

OXFAM GB STATEMENT ON MODERN SLAVERY

For the financial year 2020/21



The UK Modern Slavery Act 2015 requires organizations with a turnover of more than £36m to make a public statement on 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 sixth annual statement, we share our progress against the three-year objectives set two years ago, which focus on corporate responsibility governance, human rights due diligence and inclusion of our country programmes.

SIGNED:

Dhananjayan Sriskandarajah, CEO, Oxfam GB and Charles Gurassa, Chair of Trustees, Oxfam GB

This statement can be downloaded from <https://policy-practice.oxfam.org.uk/>

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FOREWORD

Oxfam GB recognizes its responsibility to understand, mitigate and proactively seek to deliver redress for harm – including unintentional harm – done through its everyday operations and supply chains. This includes complex issues which are difficult to address, such as racism, sexism, sexual exploitation and abuse, modern slavery and human trafficking. To deliver on this responsibility, Oxfam GB is continuing its journey to integrate its human rights-centred approach into everything we do, including the way we carry out due diligence, design our programmes and manage our various supply chains.

This statement on modern slavery is the second report against the three-year commitments we outlined in [2019](#). We share some in-depth examples of our work and highlight key progress made against our initial commitments.

The devastating impacts of the coronavirus pandemic have dramatically shaped our activities in this reporting period. One example of how we have tried to respond to these changed circumstances, was the efforts by our retail team to protect our suppliers and their workers during the pandemic. This response was facilitated by our retail team's newly published [Ethical and Environmental Supplier Framework](#). The framework was developed and tested over several years with our suppliers. It is an example of a step change in Oxfam GB's practice, demonstrating how we engage with our suppliers in striving to align our own sourcing practices with continuous improvement in our ethical and environmental impacts over time.

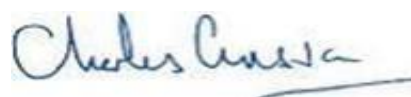
A key milestone in the past year was that all Oxfam GB programmes and projects now have a safe programming risk assessment in place, designed to identify the key risks and outline the actions needed to address them. The assessments encourage programme teams to consider underlying social, contextual and power-based risk factors affecting the communities and individuals we work with. This includes risks of modern slavery, including child marriage and human trafficking.

In this reporting period we investigated three potential cases of modern slavery and no modern slavery was identified. Two of the potential cases were in our programme operations. In one case, it was reported that Oxfam employees may have been occasionally sending family members aged 16 and over to collect their pay on their behalf or to do their job on their behalf. In another case two children under 18 had been discovered to be working on an Oxfam project. These children were providing the sole source of income for their family, and they were working instead of attending school. In both cases immediate actions were taken as soon as we became aware, in line with our Child Safeguarding Policy,¹ to protect the children involved. Measures have also been taken to prevent breaches of our Child Safeguarding Policy happening again, including closer monitoring of how workers sign in and out. Oxfam does not employ minors and there has also been training and awareness raising with contractors and staff to ensure that everyone knows what is expected of them as they deliver Oxfam's work. As detailed in the report, we are also working to establish whether there is a third potential case relating to our UK waste supply chain.

Our ongoing learning and activities continue to improve Oxfam GB systems and processes. We 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. However, it is not possible to say with absolute certainty that no other cases of modern slavery exist, nor that we will always be able to be successful in mitigating all such harm to everyone who may be affected by our business or supply chain operations. In line with our new strategy, we commit to being a safe, feminist and anti-racist organization.



Dhananjayan Sriskandarajah, CEO,
Oxfam GB



Charles Gurassa, Chair of Trustees,
Oxfam GB

1. ORGANIZATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

Oxfam GB is striving towards a radically better world, where everyone has the power to thrive, not just survive. We believe that our best hope for challenging the inequalities that drive poverty is through supporting the voices of people who are minoritized or living in poverty to be at the centre of change. We will continue to apply our core values of empowerment, accountability and inclusiveness to everything we do. How we work continues to be as important as what we do, on our journey of transformation to become a safe, feminist and anti-racist organization.

Oxfam GB is one of 21 independent affiliates that, together with an international secretariat, make up the Oxfam confederation. The detailed descriptions of our organizational structure, business and supply chains have not altered since previous statements.² However, in this reporting period, Oxfam's International Secretariat has launched the confederation's new 2020–2030 Global Strategic Framework³ and Oxfam GB has published its 2020–2023 strategy,⁴ which expresses both how we will play our role as part of this confederation and our own distinctive priorities.

2. HUMAN RIGHTS DUE DILIGENCE

Human rights due diligence (HRDD) is the approach recommended by the UN's Guiding Principles on Business and Human Rights (the UNGPs).⁵ It describes a process that it recommends for both governments and companies. The aim is to ensure that internationally accepted human rights are respected through business operations, supply chains and business relationships, to minimize harm and to maximize the positive impacts of business activities for rights holders. HRDD refers to a cycle of activities which may range from, for example, human rights impact assessments to aligning key performance indicators (KPIs) with outcomes for rights holders.⁶ It is underpinned by the ideas that transparency is essential for the purpose of accountability and that companies doing good business need to go beyond assessing risks to the company and assess, redress and mitigate the risks to rights holders of their business.

Oxfam recognizes that people living in poverty and in other difficult circumstances can be more vulnerable to abuse, including its worst forms such as modern slavery. We believe that HRDD, especially when actively championed by senior leadership, can play a valuable role in enabling positive outcomes by creating a more conducive environment in which human rights can be realized. As an Oxfam report on companies' progress against the Sustainable Development Goals (SDGs) put it in 2018: 'Viewing the issues through a human rights lens fundamentally changes how companies analyse sustainable development problems, prioritize them, attribute responsibilities, set targets and design interventions.'⁷

Integrating environmental concerns into this cycle further strengthens HRDD, since people who are living in poverty are among those most negatively affected by the biodiversity and climate crises.⁸ For this reason, Oxfam GB has been supporting the increasing calls for mandatory human rights and environmental due diligence (MHREDD), including action at the UK level for legislation with sanctions for 'failure to prevent'⁹ human rights harms.¹⁰

Available data indicates that modern slavery affects women and men in different ways, with women and girls comprising 71% of all those held in modern slavery.¹¹ To reduce vulnerability to abuse, including the worst forms of abuse such as modern slavery, and due to the global lack of progress on achieving equal rights for women, in 2019 the UNGPs were updated to clarify how they recommend addressing gendered challenges.¹²

In this section, we report the highlights of Oxfam GB's human rights due diligence in 2020/21. We will continue to report on these areas of work as key milestones are reached. For this year, the

main headline has been the publication of a new Human Rights Roadmap, which forms part of the framework that Oxfam GB uses to manage (and improve) the impacts of its retail supply chain. Also, all Oxfam GB programmes and projects now have a safe programming risk assessment in place, which is designed to identify key risks and define actions to address them.

SUMMARY OF PROGRESS AGAINST ACTIONS PLANNED FOR 2019–22

In 2019, we outlined a number of three-year commitments for the period 2019–22. These were based on the salient issues identified by our human rights impact assessment processes,¹³ including our own assessment of Oxfam GB’s leverage to effect change. Table 1 provides a summary of our second year of action against these commitments.

Table 1: Summary of actions taken against commitments 2019–22

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.	<p>AMENDED ACTION</p> <p>Over the past few years, thinking about how to address the challenges in this set of risks has changed, and there are no longer plans for Oxfam International to appoint a Chief Ethics Officer. However, steps have been taken which should contribute to addressing the issues identified. In May 2020, Oxfam International announced that it would be reorganizing its global operations to maximize impact, shift power to less advantaged countries and adapt to the financial impact of the coronavirus pandemic.</p> <p>As part of this transition, Oxfam International committed to reducing the number of countries in which it has a physical presence from 66 to 48, and its Executive Board has been focusing on how to achieve simpler, more harmonized and more efficient systems for offering business support (including HR, IT, finance and logistics) to countries and regions. In June/July 2020 it resolved to establish a single global business support unit that will bring together the support functions of</p>
Too much focus on compliance approaches, which tend to lead to a narrow focus on getting specific tasks done, rather than on transforming the impact of operations.	<p>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.¹⁴ Based on the recommendations in the Independent Commission’s report, these roles will ensure that ‘ethics and integrity are embedded into every facet of the organization by making decisions and setting strategies that have a clear link to the organization’s purpose’.¹⁵</p>	
Executing/Partner Affiliate model ¹⁶ (inability to influence and implement consistent policies and procedures).		
Partnership model (risks as above).		

		<p>three large Executing Affiliates, including Oxfam GB. The transition towards the new integrated support unit will take place in phases, starting in the 2021/22 financial year.</p> <p>Oxfam GB's 2020–2023 strategy has committed to increasing partnerships with local communities and organizations, supporting them with the resources they need to drive change.</p> <p>This strategic shift was made with the intention that it will accelerate improvements in the processes and support that Oxfam GB provides to its country teams, who manage relationships with local partners. A common approach to partnership assessment is being developed. This aims to enable the building of effective, transformative and more equal partnerships where knowledge and good practice are shared and approaches to managing risks (including risks of modern slavery) respond to local contexts.</p> <p>It is hoped that these activities will facilitate the development of common standards and approaches towards a range of issues, including modern slavery. Harmonized approaches should then create space to move beyond compliance towards more nuanced understanding and the ability to redress any instances of modern slavery that are identified and apply learning to update our mitigation measures. However, there is still significant progress to be made to ensure that modern slavery is understood and addressed effectively across the organization.</p>
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Operational risks

<p>Oxfam staff using domestic workers who are effectively bonded labour, either through intentional or unintentional poor treatment (e.g. withholding ID documents).</p>	<p>Develop guidelines for UK-based staff on the use of domestic workers. Work actively with the confederation to understand whether these guidelines can be rolled out in all countries,</p>	<p>DELAYED</p> <p>The guidelines have been developed, but not fully implemented. Although we recognize that COVID-19 has increased the urgency for their implementation, especially by</p>
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	<p>adapted to reflect the international context.</p>	<p>country teams, the impact on staff capacity caused by the pandemic has also been the main cause of delay in this process. We now aim to develop these guidelines in the next reporting period.</p> <p>In the meantime our <u>Code of Conduct</u>, which must be signed by all staff, commits staff to 'Promote human rights, protect the environment and oppose criminal or unethical activities' and ensure that their 'conduct is consistent with the human rights framework to which Oxfam subscribes'.</p>
<p>Agency workers, contracted by Oxfam (specifically those employed to work for Oxfam in our country programmes, e.g. cleaners, security staff, etc.), who are at greater risk of exploitation compared with directly employed and permanent employees.</p>	<p>Adapt the existing self-assessment supplier questionnaire to include a section with questions that relate specifically to working with agencies, ensuring that it is appropriate for the international context. Look for opportunities to incorporate content from the questionnaire into ongoing training.</p>	<p>DELAYED</p> <p>Since last year, a draft questionnaire for companies providing agency workers has been available. It includes questions about the supplier's recruitment and pay policies, as well as detailed questions about accommodation, where provided. Unfortunately, due to the pandemic, plans to share it with in-country supply and logistics teams have been delayed.</p> <p>However, since this reporting period ended our global logistics team have been working on a wider safer logistics programme, one element of which will provide these questions and training will be designed for all safe logistics issues.</p>
<p>Supply chain workers (e.g. for Oxfam GB's retail suppliers) potentially at high risk.</p>	<p>Continue to focus on UK-managed procurement,¹⁷ where Oxfam GB has the most control and leverage as well as resources to work with suppliers.</p> <p>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</p>	<p>ON TRACK</p> <p>Please refer to pages 14–19 below for details about concerns identified and how we have responded.</p> <p>Our <u>Sourced by Oxfam</u> (SbO) team buys all the new products which we sell online and in our UK shops. The SbO team has been using an <u>Ethical and Environmental Supplier Framework</u> to guide sourcing decisions. In response to feedback from our retail suppliers, our SbO and Ethics Teams have developed a new <u>Human Rights Roadmap</u>.</p>

	<p>these risks, engaging with worker representation at site level or national level where possible.</p>	<p>This clarifies how Oxfam categorizes human rights impacts in our supply chains, including various aspects of modern slavery.</p>
	<p>Use the supplier framework to identify engaged suppliers with common issues and agree actions, support and resources, where possible, to address these issues.</p>	<p>The roadmap has been tested with key suppliers and defines Level 3 within the wider SbO Ethical and Environmental Supplier Framework. It outlines how suppliers can take steps to go beyond compliance, and how they can measure their human rights impacts on their workforce and in their supply chain.</p> <p>The whole framework, including the new roadmap, has now been published on our website and is being built into how we assess new suppliers and tenders and how we review current suppliers.</p>

Programmatic risks

<p>Without a properly embedded understanding of the drivers of modern slavery, Oxfam could miss opportunities to reduce people’s vulnerability to slavery.</p>	<p>We will undertake a safe programming project to deliver a standard Safe Programming framework, which will strengthen project design, risk analysis and management strategies.</p>	<p>ON TRACK</p> <p>Last year safe programming work was set up to identify and prevent all harm, including modern slavery and human trafficking across our programmes. This year, the work has developed, with a key outcome being that all Oxfam GB programmes and projects now have a safe programming risk assessment in place, which is designed to identify the key risks and also actions to address them.</p> <p>Work has progressed beyond focusing on systems and processes to embedding an organization-wide culture of safe programming. Oxfam GB continues to work closely with Oxfam International, in particular the Global Humanitarian Team, and other affiliates to develop and deliver this work. Please refer to the section on Safe Programming on pages 12–14 below for more details.</p>
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Overarching risks

<p>Multiple actions are needed to reduce the risk</p>	<p>Strengthen mandatory safeguarding risk</p>	<p>COMPLETE</p>
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<p>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.</p>	<p>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 with whom we come into contact.</p>	<p>The creation of the Integrity and Ethics Division and 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.</p>
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IDENTIFICATION, REMEDY AND MITIGATION

Company-level complaints mechanism

Our Annual Report and Accounts¹⁸ provide information on the number of reports received through company whistleblowing mechanisms.

Instances of modern slavery and results of corrective action plans

We have investigated three potential cases of modern slavery in our operations and supply chain during this reporting period. We did not identify modern slavery, but in this section we outline key steps we have taken to investigate and respond to concerns.

a) UK waste disposal supply chain

Oxfam GB contracts waste management company Biffa to provide general waste collections across most of our sites and shops in the UK. On 14 January 2021 we heard news that three survivors of modern slavery intended to launch a [civil claim](#) against Biffa and a labour provider Smart Solutions and their umbrella company FS Commercial.

We spoke to the relevant people at Biffa and below we summarize what we know about the situation and how we are responding.

Back in 2016, Biffa cooperated fully with the police's Operation Fort investigating human trafficking in the West Midlands. Two criminal trials then identified survivors of modern slavery, some of whom are now making a new civil claim. Biffa told us that none of the Biffa group of companies nor any of its employees had been prosecuted or convicted for slavery-related criminal offences.

In response to the new civil claim, civil courts will now be asked to decide whether Biffa, Smart Solutions or FS Commercial should have done more to prevent modern slavery, harassment and unlawful intimidation and to protect these survivors. Biffa does not accept liability and is defending the claim. Oxfam GB does not yet know if any of the Biffa sites implicated in the civil claim processed Oxfam GB waste; which means we do not yet know if this is a potential case within Oxfam GB's supply chain.

In response to the initial criminal investigations in 2016, Biffa became a founding member of Slave-Free Alliance. Biffa has also been working closely with Hope for Justice, an international anti-human trafficking charity, to promote awareness of this important global challenge across its business and supply chains and the waste recycling sector.

Biffa have informed Oxfam GB that all companies in the Biffa plc group regularly review and audit procedures and protocols to ensure that good practice is followed throughout the supply chain. This includes a full mapping and assessment of risk, a repeated multilingual awareness campaign

outlining how employees can report concerns, ongoing monitoring, training and toolkits for managers and a group-wide risk assessment by Slave-Free Alliance.

Oxfam GB acknowledged Biffa's constructive and active responses in reforming its systems and raising awareness. However, when we asked how Biffa planned to respond if it were to find a survivor of modern slavery in its supply chain, we thought Oxfam GB's Survivor Policy could be helpful in ensuring a survivor-centred approach,¹⁹ which Oxfam describes as 'one where the wellbeing and the wishes of the survivor of an incident are put at the centre of all actions taken.' This includes ensuring:

- ensuring the safety and security of the survivor, any dependants, witnesses, or whistleblowers;
- assurance that issues will be handled in confidence;
- the survivor's wishes (self-determination) and best interests are taken into account;
- the survivor is treated with dignity and respect, demonstrating belief and trust;
- empowerment of the individual, their family, friends, and community
- a timely response at each stage;
- no limitations on who reports or when they report;
- an individual can report a concern or incident at any time after it happens;
- everyone is able and encouraged to report.

We also highlighted our Anti-Slavery Policy and a report which shares insights gained by Oxfam GB from interviews conducted with 26 experts on what works for women to enable them to represent themselves effectively. It outlines practical steps that companies can take to enable women to be heard in the workplace and to fulfil their potential.

We are continuing this conversation with Biffa through our regular supplier reviews and will be supporting best practice.

b) **Children**

During this reporting period, we addressed two cases of children found working²⁰ in our international programmes. Investigations did not identify any modern slavery, but we responded quickly to the breaches of our Child Safeguarding Policy, which makes it clear that we do not employ minors.²¹

One case was discovered at point of payment, where two children aged under 18 years came to collect their salary for work done on an Oxfam project. These children had no access to education. We responded immediately, according to our Child Safeguarding Policy, taking steps to protect the children and connecting them with a child protection agency on the ground. We put in place measures to ensure that this does not happen again, including closer monitoring of how workers sign in and out. There has also been training and awareness raising in the local community with contractors and staff to ensure that everyone knows Oxfam's Child Safeguarding Policy and what is expected of them as they deliver Oxfam's work.

The second case responded to a report that Oxfam employees may have been occasionally sending family members aged 16 and over to collect their pay on their behalf or perhaps to do their job on their behalf. The same steps have been taken as in the first case to ensure that this scenario would not happen in the future.

Children can be extremely vulnerable, especially in situations of poverty, humanitarian crisis or conflict, and they deserve higher standards of protection.

Our Child Safeguarding Policy and its accompanying implementation guidelines and toolkit have been developed to provide a practical guide to prevent child abuse and to enhance child safeguarding within Oxfam's work. They aim to create an open and aware environment where concerns for the safety and well-being of a child can be raised and managed in a fair and just manner, putting the best interests of the child above all other considerations. The responsibility for maintaining safe environments for children is a shared responsibility of all those associated with Oxfam's work, with the aim of translating the policy into everyday culture and practice.

Oxfam respects, and will generally work to strengthen, the culture, traditions and practices of the communities in which it works. However, in instances where cultural practices are harmful to children, we advocate for their elimination. It is Oxfam's policy to comply with legislation in all operating jurisdictions whenever it is safe to do so. This includes local and international legislation

on child welfare and protection. However, sometimes our policies and procedures may differ from local laws and may have more rigorous expectations. Our Child Safeguarding Policy requirements are in addition to any other applicable legal requirements. Any violations of this policy are treated as a serious issue and will result in disciplinary action being taken, including termination and any other available legal remedy.

Remedy and compensation provided for labour rights abuses

As stated in previous reports, 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 and our Survivor Policy²² includes a clear commitment to provide support for any survivors, including survivors of modern slavery, where harm has been caused by an Oxfam GB employee or representative.

During this reporting period, Oxfam GB has investigated to the two reports of children working in our programmes and although no modern slavery was identified, we responded with protection and mitigation measures. We have also been following up to ensure best practice is being applied by our waste disposal supplier and to find out whether any of the sites implicated in civil claim managed any of Oxfam GB's waste.

Mitigation

Ongoing human rights due diligence in this period focused necessarily on the impact of the coronavirus pandemic. Oxfam GB's responses prioritized alleviating and mitigating the changing nature of vulnerability, including to modern slavery, across our operations and supply chains. Below we explain in more detail some key areas of work to make our programmes safer and to manage our ethical (and environmental) impacts in our procurement supply chains.

MITIGATION: SAFE PROGRAMMING

Over the past year, Oxfam has continued to develop its safe programming work, to ensure that everyone is safe to participate in our programmes and that we prevent and do not cause harm. The safe programming work has gone beyond initial changes to systems and processes to focus on embedding an organization-wide culture of safe programming. Oxfam GB continues to work closely with Oxfam International, in particular the Global Humanitarian Team, and other affiliates.

A key outcome in the last year was that all Oxfam GB programmes and projects now have a safe programming risk assessment in place, designed to identify the key risks and actions to address them. These risks include sexual exploitation and abuse, child abuse and other forms of gender-based violence (GBV), and we encourage programme teams to consider underlying social, contextual and power-based risk factors affecting the communities and individuals we work with. This includes risk factors that drive modern slavery and human trafficking, including child marriage.

Specific guidance was developed and circulated to support staff to effectively manage risks in our safe programming in the new context of the coronavirus pandemic. For example, this included the provision of detailed community engagement guidance on how to prevent viral transmission to vulnerable populations during humanitarian relief activities. It also involved outlining particular risks that might be posed by the pandemic so that staff could address them in the particular context where they work, such as changes in access to the most vulnerable, patterns of GBV, increased burden on care givers, stigmatization/rumours and more.

Figure 1: The Safe Programming risk management cycle



At the end of 2020, there was an independent audit as part of Oxfam’s certification against the Core Humanitarian Standard, covering the organization’s humanitarian programmes globally. Key findings on Safe Programming included the following:

- There has been an extensive roll-out of the Safe Programming approach. Safe programming is now at the forefront, with consistent and regular risk assessments and management approach.
- There has been a significant increase in awareness amongst Oxfam and partner staff at all levels about the mandate, values and key policies of Oxfam and about their obligations to report misconduct, consider diversity and collect disaggregated data. This point in particular was noted to have supported Oxfam programmes to respond flexibly to the impact of the coronavirus pandemic by providing appropriate and relevant assistance. However, this is an ongoing process and improvements in consistency are recommended and will be scrutinized in future audits.
- The emphasis on safeguarding, safe programming and culture change has been integrated into recruitment processes, induction, ongoing training and performance review processes. More work was recommended on consistency and building staff trust in reporting systems.
- The process of designing humanitarian programmes has been improved in terms of ensuring that all programmes are both realistic and safe. More work was recommended on how to engage with short-term partners during rapid humanitarian responses.
- Communities were found to be informed of their rights, resourced, listened to, respected, able to participate and free to make complaints.
- Oxfam is systematically developing and ensuring that safe referral pathways and networks are in place in all countries where it works (this is an ongoing process).

Other actions to improve our responses (i.e. actions intended to mitigate harm and maximize positive impacts) during the pandemic include:

- Development of quality guidelines for safe programming risk assessments;
- Expansion of work on accountable community feedback mechanisms with pilot projects in three countries (Ghana, Iraq and Myanmar);
- Support to global safe programming-specific projects, including the development of context-specific monitoring and evaluation (M&E) criteria;
- Provision of webinars on specialist subjects;

- Provision of additional support to countries where the confederation is exiting or closing programmes. Oxfam GB recognizes that this can be one of the times of greatest risk in the cycle of a project and has encouraged use of the safe programming risk mitigation approach to proactively identify and address closure-related risks to communities and individuals before they occur. A strong emphasis within this is providing support to partners in these countries, including training in the safe programming approach;
- Training of Safe Programming trainers, Oxfam staff and piloting training for partners. Training on 'Making our programmes safe' was supported by our new coronavirus-specific guidance. In this period we:
 - Trained a new cohort of more than 40 Safe Programming trainers globally who are able to conduct training in English, Spanish, French and Arabic, and provided expert subject briefings in key risk areas to facilitate their continued professional development;
 - Continued to roll out training to staff, which has largely been conducted online since the start of the COVID-19 pandemic;
 - Provided online and in-person training to partners, as well as the Training of Trainers. Approximately 40% of participants in training globally have been from partner organizations (including government ministries and local authorities).

MITIGATION: SOURCED BY OXFAM'S ETHICAL AND ENVIRONMENTAL SUPPLIER FRAMEWORK

An outline of the framework

The Sourced by Oxfam (SbO) team buys all the new products that we sell online and in our UK shops and has just published its [SbO Ethical and Environmental Supplier Framework](#). This details how we work with our retail suppliers to understand and improve the ethical and environmental impacts of our sourcing decisions over time.

To determine a supplier's initial level on the framework and then to measure their progress over time, we use the combined scores of three assessment tools:

- a) The [Human Rights Roadmap](#): measures how well a company aligns its incentives and accountability to the human rights impacts/outcomes of its products, services and operations (red, orange, yellow or green rating awarded).
- b) The [Environmental Rating Tool](#): measures how well a company reduces and manages the environmental impact of its products, services and operations (pass/fail awarded).
- c) The [Equitable Business Model Tool](#): measures how the company's business model and structure lock in its social mission, and the company's intention to share its profits and decision-making power among all the stakeholders that generate those profits (pass/fail awarded).

Together with each supplier, Oxfam GB uses this information to define where the supplier sits within the framework and to agree an action plan for continuous improvement. The framework describes five levels, from Level 5, which is above industry standard levels of compliance, to our 'hero suppliers' at Level 1, who are demonstrating positive outcomes in every area (Figure 2). The framework also incentivizes suppliers to move up the levels (Figure 3) in support of Oxfam GB's aim to improve its ethical and environmental impact over time.

Figure 2: The five levels of the Sourced by Oxfam Ethical and Environmental Framework

Level 1		
<p>HERO SUPPLIERS</p> <p>Pass both of the level 2 requirements + commit to reach Human Rights (HR) Roadmap = Green</p> <p>Can be sold with SbO icons</p> <p>Can be sold with Oxfam/SbO branding</p>		
Level 2		
<p>LEADING SUPPLIERS</p> <p>Meet exceptional standards in at least one of two areas.</p> <p>Can be sold with SbO icons</p> <p>Can be sold with Oxfam/SbO branding</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; vertical-align: top;"> <p>A. ENVIRONMENT</p> <p>Environmental Tool = Pass + HR Roadmap = Yellow</p> </td> <td style="width: 50%; text-align: center; vertical-align: top;"> <p>B. EQUITABLE BUSINESS MODEL</p> <p>Enquitable Business Tool = Pass + HR Roadmap = Yellow</p> </td> </tr> </table> <p>Can be sold with SbO icons</p> <p>Can be sold with Oxfam/SbO branding</p>	<p>A. ENVIRONMENT</p> <p>Environmental Tool = Pass + HR Roadmap = Yellow</p>	<p>B. EQUITABLE BUSINESS MODEL</p> <p>Enquitable Business Tool = Pass + HR Roadmap = Yellow</p>
<p>A. ENVIRONMENT</p> <p>Environmental Tool = Pass + HR Roadmap = Yellow</p>	<p>B. EQUITABLE BUSINESS MODEL</p> <p>Enquitable Business Tool = Pass + HR Roadmap = Yellow</p>	
Level 3		
<p>BEYOND COMPLIANCE</p> <p>Pass level 4+5 requirements + agreed initial performance and workplace for continuous improvement against the HR Roadmap = demonstrate move from Orange towards Yellow</p> <p>Can be sold with SbO icons</p> <p>Can be sold with Oxfam/SbO branding</p>		
Level 4		
<p>CREDENTIALS</p> <p>External standard, certification or credential + HR Roadmap = Orange</p> <p>Can be sold with SbO icons</p>		
Level 5		
<p>COMPLIANCE</p> <p>Comply with Oxfam FB Ethical and Environmental Policy (includes Ethical Trading Initiatives's Base Code) + HR Roadmap = Orange</p>		

Figure 3: Supplier incentives

Supplier benefits gained in response to evidence-based progress against the Supplier Framework					
	Level 5	Level 4	Level 3	Level 2	Level 1
Products will be considered for category promotions.		✓	✓	✓	✓
Products are eligible to be featured in Oxfam's Online Shop communications.		✓	✓	✓	✓
Products qualify to be promoted with the SbO Icons		✓	✓	✓	✓
Suppliers are awarded additional points for their evidence-based achievements on the Human Rights Roadmap. For example, this would be added to the supplier review scores or through supplier tenders.			✓	✓	✓
Products are eligible to be branded with the Sourced by Oxfam (SbO) and/or Oxfam brand.			✓	✓	✓
Products will be considered for stand-alone promotions.			✓	✓	✓
Products are eligible to be promoted at a higher frequency across Oxfam's marketing platforms.			✓	✓	✓
Preferential terms will be considered, such as early payment.			✓	✓	✓
Oxfam will consider requests to work with suppliers to become a level 1 'hero' supplier.				✓	
Preferential consideration is given when developing new ranges. These suppliers are approached first with briefs, according to progress against the framework.				✓	✓
Products are eligible to be highlighted by Oxfam as examples of good practice.					✓
Suppliers can openly negotiate any desired benefits with the Sourced by Oxfam team. These will be specific and tailored.					✓
Total number of benefits to suppliers at each level:	0	3	8	10	11

The Human Rights Roadmap is the main tool we use to help us identify and mitigate modern slavery in our retail supply chain

The roadmap measures how well a company aligns its incentives and accountabilities with the human rights impacts of its products, services and operations. It focuses on qualitative indicators, which are particularly helpful in reflecting the shift required for a company to transition beyond a standard compliance and audit-based approach (as in Levels 4 and 5 of the framework) to a genuinely human rights-aware way of doing business (at Level 3 on the framework).

The roadmap outlines four key indicators (coded red, amber, yellow, green) against three core areas – corporate commitment, implementation and sourcing (buyer) commitment (Figure 4) – and also against key human rights impacts (such as forced and child labour). This is based on Oxfam GB's research, private sector engagement and advocacy work, which has found that these are the most useful indicators of a company that is taking genuine steps to make this transition 'beyond compliance' and to align its approach to doing business with internationally agreed human rights.

Since developing this framework, prior to establishing a new supplier relationship the SbO team discusses the evidence provided by the supplier and decides where each supplier is on the roadmap against each indicator. Based on this initial mapping, an action plan is agreed for improving those impacts, and then changes over time are measured against the same roadmap. This process is also being rolled out with current suppliers, over the coming year.

To start their journey at Level 3 (going beyond compliance), suppliers must be willing to improve their impacts over time and minimize any harm. However, to remain at this level they must

demonstrate continuous improvement. The SbO and Ethics teams play a key role in aligning Oxfam GB’s sourcing practices to enable our suppliers to deliver this continuous improvement and to improve our ethical and environmental impacts over time. We acknowledge that progress is often not linear and we encourage honest discussions with all our suppliers.

This tool has been specifically designed so that any company, no matter how small or how large, can engage with us by using the roadmap and we can tailor a plan of action based on its specific business relationship with Oxfam and measure progress on our impact over time. The majority of our suppliers are small and medium-sized businesses, and ensuring that these tools are accessible to them is our priority.

Figure 4: The three core areas of the Human Rights Roadmap

		UNSUSTAINABLE ← (Cumulative, i.e. assumes issues in previous box have been addressed as company moves to the right) → SUSTAINABLE			
		EXPLOITATIVE ROAD	LOW ROAD	MEDIUM ROAD	HIGH ROAD
		Does harm	Does some harm	Does some good	Does good
Sourced by Oxfam teams: Working with suppliers to improve the human rights impacts on women and men working in their supply chain over time					
Corporate commitment: Sourcing teams engage in ongoing dialogue with suppliers, with the aim of improving the human rights impacts of supply chain operations over time.	Company has no plan to improve its human rights impacts over time or to have these conversations with its (tier 1) suppliers.	<p>Company undertakes third party ethical/labour standards audits or self-assessment questionnaires.</p> <p>Company wants to work in its own operations and with its suppliers to improve its impacts on human rights over <u>time, but</u> has limited capacity.</p> <p>Company is working to define its minimum standards and management plan for engaging with some of its supply chain.</p>	<p>Company explicitly recognizes the shortcomings of a compliance and audit-based approach and is taking action to address those shortcomings, such as forensic audits and/or SAB8000 certification.</p> <p>Company has a minimum standard plan in place and human rights awareness at senior management level to lead the implementation of this work. The minimum standard plan is defined, <u>implemented</u> and monitored in dialogue with Oxfam and also with its own suppliers.</p> <p>Company senior management proactively supports/agrees the minimum standard of both how its sourcing team works with suppliers and what is done to improve the human rights (and environmental) impacts of supply chain operations over time.</p> <p>Company has enough sourcing team and human rights lead expertise/capacity to:</p> <ol style="list-style-type: none"> Define how to measure impacts on women and men working in the supply chain over time. Define which suppliers to <u>prioritize, and</u> start the process of implementation with some suppliers. Start the process of training its sourcing teams. 	<p>Company goes beyond a compliance and audit-based approach. This includes:</p> <p>Company has a clear human rights policy which states its aims to take on its fair share of core business and value chain human rights (and environmental) costs, risks and benefits of doing business.</p> <p>Company defines, implements and monitors its human rights management plan in dialogue with women and men working in its supply chain.</p> <p>Company has adequate capacity to maintain and develop standards towards this goal over time:</p> <ol style="list-style-type: none"> The senior management sponsor for this work reviews and plans (with support from sourcing teams and human rights leads) how the company takes responsibility for its human rights impacts across its supply <u>chain, and</u> scrutinizes progress towards raising standards. Non-executive directors or senior external consultants with the right expertise scrutinize the quality of this work. Human rights leads are clear about what needs to be done and how to drive progress. Adequate time, resources and authority are allocated to sourcing teams and human rights leads to maintain the focus across the sourcing teams. Plans/actions are continually refined based on learning over time. All staff that carry out procurement tasks have had training and are confident speaking with suppliers on 	

<p>Implementation:</p> <p>Company aims to increase and improve its knowledge about the impacts of its operations on the women and men working in its business and supply chain, by taking a human rights due diligence approach.</p>	<p>Senior management does not assess or proactively manage the human rights impacts and risks on women and men working in its core business and supply chain operations and business relationships.</p> <p>Company may assess the risks to the company of negative human rights impacts of its business and supply chain operations (e.g. reputational damage, unreliable supply, poor-quality goods, high costs due to poor staff retention and difficulty attracting the right talent, etc.).</p>	<p>Senior management proactively assesses the human rights impacts and risks on women and men working in its business and supply chain operations and relationships (proportional to their business, e.g. through standard audits or self-assessment questionnaires), but lacks the necessary expertise and/or the will to formulate a robust human rights action plan or to learn from its impacts over time.</p>	<p>Senior management decisions are informed by proactive gendered human rights due diligence, which is proportional to their business. Companies disaggregate workforce data, at least by gender and ideally also by other criteria such as contract type, migrant status and protected characteristics.</p> <p>A plan to protect women and men workers during the process of human rights due diligence is prioritized. This may include staff training, scenario planning and dummy runs of responses, so that systems are tested and everyone is clear how to implement the process safely.</p> <p>Senior management works with middle, frontline and supply chain management to plan how women and men working in the supply chain can be directly involved in this process.</p> <p>Senior management tracks the links between core business decisions, risk management and gendered human rights impacts.</p> <p>Results inform new plans/targets and senior management leads and resources the raising of standards over time (continuous improvement).</p> <p>Performance management systems are set up to ensure integration of gendered human rights efforts and to raise standards over time.</p>	<p>Senior managers value and proactively improve gendered human rights due diligence over time.</p> <p>Women and men on the lowest pay grades and least-secure jobs in the business and supply chain operations are directly involved in this process and are proactively protected from retaliation for speaking their truth.</p> <p>The company promotes women-only safe spaces and perhaps separate spaces for perpetrators of abuse to identify and address the drivers of abusive behaviours (such as debt, excessive overtime, addiction or poor mental health).</p> <p>Some real-time learning processes are in place. The company publicly shares how it carries out:</p> <ol style="list-style-type: none"> Gendered human rights due diligence. Management planning and continuous improvement of human rights risks and impacts (including learning from implementation over time). Survivor-centred responses. <p>Company learns from others and contributes to raising standards over time. This may include joining others to call for regulation or legislation that would help markets to reward businesses that do the right thing.</p> <p>Company may work with other stakeholders to integrate human rights management plans across the whole value chain – working together to transform the systemic causes of women’s inequality and in-work poverty. This may include seeking progressive shareholders/investors, brands, suppliers, service providers and producers who are willing to commit to working together to deliver minimum human rights standards through how they do business.</p>
<p>Sourcing (buyer) commitment</p>	<p>Senior management does not see a need to define or share a sourcing commitment with its suppliers.</p>	<p>Senior management has defined a senior manager with human rights expertise who sponsors this work, and has set them relevant performance targets.</p>	<p>A sourcing commitment is being developed in dialogue with (tier 1) suppliers, but:</p> <ol style="list-style-type: none"> The content has not yet been finalized/agreed. How to implement the commitment is still being defined. It is not yet clear how buyer commitments are integrated with ongoing gendered human rights due diligence and learning over time. 	<p>A sourcing commitment has been developed and a training programme is under way to ensure that all sourcing team staff understand:</p> <ol style="list-style-type: none"> What their commitments are. How to implement them in their daily work. How women and men working in supply chains will participate in feedback about the impacts of sourcing practices. How performance management of sourcing team staff will reflect the impacts of their decisions and practices on women and men working in the supply chain. <p>Learning from this work is being shared and discussed across procurement teams.</p> <p>The sourcing commitment is available on the company’s intranet and public website.</p>

Over the past couple of years, the Ethics and SbO teams have collaborated with retail suppliers to develop and test this roadmap, which was designed to respond to supplier feedback by providing more detail on what Oxfam understands to be good practice. We recognize that neither the Human Rights Roadmap nor the wider SbO Ethical and Environmental Supplier Framework provide a complete solution to identifying, mitigating and redressing human rights and environmental issues in our supply chains. However, these tools do provide a logical and transparent framework that targets actions, measures and rewards progress over time, and commits to continuously seeking innovative ways to align Oxfam GB’s standards with commercially viable operations.

The roadmap and wider framework are helping us to learn from, celebrate and share good practice already demonstrated by our suppliers, and we believe that all of these activities contribute to improving how we identify, mitigate and provide remedy for modern slavery (and other abuses that may make people more vulnerable to modern slavery) in our retail supply chain.

This framework and its tools were developed by the SbO and Ethics teams in response to feedback from our retail suppliers. We aim, where possible, to apply the learning from this pilot to other parts of our procurement.

The framework in practice

In response to the coronavirus pandemic, and the continued disruption of supply chains across the world, the Sourced by Oxfam team continues to work with suppliers to protect the lives and livelihoods of the workers in our supply chains. During this challenging period, the team's decisions have been guided by the principles that it outlined at the start of the pandemic, which are:

- Communicating with suppliers to identify what is happening along the supply chain and listening to what is 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.

The SbO team did not cancel or reduce volumes for any Fair Trade orders for Christmas 2020, Summer 2021 or Christmas 2021. Our consistent communication with suppliers meant that they could be confident in the viability of bringing their lines to market; for many of our suppliers, SbO is their biggest customer so our orders are crucial in their planning. An example of this was Palestinian food supplier **Zaytoun**, which stated that Oxfam GB's commitments enabled it to bring its almonds to the UK market.

In 2020, SbO heard that many Fair Trade producers were facing cashflow issues due to cancelled orders. SbO's usual terms are to pay validly submitted invoices within 30 days of receipt of goods, unless otherwise specified. In order to assist our Fair Trade suppliers, we switched these terms, offering 25% of the order value on placement of the order, which we completed for 28 orders totalling over £130,000.

In 2021, we continued this method so that suppliers could remain financially liquid. SbO paid over £75,000 across 23 orders to Fair Trade suppliers, with the remaining 75% paid upon shipping of goods.

SbO continues to work closely with suppliers, listening to updates, discussing challenges as they arise and sharing our forecasts for 2022 to enable them to make plans.

Examples of feedback from our retail supply chain

Palestinian food supplier **Zaytoun** stated: 'Oxfam's orders for seasonal roasted almonds have enabled us to triple our purchases of Fairtrade almonds from Palestinian producers annually. Without these orders, we wouldn't have had the volumes needed to make production cost-effective. Thank you for your commitment to our producers.'

Another Fair Trade supplier, **Shared Earth**, was told by its supplier **Asha Handicrafts Association**: 'Artisans in Mumbai are literally starving because of the lockdown. As a result of your pre-payments, we now feel secure enough in terms of cashflow to donate \$3,000 to the artisan groups. This amount will feed 100 families (500 people) for a month.'

The Hatale artisan group in Nepal told Oxfam how it had been able to support its workers during the pandemic. The photo shows Parmila Tamang at the group's workshop before the pandemic, working on soft toy decorations to be sold in Oxfam's shops. Parmila is 23 and has been working for Hatale since 2017. She lives with her family, her parents and a sibling. Before the pandemic her father had a job, but during lockdown he could not access work and, since his contract only paid him a daily rate, he lost all his income. By contrast, Hatale enabled Parmila to work from home, and her family has been relying solely on her income.

Parmila told Oxfam: 'I am very glad that I am part of Hatale and have been able survive during this pandemic. My source of income has been very reliable even in the lockdown. Even though all the members of my family have been at home without any job, I have been able to work from home and earn some money.'



The safety instructions and safety measures [I was given] helped me to make my family safe and alert about COVID-19, as I was able to explain them to my family as well.'

MITIGATION: ADDRESSING BARRIERS TO REPORTING

In last year's statement, we reported on the results of our research to better understand the barriers to reporting misconduct to Oxfam for people living in Ghana, Iraq and Myanmar. The research identified distinctive preferences in all communities, and the three most common issues identified in all communities were a preference for community resolution, a lack of awareness of reporting mechanisms and a lack of trust in the organizational system.

In this reporting period, a central team has been analysing the research results with the three country offices. The scope of this gendered analysis went beyond sexual exploitation, abuse and harassment (SEAH) to deepen understanding of gender-based violence, racism, fraud, corruption and wider power dynamics in the contexts in which we work and also within our programmes and systems of accountability. The findings of the research have also been shared with other organizations across the sector.

Pilots were designed by the teams in Iraq, Ghana and Myanmar based on the research findings, analysis and recommendations. The pilots have begun but started in the next reporting period (June 2021). Their context-specific transformational objectives aim to challenge the roles that societal norms play in driving misconduct and preventing women and girls from reporting it. This includes addressing racism, misogyny, harmful gender norms around gender-based violence and violence against women and girls (VAWG).

Ultimately our aim is to challenge all harmful norms (racialized, gendered or otherwise) that allow misconduct to continue. While this work is not directly targeted at mitigating modern slavery, because the original research showed that those most vulnerable to exploitation were unlikely to know about or trust central reporting mechanisms, we anticipate that building trust and improving access to reporting in this way can only contribute to improving our ability to identify, redress and mitigate modern slavery.

MITIGATION: TRAINING

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 integrating the issue into key organizational training programmes.

Oxfam's Code of Conduct

In this period, staff undertook mandatory refresher training on Oxfam's Code of Conduct. In particular, point 6 of the Code of Conduct commits all Oxfam employees and non-staff to 'Promote human rights, protect the environment and oppose criminal or unethical activities'.

Oxfam works with many different communities and employs staff on a variety of terms and conditions. We tailor training so that it is appropriate for the needs of different groups, for example by changing its length, complexity or content. One specific training package was designed to support people on short-term contracts with no management or data responsibilities. This package is currently being offered in the form of a Discussion Guide and is being piloted in several locations. Its purpose is to support hiring staff in all country offices to have a short conversation (in the local language) that outlines Oxfam's key values and standards and to give information on the responsibilities of working with/for Oxfam and our reporting mechanisms. It also contains more specific information about safeguarding, anti-corruption and modern slavery teams.

Additionally, we recognize that those receiving this shorter training may be those who are more vulnerable to modern slavery (for example, those on temporary contracts or hired through third party labour providers); therefore the training highlights and encourages people to feel safe to report if they think they are being mistreated. Work has also started to develop an animation based

on the Discussion Guide, with the aim of making this content even more accessible and easy to deliver consistently.

In the financial year 2020/21, 1,761 people took Oxfam GB's Code of Conduct Training.

3. POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

Previous statements have provided a comprehensive outline of relevant Oxfam GB policies. All policies are available internally on our intranet and some are also publicly available. The most relevant update in this reporting period is that in January 2021 Oxfam GB published a revised [Ethical and Environmental Policy](#), which outlines how we manage our responsibility for the labour and environmental standards in our operations and supply chains. In particular, this policy updates our commitment to working together with our suppliers to identify, prevent and respond to any negative ethical or environmental impacts from our UK-based sourcing practices. Some of the worst impacts could be modern slavery, but we recognize that other negative impacts could make people in our supply chains more vulnerable to modern slavery. We therefore strive to mitigate, better understand and improve our impacts over time

Oxfam GB's (updated) sourcing commitment to its suppliers

To ensure that we create prosperous, long-term commercial partnerships, we recognize that alongside our commitment to achieving best value, we must achieve a fairer balance of power and responsibility with our suppliers. This commitment has been tailored to Oxfam GB, but is informed by the Ethical Trading Initiative (ETI's) [Guide to Buying Responsibly](#).

We acknowledge the impact that our purchasing practices can have on workers, and commit to the standards below to support our suppliers to overcome the challenges that 'business as usual' poses to the human rights of people working in Oxfam GB's operations and supply chain by:

- Complying with both the letter and the spirit of the law of the countries in which our suppliers operate and with which Oxfam GB deals and in all contractual obligations incurred by or on behalf of Oxfam GB;
- Recognizing the contribution that stable business relationships can make to labour and environmental standards, and endeavour to establish long-term relationships with our suppliers;
- Recognizing that our suppliers may not be able to achieve all the labour and environmental standards immediately and working with suppliers towards conformance within a reasonable timeframe;
- Continuously working to improve Oxfam GB's labour and environmental policies and practices; seeking suppliers' views on these standards and ability to implement them; and providing proportionate material and practical support to suppliers to enable them to meet their commitments (as outlined in sections 2, 3 and 5 of this policy) and to make improvements within reasonable and agreed timeframes;
- In the event that a purchase arrangement or relationship must be terminated, not doing this without due regard to all material circumstances, appropriate communication and notification to the supplier as outlined in the Supplier Contract (9.2). We will, however, terminate supplier relationships where serious breaches of Oxfam's labour and environmental standards persist after reasonable attempts have been made to work with the supplier to implement improvements, and where there is no reasonable prospect of securing improvements. Such terminations will be carried out in a responsible way;
- Communicating clearly, promptly and accurately on all issues concerning orders, and ensuring that our requirements are adequately defined and specified in sufficient time to allow suppliers to react to our requirements;
- Aiming to pay a price that enables our suppliers to provide decent wages and working conditions for their workforces and never knowingly negotiating a price that is below the cost of production;
- Always negotiating lead times which take account of impacts on labour standards and do not trigger excessive working hours or subcontracting, and if changes to orders are unavoidable, amending target delivery times accordingly;
- Acting impartially and objectively in all our purchasing activities and keeping written records where appropriate to demonstrate that our actions have been fair and above reproach.

APPENDIX 1: SOURCED BY OXFAM SUPPLIER FACTORIES

As a member of the Ethical Trading Initiative (ETI), Oxfam GB is committed to continuous improvement in our due diligence processes and to providing greater transparency of manufacturing supply chains. The case for greater transparency from retailers and brands has been growing for many years and we have been calling for greater transparency through our campaigns, due to the benefits it can bring to businesses, their workers and society more widely. In support of this commitment and with the consent of the suppliers and manufacturing sites listed, below is a list of factories used by SbO to manufacture goods in their range.

The Bio-D Company, Bergen Way, Sutton Fields, Hull HU7 0YQ, UK
Oxfam Italy, 2nd Innings Handicrafts Pvt. Ltd, Shop No. 124, Wadala Udyog Bhawan, Naigaon, Wadala 400031, Mumbai, India
Mugloo, 33 Mugloo House, Madin Sahib, Srinagar, Kashmir, India
The Beeswax Wrap Ltd, T8 Middle Tynings, Nailsworth, Stroud, GL6 0EG, UK
A Short Walk, Unit 6 Cligga Head Business Park, Perranporth, Cornwall, TR6 0EB, UK
Althaea, Robianostraat, 2150 Borsbeek, Belgium
Aravali Exports, G-1/140 EPIP, Sitapura Industrial Area, Jaipur 302022, India
Asha Handicrafts Exports, G-r/140 EPIP, Sitapura Industrial Area, Jaipur 302022, India
Aspiration International Exports, G-Y/140 EPIP, Sitapura Industrial Area, Jaipur 302022, India
Canaan Fair Trade, Burqin, nr Jenin, Palestine
Chiang Mai Porcelain Co., 153/1 Moo 5, Muang Chiang Mai, 50000 Chiang Mai, Thailand
Chocolaterie Limar NV, Muizenvenstraat 15, 2300 Turnhout, Belgium
CORR – The Jute Works, House 27 Rd 119, Dhaka 1212, Bangladesh
Cotswold Fudge Co, Unit 28, Langston Priory, Kingham, Oxfordshire, OX7 6UP, UK
Craft Resource Centre, 388 Prantik Pally Rd, Kolkata 700107, India,
Dongguan Fushan Glassware Factory, No.82 Fenxisan Road, Liuyongwei Village, Wanjiang District, Dongguan City, Guangdong Province, China.
Ecopots, Evolis 100 Business Park, 8500 Kortrijk, Belgium
Eswatini Kitchen, MITC Complex, St Michaels Road, Manzini, Swaziland
Faith in Nature, Faith House, James St, Radcliffe, Manchester M26 1LN, UK
Fujian Yongchun Yongda Ceramic Co. Ltd., Xialin Village, Dongping Town, Yongchun County, Fujian, China
Gopalas Textile Overseas, G1-158, Garment Zone, EPIP RIICO Industrial Area, Sitapura, Jaipur, Rajasthan 302022, India
Green Digit, Northern Design Centre, Gateshead, Tyne and Wear NE8 3DF, UK
Hadden Court, Glaisdale Parkway, Glaisdale Drive West, Nottingham NG8 4GP, UK
Handicraft Products La Selva S.A., 5a Calle Poniente No. 12, San Juan del Obispo, La Antigua Guatemala 03001, Guatemala
Hatale Udhog Pvt Ltd, Sharanpur, Nagarjun - 5, Sitapaila, Kathmandu nepal
Hefei Eco Bamboo Fiber Ware Co., Ltd. Exports, No. 1296 Fanhua Road, Taohua Industrial park, Hefei, China
Heshan Astros Printing Ltd, Xuantan Temple Industrial Zone, Gulao Town, Heshan, Guangdong, China
Home Style Export House, Ambia Ouliya, Railway Road, City, Aligarh, Uttar Pradesh 202001, India
Hong Ou Dong Guan Plastics and Electronics Co. No 6. Linying road, Lincun center Industrial Zone, Tangxia Town, Dongguan City, Guangdong Province,China, Ltd, China
Jiyuan Green Garden Supplies Producing Co Ltd, Beishi, Chengliu, Jiyuan City, Henan, P.R China
Kim's Chocolates, Grijpenlaan 11, 3300 Tienen, Belgium

Linan Sengong Wood Industry Co. Shuinan Industrial Park, Changhua, Linan, Zhejiang, China
Ludwig Weinrich GmbH & Co., Diebrocker Str. 17, 32051 Herford, Germany
Lune Group Oy Ltd, Kopsamontie 138, 35540 Juupajoki, Finland
M.Ic Exports, F-30, Sector-11, Noida Uttar Pradesh, 201301, India
Magna, Specialist Confectioners Ltd, Magna House, Stafford Park 3, Telford TF3 3BH, UK
Mai Handicrafts Exports, 298 Nguyễn Trọng Tuyển, Phường 1, Tân Bình, Hồ Chí Minh City, Vietnam
Maojiao Industry Park, Quanxi Town, Wuyi County, Jinhua, Zhejiang Province, China
Mks Export Ltd, 314 Barakhola, Mukundapur, Kolkata, 700 099, India
Moorlands Candles, Skelgillside Workshops, Alston, Cumbria CA9 3TR, UK
Mothers Commerce, No. 40, 1st Floor Montorsier Street, Puducherry, India
Natural Cosmetics Holland BV, Gooiland 35, 1948 RC Beverwijk, Netherlands
Neelansh Exports, 2060 Tiraha Bazar, Parantha Gali, Chandni Chowk, New Delhi – 110006 India
Noah's Ark International, Delhi Rd, Majhola, Moradabad, Uttar Pradesh 244001, India
Papyra Arts Exports, H-776, Sitapura Industrial Area, Sitapura, Jaipur, Rajasthan 302022, India
Plastics Plant, Bucklers Lane, St Austell, Cornwall PL25 3FR, UK
Premier Chocolate, Premier House, Vernon St, Shirebrook, Mansfield NG20 8SS, UK
Prokritee Exports, 1, 1 Asad Ave, Dhaka 1207, Bangladesh
Ravinala SARL, Pres de la ferme ecole, Malaho, Bevalala, Antananarivo, 1660, Madagascar
Ruta UAB, Tilžės g. 133, Šiauliai, LT-76349, Lithuania
Sasha Exports, 1C Chatu Babu Lane, Kolkata 700014, India
Shenzhen Donnelly Printing Company, No. 47 Wuhe South Road, Bantian, Longgang District, Shenzhen City, China
Shree Ganpati Arts Exports, 41, Balaji Industrial, Park, RIICO Road, Bagru – 303007 India
Soap-n-Scent, 327/9 Soi Srijundorn, 2 Jareonprated Rd., Changklan, Chiang Mai, Thailand
Spice Kitchen, 9 Skyhawk Avenue, Liverpool L19 2QR, UK
St Eval Candle Company, Engollan, St Eval, Wadebridge, Cornwall PL27 7UL, UK
Starlite Limited Exports, 3/F Perfect Industrial Building, 31 Tau Yau Street, Sanpokong, Kowloon, Hong Kong
Steenbergs, 6 Hallikeld Close, Barker Business Park, Melmerby, Ripon, HG4 5GZ, UK
Steenland Chocolate Burgemeester van Reenensingel 127, 2803 PA Gouda, Netherlands
Straightline Enterprises Limited, Viraj Complex, Godown 19, Nairobi, Kenya
Tara Projects, 260, Okhla Industrial Estate, Phase – 3, New Delhi – 110020, India
Tropical Forest Products Limited, Unit 5 D, Southwick Industrial Estate, North Hylton Road, Sunderland SR5 3TX
Turqle Trading, 158 Briza Rd, Tableview, 7441, Cape Town, South Africa
Union, Guangzhou Panyu Lianhe Enterprises Stationery Co. Ltd., No. 360 Shinan Road, Dongcong Town, Nansha District, Guangzhou, China
Uptodate Impex Exports, B-14, Sector- 65, Noida, UP. 201301., India
Walkers Chocolates, Walker House, Brickfield Rd, Birmingham B25 8HE, UK
Yuliana Exports, JL. DANAU BUYAN RAYA/ NO 17. JIMBARAN – BALI, Indonesia
Get Paper Industries, Bansbari, Kathmandu, Nepal
Salay Handmade Products Industries Inc., Purok 1 National Highway, Salay, 9007 Misamis Oriental, Philippines
Swajan Crafts, House No. 6, A Rd No 23/C, Dhaka 1212, Bangladesh
Hacche, Stirling House, College Road, Cheltenham GL53 7HY, UK

NOTES

¹ One Oxfam Child Safeguarding Policy. https://www-cdn.oxfam.org/s3fs-public/one_oxfam_child_safeguarding_policy_en.pdf

² 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>

³ Oxfam International. (2020). *Oxfam Strategic Plan*. <https://www.oxfam.org/en/tags/oxfam-strategic-plan>

⁴ <https://www.oxfam.org.uk/about-us/how-oxfam-changing/>

⁵ United Nations, Office of the High Commissioner for Human Rights. (2011). *Guiding Principles on Business and Human Rights*. https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

⁶ Danish Institute for Human Rights. (2016). *Human Rights Impact Assessment: Guidance and Toolbox*. https://www.humanrights.dk/sites/humanrights.dk/files/media/dokumenter/business/hria_toolbox/introduction/welcome_and_introduction_final_may2016.pdf_223791_1_1.pdf

⁷ Oxfam. (2018). *Walking the Talk: Assessing companies' progress from SDG rhetoric to action*. https://oxfamlibrary.openrepository.com/bitstream/handle/10546/620550/dp-walking-the-talk-business-sdgs-240918-en.pdf_p16

⁸ Oxfam. (2020). *Confronting Carbon Inequality: Putting climate justice at the heart of the COVID-19 recovery*. <https://oxfamlibrary.openrepository.com/bitstream/handle/10546/621052/mb-confronting-carbon-inequality-210920-en.pdf;jsessionid=2BAB8710701A927D1A5BE52C693FAA4E?sequence=1>

⁹ The UK Bribery Act 2010 set a precedent by introducing an offence of 'failure to prevent', making illegal a failure by a commercial organization to prevent a bribe being paid to obtain or retain business or a business advantage. For more information, see Transparency International. *Bribery Act: The Bribery Act and Adequate Procedures Guidance*. <https://www.transparency.org.uk/bribery-act-and-adequate-procedures-guidance/Bribery%20Act>

¹⁰ See Corporate Justice Coalition. (2021). *Frequently Asked Questions: A 'Failure To Prevent' Human Rights And Environmental Harms*. <https://corporatejusticecoalition.org/resources/frequently-asked-questions-a-failure-to-prevent-human-rights-and-environmental-harms/>; and European Coalition for Corporate Justice. (2021). *Evidence for mandatory human rights and environmental due diligence legislation (01/2021)*. <https://corporatejustice.org/publications/evidence-for-mandatory-human-rights-due-diligence-legislation-5/>

¹¹ International Labour Organization and Walk Free Foundation. (2017). *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*. https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf

¹² United Nations Development Programme (UNDP) and the United Nations Working Group on Business and Human Rights. (2019). *Gender Dimensions of the Guiding Principles on Business and Human Rights*. https://www.ohchr.org/Documents/Issues/Business/Gender_Booklet_Final.pdf

¹³ Last year, we reported that our human rights due diligence included Anti-Slavery International's assessment of the types of risk 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.

¹⁴ Oxfam. (2019). *Update to Oxfam Statement on the Independent Commission Report*. <https://www.oxfam.org/en/press-releases/update-oxfam-statement-independent-commission-report>

¹⁵ 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

¹⁶ Oxfam annual report and accounts 2019/20, https://www.oxfam.org.uk/documents/264/Oxfam_GB_Annual_Report_2020.pdf, p16

¹⁷ Oxfam GB continues to focus on UK procurement, where it controls the decisions. In our 2017/18 statement, we outlined the challenges of implementing Oxfam GB priorities across the work of the Oxfam confederation internationally. Oxfam GB. (2018). *Oxfam GB Statement on Modern Slavery: For the financial year 2017/18*, pp.19-20. <https://oxfamlibrary.openrepository.com/bitstream/handle/10546/620552/ar-oxfam-modern-slavery-statement-2018-280918-en.pdf?sequence=4>. We continue to share our experiences of UK procurement across the Oxfam confederation.

¹⁸ Oxfam GB. (2019). *Oxfam Annual Report and Accounts 2019/20*. https://www.oxfam.org.uk/what-we-do/about-us/plans-reports-and-policies/annual-report-and-accounts-2019?cid=rdt_oldannualreview

¹⁹ Oxfam GB. (2020). *Oxfam GB Survivor Policy*. https://www.oxfam.org.uk/documents/50/OGB_survivor_policy_2020.pdf. See p.7 for the definition.

²⁰ The child labour section of the Sourced by Oxfam team's [Human Rights Roadmap](#) and the [Anti-Slavery International definitions](#) given below guide Oxfam GB's understanding of how children may be exploited at work:

- **Child work.** Some types of work make useful, positive contributions to a child's development, helping them learn useful skills. Often, work is also a vital source of income for their families.
- **Child labour.** Child labour is not slavery, but nevertheless it hinders children's education and development. Child labour tends to be undertaken when the child is in the care of their parents.
- **Worst forms of child labour.** 'Hazardous work' is the worst form of child labour. It irreversibly damages children's health and development through, for example, exposure to dangerous machinery or toxic substances, and may even endanger their lives.
- **Child slavery.** Child slavery is the enforced exploitation of a child for someone else's gain, meaning that the child has no way to leave the situation or the person exploiting them.
- **Child trafficking.** Trafficking involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion. When children are trafficked, no violence, deception or coercion needs to be involved; trafficking is merely the act of transporting or harbouring them for exploitative work.

²¹ The One Oxfam Child Safeguarding Policy, and other safeguarding policies, can be found at: <https://www.oxfam.org/en/what-we-do/about/safeguarding>

²² See: <https://www.oxfam.org.uk/what-we-do/about-us/plans-reports-and-policies>

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Photos (front cover):

Left side photo: Oxfam staff member Alam Abul spraying disinfectant in drains and alleys to prevent the spread of Covid-19 before the approaching Cyclone Amphan, Cox's Bazar, Bangladesh, 20 May 2020. Credit: Fabeha Monir/Oxfam.

Right side photo: Global Handwashing Day, Syria, October 2017. Sana, an Oxfam volunteer in Aleppo, shows local children how to wash their hands properly. Credit: Islam Mardini/Oxfam.

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