to continuously improving how modern slavery and human trafficking are tackled. As a founding member of the Ethical Trading Initiative (ETI), we adhere to their human rights' due diligence framework. Since it was published in March 2025,⁶ we have also followed the UK government's statutory Modern Slavery Act guidance, which requires organizations to apply a wider human rights due diligence approach to identifying actual and potential human rights risks across an organization's operations, supply chains and business relationships.

METHOD

Every three years we take a step back to assess the global context in which we operate. We review international benchmarking tools and updates,⁷ and teams across the organization identify the actual and potential human rights risks that our work poses to people across our operations, supply chains and business relationships. In the last year, we assessed the actions, notable impacts and trends in our:

Supply chain

- With our procurement teams (Central Procurement, Humanitarian Procurement, UK Retail, Property and Estates, UK Fundraising and International Supply and Logistics).

Operations

- Including teams focused on Speak Up (reporting concerns), Safeguarding, Anti-Corruption, Racial Justice and Equalities, Safe Programming and Global Humanitarian Protection.

The results informed a new action plan for addressing our most salient risks. Although we take these steps more purposefully every three years, in practice, the human rights due diligence approach means that we aim to continuously improve our impact by applying our learning to decisions and amending our approach to working with our partners, suppliers and stakeholders across our business relationships.

RESULTS

Salient risk: lowest-paid contingent worker roles

Oxfam GB is an accredited Living Wage Employer, which means that we already ensure that both the staff on our payroll and agency staff delivering Oxfam's work are paid, as a baseline, a rate that is higher than the minimum wage. That rate is independently calculated annually to ensure it covers the basic costs of living.⁸ Despite this, our human rights due diligence identified the potential risks of exploitation faced by contingent workers in our lowest-paid roles as our most salient.

We mapped the contingent labour which Oxfam GB relies on to deliver its work in the UK (see Table 2 above) and identified that the lowest-paid contingent worker roles in our UK warehouses, fundraising, property, freight, waste disposal and transport services are most likely to face the highest levels of potential risk.

Although we recognize other risks across Oxfam GB's operations could be prioritized, we identified this as our most salient, since Oxfam GB's procurement choices and contract terms offer some leverage over the third parties who hold those employment relationships. We therefore felt this was an area where we could deliver a meaningful improvement in our impact. Our key planned actions (outlined in the section below) include changing how we take decisions to recruit and manage these workers and being more explicit about what is needed to address those modern slavery and human trafficking risks.

Risks faced by contingent workers

Everyone has a right to decent work, and the UN's International Organization for Migration (IOM) highlights that without decent paid work, people are disproportionately more vulnerable to being trafficked or held in modern slavery.

For some people, there are clear benefits to decent work that fits around their life's demands and priorities. Some may be chasing their dream career and want an income that leaves them free to jump when they get another opportunity. Others may have caring responsibilities and need decent, flexible work to support their families.

However, this is not the case for everyone. Low-paid contingent workers tend to both face a greater number of risks and have fewer safety nets or negotiating cards to fall back on when things go wrong. Additionally, people with protected characteristics are disproportionately represented in low-paid and insecure roles, with people in unpaid care roles and migrant workers facing further barriers to accessing decent work. For example:

- While some contingent work offers a fair and predictable income, when this is not guaranteed under the terms and conditions of employment a worker may find it harder to get a mobile phone contract or rent a place to live. Without a fixed address, they may struggle to open a bank account or access healthcare – and without those, they may find essential services and basic purchases more expensive or have fewer options to access a secure job with a predictable income,⁹ which is what most people in insecure work in the UK have stated they want.¹⁰

Salient risks

are the business' operational and supply chain risks to people's human rights, which intersect in three ways:

- most likely to happen;
- most severe;
- the organisation has leverage to change.

Decent work

The International Labour Organisation is the only United Nations body that gives equal decision to workers, employers and governments. It has defined the four pillars of decent work as job creation, rights at work, social protection and social dialogue.

- Whatever their income, people with one or more protected characteristics¹¹ are more likely to face discrimination. Global estimates indicate that being discriminated against increases people's vulnerability to modern slavery and human trafficking.¹²
- If people have been forcibly displaced, or have migrated to avoid persecution, discrimination or to seek a chance to work towards a decent life, they tend to be less able to rely on their family, friends or wider social network. They need to 'start again', but who should they trust? When faced with a different culture, different social norms and perhaps a language barrier, migrant workers can find it harder to assess the threat of potential exploitation and may find themselves taking risks they are not comfortable with because they see no other options.
- Overall, people who are second-generation immigrants to the UK tend to face fewer barriers compared with their parents, but certain ethnic communities continue to experience significant unfair disadvantages.¹³

'Migrants without the legal means to secure a livelihood are also at higher risk of exploitation through forced labour, debt bondage or servitude; they may be paid less than the statutory minimum wage, have excessive deductions made by unscrupulous employers, or be forced to pay extortionate fees to recruiters aware that they are less likely or unable to seek recourse.'

(IOM Handbook on Protection and Assistance for Migrants Vulnerable to Violence, Exploitation and Abuse, p71)

Internal audit

Since our first annual Modern Slavery statement in 2016, Oxfam GB has been taking steps to address the risks to contingent workers. We have amended our policies, guidelines and training, and embedded measures into the daily workflow of various teams. For example, our Procurement Team maintains relevant guidance and has identified responsible third-party labour providers and contractors, while the Ethics Team has worked with budget holders who frequently use agency labour.

In 2025 Oxfam carried out an internal audit on its use of consultants. The results highlighted that our policies are robust and aligned with relevant legal and regulatory standards, and work has been done to ensure teams who may decide to hire consultants understand them. However, we found that internal guidance is not being implemented universally and that our processes could improve.

While this audit was focused on consultants, who are generally higher paid and face fewer barriers to avoiding exploitation, we recognize that the learning about our systems, oversight and accountability applies to all contingent workers. Therefore, the recommendations of our internal audit now inform our approach to all contingent workers, as outlined in Risk 1 in Table 3 below.

Next steps

Having identified room for improvement, we aim to improve our governance, oversight and the consistency of our checks, and to ensure that learning from the impact of past contingent labour decisions is integrated across the whole organization.

Below is an outline of the key actions we will take, which focus on improving our UK procurement practices and the impact on our lowest-paid contingent workers. We will report our progress in forthcoming statements and will also share both the steps we take in the UK and our learning via Oxfam GB's International Supply and Logistics Team, who manage our connections with colleagues across the Oxfam confederation globally.

ACTIONS PLANNED FOR OCTOBER 2026 – MARCH 2029

Table 3: Action plan

Supply chain	
Risk 1	Oxfam GB fails to prevent harm to and by its contingent workers due to insufficient internal processes limiting assurance that minimum standards are being met in practice.
Objective	Improve assurance that minimum standards for contingent workers are being met in practice.

Planned actions	1.1 Oxfam GB will expand its steering group on the recruitment of consultants so that: - all contingent workers are included in the scope; - Central Procurement, Human Resources, Ethics and other relevant teams are involved in the oversight, training and decision-making on responsible recruitment of contingent labour across Oxfam GB's operations and supply chains; - the group's oversight extends to resource use, duty of care and keeping people safe. 1.2 Oxfam GB's retail division will take steps to improve assurance that agency workers: - have received an induction to Oxfam's Code of Conduct; - are clear how they can report a concern; - are receiving a living wage; - have not paid to access work; - have been informed of their right to join a trade union.
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Supply chain	
Risk 2	Oxfam GB fails to deliver on its sourcing commitments to suppliers (as outlined in the Ethical and Environmental Policy). This results in suppliers not feeling confident to disclose concerns or being unwilling to collaborate to meaningfully address actual or potential harm, and in Oxfam being unable to measure the effectiveness and impact of purchasing practices in its retail supply chains.
Objective	Oxfam GB's Sourced by Oxfam Team (which buys the new products we sell in our UK shops and online) will continue to use its Ethical and Environmental Supply Chain Framework to deepen the quality of engagement with its suppliers.
Planned actions	2.1 Oxfam's Sourced by Oxfam Team will continue improving the quality of its ethical and environmental dialogue with suppliers and developing how it tracks the impact of our new products on the people in our retail supply chain. 2.2 Examples of our impact and learning will be shared with suppliers and used to raise awareness about responsible procurement.

Governance	
Risk 3	Without executive ownership to set direction and ensure accountability, there is a risk that action is not taken to identify and mitigate modern slavery risks in Oxfam GB's operations and supply chains, meaning Oxfam does not live up to its values and duty of care.
Objective	The Strategic Leadership Team and Board will routinely oversee modern slavery and human trafficking risks across Oxfam GB's operations, supply chains and business relationships.
Planned actions	3.1 The Ethics Team will report to the Strategic Leadership Team every six months about progress on risks and agreed objectives. 3.2 The Ethics Team will report to the Board every six months about progress on risks and agreed objectives. 3.3 Modern slavery and human trafficking risks will be continuously included in Oxfam GB's risk register, which the Strategic Leadership Team and Board oversee. This will allow consistent oversight of the relevant actions, some of which are outlined below.

IDENTIFICATION, REMEDY AND MITIGATION

In the last year, no cases of modern slavery or human trafficking were identified, and no such concerns were raised.

This section summarizes the key actions taken in the period 1 April 2025 to 31 March 2026 by Oxfam GB to identify, remedy and mitigate modern slavery and human trafficking across our operations, supply chains and business relationships. Different teams lead varied aspects of Oxfam GB's responsibilities for identifying, remedying and mitigating harm, depending on the type of harm and who caused it. In this period our Safe Programming, Safeguarding and Retail colleagues led our most significant actions.

IDENTIFICATION

- **Revised safe programming framework**

During the last reporting period, a revised safe programming framework was signed off to be applied across the confederation. It refreshes our vision by applying the lessons highlighted by our three-yearly external safe programming evaluation, the results of which were discussed in previous statements.

The update marks a significant shift in direction, taking us more clearly beyond a compliance mindset and encouraging a deeper assessment of the systemic drivers of harm, such as patriarchy and racism.

The framework supports staff to adopt a more open and flexible approach that adapts to different contexts and changing circumstances, and to improve identification of actual and potential harm by scrutinizing intersectional barriers. The framework emphasizes learning and adaptation, ensuring that information about the causes and mitigation of harm feeds directly into decision-making.

Importantly, the framework highlights the need for meaningful accountability when harm occurs, reinforces survivor-centred responses and clarifies responsibility for addressing exploitation. We expect this to support safer reporting, provide greater protection from retaliation and assist in preventing recurrence. Therefore, an increase in the number of concerns raised may indicate the success of this approach.

Our Anti-Slavery Policy states that we 'act as if' modern slavery exists and that we address it by default through our decisions to avoid placing the risks and burden on those affected. This framework applies that policy by explicitly acknowledging that our work can cause harm and encourages staff to create space to recognize how modern slavery (such as forced labour, forced marriage and other forms of exploitation) might be unintentionally enabled through the decisions we take about our programmes, partnerships and operations.

By centring the potential or actual harm done to the person, rather than the risks to the organization, the safe programming approach makes modern slavery visible as a lived experience instead of an abstract possibility. We expect this to improve identification of exploitation as it is experienced by workers and communities, particularly since power imbalances, poverty, forced displacement, gender inequality and discrimination increase vulnerability.

REMEDY

Since no modern slavery or human trafficking concerns were identified, we found no need for a remedy to be offered in this reporting period.

MITIGATION

We take a survivor-centred approach in response to concerns raised,¹⁴ meaning we listen to each survivor's wishes (self-determination) and centre their best interests. We aim to respond in ways that the individual, their family, friends and community tell us is empowering for them. This section outlines the key steps we have taken in this reporting period to improve how we mitigate harm, based on what we have learned about what works well and for whom, and what needs improvement.

As outlined above (page 9), the actions following our internal audit on consultants will now be applied to all contingent workers.

- **Safeguarding**

A new regional safeguarding working group was set up due to the rapid expansion of multiple conflicts across the Southwest Asia and North Africa (SWANA) region. Specific new potential risks regarding the use of guest houses and staff accommodation were highlighted, and in response, the group developed and disseminated new operational guidance on Safeguarding in Emergencies and Guest Houses. The guidance aims to help staff mitigate or prevent sexual exploitation, abuse and harassment risks, which are heightened during emergency humanitarian responses and the rapid scale-up of operations. It complements and strengthens staff's continued use of standard operating procedures.

Alongside these steps, we increased the number of full-time safeguarding staff across the SWANA region to strengthen managerial support for safeguarding.

Together, these measures have improved protections for staff, partners and communities served by Oxfam.

- **Safe programming**

The Safe Programming and Accountability Team finalized and rolled out the Safe Programming and Gender-Based Violence (GBV) Prevention Toolkit, a critical tool for integrating GBV prevention and mitigation into Oxfam projects. Trainers were trained in March 2026 and in the next reporting period they will start training other teams. The toolkit and training sessions guide teams to apply organizational learning to how they identify who in their target groups is most vulnerable, how project activities might accidentally exacerbate GBV risks, and what practical actions can reduce harm and contribute to gender-transformative change. More details about our approach to safe programming training are available in the training section below.

We anticipate that this toolkit will assist teams to define mitigation actions to reduce the risk of GBV in our programmes. Given GBV is strongly linked to modern slavery and human trafficking through violations like child marriage and forced labour, our hope is that this will also contribute to reducing vulnerability to these harms.

- **Retail supply chain**

The Sourced by Oxfam Team continues to embed responsible purchasing practices into its day-to-day business. Rather than solely focusing on seeking the lowest price, the team supports suppliers to improve their internal processes and social impact. In this reporting period, Oxfam heard from the main producer groups supplying the handicraft products we sell in our shops and online. They told us that our guarantees and consistent volumes of work have:

- improved producer groups' income stability, which has enabled them to spend time improving their internal processes and upgrading their production facilities;
- increased the confidence of artisanal groups, who have recruited additional employees and expanded job opportunities to more marginalized individuals;
- generated income, which is frequently reinvested into social programmes that address the immediate and future needs of the artisans, such as healthcare, education and access to advance payments;
- allowed for orders to be produced during the off-peak season, providing employment to artisans all year round;
- generated a personal shift – especially among female artisans – from meeting basic survival needs to pursuing aspirations for personal growth, and increasing social confidence and financial independence.

'Earlier, producers' concerns were mostly about survival and basic needs. Today their dreams increasingly relate to independence, personal growth, supporting their children's education and gaining confidence in society. In many ways, it feels as if they have moved up the ladder of needs – from survival toward more advanced personal and social aspirations.'

Supplier of artisanal products from India

In one example, a producer group's warehouse had been flooded. Although Oxfam's own order had not been directly affected, the producer group's shipping schedule was seriously delayed. Based on their localized flood as well as wider challenges and delays to global shipping, we:

- agreed to their request to delay Oxfam's August delivery until early October, without any penalty charges for late delivery;
- revised our workflow so that future orders are placed earlier to mitigate shipping delays;
- began maintaining close, ongoing communication with our producers, so that our purchasing decisions guarantee feasible production windows.

Our aim is to ensure our sourcing decisions maximize the opportunities for producer groups to develop a thriving business. We believe this will reduce their vulnerability to harm, including to modern slavery or human trafficking, since – for example – they will be less likely to accept risky loans.

3. POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

In this reporting period we completed the regular three-yearly review and update of Oxfam GB's safeguarding policies. These policies cover all Oxfam GB's work across our UK and non-UK country programmes. As a result of the review, we reduced the total number of policies to make it easier for staff to implement them. We also made updates which reduce the risk of gaps between the requirements across the UK and our global programme work.

Although all staff have already been trained that they are required to report any concern, we updated our Adult Safeguarding Policy to align with new UK legislation on adults-at-risk. Our policy already covered modern slavery and human trafficking as potential forms of abuse and exploitation that we need to safeguard against. It is now more explicit that Oxfam staff and volunteers are required to be aware of the duty to report abuse of adults-at-risk, and we have outlined the steps Oxfam must take to protect and mitigate harm.

We also updated our Child Safeguarding Policy for UK Retail so that Oxfam staff and volunteers now have a clear duty to tell Oxfam if they have any *new* information that may affect their eligibility to work or volunteer with children or adults-at-risk, including allegations, investigations or charges. This both complements our overarching Code of Conduct and improves on previous checks by ensuring new issues are raised in real time.

4. TRAINING

This section sets out the key steps taken from 1 April 2025 to 31 March 2026 to train staff on identifying and mitigating risks. We describe below key steps taken to learn from past impact and to integrate those lessons into our training, so that we continuously improve how our daily decisions align with our intended impact.

- **Oxfam GB's mandatory training**

All Oxfam GB's staff, regardless of role or location, complete the five mandatory training courses outlined in the table below. Standardized criteria are used to decide what is mandatory and whether additional training is mandatory for specific roles. For example, staff working in the finance department at head office are required to do the same mandatory safeguarding training as all staff, whereas staff who manage shops or young people must complete additional enhanced safeguarding training. All decisions are overseen by the senior manager responsible for ensuring that all staff are trained to meet both legally defined minimum standards and additional Oxfam standards.

In the last year, the number of Oxfam GB staff who completed these mandatory courses rose from 88% at the end of March 2025 to **91% at the end of March 2026**.

Oxfam expects 100% compliance rates and has strengthened follow-up processes and consequences for continued non-compliance. Although the figure by the end of this reporting period is below our target, this is because several new courses and refreshers have just been rolled out, and this rate does not yet reflect ongoing actions taken to drive training compliance for these new courses.

Table 4: Oxfam GB's mandatory training compliance (2025/6)

Mandatory training course (first taken during the first 30 days of employment)	Refresher training requirements
Oxfam's Code of Conduct (CoC)	Annual (from April 2025, either a light-touch or full refresher course)
Safeguarding in Oxfam	Annual – but this year the Safeguarding refresher training was integrated into the annual CoC refresher course
Anti-Fraud and Corruption	Annual – but this year the Anti-Fraud and Corruption refresher training was integrated into the annual CoC refresher course
Privacy and Data Rights	Annual
Information Security Awareness	Annual
Health and Safety Foundations (for UK-based colleagues only)	Every three years

Each mandatory course supports staff to identify, prevent and report different aspects of the potential negative human rights impacts of Oxfam's work. Some explicitly address modern slavery and human trafficking in their content, practice examples and annual refresher courses. The Code of Conduct training integrates modern slavery and human trafficking concerns and is mandatory not only for all staff, but also for the people not on our payroll who implement Oxfam's work (e.g. those employed by third parties, such as an agency).

This includes the low-paid contingent workers who were identified as our most salient risk. They are proactively informed about what they can expect from Oxfam, how we expect them to treat others and how to report their concerns.

We deliver training through a mix of online, face-to-face and offline approaches (using resources which have been tailored for colleagues for whom online access is not available or appropriate). All training is recorded, regardless of the method used.

- **Safeguarding training**

In addition to training all staff to meet mandatory training requirements, Oxfam GB's Safeguarding Team delivers in-person training for partner organizations. In the past year, this has taken place in South Sudan, DRC, Kenya, Ethiopia, Nepal, Bangladesh and Syria.

Some roles receive additional tailored safeguarding training, which incorporates role-specific good practice and is regularly updated. This year that additional type of training has been updated and delivered to:

- Safeguarding Focal Points
- Festival Coordinators
- Strategic Leadership teams in each country
- Our 27 Retail Area Managers

- **Anti-Corruption training**

Every country programme is required to undertake an annual fraud and corruption risk assessment, and the country management teams have all been trained in how this can be carried out. The Anti-Corruption Team also provides face-to-face training for each country programme team every three years. In some countries this happens more often, but in others there may be times when contextual challenges necessitate a different approach. For example, in this last year, the Myanmar Country Management Team had to travel to Bangkok for face-to-face training, as it was not possible for it to take place in Myanmar.

We know that in-person meetings are where staff feel safer, with space to talk much more openly, informally and in depth about their genuine concerns. Beyond improving identification of corruption concerns, these face-to-face meetings also enable teams to work together to co-design controls or other solutions that would work best for their specific operational context.

- **Safe Programming training**

Our last three-yearly evaluation found that our staff and partners prefer in-person training because they experience it as the most effective way to learn from others and develop safer approaches to their work. In response, the Oxfam confederation's Strategic Oversight Group has actively encouraged a move away from a training style where one person gathers knowledge and delivers training sessions, to a more open dialogue which focuses on sharing learning between participants during face-to-face gatherings.

Since we aim to strengthen locally driven (and globally informed) decision-making, throughout 2025 we focused on encouraging regional trainers to support one another instead of defaulting to asking advice from Oxfam GB's central Safe Programming Team. Although trainers from Oxfam GB have continued to convene in-person sessions, they have deepened their preparatory research into specific country contexts and the country team's work, so that sessions are more tailored, promote sharing and encourage participants to define the actions they will integrate into their daily work as they leave the session.

Feedback from sessions has been shared with the confederation-wide Strategic Oversight Group and Programme Director Forum and is being integrated into our work.

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Photo (front cover): Adamson Samuel (draped in a red fabric), a community member, and Mercy Kieni, Oxfam Kenya's Water, Sanitation and Hygiene (WASH) Lead inspecting a newly established borehole chamber in Moruese village, Turkana. Before this borehole was rehabilitated, getting water meant women and girls carrying 20-litre jerry cans on foot for a three-hour round trip to a shallow hand-dug well which was shared with cattle. Photo: Emmanuel Albert/Oxfam, February 2026

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