

OXFAM GB STATEMENT ON MODERN SLAVERY

For the financial year 2021/22



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's seventh annual statement shares our third year of progress against the three-year objectives we set ourselves in 2019.

SIGNED:

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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

This is the third report against the three-year commitments that Oxfam GB outlined in 2019.¹ Overall, we are pleased to report that we have achieved our specific goals. We have contributed to agreeing a single confederation-wide approach both to safeguarding and to tackling fraud and corruption,² which are positive steps towards delivering our commitment to implement the UN Guiding Principles on Business and Human Rights. We have made particularly good progress in how we articulate good practice to our retail suppliers and in how we work with them to improve our impact. Our commitment to understanding the barriers to reporting misconduct is also crucial to overcoming barriers which may be preventing us from hearing about cases of modern slavery and human trafficking in our own operations.

However, we recognize that this does not mean that we know beyond doubt that no (unintended) harm was done. We understand that we will need keep investing in the systems and processes to identify the issues that may be present throughout our supply chains and operations.

In this reporting period **we found no cases of modern slavery or human trafficking in our operations, supply chain or business relationships**. We recognize that this does not mean that we know beyond doubt that no (unintended) harm was done. Instead, we understand that this is an indicator that our systems and processes are not yet sufficient to identify the issues we know will be present throughout our supply chains and operations. We remain committed to continuously improving the ways in which we identify, redress and mitigate all forms of abuse, exploitation and harassment. We continue to proactively seek external collaboration, scrutiny and challenge from experts and to learn across Oxfam about what works for survivors.

Oxfam understands that some people are more vulnerable to the risks of becoming enslaved. Common vulnerabilities that people face include living in material poverty, discrimination (especially if they are a woman or girl), the threat of physical violence, being forcibly displaced or being a migrant worker in insecure employment.³ In general, the fewer alternative and secure livelihoods or safety nets a person can access, the more vulnerable they are to being exploited.

With 263 million more people potentially being pushed into extreme poverty in 2022, due to the combined impact of COVID-19, inequality and food and energy price inflation, the need to remain vigilant to the threat of modern slavery is only increasing.⁴ Over 161 million people across 42 countries are already suffering from acute hunger.⁵ In East Africa alone, an estimated 23 million people are in urgent need of food.⁶ In the context of increasing inequalities and the climate crisis, this is more likely to be a new normal than a one-off situation.

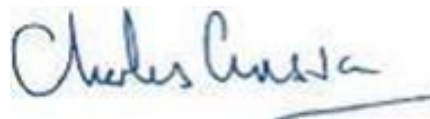
The activities of human traffickers have been particularly apparent to Oxfam in places where people have been forcibly displaced and are at their most vulnerable. For example, our own staff working to assist refugees fleeing the conflict in Ukraine have been approached by traffickers. The most recently available official statistics on the profits made from just one aspect of human trafficking and modern slavery – forced labour – date back to 2014, when perpetrators made an estimated \$150bn in annual profits.⁷ In 2014, an estimated 64.5 million people had been forcibly displaced globally.⁸ By May 2022, the UN estimated that this number had risen to a record 100 million displaced people.⁹ With greater numbers of people at risk, this kind of business is likely to be even more profitable for today's perpetrators.

It is in this context that we seek to proactively identify and mitigate risks of modern slavery in our own operations, supply chain and business relationships. We have been strengthening the action we take within our responses to crises to mitigate the threat posed by those seeking to profit from human suffering. We remain committed to a journey of continuous improvement. In the coming year we will review of some of Oxfam GB's human rights impacts and define a new set of objectives to strengthen how we to tackle the scourge of modern slavery and the human misery it causes.

Dhananjayan Sriskandarajah, CEO,
Oxfam GB



Charles Gurassa, Chair of Trustees,
Oxfam GB



1. ORGANIZATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

Oxfam GB is one of 21 independent affiliates that, together with the international secretariat Oxfam International (OI), make up the Oxfam confederation. The detailed descriptions of our organizational structure, business and supply chains have not altered significantly since previous statements¹⁰ and are outlined in our Annual Report and Accounts.¹¹ The most significant change is that, as a confederation of independent Oxfam affiliates, we have strengthened our global governance framework and put in place a new board with a majority presence from the Global South. Together, we have agreed to put even greater focus on working in the toughest and most fragile places globally where we are best placed to achieve the greatest impact. This has meant that we have reduced our presence in some countries in order to focus our efforts more effectively on those most in need.¹² Both the confederation's 2020–2030 Global Strategic Framework¹³ and Oxfam GB's 2020–2023 strategy¹⁴ update our intentions and Oxfam GB's role as part of the transformation to becoming 'one Oxfam', while emphasizing our own distinctive priorities.

In 2019, the three main areas that Oxfam GB prioritized to tackle modern slavery and human trafficking were:

- corporate responsibility governance structure
- human rights due diligence
- inclusiveness of country programmes.

All three priority areas are strongly interlinked with our governance and with the principle of being survivor-centred. Oxfam GB can make progress in each of these areas as an independent affiliate but it is becoming increasingly interdependent on other affiliates within the Oxfam confederation. Oxfam GB remains committed to working, together with affiliates across the confederation, to improve alignment in key areas.

Oxfam GB has achieved the specific goals it set in 2019 to tackle modern slavery and human trafficking. We have also achieved a key milestone by agreeing how we work as one Oxfam across the whole confederation in the areas of safeguarding and tackling fraud and corruption. The structures used to report safeguarding concerns are the same as those used to report modern slavery and human trafficking, and the Oxfam GB global safeguarding team manages all such cases across our operations.

At the end of this reporting period, we launched a new Oxfam GB safeguarding strategy, which clearly integrates safeguarding as a priority for everyone delivering Oxfam's work. The process for reporting a concern relating to modern slavery or human trafficking is the same as that for reporting a safeguarding concern. Also during this period, some aspects of tackling modern slavery and human trafficking have been integrated into the confederation-wide Safe Programming Toolkit and safeguarding training.

The Oxfam GB safeguarding strategy recognizes the need for everyone to be included without discrimination, for power to be shared fairly and for us to be held to account by the people we work with, and that this needs to be a process of continuous improvement: There is no ultimate end point for safeguarding whereby an organization can say the work is complete, rather an acknowledgement there is always a need to learn, adapt and develop.

In the same way, we know that tackling modern slavery and human trafficking requires ongoing work to ensure that all systems routinely prompt each individual who delivers Oxfam's work to recognize that it is possible for harm to be caused even by actions taken by someone who intended to do good. We also know that proactive steps are required to seek out harm done, to report concerns and to apply learning from across the organization so that we can integrate how we mitigate harm throughout our everyday work.

We know too that the process of aligning what we say with what ultimately gets done requires committed champions at senior level to proactively integrate ethical and environmental considerations into incentives (such as performance, financial or commercial incentives) and also into the everyday decisions made by all those delivering Oxfam's work. In relation to our commitment to decolonize¹⁵ and to address modern slavery and human trafficking (and wider human rights, along

with ethical and environmental issues), decisions will be made in the coming years about how we will oversee and manage these issues according to our new structure, both as Oxfam GB and as a confederation.

Oxfam GB has learned that these processes require continuous learning, especially where any harm done through our operations, supply chain or business relationships affects people who have previously been overlooked, for example due to discrimination on the basis of their race, gender or other unjustified cause. We recognize that some of the worst abuses are the most hidden and require well-informed, skilled and proactive action to identify and address. In this respect Oxfam GB is on a learning journey, which is transforming our whole organization. At present various parts of the organization are working specifically towards this aim, in a number of specialized areas. These vary from tackling racism to ensuring that everyone is treated with equality, to help provide safe humanitarian responses and make responsible sourcing decisions.

This year a confederation-level governance restructure has been taking place, and in the coming year foundational decisions will be taken, for example about what business services will be provided to the confederation and how, and about digitizing our work. As we transform our attitudes to risk and move beyond compliance into decolonized ways of working, we recognize that these are crucial decisions that will shape the parameters within which we tackle modern slavery and human trafficking through our operations, supply chains and business relationships for many years to come.

Since the major disruption of the COVID-19 pandemic began, the value of our spend in our supply chain has changed significantly. The table below provides an updated overview.¹⁶

Table 1: Post-pandemic changes in Oxfam GB’s supply chain spend

Procurement category	Managed from	Purpose	Categories	Value of spend FY 2019/20 (pre-pandemic)	Value of spend FY 2021/22	Number of suppliers
International Programmes	UK and 32 countries	To support our development work on the ground	Direct e.g.: office equipment, fuel. Indirect e.g. utilities, legal advice	£97m	£78m (partly due to reduction in country programmes, not just impact of COVID-19)	c. 4,500
Central Procurement	UK	To responsibly source and procure the goods and services that Oxfam GB needs to enable it to deliver its mission	Indirect procurement (facilities, logistics, IT, marketing, fundraising, HR, finance, travel, shop and office supplies, printing, utilities, work contracts)	£40.8m	£30.1m	2,300
Humanitarian	UK	To provide equipment from our equipment catalogue through Oxfam	Water and sanitation, health and hygiene, shelter, vehicles, communications	£1.8m	£1.4m	60

		GB's Supply Centre/Humanitarian Procurement Centre (HPC), not only to Oxfam GB and its affiliates but to other NGOs including UNHCR, IOM	equipment, held at the Oxfam Supply Centre in Bicester, Oxfordshire			
Sourced by Oxfam	UK	To retail new products sold in Oxfam shops and online to raise unrestricted funds	Food, everyday essentials, cards, Christmas ranges; 50% of our suppliers are Fair Trade	£6.3m	£4.9m	73 List of suppliers is available in the 2020/21 statement ¹⁷
Global total				£145.9m	£114.4m	c. 6,933 suppliers

2. HUMAN RIGHTS DUE DILIGENCE

SUMMARY OF PROGRESS AGAINST ACTIONS PLANNED FOR THE PERIOD 2019–22

In 2019, we outlined our three-year commitments for the period 2019–22. These were based on the salient issues identified through our human rights impact assessment processes.¹⁸ Salient issues were assessed as being the largest or most serious risks over which Oxfam GB has leverage to effect change.

Table 2: Summary of risks and actions

This table summarizes the different risks identified in 2019, how Oxfam GB originally planned to respond to those risks, and what actions have been taken in this reporting period (i.e. the financial year 2021/22).

Organizational/structural risks	
Risks	<ul style="list-style-type: none"> ○ Insufficient organizational understanding of slavery and its relationship with Oxfam's work. ○ 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. ○ Executing/Partner Affiliate model¹⁹ (inability to influence and implement consistent policies and procedures). ○ Partnership model (risks as above).
2019 planned actions	<p>Appoint a senior executive who will hold operational responsibility for human/labour rights and remedy in the organization's supply chains and operations.</p> <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.²⁰ 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'.²¹</p>


March 2022 update	<p>COMPLETE/ONGOING</p> <p>Governance reforms have continued as planned. As a confederation of independent Oxfam affiliates, we have strengthened our global governance framework and put in place a new board with a majority presence from the Global South, which has finalized the confederation's constitutional documents and standards.²² A Transforming Business Support Unit is being established. How we will integrate ethical and environmental issues (such as tackling modern slavery and human trafficking) into what we do and how we work is an issue that will be addressed in the coming years, as we prioritize decolonization, mutual accountability and transforming how we work as one safe, feminist and anti-racist confederation.</p> <p>As our international governance and ways of working evolve, resources and expertise are increasingly being shared across the confederation. In 2019 an Oxfam International Culture Lead was appointed. Oxfam International decided not to appoint a Chief Ethics Officer; however, during the transition towards a central program management function, the leadership on ethics is held by a group of senior leaders across the Confederation known as the Safeguarding and Culture Forum. Oxfam GB created a new Integrity and Ethics (I&E) Division, which is led by a director who has a direct reporting line to the CEO and the board. This provides leadership on all aspects of responsible business.</p> <p>The same structures that are used to report other safeguarding concerns are used to report modern slavery and human trafficking, and the same Oxfam GB global safeguarding team manages all such cases across our operations. The Oxfam GB Safeguarding Strategy was finalized in this period. In the next period a workplan will be defined and there is an intention to integrate how modern slavery and human trafficking are addressed, through implementation of the Safeguarding Strategy across Oxfam GB.</p>
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Operational risks	
Risk	Oxfam staff using domestic workers who are effectively bonded labour, either through intentional or unintentional poor treatment (e.g. withholding identity documents).
2019 planned action	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, adapted to reflect the international context.
March 2022 update	<p>COMPLETE</p> <p>These guidelines were more comprehensively developed than initially planned, to reflect Oxfam's new strategic commitments and were finalised after the end of this reporting period.</p>

Risk	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.
2019 planned action	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.
March 2022 update	<p>AMENDED ACTION – PARTIALLY DELAYED</p> <p>The reduction in capacity during the COVID-19 pandemic, together with the shift from this initial aim to a much broader safer logistics programme, combined to amend and delay this task. In line with OGB's strategy which focuses us not only on what we do but on how we do it, conversations with non-UK teams have been fruitful and have contributed to developing a wider safer logistics programme, in line with our decolonizing aims.</p> <p>The result so far is that we have concluded that amending the self-assessment supplier questionnaire would have been a minimum-level compliance action, which our experience indicated would be unlikely to have the intended impact.</p>

	<p>Instead, as a first step, we have amended the International Programmes vehicle rental contract template, which we anticipate will go further towards mitigating negative impacts in one high-risk area.</p> <p>Separate Oxfam GB research on addressing barriers to reporting had identified drivers as key stakeholders. Where drivers feel safe to report their concerns, we are likely to better identify, redress and mitigate harm. We also know that third-party drivers often face high risks themselves. We therefore prioritized this action because many Oxfam GB programmes use third-party vehicles with drivers to implement their work. This action was also a realistic one to implement across different countries and it had the potential to improve the identification and mitigation of harm. The vehicle rental contract template now includes additional checks, which remind contracting managers about the protections required for the drivers of those rented vehicles.</p> <p>As a second step, we are working on some Oxfam GB guidelines for recruiting third party workers, which we anticipate could be used to inform discussions about whether similar guidelines could be developed across the confederation. There is some delay as we try to understand across all the countries in which we operate what materials are needed, and for whom. At the time of writing, we anticipate that it might be appropriate to produce a full guideline for decision-making sourcing managers plus a template to guide implementation, and we have begun drafting these to inform the discussions.</p>
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Risk	Supply chain workers (e.g. for Oxfam GB’s retail suppliers) potentially at high risk.
2019 planned action	<ol style="list-style-type: none"> 1. Continue to focus on UK-managed procurement,²³ where Oxfam GB has the most control and leverage as well as resources 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. 2. Use the supplier framework to identify engaged suppliers with common issues and agree actions, support and resources, where possible, to address these issues.
March 2022 update	<p>COMPLETE/ONGOING</p> <p>Please refer to pages 14–19 of our previous statement.²⁴ The Sourced by Oxfam (SbO) team, which buys new products to sell in our shops and online, has continued to work with suppliers to overcome challenges and improve our impact using Oxfam’s Ethical and Environmental Supplier Framework.²⁵ This approach is a key part of decolonizing how we operate, shifting power and becoming a safer, more feminist and more anti-racist organization.</p> <p>We identify the suppliers through which we have the greatest volume or gravity of risk and work most closely with those key suppliers to improve our ethical and environmental impacts. In this reporting period, we agreed joint action plans with key suppliers, which represented 31% of the spend we are now committed to making during the 2022/23 financial year. Those agreed plans are based on the human rights roadmap tool,²⁶ which sits within the framework and provides a consistent structure for mutual accountability and the monitoring of progress over time.</p> <p>Additionally, we have now agreed with each SbO supplier which level they are at according to our framework. This information now forms a baseline against which the sourcing team will be setting targets for continuous improvement on ethical and environmental issues with suppliers. Even the lowest level, Level 5 is already considerably beyond minimum commercial standards, with suppliers expected to adhere to the Ethical Trading Initiative (ETI) Base Code and achieve a minimum score on our human rights roadmap. Level 1 is rarely encountered, but the aim is to encourage innovation which improves ethical and environmental impacts, especially in levels 3, 2 and 1.</p>

Supplier framework level	% of Oxfam business FY 2021/22
 1	1%
2	10%
3	33%
4	38%
5	1%

In response to feedback, the onboarding (introductory) process for new suppliers was also modified. For example, we have reformulated the supplier questionnaire to align with the framework and its tools, making it easier for both Oxfam and our suppliers to use.

Programmatic risks	
Risk	Without a properly embedded understanding of the drivers of modern slavery, Oxfam could potentially miss opportunities to reduce people's vulnerability to slavery.
2019 planned action	We will undertake a safe programming project to deliver a standard safe programming framework, which will strengthen project design, risk analysis and management strategies.
March 2022 update	<p>COMPLETE/ONGOING</p> <p>Safe Programming is now well established, and therefore the initial objective is met. However, this work continues to develop and we recognize that ongoing actions are needed to address the identified risk. The Addressing Barriers to Reporting work is now a central part of Oxfam GB's new Safeguarding Strategy and will be a key focus in the next couple of years. Please refer to pages 11–14 below for more detail.</p> <p>We reiterate that we understand that we will not identify modern slavery or human trafficking if we do not proactively seek it out.</p>

Overarching risks	
Risk	Multiple actions are needed to reduce the risk of Oxfam causing harm to others. If these actions are too fragmented, it will be more difficult for country teams to prioritize and implement them in an efficient way.
2019 planned action	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 with whom we come into contact.
March 2022 update	The set up was completed last year. We are now focused on embedding this work. Actions continue to be developed to fully address risks and to enable us to learn from processes.

IDENTIFICATION, REMEDY AND MITIGATION

• IDENTIFICATION

• **Identification: company-level complaints mechanism**

Our Annual Report and Accounts²⁷ provide information on the number of notifications received through company reporting and whistleblowing mechanisms.

Oxfam GB has zero tolerance for inaction on all forms of abuse, exploitation and harassment. Such things go against our values and everything we stand for. We will do all we can to prevent them from happening and tackle them rigorously when they do, enabled by strong processes of reporting, survivor-centred investigation and action. Furthermore, we hold those responsible to account.²⁸

In this reporting period, Oxfam GB did not identify any instances of modern slavery or human trafficking in its operations, supply chains or business relationships.

Oxfam knows that not identifying cases is not necessarily the same thing as there being no cases. The Global Safeguarding Team continues to work closely with the Protection, Safe Programming and Ethics Teams to continuously improve understanding among those delivering Oxfam GB's work on how to identify modern slavery and human trafficking, how to report potential cases safely and effectively and how to assess and manage risk.

- **Identification: in our humanitarian responses**

Human trafficking has been one of the most important issues for Oxfam's protection teams across Poland, Romania, Moldova and Ukraine. Romania was a known transit route, and human trafficking had already been a key challenge across the region; this has been exacerbated by the conflict in Ukraine. There are highly skilled organizations working locally to address these challenges, and Oxfam is supporting them with finance and other means of technical support. For example, Romanian NGO eLiberare trains border guards on how to spot people who are being trafficked and how to report incidents. As a result, cases have been identified and trafficking prevented. eLiberare, La Strada and other organizations supported by Oxfam also advocate to influence policies and their implementation, with the aim of preventing human trafficking and gender-based violence (GBV) and providing more effective responses to survivors.

- **Identification: new International Programmes vehicle rental contract template**

In our experience, our drivers often get a close-up view of our operations, including in the most remote communities and challenging contexts in which we work. They can be among the first to see when something is not as it should be and we believe that, comparatively, we are more reliant on our drivers than on people in many other roles across our organization to flag up concerns, so that they can be addressed.

Following on from how we have been addressing risks to agency workers (see page 8 above), we know that agency drivers are vulnerable to risks and at the same time play an important role in how well we identify risks. Therefore, we have made two main changes to our International Programmes vehicle rental contract.

Firstly, before Oxfam will use rental vehicles and their drivers, we now proactively require International Programmes staff to ensure that:

- rental vehicle providers sign their agreement to our cross-affiliate Supplier Code of Conduct. The code outlines the minimum standards expected of Oxfam suppliers, and the standards apply to suppliers and their employees, subsidiary entities and subcontractors. We recognize that this is a first step which does not go beyond compliance, but it is engaging a key audience;
- drivers sign their agreement to adhere to the Oxfam non-staff code of conduct.²⁹

The second change was to add the section below into the contract (Table 3). It requests an outline of driver working hours, including official working hours, overtime conditions, overnight stays and what is paid directly to the driver. This now forms part of the contractual agreement and, crucially, it needs to be filled in by the supplier, which experience tells us is the best way to ensure that suppliers are aware of a requirement.

Table 3: Additional section in the International Programmes vehicle rental contract

In case the Driver is provided by the Supplier:

Driver’s working hours	8h / day with 1 day off after 7 worked days or Xh / month	
Driver’s overtime	In case that cannot be compensated with days off in the same month, will be paid at XX [currency] per hour	
Driver’s allowance in case of overnight outside the base or working location To be paid directly to the driver	In cases where accommodation is provided by Oxfam XX per night in [currency]	In cases where accommodation is not provided by Oxfam XX per night in [currency]

• **REMEDY**

• **One survivor-centred approach**

Oxfam GB has been actively contributing to developing a single confederation-wide approach to survivors. We anticipate that having a more coherent approach will also improve how we can learn across the confederation about what remedy works best, for whom, and in which contexts.

• **Learning and improvement**

Oxfam GB is committed to fostering a culture of reflective practice, learning and continuous improvement. For its global safeguarding team, a **Learning and Improvement Framework (LIF)** outlines an ongoing cycle of evaluating and adapting the team’s approach. This enables more effective responses to safeguarding concerns and can be used to highlight and address recurring themes and trends across the organization.

The LIF utilizes tools such as case audits, data analysis and feedback from key stakeholders to continually gather data on what is working, what is not working and where changes need to be made. The information gathered through these tools facilitates the development of best practice and lessons learned. This learning drives continuous improvement in survivor-centred responses and includes updates to policies, procedures and practice.

• **MITIGATION**

This section explains some key areas of work to make our programmes safer.

• **Mitigation: Addressing Barriers to Reporting**

Oxfam GB’s new Safeguarding Strategy (2022–24) outlines a renewed commitment to continue challenging the structural, individual and culturally held norms which prevent survivors from reporting misconduct.

In this reporting period, Oxfam has channelled funding to partners who have been implementing two pilot projects, one in Iraq and the other in Ghana, working alongside Oxfam in Ghana and Oxfam in Iraq respectively.

Each project was designed to address the different context-specific barriers which we have reported in previous statements. To recap, we decided to be more proactive in how we identify and address barriers to reporting concerns in our operations because we recognize that concerns will not be raised unless all survivors feel safe to report and trust that there will be no negative consequences if they speak up. The learning from each context is then shared to enable different stakeholders to apply wider learning to their own work.

For example, in Iraq the project commissioned additional research which highlighted three new issues:

- The reason why survivors preferred community reporting channels was because they can predict the outcome and understand in advance what will happen if they choose to report. However, survivors did not think that those outcomes were desirable because reporting to community leaders and mukhtars (decision makers) means reporting misconduct predominantly to men. This means that this channel which survivors trust the most does not in practice provide assurance that it is in a woman's or girl's best interest to report a concern.
- Survivors wanted assurance in advance that they could trust the person they were reporting to, and would not risk reporting to anyone they did not already know.
- In Iraq, widows and divorced women are the groups most at risk of negative consequences if they report a concern.

In response to the new findings, the pilot project:

- delivered comprehensive community awareness training that targeted perceptions around confidentiality and how seriously Oxfam treats it, so that alternatives can be developed to current reporting channels that earn survivors' trust;
- is challenging wider negative social norms on:
 - survivor blaming
 - masculinity
 - perceptions on what constitutes justice for survivors
 - what just outcomes would look like for survivors in their communities.

This triggered particularly deep reflection amongst participants regarding how they personally have contributed to community-held views on shame, loss and reputational loss, which in turn form barriers to survivors accessing remedy for harm done.

Oxfam in Iraq responded by:

- increasing the number of safeguarding focal points and delivering comprehensive training to staff. It also worked alongside partners to improve the identification and reporting of misconduct in various local languages;
- prioritizing working with drivers, since they are currently mainly men and are often in a key position to identify a concern. Oxfam is also training women to become drivers, with the aim of reducing barriers to women reporting their concerns. This has already increased the number of incidents that are being reported.

In Ghana, the objectives of the pilot project were similar, but it had a greater emphasis on tackling GBV. The pilot project identified key barriers to reporting as: a lack of trust, transparency and awareness of what happens when a person reports misconduct; uncertainty; shame; perceptions that no action would be taken; and perceived consequences for survivors of misconduct.

In response, Oxfam in Ghana recruited a team of paralegals, who are able to advocate on behalf of survivors who wish to seek legal recourse for harm done. These paralegals can accompany survivors in navigating difficult legal processes and tackle challenging power dynamics which persist along the journey of reporting misconduct. As a result, survivors now report that they have a better understanding of both legal processes and also of their own right to access redress.

At both national and local levels, Oxfam in Ghana is challenging social norms, pressures, shame and fear of negative consequences from reporting issues of safeguarding and GBV. Training and awareness-raising sessions, coupled with research to better understand social norms on masculinity, have to date:

- improved understanding of power dynamics and other underlying drivers of GBV;
- improved access to reporting systems for Ghanaians working with or for Oxfam in Ghana.

As a result, Oxfam and its partners are now better placed to make adaptations which achieve better outcomes for survivors and help them to keep learning alongside survivors, partners and communities about the context in which they work.

Oxfam in Ghana has accessed funding for a campaign (which will launch in the next reporting period) to tackle a major barrier to reporting. It will call for health services across the country to follow up on sexual abuse with no fees payable by the survivor. Currently, survivors must pay in full for any healthcare they require and for the expert health evidence required to access redress.

3. POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

There were no updates to relevant policies during this reporting period.

4. TRAINING

- **Training: Code of Conduct**

Oxfam GB has continued to train all new staff on the Code of Conduct as a mandatory part of induction.³⁰ We acknowledge that mandatory e-learning is only one part of what Oxfam needs to do to ensure a culture which is safe, ethical and in line with our values. But this training is a crucial first step for all those joining the organisation to understand what will be expected of them. Over the last year we have focused on making improvements to our systems which enable us to better monitor training levels and improve compliance.

The training includes information on modern slavery and human trafficking and where this might occur in our operations and supply chains. This training is primarily accessed online. Oxfam GB has committed to provide alternative offline training in contexts where online courses cannot be accessed. Currently we can only systematically monitor online compliance.

In this reporting period, we developed an animation which covers the minimum requirements of the Code of Conduct, together with a reporting process to monitor completion. Next year this will be rolled out to all staff who do not have an Oxfam email address or reliable internet connection or who experience other barriers to accessing online training. This will include staff in our shop network and warehouses and in our country and regional programmes.

Oxfam GB has also committed to roll out annual Code of Conduct refresher courses. These will cover aspects of modern slavery and human trafficking, anti-corruption, safeguarding, data rights and health and safety compliance. The updated refresher course compares staff responses before and after the training module to analyse its impact on staff confidence and their ability to implement the Code of Conduct. The post-training questionnaire asks staff what changes in behaviour they will adopt as a result of the training. We also assess which parts of the Code of Conduct and of Oxfam policies staff tell us they need help in understanding.

The annual refresher for all staff was delayed and therefore did not take place in the reporting year. The delay was to allow time for conversations with colleagues across the confederation in order to agree a common training course for all staff; this is now being rolled out across Oxfam GB and all country programme staff.

- **Training: safeguarding**

From June to September 2021, online mandatory safeguarding training was refreshed for all staff across the Oxfam confederation; it consisted of two modules in four languages.³¹ Monthly completion rates were tracked, shared and acted on, to ensure that all staff completed the training. The training outlines how to identify and report abuse and underlines that it is the responsibility of everyone to recognize abuse and report it.³²

In Syria in November 2021, a total of 271 people received safeguarding training, which was tailored to individual roles, i.e. information presented to drivers, safeguarding focal points, senior managers, etc. was presented in different ways or different examples were used to support staff to assimilate an understanding of the actions expected of their role after the training.

- **Training: Safe Programming**

In this reporting period, the Global Humanitarian Team produced a new Safe Programming Training Pack for trainers, working with the Ethics Team to integrate some examples and scenarios of modern slavery and human trafficking into the pack.

In the reporting period, four Safe Programming trainings were conducted in four locations within Somalia/Somaliland (Garowe, Mogadishu, Burao and Hargeisa). A total of 71 participants attended, comprising 31 Oxfam staff and 40 representatives from 11 different partner agencies.

The training highlighted how identifying, redressing and mitigating modern slavery and human trafficking are an integral part of keeping our programmes safe. The objectives of the training were to ensure that participants:

- understood the concept of Safe Programming;
- understood the difference between Safe Programming, safeguarding and protection;
- were able to complete risk analyses using the risk matrix; and
- knew how to apply Safe Programming to their ongoing and future responses.

The main aims of the trainers' work were to raise awareness and ensure that participants recognized potential risks and took measures which prevented, minimized and/or managed those risks.

Since the Safe Programming Training was introduced, implementation teams have reported that making these links more explicit has contributed to improved identification and mitigation of harm. For example, during Oxfam's response to the Ukrainian refugee crisis, the risks of trafficking have been particularly high. Staff carrying out Oxfam's work have themselves been approached by traffickers, and they found the training useful in supporting them to identify and then protect themselves from harm and also to design responses for refugees that are more proactively protective within this context.

- **Training: Addressing Barriers to Reporting**

As part of the Ghana pilot project on addressing barriers to reporting:

- 800 girls and 90 teachers from 16 model girls' schools across the country received training on safeguarding and reporting mechanisms. Some of these people received additional training in October 2021 from the Ghana Education Service (GES), to support them to become active advocates and allies.
- These newly trained graduates are now proactively supporting girls, alongside a network of social workers, in those 16 schools across Ghana. Previously, the only channel through which girls could report misconduct was via school administrators, who occasionally had perpetuated abuse themselves. As a result, girls at school are now better equipped to identify incidents of misconduct and also have access to safe reporting mechanisms.

- **Training: Sourced by Oxfam**

As the COVID-19 pandemic eased and staff returned from furlough, the Sourced by Oxfam (SbO) Sustainability Manager delivered four half-day training sessions to all buyers on new product and supplier onboarding processes. This training now includes how to assess suppliers using the three tools of the Ethical and Environmental Supplier Framework; how to rate them according to the five levels of the framework; how to onboard a new supplier responsibly; how to establish whether the supplier is in alignment with Oxfam GB's Ethical and Environmental and Anti-Slavery and Human Trafficking Policies; and how to use this information to define what it is possible to do with each specific product and supplier.

The impacts of this training to date include:

- **Greater clarity:** Staff on the SbO sourcing team report being clearer about the standards that Oxfam seeks from its suppliers and can explain why these standards exist. The training has brought Oxfam GB policies to life, and they now know how to implement them in practice through their own roles and sourcing decisions.
- **Motivation:** Members of the team are now clearer on how their roles help to deliver Oxfam's mission and values, and they are more enthused about integrating these ethical and environmental issues into their everyday decisions.

- **Personal commitment to raising standards:** Buyers and merchandisers are now choosing to make specific performance commitments about how they will integrate these values into their everyday work within their own personal objectives.
- **Annual supplier review processes are now more effective:** We have completed the first round of supplier annual reviews to include an agreed set of joint framework action plans. These plans outline actions for both Oxfam and suppliers and how they aim to deliver against specific ethical and environmental standards. Suppliers and Oxfam have been scored against these commitments as key performance indicators (KPIs).
- **Improved identification of risk:** Even in cases where the supplier does not yet have an agreed joint action plan, we have been receiving more honest feedback. Due to the way that the framework guides conversation, and since suppliers have not experienced any negative repercussions as a result of providing honest feedback about what Oxfam needs to do to align its business practices with its ethical and environmental intentions, we are hearing more about the barriers that exist to achieving the impacts we aspire to. This is a crucial step in accurately identifying barriers and enables us to align our business practices with our desired outcomes and to proactively co-create solutions with our suppliers.
- **Easier to implement policies:** The framework has made this easier by guiding steps for applying policies through revised business processes and specific next steps linked to end goals and impacts.

During an annual review, supplier Shared Earth told Oxfam GB that its producer group, Aspirations, had flagged up an issue. The notice period that Oxfam GB had been giving when it wanted to source a product (i.e.: the 'lead time') had slipped from 90 to 60 days. We responded by offering a 90-day lead time if that would help the company to manage its business more responsibly. In addition, we have asked for information about the difference that this would make, for whom and why, so that we can factor what works into our sourcing decisions.

NOTES

- ¹ Oxfam GB. (2019). *Oxfam GB Statement on Modern Slavery for the financial year 2018/19*. <https://oxfamilibrary.openrepository.com/handle/10546/620873>
- ² Oxfam International. (2021). *Tackling fraud and corruption at Oxfam*. <https://www.oxfam.org/en/tackling-fraud-and-corruption-oxfam>
- ³ M. Kaye and A. McQuade. (2007). *Poverty, Development and the Elimination of Slavery*. Anti-Slavery International. http://www.antislavery.org/wp-content/uploads/2017/01/fco_full_dfid_meeting_background_paper_2oct2007.pdf
- ⁴ Oxfam International. (2022). *Pandemic creates new billionaire every 30 hours – now a million people could fall into extreme poverty at same rate in 2022*. Press release, 23 May. <https://www.oxfam.org/en/press-releases/pandemic-creates-new-billionaire-every-30-hours-now-million-people-could-fall>
- ⁵ Oxfam. (2022). *East Africa: People facing hunger need the world's solidarity now*. <https://www.oxfam.org.uk/oxfam-in-action/current-emergencies/east-africa-people-facing-hunger-need-the-worlds-solidarity-now/>. Over 161 million people across 42 countries are already suffering from acute hunger. More than half a million people are experiencing famine-like conditions in parts of East Africa and the Middle East, and 10.5 million people are facing high levels of hunger and malnutrition in the Sahel countries of Burkina Faso, Chad, Mali, Mauritania and Niger.
- ⁶ E. Farr et al. (2022). *Dangerous Delay 2: the cost of inaction*. Save the Children International and Oxfam International. <https://www.oxfam.org/en/research/dangerous-delay-2-cost-inaction>
- ⁷ International Labour Organization. (2014). *ILO says forced labour generates annual profits of US\$ 150 billion*. https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_243201/lang--en/index.htm
- ⁸ International Organization for Migration (IOM). (2017). *UN Migration Agency Reinforces Commitment to Displaced People through Enhanced Framework on Internal Displacement*

<https://www.iom.int/news/un-migration-agency-reinforces-commitment-displaced-people-through-enhanced-framework-internal-displacement>

- ⁹ UN News. (2022). *UNHCR: Record 100 million people forcibly displaced worldwide*. <https://news.un.org/en/story/2022/05/1118772>. Furthermore, increases in forced migration are anticipated. Although the pandemic caused a slight drop in international migration, in 2021 internal displacement due to disaster, conflict and violence was reported to have risen to 40.5 million (up from 31.5 million in 2019). International Organization for Migration. (2021). *IOM's World Migration Report Shows Global Displacement Rising Despite COVID-19 Mobility Limits*. <https://www.iom.int/news/ioms-world-migration-report-shows-global-displacement-rising-despite-covid-19-mobility-limits>
- ¹⁰ 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>
- ¹¹ For example, see the foreword to *Oxfam GB Annual Report 2020/21* and section starting on page 94: <https://www.oxfam.org.uk/documents/540/Oxfam-Annual-Report-and-Accounts-2020-21.pdf>
- ¹² Ibid. (foreword).
- ¹³ Oxfam International. (2020). *Oxfam Strategic Plan*. <https://www.oxfam.org/en/tags/oxfam-strategic-plan>
- ¹⁴ Oxfam GB. (2020). *How Oxfam Is Changing*. <https://www.oxfam.org.uk/about-us/how-oxfam-changing/>
- ¹⁵ For more information, please see Oxfam GB. (2022). *Transforming for a Radically Better World*. [https://www.oxfam.org.uk/documents/558/Transforming for a radically better world 1.pdf](https://www.oxfam.org.uk/documents/558/Transforming%20for%20a%20radically%20better%20world%201.pdf). Pages 4–5 in particular outline our approach to tackling structural racism, how that relates to intersectional feminism and why it is needed to realize Oxfam's vision of a world without poverty.
- ¹⁶ This table updates the information on page 18 of Oxfam GB. (2016). *Oxfam GB Statement on Modern Slavery for the financial year 2015/16*. <https://www.oxfam.org.uk/documents/276/ar-oxfam-modern-slavery-statement-2016.pdf>
- ¹⁷ Oxfam GB. (2021). *Oxfam GB Statement on Modern Slavery for the financial year 2020/21*. [https://www.oxfam.org.uk/documents/496/Modern Slavery Statement 2021.pdf](https://www.oxfam.org.uk/documents/496/Modern%20Slavery%20Statement%202021.pdf)
- ¹⁸ 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.
- ¹⁹ Oxfam. (2020). *Oxfam Annual Report and Accounts 2019/20*. [https://www.oxfam.org.uk/documents/264/Oxfam GB Annual Report 2020.pdf](https://www.oxfam.org.uk/documents/264/Oxfam_GB_Annual_Report_2020.pdf), p16
- ²⁰ Oxfam. (2019). *Update to Oxfam Statement on the Independent Commission Report*. <https://www.oxfam.org/en/press-releases/update-oxfam-statement-independent-commission-report>
- ²¹ 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
- ²² Oxfam GB. (2021). *Oxfam GB Annual Report 2020/21*. <https://www.oxfam.org.uk/documents/540/Oxfam-Annual-Report-and-Accounts-2020-21.pdf>
- ²³ Oxfam GB continues to focus on UK procurement, where it controls decision making. In our 2017/18 statement, we outlined the challenges of implementing Oxfam GB priorities internationally across the work of the Oxfam confederation. Oxfam GB. (2018). *Oxfam GB Statement on Modern Slavery: For the financial year 2017/18*, pp.19–20. <https://oxfamilibrary.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.
- ²⁴ Oxfam GB. (2021). *Oxfam GB Statement on Modern Slavery for the financial year 2020/21*, op. cit.
- ²⁵ Oxfam G B. (n.d.). *A Supplier's Guide to the Sourced by Oxfam Ethical and Environmental Supplier Framework*. [https://www.oxfam.org.uk/documents/313/SbO Ethical Environmental Supplier Framework.pdf](https://www.oxfam.org.uk/documents/313/SbO_Ethical_Environmental_Supplier_Framework.pdf)
- ²⁶ Oxfam. (n.d.). *Oxfam Human Rights Roadmap: Sourced by Oxfam and Ethical and Environmental Supplier Framework*. <https://oxfam.app.box.com/s/s16b3q8a1f92lv81d655qvqqcqhptplb>
- ²⁷ Oxfam GB. (2021). *Oxfam Annual Report and Accounts 2020/21*. <https://www.oxfam.org.uk/about-us/plans-reports-and-policies/annual-report-and-accounts-2020/>
- ²⁸ Oxfam GB. (2021), *Improving safeguarding and culture at Oxfam – internal quarterly report*.
- ²⁹ Oxfam. *Oxfam's Code of Conduct*. <https://www.oxfam.org.uk/about-us/plans-reports-and-policies/oxfams-code-conduct/>
- ³⁰ Ibid.
- ³¹ Oxfam GB. (2021). *Oxfam GB Annual Report 2020/21*, op. cit., p.77
- ³² Oxfam GB. (2020). *Speak Up: Ways to Report Misconduct (Whistleblowing)*. <https://www.oxfam.org.uk/about-us/tackling-abuse-information-and-updates/speak-up/>

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Photo (front cover):

Woman with scythe: Diyaara on the farm that used to provide food for her family. Wajir County, Kenya, February 2022. Credit: Khadija Farah/Oxfam.

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