



Oxfam GB Anti-Slavery and Human Trafficking Policy

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Author:	Corporate Responsibility Adviser
Policy Owner:	Head of Ethics
SLT Sponsor:	Chief Operating Officer
Approved By:	Safeguarding and Ethics Committee
Union consulted:	N/A
Date for Renewal:	November 2027
Geographical Scope:	Worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed.
Implementation owner:	All managers, staff, non-staff and suppliers.
Implementation plan:	This is the implementation plan
Circulation:	Public

POLICY STATEMENT

At Oxfam GB, we believe that everyone has the right to live their lives free from exploitation. Oxfam GB **will not tolerate** anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. This includes employees, volunteers, consultants, or any other representatives.

We recognise that a zero-tolerance approach with staff, suppliers and partners could undermine our ability to engage in the best interests of the survivor and to address the root causes of the issue. Therefore, we take an approach of **zero tolerance to inaction** on modern slavery and human trafficking. This means we require any concerns to be reported, so that specialised staff can respond in a robust and timely manner. We believe this increases our chances of getting this complex and often hidden type of abuse identified, responding to survivors in a manner that is informed by their safety, holding any perpetrators to account and taking the right steps to mitigate or ideally prevent any further harm. Where appropriate, Oxfam GB may refer incidents to the necessary authorities. We will terminate a contract where conduct demonstrably violates this policy, and there is no willingness to address specific behaviour, instances and/or underlying weaknesses in systems which led to the incident, to meet the standards outlined by this policy within a reasonable time period. This approach is in line with Ethical Trading Initiative guidanceⁱ and the EU's Corporate Sustainability Due Diligence Directive.ⁱⁱ

SCOPE AND ELIGIBILITY

This policy applies where Oxfam GB operates (either directly, or as an executing or partner affiliate). This includes all Oxfam GB staff, volunteers and representatives.

Oxfam GB expects implementing partners and suppliers to work with Oxfam GB to ensure this policy is implemented across our operations and supply chains and will take appropriate steps to assess the risk of partners and suppliers not implementing this policy.

Proactive assessments of salientⁱⁱⁱ risks will be undertaken. Actions will be integrated into our governance and decision-making across the organisation, based on Oxfam's capacity and leverage to address those salient risks.

POLICY PURPOSE

Oxfam “acts-as-if” modern slavery is present. In this way, our work is designed by default to centre the needs of people who are likely to be most vulnerable to these forms of harm, regardless of whether they can safely disclose their circumstances.

This policy sets out Oxfam GB's approach to identifying, preventing and responding to modern slavery and human trafficking in our operations, implementing partners and supply chain. It includes:

- Our commitment to assess the salient risks, provide remedy for survivors, to take preventative steps
- The principles upon which we will base our decision-making and actions
- Our expectations of all who represent Oxfam GB
- Our commitments to ensure effective action is taken when problems occur.

To report a concern:

use the [Misconduct Webform](#), or email safeguarding@oxfam.org.uk, or whistleblowing@oxfam.org.uk

Staff will be made aware of this policy. Oxfam GB publish an annual modern slavery [statement](#) which outlines the actions we plan to take to identify, redress and mitigate the risks of modern slavery and human trafficking in our operations, implementing partners and supply chains. The statements report our progress against those plans and what we are learning about what works and what doesn't and for whom.

RELATED DOCUMENTS

- [Oxfam GB Ethical and Environmental Policy](#)
- [One Oxfam Safeguarding Policies](#)
- [Oxfam GB Survivor Policy](#)
- [Recruitment Policy](#)
- [Code of Conduct](#)
- [Non-staff Code of Conduct](#)
- [Oxfam GB Reporting Misconduct at Work \(Whistleblowing\) Policy](#)
- [Anti-Bullying and Harassment Policy](#)
- [Complaints Policy](#)
- [Gender Equity Policy](#)
- [Employee Relations and Involvement Policy](#)
- [Pay and Benefits Policy](#)
- [Oxfam GB Domestic Worker Guidelines](#)

VERSION CONTROL

Version Number	Date Approved	Approved By (Name & Title)	Brief Description of Changes
V3	October 2024	Safeguarding & Ethics Committee	<ul style="list-style-type: none"> ○ We have included more detailed definitions to support more transparent identification of child work and child slavery. This policy aligns with: <ul style="list-style-type: none"> ○ Oxfam GB Ethical & Environmental Policy ○ Oxfam safeguarding policies ○ Ethical Trading Initiative Base Code

POLICY CONTENTS

1.0 Definitions

Modern slavery happens when a person exerts power over another person, for personal and/or commercial gain. It can manifest in various forms^{iv}, including:

- work or service which the person did not voluntarily enter in to, or which is exacted under the menace of a penalty (**forced labour**).
- transforming a debt into a mechanism of control over a person and then forcing people to work to pay off that debt (often with unfair/unattainable terms for repayment) (**bonded labour**).
- recruiting, harbouring, transporting or receipt of people, by means of the threat or use of violence, deception or coercion (including payments or benefits) to achieve control over another person, for the purpose of exploitation (**trafficking in persons**)

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- **child trafficking** is the recruitment, transportation, transfer, harbouring or receipt of any person under the age of 18 years of age, for the purpose of exploitation.
- **forced marriage** refers to situations where persons have been forced to marry without their consent. A marriage can be forced through a range of different mechanisms, including physical, emotional or financial duress; deception by family members, the spouse or others; or the use of force or threats or severe pressure.
- denying people who work in a home the freedom to leave the house, taking compulsory deductions for food or accommodation, withholding wages or identity documents, limiting their contact with family, (**domestic servitude**)
- **descent-based slavery** also still exists (mainly in parts of Africa). When someone is born into a group or caste viewed as 'slave class' by their society.

Consent

It is irrelevant whether a person gives their consent.

For example, a person may not give their **voluntary consent** if they:

- Are a child
- Felt they have no other options to earn a living
- Feel under any menace of penalty
- Consent to terms and conditions that turn out to be false
- Are suffering from trauma or experiencing a physical or mental health or development challenge which may affect their judgement.

2.0 Commitments

Oxfam GB's Directors and ultimately Council hold overall accountability for the effectiveness of this policy. It is the responsibility of all Oxfam GB managers to ensure the delivery of this policy is integrated into daily decisions and practices. Any allegation of modern slavery or human trafficking will be dealt with in a robust and timely manner, in adherence with our survivor-centred approach, as defined by our [Survivor Policy](#).

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of management.

3.0 Standards (must be measurable and reportable)

Oxfam GB **will not tolerate** anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. Oxfam GB and its suppliers and partners are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements and existing policies, including;

- Suppliers: [Oxfam Ethical and Environmental Policy](#)
- Staff: [Code of Conduct](#) and [Pay and Benefits Policy](#)
- Partner Staff: [Non-Staff Code of Conduct](#)

In addition to the above, all staff, implementing partners and suppliers are expected to demonstrate commitment to meet the following standards:

Requirement to report / 'Zero-tolerance-to-inaction' on exploitation

This includes all forms of modern slavery and human trafficking through robust prevention and response work, offering support to workers and holding those responsible to account. In line with our safeguarding policies, Oxfam GB requires anyone carrying out its work to report any concerns.

To report a concern:

use the [Misconduct Webform](#), or email safeguarding@oxfam.org.uk, or whistleblowing@oxfam.org.uk

There is no requirement to have evidence or know that the incident is definitely modern slavery or human trafficking; all reports will be investigated by specialist staff so that the most appropriate action is taken.

Fair Payment

- No worker should pay for a job - the costs of recruitment should be borne, not by the worker, but by the employer ('employer pays' principle^v)
- Wages should be paid directly to the worker. Where Oxfam GB is not the direct employer, appropriate checks should be in place to ensure the worker receives the correct wage.
- No compulsory deductions from wages shall be made that aren't mandated by law and the worker should still have enough to live on after all deductions have been made. Where possible workers should freely give their consent for all deductions.
- Workers shall not be held in debt bondage or forced to work for an employer to pay off an incurred or inherited debt.

Freedom

- Coercion or force shall not be used to physically confine or imprison workers to the workplace, accommodation or related premises.
- Workers' terms of contract will outline their freedom to leave their employment and that they may not be prevented from doing so.
- Workers have the right to enter into employment voluntarily and freely, without the threat of a penalty.
- No worker has their identity or immigration documents destroyed, concealed, confiscated, or otherwise denied to them.

Working and Living Conditions

- Working conditions and accommodation are safe, clean, and protect workers' welfare and needs. In line with the host country housing and safety standards, or the ETI base code, whichever is higher.^{vi}
- All workers should have the option to choose not to live in accommodation provided by the employer.

Culture and Transparency

- No worker is solicited for the purpose of employment, on the basis of deception, coercion, or abuse of their position of vulnerability. No worker is to be offered employment, by means of materially false or fraudulent pretences, or representations or promises regarding that employment.
- There are multiple channels through which staff and other stakeholders can raise concerns which are accessible to all genders. Appropriate steps are taken to raise awareness about these channels and to check that all stakeholders feel safe to use at least one channel.
- All concerns or allegations of modern slavery or trafficking are responded to in a timely and appropriate manner, based on our Survivor Policy (and specifically using a survivor-centred approach).
- Disclosure in Oxfam GB's annual Modern Slavery Statement of any incidents of modern slavery or human trafficking occurring within Oxfam GB's operations, implementing partners and supply chains.

Principles to guide our anti-slavery and human trafficking policy

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- Our guiding principle is to be **Survivor-Centred**: we are committed to the wellbeing and the wishes of the survivor of an incident being put at the centre of all actions taken. This includes ensuring: The safety and security of the survivor, any dependents, 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.
- Non-directive: we aim to empower survivors and complainants by helping them explore their options in safe ways without imposing our own opinions.
- Non-judgemental: we never judge survivors or complainants for their actions or decisions. We aim to empower survivors and complainants by helping them explore their options in safe ways.
- Confidentiality: We are committed to ensuring confidentiality, but some information will need to be shared with specialist teams outside the organisation to ensure safety and to prevent modern slavery.
- Independent investigations: through our Safeguarding team and working with local NGOs, trade unions, community organisations or authorities, we will carry out independent and discreet investigations, recognising the rights and duty of care to everyone involved, including the complainant or survivor, witnesses and the person accused.
- Commitment to good practice: we always strive to offer the best service possible and are open to feedback and continual learning.
- Conscious of gendered, racialised and other discriminatory risks and implications: There are a number of ways that anyone can become enslaved and also different routes out of slavery, but there are notable particularities of experience that differ between women and girls compared with men and boys, therefore we are conscious of the gendered implications of effective identification, response and mitigation of modern slavery for women and for men.
- A culture where women and men feel empowered and respected and able to raise concerns related to this policy.
- Open to learning and improving, to drive wider change to tackle modern slavery and human trafficking in our operations, supply chains and business relationships.

4.0 Roles and Responsibilities

Oxfam GB Directors and ultimately Council hold overall accountability for this policy and its effectiveness in practice. All Oxfam GB managers are responsible for integrating its implementation into daily decisions, practices and performance measurement across the organisation.

The Ethics Team is responsible for reviewing and updating this policy every three years and in line with good practice, legislative and organisational developments.

All staff, volunteers, implementing partners, suppliers and other representatives of Oxfam GB are required to adhere to this policy and Oxfam GB's Ethical and Environmental Policy at all times.

All Oxfam GB employees are obliged to report any suspicions of modern slavery or human trafficking. Where information has been shared in confidence, cases can be reported without disclosing personal information. This can be done without sharing details of cases. Failure to report, to a relevant person, suspicion of modern slavery relating to someone else is a breach of Oxfam GB's

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policy and could lead to disciplinary action being taken. For the avoidance of doubt, there is no obligation placed on any survivors to report any incident that has happened to them.

Oxfam GB's Ethics Team and Senior Management Teams can offer further support to help staff, volunteers and other representatives implement this policy.

5.0 Consequences of non-compliance

Oxfam GB **will not tolerate** anyone associated with the delivery of its work carrying out any form of modern slavery or human trafficking. Oxfam GB and its suppliers and partners are expected, as a minimum, to comply with all applicable international human rights standards, national legislation, statutory requirements and existing policies, including:

- Suppliers: [Oxfam Ethical and Environmental Policy](#)
- Staff: [Code of Conduct and Reward Policy](#)
- Partner Staff: [Non-Staff Code of Conduct](#)

Oxfam requires everyone carrying out its work to report any concern. The policy is **zero tolerance to inaction on exploitation**, including all forms of modern slavery and human trafficking.

Remediation

The wishes and best interests of survivors are the primary concern for interventions in modern slavery cases. Initial consequences of non-compliance may in rare cases include immediate termination of a supplier or partner or removing a worker from the situation. However, internationally, evidence has shown such actions may reduce the likelihood of an appropriate resolution for the survivor and could cause more harm. Therefore, our approach will be case-specific and will look for solutions that mitigate the survivors' current situation, and prevent the risk of further harm, by:

- Listening to survivors directly taking into account their needs and considerations expressed directly by themselves are first considerations.
- Engaging specialist local NGOs, trade unions, community organisations or authorities (where appropriate and safe).
- Where appropriate and safe, involving the police, where there are suspicions of serious and organised criminal involvement.
- Looking beyond the individual case to identify contributing factors and poor practice.
- Providing or facilitating workers' safety, access to compensation and / or redress (for lost earnings or unpaid wages as well as for pain and suffering^{vii}).
- Exploring possible ways of helping workers to secure alternative jobs or income.
- Ensuring the supplier /partner takes significant action to prevent any further cases.

Where the survivor is employed/ recruited through a supplier/ implementing partner, it will be the responsibility of the supplier/ partner to provide remedy, with support from Oxfam GB to who will seek to ensure that remediation is in line with the above.

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use the [Misconduct Webform](#), or email safeguarding@oxfam.org.uk, or whistleblowing@oxfam.org.uk

Oxfam GB commits to supporting and working with suppliers, and partners who have genuine difficulties in meeting these guidelines but demonstrate commitment to ensuring the best outcome for the survivors and show timebound progress.

Mitigation

- a) All staff, volunteers, implementing partners and other representatives will have access to information about how to identify risks, report concerns or allegations of modern slavery and human trafficking.
- b) All managers, employees, volunteers and other representatives will have access to, and be aware of this policy and know the parameters of their responsibilities within it.
- c) Staff with specific responsibilities (e.g. managers, people who manage our suppliers and partners) will receive training on this policy.
- d) All managers are responsible for promoting awareness of this policy within their divisions, individual departments or teams and with suppliers and partners.
- e) Suppliers and implementing partners have demonstrated that they have sufficient checks and processes in place to ensure that they are in alignment with this policy.
- f) Concerns or allegations about modern slavery and human trafficking will always be taken seriously, investigated and where appropriate acted on.
- g) Learning will be fed into everyday decisions across Oxfam GB, to improve prevention of harm.

This policy will be used in conjunction with employment/labour, duty of care and relevant criminal laws to make decisions about how to respond to complaints and concerns raised by staff, volunteers and other representatives and suppliers.

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use the [Misconduct Webform](#), or email safeguarding@oxfam.org.uk, or whistleblowing@oxfam.org.uk

Appendix 1

How to raise a Complaint or Concern

Anyone can raise a concern or make a complaint to Oxfam about something they have experienced or witnessed. You can do this verbally or in writing to your Line Manager, HR, safeguarding focal point, the safeguarding team safeguarding@oxfam.org.uk or via Oxfam's Whistleblowing Service, 'Speak Up' either by using the [Misconduct Webform](#) or via email to speakup@oxfam.org.uk.

If an allegation is made against you, then you must inform your manager immediately. You should create a signed and dated record of the details as you know them and send a copy of this to HR. All those accused will be treated with respect and all allegations are treated confidentially. You may wish to seek support from your Union or Staff Representative.

NOTES

ⁱ ETI Base Code Guidance: Modern Slavery

https://ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf, p39

ⁱⁱ European Commission, (July 2024). *Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (Text with EEA relevance)*. https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en

ⁱⁱⁱ Salient risks are defined as: 'The human rights at risk of the most severe negative impact through the company's activities and business relationships'. *UN Guiding Principles on business and human rights*, (2011), cited in: <https://www.ungpreporting.org/resources/salient-human-rights-issues/>

^{iv} Anti-Slavery International, *What is modern slavery?* <https://www.antislavery.org/slavery-today/>

^v *The Dhaka Principles for Migration with Dignity*, hosted by the Institute of Human Rights and Business.

<https://dhakaprinciples.org/>

^{vi} Where the humanitarian imperative is applied, Oxfam will follow standards outlined in: '[Minimum Requirements for First Phase Humanitarian Response](#)' and p.11 of the Oxfam Supply and Logistics Manual.

^{vii} Ethical Trading Initiative, (2017), *Base Code Guidance: Modern Slavery. Practical guidance for companies on implementing ETI Base Code. Clause 1: Employment is freely chosen*.

<https://www.ethicaltrade.org/resources/base-code-guidance-modern-slavery>

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