OXFAM GB STATEMENT ON MODERN SLAVERY

For the financial year 2019/20

The UK Modern Slavery Act 2015 requires organizations with a turnover of over £36m to make a public statement on the steps they are taking to identify and prevent modern slavery and human trafficking in their operations and supply chains. Oxfam GB advocated for this legislation, and this statement relates to steps taken in our own operations and supply chains. In this, our fifth statement, we share our progress against the three-year objectives set last year, which focus on corporate responsibility governance, human rights due diligence and inclusion of our country programmes.

SIGNED:

Danny Sriskandarajah, CEO, Oxfam GB and Caroline Thomson, Chair of Trustees, Oxfam GB

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FOREWORD

Oxfam GB, like all organizations across the world, is living with unprecedented levels of social, political, economic and environmental uncertainty. The differing vulnerability of particular groups to the coronavirus pandemic has highlighted structural inequalities in new and profoundly shocking ways. Poverty and inequality make some people disproportionately vulnerable to exploitation, including to modern slavery and human trafficking. This is further exacerbated where historical coping strategies become ineffective in the face of a fast-changing world.

As Oxfam GB and others have highlighted in previous statements, modern slavery is complex, often hidden, and pervasive across all sectors. Incidents do not always clearly fall within a neat category or occur in isolation from other human and labour rights abuses. Rather these issues exist on a spectrum, beginning with lack of protection of labour rights and evolving through more serious exploitation into the most extreme forms of abuse, such as forced labour, domestic servitude, human trafficking and other forms of modern slavery. Oxfam GB recognizes its responsibility (and the responsibility of all organizations and individuals who hold positions of power) to better understand, mitigate and proactively deliver redress for harm – including unintentional harm – done through its everyday operations and supply chains, including complex issues which are difficult to address, such as racism, sexism, modern slavery and human trafficking. To deliver this, Oxfam GB is integrating its human rights centred approach into its governance structures and decision-making processes.

Since Oxfam's mandate is to help create lasting solutions to the injustice of poverty,[1] it works alongside people who are particularly vulnerable to exploitation of all kinds. Therefore, we recognize the importance of ensuring that Oxfam GB's human rights centred approach is incorporated into everything we do, including the way we carry out due diligence, design our programmes and manage our various supply chains.

This is the second year of the three-year commitments we outlined in last year's statement.[2] This year, we are highlighting key progress made against those commitments and sharing some in-depth examples. Due to the particularly devastating impacts of the coronavirus pandemic, we have added a section to highlight our initial response in March 2020, which fell within this reporting period.

In this reporting period, the Safeguarding Team received reports of two incidents where child marriage was due to take place or had already taken place. Oxfam GB recognizes child marriage as an institution similar to slavery.[3] These reports have been investigated, the complaints upheld and responded to and, where necessary, support (psychosocial, youth services, clinical) provided or referred to. In both instances, Oxfam's relationship with the person involved has been terminated.

Although our ongoing learning and activity has resulted in improvements to our systems and processes Oxfam GB continues to be in the position that we cannot say with confidence that no other cases of modern slavery exist, or that we will be successful in mitigating all such harm to everyone who may be affected by our business or supply chain operations.

Oxfam GB will continue to seek to collaborate with others to be as effective as we can be in tackling all forms of human rights abuses, including modern slavery and human trafficking. Our aim is to continuously improve our practices and impact over time. We are aware that the threat of modern slavery may never be eliminated; however, we are becoming more confident in our approach, due to our ongoing learning and activity, and as we make some progress on measures to reduce workers' vulnerability and to improve how we identify, mitigate and redress harm.

Danny Sriskandarajah, CEO, Oxfam GB

Caroline Thomson, Chair of Trustees, Oxfam GB

1 SUMMARY OF PROGRESS AGAINST ACTIONS PLANNED FOR 2019–22

Full details of our organizational structure, supply chains and policies have been provided in previous statements.[4] All policies are available on our intranet and some are also publicly available. Organizational change decisions have been catalysed by the coronavirus pandemic and will be reported in future annual reports and modern slavery statements.

In last year's statement, we outlined three-year commitments for 2019–2022. These were based on the salient issues identified by our human rights due diligence processes[5] and our own assessment of Oxfam GB's leverage to effect change. Table 1 below provides a summary of action against these commitments in the reporting period. As we have explained in more detail in previous statements, this shows that we have a greater spend and therefore leverage over our UK-managed supply chains compared with in-country procurement. Approximately £50m of Oxfam GB's procurement spend is managed from the UK by a team of qualified procurement specialists, while the remaining circa £90m is managed across 25 different countries. Oxfam believes it is important that in-country teams hold responsibility for their own management of ethical issues within their own context; although as a practical consequence, Oxfam centrally has had less visibility of in-country spend and more limited engagement with in-country teams. A focus for in-country teams to improve Oxfam GB's central oversight of local impacts was therefore to focus on recruitment of agency labour, since it is an area that is most within the control of country teams. This is the first year of reporting our progress against these commitments. More detail is provided in the sections that follow.

Table 1: Summary of actions taken against commitments 2019–2022

Risks of Oxfam GB contributing to slavery in its operations and supply chains	Planned actions	Actions taken
Organizational/structural risks		
Insufficient organizational understanding of slavery and its relationship with Oxfam's work	Appoint a senior executive who will hold operational responsibility for human/labour rights and remedy in the organization's supply chains and operations.	ON TRACK
Too much focus on a compliance approaches, which tend to drive a narrow focus on getting specific tasks done, rather than on transforming the impact of operations.		Oxfam International has not yet appointed a Chief Ethics Officer, but in October 2019, the Culture Lead was appointed. In August 2019, Oxfam GB created a new Integrity and Ethics (I&E) Division, led by a director reporting directly to the CEO and the board, to provide leadership on all aspects of ethical and responsible business.
Executing/Partner Affiliate model (inability to influence and implement a consistent policy and procedure)	Following the recommendations of the Independent Commission on Sexual Misconduct, Accountability and Culture Change, Oxfam International made a commitment to establish two new global senior leadership roles – Chief Ethics Officer and Culture Lead.[6] Based on the recommendations in the report, these roles will ensure that *'ethics and integrity are embedded into every facet of the*	All I&E teams work across the whole organization to embed good practice, advise others and investigate allegations of misconduct involving Oxfam staff and representatives. An important aspect of all the division's work in the future will be sharing good practice within the confederation.
Partnership model (risks as above)		

	organization by making decisions and setting strategies that have a clear link to the organization's purpose'.[7]	

Operational risks		
Oxfam staff using domestic workers who are effectively bonded labour, either through intentional or unintentional poor treatment (e.g. withholding ID documents)	Develop guidelines for UK-based staff on the use of domestic workers. Work actively with the Oxfam confederation to understand whether these guidelines can be rolled out in all countries, adapted to reflect the international context.	ON TRACK The guidelines have been developed, but not fully implemented. Although we recognize that coronavirus increases the urgency for their implementation, especially by country teams, the pandemic has also been the main cause of delay in this process.
Agency workers, contracted by Oxfam (specifically those employed to work for Oxfam in our country programmes, e.g. cleaners, security, etc.), who are at greater risk of exploitation compared with directly employed and permanent employees.	Adapt the existing self-assessment supplier questionnaire to include a section with questions that specifically relate to working with agencies, ensuring it is appropriate for the international context. Look for opportunities to incorporate content from the questionnaire into ongoing training.	ON TRACK A draft questionnaire specifically for companies providing agency workers is now available. This includes questions about the supplier's recruitment and pay policies, as well as detailed questions about accommodation, where provided. This has been tested in one case and plans are in place to start sharing it with in-country supply and logistics teams for feedback and input.
Supply chain workers (e.g. for Oxfam GB's retail suppliers) potentially at high risk	Continue to focus on UK-managed procurement,[8] where Oxfam GB has the most control and leverage as well as resource to work with suppliers. In addition to our existing processes, Oxfam GB will work with one engaged retail supplier with salient risks in its supply chain to develop a new 'beyond compliance' approach to understand and mitigate these risks, engaging with worker representation at site level or national level where possible. Use the supplier framework to identify engaged suppliers with common issues and agree actions, support and resources, where possible, to address these issues.	ON TRACK Please refer to section 2 below for details about concerns identified and how we have responded. During our conversations with suppliers about how to address the human rights risks identified through our due diligence, it became apparent that it would be beneficial for Oxfam GB to provide more detailed guidance on what we consider to be good practice regarding human rights in our supply chains. Therefore, we responded to feedback and decided to focus our engagement with suppliers on developing a 'roadmap to human rights'. This now defines level 3 within the 'Sourced-by-Oxfam' framework and outlines how suppliers could take steps to go beyond compliance, and how to measure their human rights impacts on their workforce. Progress on testing this with suppliers was halted as attention turned to the coronavirus response. However, we aim to publish the Sourced-by-Oxfam framework and roadmap as soon as a preliminary testing period has clarified how we will use these tools with our suppliers.

Programmatic risks		
Without a properly embedded understanding of the drivers of slavery, Oxfam could miss opportunities to reduce people's vulnerability to slavery.	We will undertake a safe programming project to deliver a standard Safe Programmes framework, which will strengthen project design, risk analysis and management strategies.[9]	ON TRACK A new post, Safe Programme and Policy Lead, was appointed in January 2020. Please refer to the Safe Programming section below for more details about how the programme works to identify and prevent all harm, including modern slavery and human trafficking. Work has begun to develop a single, holistic approach to Safe Programming across the Oxfam confederation. This will include considering the underlying contextual factors and power dynamics which drive slavery, and the potential for the design of our programmes to influence these. This work is being led by the new Safe Programme and Policy Lead with input from the existing Safeguarding Team and Global Humanitarian Team Protection lead – please refer to Figure 1 below.
Overarching risks		
Multiple actions are needed to reduce the risk of Oxfam causing harm to others. If these actions are too fragmented, it will make it more difficult for country teams to prioritize and implement them in an efficient way.	Strengthen mandatory safeguarding risk assessment and mitigation planning in international programmes so that we understand, and seek to effectively manage, the risks that our work may pose to the people we come into contact with.[10]	COMPLETE The creation of the Integrity and Ethics Division plus the new safe programming role have resulted in greater capacity and improved ways of working, which mean that the different teams managing different types of risk are better coordinated. As a result, every Oxfam GB programme and project now has a risk assessment and mitigation plan, which is required before it can be signed off. This means that a range of different risks, from slavery to data protection, are all managed through one process.

2   HUMAN RIGHTS DUE DILIGENCE

To align Oxfam GB's human rights centred approach with its governance structures and decision-making processes, we use human rights due diligence to proactively identify and address any potential or actual adverse human rights impacts caused by our business and supply chain operations.

Oxfam GB recognizes that adverse human rights impacts do exist within our operations and supply chains, and that it is our responsibility to ensure we put adequate time and effort into identifying exactly what these impacts are so that we can work to mitigate or address them. Human rights due diligence can take many different forms, and below we share some examples of areas of our operations where Oxfam GB has taken proactive steps to identify potential harm caused by the organization.

Our first-tier sourcing countries (final point of manufacture)[11] and the countries where Oxfam has country offices for which Oxfam GB is the Executing Affiliate (meaning Oxfam GB is legally liable for operations in this country[12]) are broadly the same as last year. We have focused on implementation of last year's commitments, based on last year's human rights due diligence. This involved our own desk-based assessment to identify the salient human rights risks in our supply chains, along with a report produced by Anti-Slavery International which outlined the salient modern slavery and human trafficking risks in our operations.

SOURCED-BY-OXFAM FRAMEWORK

The Sourced-by-Oxfam framework outlines Oxfam GB's ethical standards for the retail goods we buy to sell in our shops. The salient risks in our supply chains encompass a range of issues across many sourcing countries. Since Oxfam GB works through UK-based agents, we have developed a roadmap to human rights which aims to clarify to these agents how Oxfam GB seeks to work together with them to address potential human rights risks in our supply chains. The roadmap is one of five elements of the wider framework.

The overall aim of the Sourced-by-Oxfam framework is to increase the percentage of suppliers we buy from that prioritize people and the environment through how they do business, by creating targets for buyers and incentives for suppliers to move up the framework. The roadmap element of the framework defines different levels of human rights impacts, from 'poor' to 'good', on:

> a. Corporate commitment, implementation and buyer commitment.

> b. Workers' perceptions of various labour rights and indicators of worker wellbeing. These include, for example, forced labour, child labour, violence and harassment, freely associated collective representation, discrimination, health and safety, working hours, wages and job security.

The framework is intended as a tool to facilitate targeted dialogue between buyers and suppliers, starting with creating a baseline scatterplot on the roadmap, agreeing a human rights action plan, measuring progress, and targeting dialogue to co-create more effective solutions with our suppliers over time. This will necessarily rely on gathering (confidential) workers' perceptions and ratings on fundamental labour rights. Our intention is that this will improve our ability to identify, mitigate and redress any human rights harm in our retail supply chain, including any instances of modern slavery.

Over the last year, we have drafted the roadmap and shared it with our suppliers and leading Fair Trade companies to invite comments and challenge. We had to deprioritize this work as we

responded to the coronavirus pandemic. In the next reporting period, we plan to restart our work with key supplier(s) to begin trialling this tool and to publish an initial version of the roadmap to invite wider feedback. We expect this to be a work in progress that will develop as Oxfam GB and our suppliers learn over time about the best ways to improve understanding and action to identify, mitigate and redress harm.

We recognize that neither the human rights roadmap nor the wider Sourced-by-Oxfam framework provides a complete solution to identifying, mitigating and redressing human rights and environmental issues in our supply chains. What they do provide is a clear and transparent framework that targets actions, that measures and rewards progress over time, and that commits to continuously seeking innovative ways to align human rights and environmental standards with commercially viable operations.

OXFAM GB SUPPLY CHAIN: CORONAVIRUS RESPONSE

Although the coronavirus pandemic began in this reporting period, Oxfam GB expects that its full impacts will only be felt in years to come. Oxfam has estimated that the hunger caused by the effects of managing the crisis will kill more people than the virus itself,[13] and will increase vulnerability to exploitation. This part of the statement touches on our initial response to the pandemic in relation to our supply chains.

Since 2016, Oxfam GB has prioritized integrating human rights into its governance. This, together with the human rights expertise of key staff in decision-making positions, enabled the quality of dialogue achieved with our retail suppliers and the responses from our retail purchasing team described below. We recognize that much more can be done to align our senior leadership decisions, staff job descriptions and incentives with our human rights centred approach.

Since the end of March 2020, our response to the coronavirus pandemic has been a stress test for our corporate responsibility governance. In March 2020, our corporate responsibility staff issued guidance to our retail and central procurement teams suggesting that they: review the situation of Oxfam GB's supply chain workforce; consider what Oxfam GB could do to reduce any negative impacts and/or to support suppliers and their workforce; and be explicit with suppliers about how we will behave and what they can expect from Oxfam GB. As a result, Oxfam GB's retail sourcing team's actions included:

• Communicating with suppliers to identify what was happening along the supply chain and listening to what was needed;

• Providing guarantees to producers that no orders would be cancelled during the pandemic;

• Offering better payment terms;

• Allowing delays in delivery dates;

• Suspending penalties for not meeting contractual obligations;

• Keeping suppliers in business by paying on time, and early where possible;

• Offering financial facility/low-interest loans.

For example, to help Fair Trade producers ease their cashflow problems, which would have resulted in delayed goods, we moved from a model of paying when goods were ready to ship to paying for 25% of orders when they were placed. We completed this for 28 purchase orders, totalling £130,000 payment upon placement of orders.

ADDRESSING BARRIERS TO REPORTING

Oxfam recognizes that effective grievance mechanisms improve understanding of our human rights impacts and how best to mitigate and manage them. Oxfam has its own systems in place for anyone to report misconduct and abuse perpetrated by anyone connected to its work (employees, workers, volunteers, trustees, partners or contractors). These enable Oxfam to take the necessary disciplinary action in response to misconduct. Although workers in our supply chains could in theory report a concern through Oxfam's systems, this is not common. Our aim is to simplify user access and encourage the sharing of learning across the various grievance channels available at any one location. For this reason, we support suppliers to develop their own whistleblowing channels, in line with best practice principles.

Oxfam recognizes that robust grievance mechanisms are needed to enable us to provide effective remedy in response to harm done or abuses of power, including modern slavery, human trafficking and other forms of exploitation. During the reporting period, Oxfam GB undertook research to understand the barriers that community members face in relation to reporting misconduct.[14] The research was conducted with communities in a range of contexts in three countries. In line with our previous global experience and in-country observation, the research identified that members of the communities we work with do not speak to Oxfam representatives about misconduct experiences; where they do speak up, their experiences are not reported through the formal systems. This is a common shortcoming of non-state grievance mechanisms, as highlighted by a recent Human Rights council report.[15] The report called for greater emphasis on meaningful stakeholder engagement by prioritizing the needs, expectations and perspectives of the people these mechanisms are intended to protect.

Oxfam GB's research also sought to understand people's preferences for reporting misconduct. The long-term goal is to design community-led, context-specific mechanisms for misconduct reporting, which are safe and confidential, and for Oxfam GB to strengthen its accountability to affected people on a global scale. The report highlighted many factors which influence and strengthen the barriers to formal reporting of sexual misconduct and corruption, including the negative social norms affecting those who experience sexual misconduct, and a preference for community resolution. The following findings are also relevant to modern slavery:

- **Understanding existing threats and vulnerabilities**: The research highlighted that cases of misconduct do not exist in a vacuum; people who are vulnerable to one form of exploitation are often vulnerable to many forms of harm. This, yet again, highlights the need to take a holistic, human rights based approach.

- **Lack of awareness:** Many interviewees had limited awareness of their rights, NGO accountability or Oxfam's reporting systems. Since Oxfam often works through partner organizations, the link to Oxfam is not always apparent to the communities in which the work is taking place.

- **Ineffectiveness of formal reporting mechanisms:** Community members in all contexts felt that the mechanisms put in place for them were not designed in consultation with them, don't function well, don't guarantee confidentiality and as such may lead to safety concerns. Building trust, ensuring safety and communicating effectively about actions taken in response to feedback mean that people are more likely to report.

- **An imbalance of power:** Understanding who has power and how they exercise it explained, at least in part, the use of certain reporting systems and not others. Feelings of gratitude or fear of losing support from Oxfam/other organizations contributed to a reluctance to report. The research noted how gendered power dynamics perpetuate the marginalization of, and violence against, women and girls. This is particularly relevant to reporting sexual misconduct and to the supply chain context, where the majority of workers are women but the majority of managers are men.

Oxfam GB concluded that it is helpful to simultaneously take long-term and short-term approaches to removing barriers and shifting cultural norms. The research acknowledges that there is nothing new or ground-breaking in its ideas for addressing these barriers, saying: '*Indeed, their strength and power lie in the fact that they are simple, effective and rooted in the principles and core values of humanitarian and development work.*' Effective reporting mechanisms must be:

- **Inclusive:** Community participation in designing reporting systems is key to ensure that they are based on user needs and preferences.

- **Accountable:** There needs to be a trusted system in place alongside a strong accountability culture. Starting from the basics, systems should be simple, easy to access and coordinated with other national and international NGOs working in the area.

- **Empowering:** Oxfam needs to work to shift power on two tracks – increasing community members' power in their work with NGOs, and promoting women's, girls' and marginalized groups' power within their own communities.

SAFE PROGRAMMING

Oxfam's governance model means that country teams have their own country-based Human Resources (HR) and procurement teams and are responsible for managing their own country-level risks. Historically, Oxfam GB's Corporate Responsibility Team did not focus on country-level risks, but one of the original commitments in the first Modern Slavery Statement was that Oxfam GB must recognize country-level risks. This should be at an operational level, through its HR and procurement systems, but also by integrating response to identified risks within the design of its humanitarian and development programmes, and measuring human rights impacts on communities. This is particularly important given that the communities Oxfam works with have been selected precisely because they are vulnerable to threats, including modern slavery and human trafficking.

For Oxfam, Safe Programming is about recognizing the potential for Oxfam to cause harm through the way in which it works. The Safe Programming approach requires us to:

> i) Identify the main threats posed by our programme activities. For example, could Oxfam's humanitarian response in a refugee camp have negative consequences – even if unintended? Might these effects differ between women and men?

> ii) Take proactive steps to prevent or reduce harm.

Good progress has been made against the commitments outlined in last year's statement. In January 2020, Oxfam GB appointed a new Safe Programme and Policy Lead, and we have developed an overarching Safe Programming framework for Oxfam. This includes guidance and training for programming and influencing teams on how to identify and mitigate the risk of Oxfam causing or contributing to harm, including modern slavery.

While Safe Programming covers a wide body of work that includes research, advocacy, tools and guidelines, we are currently focused on proactively mitigating harm to people living in the communities in which we operate. This has included developing guidance for managing risk in Oxfam's humanitarian responses, which highlights a range of potential risks and how programmes can reduce them. These varied risks may include sexual exploitation and abuse, data protection, human trafficking and more.

Box 1: Example case study from the Oxfam's internal Safe Programming Guidance

Oxfam is responding to a cyclone in an area notorious for human trafficking. There are many separated and unaccompanied children in informal settlements, and there have already been abductions. Oxfam identifies this as a risk in the environment and takes it into account when designing the response.

For example, the need for parents to leave children alone to collect aid is minimized by having more local distributions and taking items directly to single-headed households. And instead of only providing female-headed households with solar-powered lights, as was originally planned, the programme switched this to blanket distribution, so those households would not be so identifiable at night. Oxfam also provided funding for a local child protection organization, whose volunteers helped people take simple measures to reduce risk and worked with local police to more effectively patrol the spontaneous camps.

All these measures had financial and resource considerations. While donors accepted the costs of additional solar lights and funding for the child protection agency, they would not cover the costs of extra volunteers for more localized distribution based on the risk assessment, and Oxfam has had to cover these costs.

Figure 1: Oxfam's Safe Programming framework
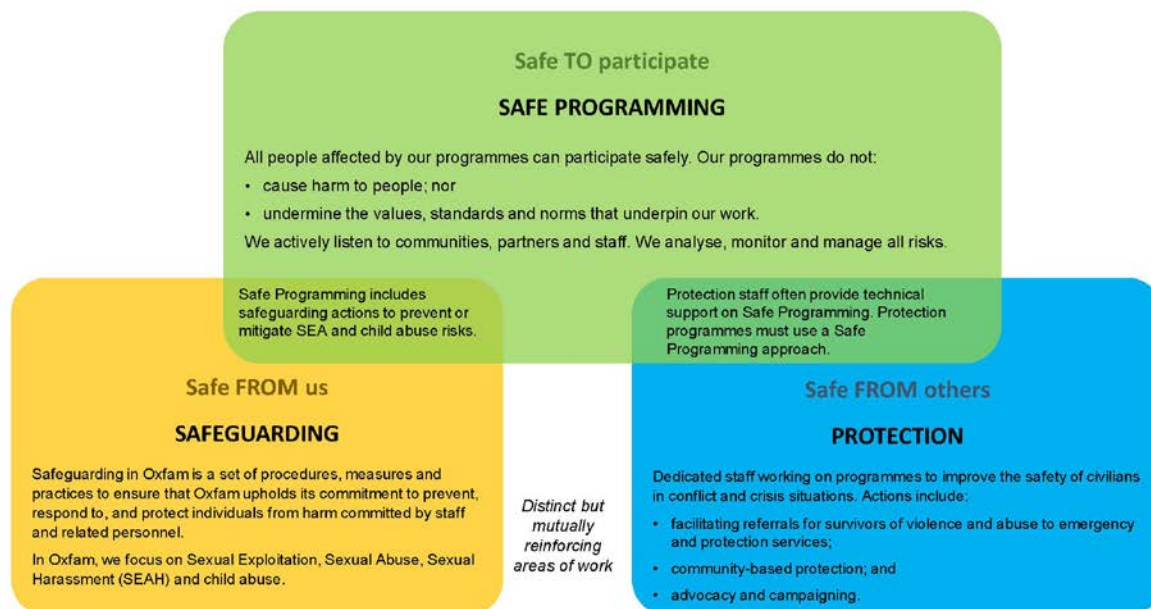
3 IDENTIFICATION, MITIGATION AND REDRESS

INSTANCES OF MODERN SLAVERY AND RESULTS OF CORRECTIVE ACTION PLANS

Our 2018/19 statement reported one case where there was a potential breach of Oxfam GB's Anti-Slavery and Human Trafficking Policy. It had been reported through the whistleblowing line, as a consequence of the inclusion of modern slavery in Oxfam GB's Code of Conduct training. The case had been investigated by the Safeguarding Team and although it was not found to be a case of forced labour, there was evidence of poor labour standards. During this reporting period, this led to appropriate action being taken with the supplier to terminate the contractual arrangement, as the supplier did not demonstrate that they were willing to work to address the issue.

In addition to the above, during this reporting period there was one incident of marriage and one prospective marriage of girls under the age of 18; one to a member of Oxfam staff and the other to a representative of Oxfam. These have been investigated, the complaints upheld and responded to and, where necessary, support (psychosocial, youth services, clinical) provided/referred to. Oxfam has terminated the relationship with the people in question. Due to the age of the girls involved, we have classified these incidents as forced marriage, which is included within the scope of Oxfam GB's Anti-Slavery and Human Trafficking Policy, based on the UN definition of forced and child marriage as an institution similar to slavery.[16]

COMPANY-LEVEL COMPLAINTS MECHANISMS

Oxfam's Annual Report and Accounts[17] provides information on the number of reports received through company whistleblowing mechanisms.

REMEDY AND COMPENSATION PROVIDED FOR LABOUR RIGHTS ABUSES

For Oxfam GB staff, the Dealing with Problems at Work Policy and guidelines provide a clear process for workers, unions and management to ensure that appropriate investigations, hearings and remedial actions take place. Our Anti-Slavery and Human Trafficking Policy details our commitment to remediation for incidences of modern slavery.

Oxfam GB's new Survivor Policy,[18] which was adopted in July 2019, includes a clear commitment to provide support for any survivors, including survivors of modern slavery, where the harm has been caused by an Oxfam GB employee or representative. This support can include psychosocial counselling, access to Oxfam's employee assistance programmes (where available, where the survivor is a member of staff) and/or access to other appropriate support as needed. During the reporting period, there was one instance where Oxfam GB provided living expenses for a survivor to ensure the individual's safety following the incident.

4 TRAINING ON MODERN SLAVERY AND HUMAN TRAFFICKING

Oxfam GB recognizes the need to take a holistic approach to embed an understanding of the risks of modern slavery across the organization. Our training programme has therefore evolved from stand-alone training sessions on modern slavery to the issue being integrated into key organizational training programmes.

OXFAM'S CODE OF CONDUCT

The Integrity and Ethics Division is responsible for the ongoing rollout of the holistic Code of Conduct training described in last year's statement.[19] There is a staff and a non-staff Code of Conduct (for contractors, agencies, suppliers and other third parties) and a mandatory training course. The modern slavery component of these materials focuses on identifying the areas of Oxfam's operations which are most at risk for modern slavery and how to ensure our recruitment and procurement practices go some way to mitigating these risks. It also includes details of Oxfam's whistleblowing mechanisms.

The initial code of conduct training was carried out in person, but this year we created an online version of the training, so that anyone can access the training, whenever and wherever they start their work for Oxfam GB. The online training was launched in November 2019 and is now a requirement for all Oxfam GB staff worldwide. We also focused on ensuring that the Code of Conduct is understood by Oxfam GB staff and contractors in priority countries where we are piloting new approaches. We took three main steps to integrate this training into induction processes, as follows.

We discovered that a few short-term contract personnel were finding it difficult to access the training due to lack of trainers in remote locations, the level and appropriateness of training materials, or problems with internet access. Our first step was to respond by producing a discussion guide, which is quick and easy to use and is designed to support discussion in the local language at the field level.

Secondly, we made both the online training materials and discussion guide available in English, Arabic, French and Spanish.

The third step was to train a total of 993 people across Oxfam GB globally. This included staff, contract personnel and consultants.

We will endeavour to assess a) the impact of the training on people's understanding of the issues and b) the number of whistleblowing reports Oxfam GB receives.

SAFE PROGRAMMING

In the past 12 months, Oxfam's country programme staff and Global Humanitarian Team (GHT) have carried out capacity building around our Safe Programming approach. Training is based on scenarios where participants have to consider how they would address risks; one such scenario is a mother who may feel she has no other option than to sell her child into slavery. To date, almost 2,000 people in 18 countries have been trained, of whom almost 700 are local humanitarian leaders, partners and local authority staff. In this reporting period, 436 people received Safe Programming training.

In addition, the GHT is training all its staff on an ongoing basis. During the reporting period, 136 GHT staff were trained, and 36 staff who were already humanitarian experts were trained to become trainers themselves to build greater capacity and expertise across the global humanitarian programme. The GHT is also funding projects in Mozambique and Burkina Faso that pilot new, practical approaches to Safe Programming in field responses.

The GHT has created a monitoring, evaluation, accountability and learning (MEAL) framework to assess whether the Safe Programming approach is being applied effectively across Oxfam's humanitarian programmes. Once the MEAL framework has been rolled out, the impacts of applying this approach will be more rigorously assessed. In the meantime, people who have participated in training have already started identifying potential harm and have put in place mitigation measures.

NOTES

1 The 'charitable objects' for which Oxfam was established for the public benefit are outlined here: https://www.oxfam.org.uk/about-us/plans-reports-and-policies/oxfams-constitution/

2 Oxfam (2019). Oxfam GB Statement on Modern Slavery for the financial year 2018/19. Available from: http://hdl.handle.net/10546/620873

3 United Nations (1956). Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery. Available from: https://www.ohchr.org/en/professionalinterest/pages/supplementaryconventionabolitionofslavery.aspx

   Article 1 defines forced marriage as an institution similar to slavery when: 'A woman, without the right to refuse, is promised or given in marriage on payment of a consideration in money or in kind to her parents, guardian, family or any other person or group.'

   Article 2: 'With a view to bringing to an end the institutions and practices mentioned in article 1 (c) of this Convention, the States Parties undertake to prescribe, where appropriate, suitable minimum ages of marriage, to encourage the use of facilities whereby the consent of both parties to a marriage may be freely expressed in the presence of a competent civil or religious authority, and to encourage the registration of marriages.'

   The UN Convention on the Rights of the Child defines a child as anyone under the age of 18 years old. Available from: https://www.ohchr.org/en/professionalinterest/pages/crc.aspx

4 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

5 Last year, we reported that our human rights due diligence included Anti-Slavery International's assessment of the types of risks caused by our international operations, including specific risks in the six countries with modern slavery action plans. Specific recommendations were made in this report: A. McQuade and K. Skrivankova (2018). Oxfam GB: Slavery Risks, Responses and Opportunities. Anti-Slavery International.

6 Oxfam (2019). Update to Oxfam Statement on the Independent Commission Report. https://www.oxfam.org/en/press-releases/update-oxfam-statement-independent-commission-report

7 Independent Commission on Sexual Misconduct, Accountability and Culture Change (2019). Committing to Change, Protecting People: Toward a more accountable Oxfam, p.37. https://www-cdn.oxfam.org/s3fs-public/oxfam_ic_final_report-en.pdf

8 Oxfam GB continues to focus on UK procurement, where Oxfam GB controls the decisions. In our 2017/18 statement, we outlined the challenges of implementing an Oxfam GB priority across the Oxfam confederation's work internationally: https://oxfamilibrary.openrepository.com/handle/10546/620552 p.19-20. We continue to share our experiences of UK procurement across the Oxfam confederation.

9 This commitment was also shared in Oxfam GB's action plan response to the Charity Commission Report, p.12, point 3. https://www.oxfam.org.uk/what-we-do/about-us/commission-reports

10 Ibid., p.10, point 2.

11 UK-managed only, and excluding products bought through our in-country procurement.

12 Some Oxfam affiliates provide underpinning systems, policy and processes – such as human resources (HR), information technology (IT), finance and logistics – which enable country offices to operate effectively; this is known as the 'Executing Affiliate' function. This was described in our 2017/18 statement: https://oxfamilibrary.openrepository.com/handle/10546/620552, p.6.

13 Oxfam International (July 2019). The Hunger Virus: How COVID-19 is Fuelling Hunger in a Hungry World. Available from: https://oxfamilibrary.openrepository.com/handle/10546/621023

14 Oxfam GB (2020). Factors Influencing Misconduct Reporting: A meta-analysis. https://oxfamilibrary.openrepository.com/handle/10546/621022

15 United Nations Human Rights Council (2020). Improving accountability and access to remedy for victims of business-related human rights abuse through non-State-based grievance mechanisms. https://undocs.org/A/HRC/44/32

16 United Nations (1956). Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery, op. cit.

   The UN's Convention on the Rights of the Child defines a child as anyone under the age of 18 years old. Available from: https://www.ohchr.org/en/professionalinterest/pages/crc.aspx

17 Oxfam GB Annual Report and Accounts 2018/19. Available from: https://www.oxfam.org.uk/what-we-do/about-us/plans-reports-and-policies/annual-report-and-accounts-2019?cid=rdt_oldannualreview

18 See: https://www.oxfam.org.uk/what-we-do/about-us/plans-reports-and-policies

19 Oxfam (2019). Oxfam GB Statement on Modern Slavery for the financial year 2018/19, op. cit.

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