



Oxfam GB Anti-Bribery Policy

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Author:	Deputy Head of Anti-Corruption
Policy Owner:	Director of Integrity & Ethics
SLT Sponsor:	Chief Operating Officer
Approved By:	Council
Union consulted:	No
Date for Renewal:	March 2024
Geographical Scope:	Worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed.
Implementation owner:	Head of Anti-Corruption
Implementation plan:	Anti-Fraud and Corruption Strategy
Circulation:	Public

POLICY STATEMENT

Oxfam GB has a zero-tolerance approach to bribery, recognising that bribery is a driver of poverty and inequality, and contrary to our fundamental values of inclusion, empowerment and accountability. Under UK legislation (the UK Bribery Act 2010) it is a criminal offence to offer or receive a bribe anywhere in the world, and liability falls on both those who offer and receive bribes and on Oxfam GB should insufficient steps be taken to prevent bribery.

Oxfam GB expects a commitment by all its staff to achieving the highest possible ethical and conduct standards in all practices and operations. All staff and those who work on our behalf must understand and fully comply with the guidance on values and behaviours expected of them outlined within Oxfam's Code of Conduct; non-compliance may result in disciplinary action.

SCOPE AND ELIGIBILITY

This policy applies to Oxfam GB operations worldwide. The UK Bribery Act 2010 is 'extra-territorial' in nature, meaning that it applies to all Oxfam GB staff globally, even if an incident of bribery takes place outside the UK or involves non-UK persons.

The UK Bribery Act 2010 also makes Oxfam GB responsible for the behaviour of 'Associated Persons' who provide services for Oxfam GB, including employees, Trustees, agents and partners,

volunteers and contractors and suppliers.

Application of policy to partners

Oxfam GB expects partner organisations to, as a minimum, adopt an equally robust approach to prohibit bribery as Oxfam GB. This requirement should also be included in contractual agreements with partners and suppliers wherever feasible. Oxfam GB takes the following actions with regard to partner organisations:

- Communicates this policy to prospective partners as part of the partner selection process and to existing partners during partner monitoring reviews;
- Assesses and builds on the capacity of partners in their efforts to prevent and respond to bribery risk;
- Expects partners to report incidents of bribery involving any Oxfam GB funds or staff involved in the delivery of Oxfam GB programmes;
- Promotes Oxfam GB's whistleblowing/confidential reporting procedures to partner staff.

POLICY PURPOSE

This policy sets out Oxfam GB's approach to bribery. This policy prohibits the paying, offering, receiving or requesting of bribes by an individual employed by, or an 'Associated Person' of, Oxfam GB. This policy is supplemental to and should be read in conjunction with the approach set out in the One Oxfam Anti-Fraud and Corruption Policy.

RELATED DOCUMENTS

This policy should be read and understood in conjunction with:

Oxfam International Code of Conduct
Oxfam International Anti-Fraud and Corruption Policy
OGB Fraud and Corruption Response Plan
OGB Conflict of Interest Policy
OGB Reporting Misconduct at Work (Whistleblowing) Policy
OGB Reporting Misconduct Standard Operating Procedures
OGB Serious Incident Reporting Standard Operating Procedures
OGB's Guidance on Interactions with Public Officials
OGB's Guidance on Gifts & Hospitality
Bribery Act 2010
The Bribery Act 2010, Guidance, Ministry of Justice

VERSION CONTROL

Version Number	Date Approved	Approved By (Name & Title)	Brief Description of Changes
1	March 2018	Council	Oxfam GB Anti-Bribery Policy
2	March 2021		Three-year review cycle

POLICY CONTENTS

1.0 Definitions

Paying or offering a bribe: Offering, promising or giving a financial or other advantage intending to induce or reward improper conduct, or knowing that the acceptance would in itself amount to improper conduct, constitutes bribery. Bribery takes place irrespective of whether the offer, promise, or giving of the bribe is made directly, or via, or on behalf of, a third party.

Improper conduct means an act which breaches an expectation of good faith, impartiality, or trust.

Public officials are regularly encountered in Oxfam's work and the UK Bribery Act 2010 creates a specific offence of bribing a foreign public official in order to secure a business advantage. Further guidance on this can be found in Oxfam GB's Guidance on Interactions with Public Officials.

Facilitation payments are payments made to public officials to expedite routine administrative activities where the outcome is pre-determined, or to secure a service to which one is already entitled such as to speed up the processing of a visa or release items through customs; any such payments are bribes and are prohibited.

Receiving or requesting a bribe: Requesting, agreeing to receive, or accepting any form of financial or other advantage where that in itself constitutes improper conduct, or where improper conduct may follow, or in reward for such conduct, constitutes bribery. Bribery takes place irrespective of whether the request, promise, or receipt of the bribe is made directly, or via, or on behalf, of a third party.

Gifts and hospitality: Gifts (material objects) or hospitality (such as entertainment, travel, food or accommodation) offered or accepted by a person or organisation could be considered a bribe if the intent is to induce or reward improper conduct. Oxfam GB's approach to the acceptance, refusal and management of gifts and hospitality can be found in Oxfam GB's Code of Conduct and Guidance on Gifts & Hospitality.

Donations: Charitable donations are a common method through which bribes can be made in exchange for favouring the giver, or improperly influencing the independence, conduct, activities or decision-making of Oxfam GB or its Associated Persons. Any such attempt to improperly influence the normal course of business in this way should be reported via the SpeakUp reporting channels. Donations should only be received in accordance with documented donation procedures in place in each country.

Favour: Bribery does not always take place in monetary or tangible form, but could be offered or received as the provision of a service, preferential treatment, inducement, advancement or trading of influence in exchange for an advantage.

2.0 Responding to reports of suspected bribery

All staff and volunteers, including Trustees and senior managers, have a responsibility to report their suspicions of bribery to the Anti-Corruption Team either directly or through the SpeakUp channels. The procedures relating to the reporting of bribery are documented in the OGB Reporting Misconduct at Work (Whistleblowing) Policy.

Suspected or actual cases of bribery will be investigated by the OGB Anti-Corruption Team and appropriate action taken where such suspicions are upheld. The response to such is outlined in the OGB Fraud and Corruption Response Plan.

3.0 Reporting incidents

Any incidents of bribery that are deemed 'serious' are reported to the UK Charity Commission. The criteria for what constitutes 'serious' is defined by the Charity Commission and Oxfam's case management processes. Reports are made through the regulator's Serious Incident Reporting mechanism with the trustees notified both at the time of reporting and in quarterly reports.

Incidents of bribery are also reported to donors (institutional, corporate, foundation and philanthropic organisations) in line with Oxfam GB's contractual requirements and/or other commitments entered into as a result of the donor relationship. Such reporting of incidents of bribery are in line with the reporting framework described in the OGB Reporting Misconduct Standard Operating Procedures.

Duress

It is recognised that there are circumstances in which individuals are left with no alternative but to make unauthorised payments to a third party in order to protect against loss of life, serious physical harm or liberty. The payment will not constitute a bribe, but should be reported to the Anti-Corruption Team as well as being reported as a security incident.

4.0 Roles and responsibilities

The Country Management Teams of each Oxfam GB country are responsible for a regular risk assessment relation to bribery risk of its country programmes, using a bribery risk assessment template published by the OGB Anti-Corruption Team. The completion of the risk assessment will be kept under annual review through the annual audit cycles.

Oxfam GB's Director of Integrity and Ethics, and ultimately the Trustees, hold overall accountability for this policy. All Oxfam GB managers are responsible for its implementation. All staff, volunteers, implementing partners, suppliers and other representatives of Oxfam GB are required to adhere to this policy.

5.0 Awareness raising and provision of training

Oxfam's GB's stance on bribery is communicated through its mandatory anti-corruption e-learning module and training sessions provided by the Anti-Corruption team, which are conducted with all Oxfam GB staff globally at least once every two years.

Additionally, all employees are made aware of Oxfam GB's stance on bribery as part of their contractual obligations, inductions and by their managers. A statement prohibiting bribery is included in the Oxfam GB Code of Conduct, which all Oxfam employees must sign at the outset of their contractual relationship with Oxfam. Similarly, suppliers (including agents and contractors), partners and non-staff Codes of Conduct also contain a statement prohibiting bribery.