



# INTEGRITY AT OXFAM

April 2022 – September 2022

## INTRODUCTION

At Oxfam we can see a future where everyone has an equal opportunity to thrive, and not just survive. A future where a full and dignified life is not just for the privileged few – but a right for all of humanity.

That future begins today, and within our own organization. It begins with creating an inclusive working environment, where all of us can feel safe and free to speak up – our colleagues and our volunteers, our partners and peers, and the people we work with across 87 countries.

This is our six-monthly report on the progress we make to improve safeguarding and culture across Oxfam. Covering 1 April to 30 September 2022, the report presents initiatives at confederation-level, as well as tangible examples of work led by Oxfam affiliates.

As much as this report helps us to be accountable to all of our stakeholders on all of our commitments, it also constitutes a vital moment of reflection and learning internally. While we are changing our culture and improving our systems, we are aware that more work remains to be done, in order for us to become a truly and fully safe and inclusive organization for all involved. This is the journey we are on – and are committed to continue.

Gabriela Bucher  
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**NOTE:** We hold ourselves accountable to key Oxfam policies, strategies, and other guidance documents, shared internally and externally.

They are as follows:

- Oxfam Safeguarding and Culture Framework
- Anti-Fraud and Corruption Policy
- Anti-Fraud and Corruption Strategy
- Terrorism Financing and Financial Crime Policy
- Conflict of Interest Policy
- One Oxfam Corruption Response Standard Operating Procedure
- Oxfam Employee Code of Conduct

## **PROGRESS UPDATES**

This report covers Oxfam's progress from **1 April 2022 to 30 September 2022**.

### **Safeguarding**

At Oxfam we are committed to zero tolerance of sexual harassment, exploitation, and all forms of abuse. This means that we will do everything in our power to prevent these from happening within our activities, and rigorously respond to and address safeguarding concerns or allegations. Our latest work on safeguarding, as listed below, is shaped and guided by the Oxfam Safeguarding and Culture Framework and governance structures including the Safeguarding and Culture Forum to provide strategic guidance and monitoring of implementation of the framework.

- **Policy development:** Oxfam is committed to providing survivor-centered support and to continuously improving efforts to prevent abuse. A One Oxfam Survivor Support Guideline was approved, outlining Oxfam's survivor-centered approach. It provides operational advice for staff on how to engage and empower survivors to access sensitive and appropriate support that meets their needs. Work has also begun on reviewing the One Oxfam Case Management process. The review team will work closely with the Interpersonal Misconduct Working Group, to ensure alignment of linked processes and good practices to case management of all misconduct types.
- **Training:** We designed a bespoke safeguarding course which is inclusive of local languages and accessible for administrative/facilities support staff, as well as staff and volunteers who do not have access to a computer. This training could also be used in partner organizations. The course is based on a participative, case-study-based learning methodology.
- **Internal network building:** We continue to support Safeguarding Focal Points (SGFPs)<sup>1</sup> in their daily work, through:
  - **Webinars:** Global sessions are scheduled to roll out the updated SGFP model.
  - **Workshops:** Week-long regional workshops were held in Asia, the Middle East and North Africa (MENA) region, and South Africa (SAF), with 57 SGFPs from 30 countries attending. Workshops are planned for West Africa (WAF) and the Pacific. In-country training was delivered to 28 SGFPs.

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<sup>1</sup> Safeguarding Focal Points are an integral element to supporting the rights of communities and survivors and to supporting safeguarding investigations. The Safeguarding Core Standards recommends that two Focal points are appointed in every office. The Safeguarding Focal Point program was launched several years ago and revised in March 2022. The reviewed model aims to strengthen and clarify the role of SGFPs as well as their line managers through a new global database, guidance documents and a template focal point agreement.



- Online training: A five-module online SGFP Training is now available. Since it is modular-based, teams from Monitoring, Evaluation and Learning (MEAL), Gender and Protection can access modules they find most relevant. The course is available in English, French and Spanish.
- **Support to regions and countries**: Oxfam continues to embed safeguarding into country- and project-level activities. Some examples:
  - Training: Training events have taken place targeting staff, local non-governmental organizations (NGOs) and partner organizations. Topics ranged from general awareness-raising to sexual harassment in the workplace. More than 900 people took part in these events. To address language barriers, a safeguarding visual toolkit and IEC (Information, Education, Communication) materials were developed.
  - Partner support: Partners were supported to develop their safeguarding strategies, policies, risk assessments and action plans. In collaboration with the Safeguarding Resource and Support Hub (a UK charity), a further 60 partners in 10 countries were supported to strengthen their safeguarding policy development.
  - Reporting mechanisms: A pilot project was undertaken to develop and strengthen sexual exploitation, abuse, and harassment (SEAH) reporting mechanisms in five projects/areas, and the outcomes will serve as a pilot for other countries. In addition, the pilot has included work to improve reporting mechanisms in Ghana and Iraq (see Safe Programming, below).
  - Engagement in the sector: To strengthen our safeguarding capability, Regional Safeguarding Advisors are active participants in inter-agency PSEAH networks. Oxfam are co-chairs in Yemen and the Regional Office for the Southern and Eastern Africa PSEAH Working Group.
  - Communities of practice: Regional communities of practice have been set up, allowing a safe space for staff to share knowledge and experiences and discuss both safeguarding and cross-cutting topics. This also provides staff with signposting to people for support as part of our case management processes.
  - Strategy: Oxfam invests in drafting regional safeguarding strategies as well. The One Oxfam in Africa change management process has incorporated specific safeguarding commitments, with safeguarding staff participating in the consultation process. Safeguarding Guidelines were developed for programs addressing Category 1 crises.

## Safe Programming

As Oxfam, we recognize that whenever we interact with anyone through our work, we have the potential to cause harm. With this in mind, we seek to adopt a safe programming approach that centers on risk identification and management. While we can never fully eliminate all risk, by proactively managing actual or potential risks, we can take every measure possible to prevent or reduce the likelihood of it occurring.

- **Training**: Oxfam's 30-minute safe programming e-learning module, launched in January 2022 to Oxfam staff, is now also accessible to partners. The module, which is available in Arabic, English, French and Spanish, covers introductory information on mitigating harm through risk identification. Also, following a pause in online global safe programming trainings due to staffing gaps, these sessions have resumed. In the reporting period we delivered three online trainings (in Arabic, English and French).
- **Fragile contexts**: The Rights, Resilience and Response (RRR) Horizon Plan states that Oxfam's programming in fragile contexts must be principled, ensuring that our work does not inadvertently cause harm, by preventing or mitigating risks. To support these efforts, a Safe Programming Working Group was established in September 2022 and will be piloted until March 2023. The aim



of the working group is to provide a regular space where colleagues can share technical expertise and challenges around safe programming, as well as informing global initiatives and policies.

- **Reporting mechanisms:** In Ghana and Iraq, Oxfam implemented pilot projects following qualitative research on the barriers that communities face in reporting misconduct. Some of the key findings include research in Iraq exploring community perceptions of justice for survivors – with a power analysis approach across Kurdistan. Both teams developed new approaches to accompany partners on establishing safe and accessible reporting mechanisms. They also supported partners in improving access, awareness, and appropriateness of reporting mechanisms. These pilots demonstrated the necessity for programming that includes the prevention of misconduct from the design, implementation, and measurement stages.

## People and Culture

Embodying the feminist principle of ‘nothing about us without us’, we encourage colleagues to make their voices heard through platforms such as the Global Staff Survey and ‘pulse checks’ – brief and regular questionnaires to see how staff are feeling about working at Oxfam. Our activities and priorities during the reporting period, as listed below, are guided by the outcomes of these surveys and by our Global Action Plan.

- **Oxfam’s Culture Framework:** To define the culture we aspire to, at Oxfam, and the steps to achieving it and agree on how we can hold ourselves accountable, Oxfam initiated the co-creation process for Oxfam’s Culture Framework. We held eight culture sessions, with 388 colleagues attending. We discussed Oxfam’s culture vision; identifying patterns that unite us at Oxfam; defining overarching principles, and assessing our individual, team and organizational behaviors.
- **Wellbeing:** Employee wellbeing and mental health remains a top priority at Oxfam. Representatives from across the confederation engaged to develop a Staff Wellbeing Implementation Plan. In addition to an existing Employee Assistance Program, the focus will be on the following elements:
  - supporting line managers to be wellbeing ambassadors and the first point of contact for their team, working with team members to identify wellbeing challenges and channel them to appropriate professional support resources.
  - building a sustainable community of mental health/wellbeing focal points across the confederation who are trained to offer guidance to colleagues.
  - developing a wellbeing knowledge bank that is easily accessible by colleagues for their own self-care.
- **Hybrid working:** Offering an example of our initiatives to promote wellbeing, Oxfam Intermón (OES) and various other Oxfam affiliates have implemented a hybrid-working model based on the principles of co-responsibility, flexibility, and trust. Survey results show that combining face-to-face and remote working improves work-life balance and overall personal wellbeing.
- **Leadership:** Leadership remains key in driving culture change initiatives within Oxfam. Following the Global Staff Survey, efforts are being put in place to support Oxfam leaders to lead in an ever-evolving work environment. The plans include a 360-degree feedback and coaching program for the Executive Directors’ Forum and for Regional/Cluster/Country Directors. At the time of writing, we are in the process of hiring a consultant, and we aim to start work on this in early 2023.
- **Training:** Among other training initiatives over the past six months, Oxfam Great Britain (OGB) delivered three Managing People at Oxfam (MPO<sup>2</sup>) training sessions in Jordan (34 participants),

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<sup>2</sup> Managing People at Oxfam is offered in both face-to-face and online formats. The former is three- to four-days’ long held in various locations, and the latter is a multi-module facilitated online course.



Democratic Republic of Congo (16 participants) and South Sudan (approx. 30 participants), with the main objective of introducing managers to the framework, strategies, and tools for managing individuals and teams.

- **Inter-personal misconduct:** Work is ongoing to align our approach to inter-personal misconduct. This covers areas such as the abuse of power, discrimination, harassment, bullying, institutional harm, and retaliation. A diverse working group with representation from across the confederation has been formed to define guiding principles and standard operating procedures for dealing with interpersonal misconduct cases across the confederation.
- **Referencing practices:** In addition to our participation in the Misconduct Reporting Scheme set up by the Steering Committee for Humanitarian Response (SCHR), work is ongoing to review our internal referencing guidelines defined in 2019 and to review and improve safer recruitment practices so that candidates are evaluated against our values.

## Gender Justice

Advocating for a gender, racially and climate-just economic recovery is one of Oxfam's core priorities in the implementation of our [Global Strategic Framework](#) (2020–2030). In addition to this, our Gender Justice work is driven by our [commitments made at the Generation Equality Forum](#). A first annual report on progress towards these commitments was submitted to UN Women in mid-2022, and is referenced in the Generation Equality Accountability Report 2022. Oxfam launched the Care Responsiveness Barometer (a tool for institutions to improve care-responsiveness) and the Care Policy Scorecard (to assess country progress for an equitable care policy). In order to complement these, we launched a toolkit aimed at international financial institutions. A meeting entitled *Building a Caring Economy: bringing diverse voices for a just recovery* was held, bringing together diverse feminist visions, approaches and initiatives from the grassroots and margins of the Global South, offering a vision for green, just, and equitable feminist recovery from the Covid pandemic.

- **Advocacy:** In June 2022, Oxfam responded to the [World Bank's Child Care Incentive Fund](#), advocating for the inclusion of women workers (especially care workers) and women's rights organizations (WROs) in its design and implementation. Oxfam advocates for public provisioning of childcare, the adherence to the International Labour Organization (ILO)'s decent work pillars, labor rights and social protection, as well as the need for the World Bank Group to attend to care beyond childcare.
- **Movement building:** Following on from the two feminist 'convenings'<sup>3</sup>, facilitated by Oxfam in late 2021, Oxfam in Asia supported a feminist coalition in the Asia region. This brings individuals and organizations together, amplifies women's voices, and supports their access to resources in working towards migrant, racial, economic, labor, and reproductive and global justice at the intersections of care work, gender-based violence and climate justice.
- **Care work:** The five working groups established under the Oxfam Care Organizing and Coordinating Group<sup>4</sup>, are now consolidating and refining their objectives, outcomes and workplans.
- **Knowledge sharing:** Issue 7 of the Feminist Futures Magazine<sup>5</sup> was launched in September 2022, and covers issues such as decolonizing feminism, feminist economies, communitarian feminism

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<sup>3</sup> gatherings of activists, economists, WROs and others to determine solutions

<sup>4</sup> the Oxfam Care Organizing and Coordinating Group is a cross-confederation 'care collective' which facilitates Oxfam's implementation of the care commitments we have made at the Generation Equality Forum.

<sup>5</sup> Oxfam's Feminist Futures Magazine is an internal Oxfam publication and provides a bird's eye view of the wide-ranging body of intersectional feminist work across the Oxfam confederation. The magazine aims to help Oxfam to celebrate and learn from its work across these issues.



and ecofeminism, embedding feminist practice in learning, and designing strategies for feminist resistance, in collaboration with feminist, LGBTQIA+ and social justice movements. Our last edition also covers Oxfam's #QueerJoy campaign to mark Pride Month and helps to express our solidarity and gratitude to LGBTQIA+ people, movements, and allies.

- **Thought leadership:** In mid-2022 Oxfam reconstituted a confederation-wide platform with new membership, the Gender Justice and Feminist Futures Platform. In striving for diversity and inclusion, the platform reflects Oxfam's global footprint and commitment to shifting power within and beyond the confederation. Interacting closely with global executive leadership teams, the platform will provide feminist thought leadership and action both in Oxfam's external work as well as issues relating to Oxfam's internal transformation.

### Fraud and Corruption

Our efforts to combat fraud and corruption are guided by our [Anti-Fraud and Corruption Strategy](#).<sup>6</sup> This focuses on four pillars to improve the confederation's fraud and corruption resilience: deterrence, prevention, detection, and response.

- **Training:** We continued to invest in existing and new staff training and awareness raising. Some examples:
  - Awareness-raising posters on the theme of fraud and corruption were circulated to Oxfam offices globally.
  - Oxfam Australia (OAU) is using a new Human Resources system to drive mandatory training, as part of an effort to ensure all staff complete both initial and refresher anti-fraud and corruption training.
  - Fraud and corruption workshops were conducted for staff in Ethiopia, Ghana, and Iraq.
- **Internal network building:** We provided information and training for staff. Some examples:
  - The Oxfam Great Britain (OGB) Anti-Corruption Team attended a full day's Train the Trainer course, aimed at developing and improving their delivery of the anti-corruption training material delivered to all staff and country management teams.
  - Oxfam Intermón (OES) delivered a training and capacity building on misconduct (case) management to team leaders and managers.
  - A quarterly e-bulletin was sent to anti-corruption champions<sup>7</sup> in July 2022, and a recruitment drive for new champions is underway in Oxfam countries in Africa.
- **Staff Survey:** An Anti-Corruption Staff Survey was conducted in countries in September 2022, which yielded 922 responses. Data are being processed at the time of writing. The results will be used to respond to identified risks, as well as to determine how effectively the policy is being implemented.
- **Monitoring and auditing:** We are including more frequent monitoring, following the lifting of Covid-19 restrictions, with a robust internal control framework and internal audits processes. Some examples:
  - Oxfam Hong Kong (OHK) implemented more frequent monitoring by program officers on fund application and usage. OHK also designated program auditors to review and audit the use of funding received by our partners in mainland China on regular basis. It conducted more than 65

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<sup>6</sup> During the reporting period, the strategy was reviewed and submitted for approval by each affiliate. Work is also in progress to update our Terrorism Financing and Financial Crime Policy.

<sup>7</sup> Oxfam has previously appointed staff to act as anti-corruption champions in countries in which we work. Designated staff coordinate anti-corruption training and awareness, promote reporting suspicion cases and work with managers to ensure that cases are being addressed and resolved.



audits during the period. In addition, OHK established a contract register and contract management guidelines to improve internal control and compliance.

- Oxfam Québec(OQC) provided in-person training in anti-fraud and corruption to teams and partners, e.g. in the Democratic Republic of Congo. OQC also audited selected internal procedures and supporting documents, to ensure compliance.
- **Detection:** Our [online form for reporting misconduct](#) is now translated into 14 languages, allowing for easier reporting in countries such as Ukraine.
- **Response:** We are continuously improving our processes for responding to fraud and corruption cases. As an example, Oxfam IBIS (Denmark) held its first Fraud Risk Committee meeting attended by the Head of International Programs, Head and Interim Head of Operations, and the Internal Auditor. Having met monthly in 2022, the Fraud Risk Committee will meet quarterly in 2023. If reports of possible fraud come in, meetings will be held to respond.

## Governance

We continued to consolidate our global governance structure (which took effect in July 2021) under the leadership of the Interim Chair of Oxfam International.

- **Chair recruitment:** Following the resignation from the OI Board of Dr Jemilah Mahmood, an OI Chair Recruitment Taskforce – constituted by the OI Board in December 2021 – led an extensive chair recruitment process. Supported by an executive search firm (appointed through a competitive global procurement process), the taskforce considered a strong pool of candidates from across regions and sectors – the majority being women, including many candidates from the Global South. Following both long list and short list interviews, the final candidate Dr Aruna Rao was [appointed to the OI Board](#) in July 2022 and, after a thorough due diligence process, confirmed at an extraordinary Assembly meeting on 15 September 2022.
- **Affiliate Business Meeting:** The first Affiliate Business Meeting<sup>8</sup>, attended by members from all Oxfam affiliates, was held in June 2022. On recommendation of the OI Board and OI Executive Directors' Forum, the Meeting approved the application for prospective affiliate status from Oxfam in the Pacific and Oxfam Pilipinas. As prospective affiliates, they will now work towards full affiliate status.
- **Initial Governance Reform Learning Review:** Following discussion of findings in the period June to August 2022 the OI Board at its August 2022 meeting was presented with the Initial Governance Reform Learning Review report<sup>9</sup>, including 14 recommendations for how to consolidate the new global governance structure (with a focus on processes and ways of working). The OI Board will now lead the development of an action plan based on further dialogue with key confederation stakeholders.

## SAFEGUARDING DATA, 1 APRIL – 30 SEPTEMBER 2022

For the period 1 April to 30 September 2022, a total of 106 cases were managed on the OI Safeguarding Register. This included 28 cases brought forward from the previous period and 78 cases that were

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<sup>8</sup> OI Affiliate Business Meetings are an important component of the OI global governance architecture. In line with the OI Constitution, they are convened by the OI Chair at least once a year or when a matter within their constitutional area of responsibility arises for decision.

<sup>9</sup> In February 2022, the OI Governance and Nominations Committee commissioned an initial review of Oxfam's transition to the new global governance structure. The review, facilitated by consultants, engaged governance stakeholders from across the confederation through a survey, individual interviews and focus group discussions.



registered during the reporting period. At the end of September 2022, 71 cases were closed, and 35 have been carried forward as open cases.

### Closed cases

Closed cases are those where an allegation has been reviewed, investigated where necessary, and an outcome reached and acted upon. There are some closed cases which include instances where the case was not upheld or did not proceed because a survivor did not want to continue.

Closed cases	#	%
Fully Investigated Cases	26	37%
Initial Review / Assessment / referred to other departments	41	58%
Complainant did not want to go forward	4	5%
<b>Total</b>	<b>71</b>	<b>100%</b>

The 71 closed cases included:

Misconduct subtype	#	%
Allegations of sexual abuse	3	4%
Allegations of exploitation (including actions such as paying for sex)	13	19%
Allegations of sexual harassment	17	24%
Allegations that involved children	3	4%
Allegations of other internal reportable issues (such as bullying or other inappropriate conduct; sexual or romantic relationship against the Code of Conduct and Conflict of Interest Policy)	35	49%
<b>Total</b>	<b>71</b>	<b>100%</b>

The outcomes and actions taken against the 71 closed cases were:

The outcomes and actions taken	#	%
Upheld	13	18%
Dismissals	4	
Disciplinary actions	5	
Non-disciplinary actions	4	
Partially upheld		1%
Non-disciplinary actions	1	
Other actions	53	75%
Not upheld	2	
Not upheld due to insufficient evidence	9	
Person resigned before investigation concluded (note made on file)	1	
Initial review / assessment / referred to other departments	41	
Complainant did not want to go forward	4	6%
<b>Total</b>	<b>71</b>	<b>100%</b>

Of the 71 cases closed, the survivors (alleged)\* are made up of:

Survivors (alleged)*	#	%
Program participants	2	3%





Community members (not directly receiving Oxfam assistance)	8	11%
Volunteers	8	11%
Children	2	3%
Non-managerial staff	15	21%
Managerial staff	3	4%
Others	33	47%
<b>Total</b>	<b>71</b>	<b>100%</b>

Of the 71 closed cases, the subject of the complaint (alleged perpetrator\*) is made up of:

<b>Subject of complaint (alleged perpetrator)<sup>10</sup></b>	<b>#</b>	<b>%</b>
Volunteers	6	8%
Non-staff (contractors or consultants)	3	4%
Partner staff	10	14%
Non-managerial staff	21	31%
Managerial staff	13	18%
Unknown or undisclosed	18	25%
<b>Total</b>	<b>71</b>	<b>100%</b>

Oxfam is committed to supporting survivors and to creating a culture of zero tolerance for inaction, doing all we can to prevent abuse and exploitation, and to encouraging people to come forward to report their concerns. Oxfam offers and provides support to survivors through all steps of the investigation, including from when an incident is reported, during and after the investigation of the case, and even when an investigation does not take place. This support can include counseling, health care, and legal support as required and wherever available.

### Open cases

At the end of September 2022, Oxfam continued to investigate 35 open cases.

Oxfam’s commitment to a survivor-centered approach means that some investigations take additional time to ensure that they are conducted safely and at a pace that survivors are comfortable with.

### **FRAUD AND CORRUPTION DATA, 1 APRIL – 30 SEPTEMBER 2022**

Closed cases are those where an allegation has been reviewed, investigated where necessary, and an outcome reached and acted upon. There are some closed cases which include instances where the case was not upheld or did not proceed because of insufficient information available to justify the need for formal investigation or the case was transferred to other department, among other reasons. Between the period from April 2022 to September 2022, there were 72 misconduct cases reported and 53 closed. Some of the closed cases relate to earlier reporting periods. Of the 53 cases closed, 29 were investigated and 24 underwent an initial review and assessment.

<b>Closed cases</b>	<b>#</b>	<b>%</b>
Fully investigated cases	29	55%
Initial review / assessment	24	45%
<b>Total</b>	<b>53</b>	<b>100%</b>

\*Closed cases include those where the allegation was not upheld; therefore, we cannot consider all of them as victims or perpetrators, just alleged.



Closed cases of misconduct were classified as follows:

Misconduct allegation subtype	#	%
Bribery	10	19%
Fraud	26	48%
Nepotism	4	8%
Fraud and corruption, other	7	13%
Terrorist financing	1	2%
Theft	2	4%
Undeclared Conflict of Interest	3	6%
<b>Total</b>	<b>53</b>	<b>100%</b>

Of the 29 investigated cases, 76% were upheld (22 cases), and the remaining 24% (7 cases) were not upheld. However, all 53 closed case results were as follows (note that a case may have multiple outcomes):

The outcomes of actions taken for the 22 upheld cases	#
Written warning	3
Termination of employment	1
Referred to partner for action	3
Non disciplinary actions, e.g. control Improvements, modification to processes	9
Other disciplinary action	10
The outcomes of actions taken for the 7 not upheld cases	
Not upheld, no further action	7
Not upheld, non-disciplinary actions, e.g. control Improvements, modification to processes	2
Preliminary assessment	
Insufficient evidence to proceed	11
Informant did not wish to proceed	0
Outside organization's mandate	1
More information required	1



Referred to another affiliate	0
Referred to another department	3
Lack of resources	0
Other	8

Subjects of complaint amounted to 74, as follows:

<b>Subjects of complaint</b>	<b>#</b>	<b>%</b>
Non-managerial staff members	30	40%
Managerial level staff members	22	30%
Community members	2	3%
Partner related	9	12%
Related personnel	2	3%
Others	9	12%
<b>Total</b>	<b>74</b>	<b>100%</b>

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