



INTEGRITY AT OXFAM

April – September 2021

INTRODUCTION

As part of our commitment to transparency and accountability, Oxfam reports every six months the progress it makes to improve Safeguarding and culture, and discloses its global case data for that period. In this Integrity Report, we will continue to do so and start including progress on other areas that are vital to ensure a safe and inclusive workplace. For the first time, Oxfam publishes its globally consolidated case data on fraud and corruption and introduce its work to prevent any financial misconduct.

Both in the public domain and within Oxfam, this report helps us to monitor our progress in delivering on our organizational values and commitments to improve the ways we foster a safe and inclusive place for the people we serve, our staff, partners, and all other stakeholders.

It is crucial to me to have this regular moment of reflection to keep setting a higher bar for the future.

Gabriela Bucher
Executive Director
Oxfam International

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PROGRESS UPDATES

This report covers Oxfam’s progress from **April to September 2021** and planned improvements towards the Oxfam Safeguarding and Culture Framework and Anti-Fraud and Corruption Strategy. The headlines are as follows:

Safe Programming

- **Regional Safeguarding trainings:** Regional Safeguarding trainings were conducted in Horn, East and Central Africa (HECA), Southern Africa (SAF), and Middle East and North Africa (MENA). These trainings included Training of Trainers in safe programming, data gathering and reporting mechanisms, risk assessments, child safeguarding, developing Safeguarding actions plans, Safeguarding in emergencies and undertaking investigations.
- **Development and implementation of Community feedback and complaint mechanisms:** Oxfam piloted the implementation of feedback and complaint mechanisms in countries within Latin America & Caribbean (LAC). In Cuba, this included development of a partner



toolkit to build local Safeguarding and safe programming capacity. Lessons learned in these pilots were shared in a regional discussion space “Pensando LAC.” The community-based feedback and complaints mechanisms were assessed in the HECA Region; lessons learned will be shared with the wider confederation. In the current reporting period, the focus is on strengthening feedback and complaint mechanisms in the West Africa (WAF) Region in the next calendar year. Oxfam in MENA is establishing feedback mechanisms, especially for those who are not able to read.

- **Confederation-wide Safeguarding activities:** We have developed and will continue working on a range of tools: A safe programming roadmap for Oxfam in HECA; an online Training of Trainers on Safe programming for Francophone staff; compliance assessment against the Safeguarding Core Standards. Oxfam in SAF have made specific commitments to ensure that Safeguarding is embedded in all their work (e.g., budget allocations, including Safeguarding element in all donor proposals). In the MENA Region, countries are working specifically with MEAL (Monitoring, Evaluation, Accountability and Learning) and Protection teams to integrate Safeguarding mitigation measures into their work.
- **Country and regional Risk Assessments:** Country Safeguarding risk assessment and mitigation plans are now part of routine processes and are being signed with donors prior to any new contract. Oxfam in Liberia and Sierra Leone (who are phasing out) have developed their Transition Risk plans to mitigate risks relating to Safeguarding during the change processes.
- **Strengthening partner Safeguarding capacity:** Oxfam has provided training to local partner NGOs on Safeguarding matters and will continue to do so. The trained partners will provide Training of Trainers support to others. In HECA, partner organisations were supported to develop their own safeguarding policies and implementation mechanisms. Over 40 partners within the MENA Region have received Safeguarding training. Oxfam in MENA now has Safeguarding assessment as part of the partner assessment process. The SAF Cluster is responding to a CAT2 emergency, and two partners and staff have been trained on Safeguarding obligations. In the MENA region, UNICEF and Oxfam are building their partners’ capacities to strengthen the accountability cultures and systems of 12 local and national partners. An Accountability to Affected People (AAP) context analysis was conducted for these specific partners.
- **Participation in regional, national, and sub-national inter-agency PSEA Networks:** Oxfam is currently chairing the Regional PSEA Network in Eastern and Central Africa. Oxfam is part of the WAF Regional Interagency Task Force on Protection from Sexual Exploitation and Abuse and Accountability to Affected Populations (PSEA/AAP Task Force) led by UNFPA. Oxfam in the MENA Region participate in various coordination bodies such as PSEA task forces, including the creation and roll out of sector-wide feedback mechanisms for communities. Myanmar participated in an INGO PSEA network focal points training.

Safeguarding

- **Harmonized guidance for budgeting Safeguarding:** During the period, new guidance on budgeting for Safeguarding was rolled out across the confederation. The guidance was developed with colleagues from Finance and Donor Funding teams. Webinars in 4 languages are planned to further socialize and implement the guidance.
- **Updated One Oxfam Child and Youth Safeguarding policies:** As part of the normal review cycle process, these policies were revised to better meet the ongoing needs of Oxfam’s work and engagement with children and youth. These policies were translated and disseminated across the confederation.
- **Harmonizing safeguarding websites across affiliates:** A format with required safeguarding information has been developed and will be offered to Oxfam affiliates. This will improve



consistency on what we're sharing about our safeguarding work across our channels globally.

- **Roll out of new Safeguarding Training:** In our first year of rolling out the mandatory training, 4,194 staff (approximately 50% of our workforce) across the Oxfam confederation completed the core Safeguarding trainings. While most staff did this online, offline and virtually facilitated training sessions were held in remote locations with limited internet access. A shorter, simpler facilitated course for volunteers and administrative/support staff is being field tested, prior to translation and formal roll out. We will continue to promote, support, and create an enabling environment that ensures all staff complete the course.
- **Confederation-wide drop-in sessions on Improving Safeguarding and Culture at Oxfam:** Approximately 10% of all Oxfam staff attended eight voluntary, global drop-in sessions on Improving Safeguarding and Culture at Oxfam. We presented where we are in our journey of change, responded to queries, and discussed any issues that were brought up by participants. Going forward, these drop-in sessions will be held on a six-monthly basis.
- **Implementation of the UN Implementing Partner Protection from Sexual Exploitation and Abuse (PSEA) Capacity Assessment tool.** This is a desktop self-assessment tool to review and approve partner (NGO) capacity for use by all UN partners. A guidance document on how to complete the template has been drafted, and will be shared with Oxfam affiliates and countries in the next reporting period.
- **Strategic and operational engagement in inter-agency coordination mechanisms including the Inter-Agency Standing Committee (IASC) at both the technical and Principal's level.** Oxfam continues to actively participate in and contribute to interagency initiatives at global, regional, and country level. This includes Digna, Interaction, Bond, and ACFID, and actively participates in in-country PSEAH networks.

Global case management system

- **Oxfam's Global Case Management System for Safeguarding, fraud, and corruption misconduct operational at all Oxfam affiliates.** Relevant staff receive ongoing training on how to use the system. Since its rollout, minor improvements and debugging of a few technical issues have taken place. All Oxfam affiliates are now inputting their case data into the system.

People and Culture

- **Oxfam completed a global staff survey and plans actions to act on the findings.** A Global Staff Survey was launched on the 5th July 2021, with the aim of encouraging colleagues to make their voices heard. The holistic approach used to launch, encourage participation, analyze the data, and finally to share back the results was centered on putting people at the heart of it all. The process embodied the feminist principles of 'nothing about us without us' and inclusion as various teams were consulted along the process. In addition, a dedicated working group that gave insight to the survey process was formed to support the work. With the support of an agency, we developed the questionnaire, analyzed the data, and shared the results to the confederation. The next steps in the survey process involves the action planning phase that encourages co-creation amongst colleagues across the confederation. The global staff survey will take place every 2 years in addition to regular pulse surveys, to ensure continuous improvement and benchmark data.
- **Operationalizing Zero Tolerance for Inaction Policy on HR misconduct.** We have started to align processes for the management of HR misconduct across the Confederation as a priority. Terms of reference for a working group have been developed, and it will be a key focus in the first half of 2022.



- **Strengthened processes regarding fixed term contracts.** One of the recommendations of the Independent Commission was to review the use of contract types and duration, particularly as the use of fixed term contracts may lead to potential abuse of power. As we continue to work through the complexity of contract types and duration, work has been done to strengthen processes linked to fixed term contracts. An example is the 'Common approach to redundancies' which has been implemented for countries and regions. This outlines principles to be followed in the case of a fixed term role being impacted in a restructure, and aims to provide for those staff who may have been on rolling fixed term contracts (within specific parameters).
- **Refreshing Oxfam's leadership development model.** Leadership emerged as a focus area from the Global Staff Survey results. Through our discussions with staff, around the global staff survey results we heard from staff that more work needs to be done to support them to understand how our feminist leadership principles can be applied in their day-to-day work. We are planning to develop tools and training to further embed our values and feminist leadership principles across the organization, and this will include leadership development. Our aim is to listen to staff, so that we can ensure the leadership development model is clear, and that we find meaningful ways to embed it.
- **Operationalizing the Oxfam Code of Conduct:** We have developed guidance to provide more clarity on how the Code of Conduct affects personal relationships within and outside of Oxfam. We have also conducted refresher trainings and shared successful practices of how to operationalize the Code of Conduct meaningfully.

Gender justice

- **Oxfam's Gender Justice commitments:** As part of the Generation Equality Forum (GEF) in July 2021, Oxfam committed to advocate for greater recognition of and investments in care work for a more feminist, climate and racially just economic transformation; to share existing and co-create new tools, evidence and research related to care work; and to mobilise grassroots feminist and women's rights organizations to advance the care agenda. Oxfam will also seek to further strengthen its own policies and practices with regards to parental and care leave, diversity and inclusion including in organisational decision processes and confederation-wide collection of global data on diversity and racial equity; and committed to avoid participation in manels and panels that do not reflect racial and ethnic balance. To support implementation of the above-mentioned commitments, Oxfam established a confederation-wide Care Organising and Coordinating Group.
- **Participation in the Global Alliance on Care:** Oxfam now participates in the Global Alliance on Care, co-sponsored by the governments of Mexico and France and UN Women.
- **Inter-generational Dialogue convened:** Oxfam convened a dialogue with young feminists from the Pacific, Asia, and Southern Africa to mobilise grassroots organisations to push for a just and feminist recovery.
- **Campaigning for a feminist economic transformation:** In collaboration with others, Oxfam France launched a campaign for a Feminist Economic Recovery and Oxfam Canada shared the new Feminist Economic Transformation Manifesto as an outcome of a visioning exercise with global partners ("Imaginations of a Feminist Economic Transformation with a focus on Trade Justice"). Oxfam continued to campaign for the integration of women's land rights within the Economic Justice & Rights Action Coalition and the Climate Justice Action Coalition.
- **Suite of tools on care work delivered:** Together with many partners, Oxfam helped deliver a Care Policy Scorecard for measuring public policies on care; a set of Care Principles to influence institutional policies towards care work; and the Care-Responsiveness Barometer



that provides an accountability framework for institutions for greater integration of care related policies.

Governance

A new governance structure, approved by the OI Board of Supervisors in June 2021, came into effect in 1st July 2021. The former Executive Board and Board of Supervisors, have been replaced by a new governance structure with three main components; namely an international nine-member board - composed of independent and non-independent members meeting quarterly, a multi stakeholder assembly meeting every two years, and the affiliate business meeting that meets when called upon. The Oxfam International constitutional documents were amended to reflect this new change and all legal registrations have now been fulfilled. The newly appointed board members reflect the diversity of the confederation and strengthen the skills, knowledge and experience needed for governance oversight of the Oxfam 2030 Global Strategic Framework. The governance structure has been significantly changed for greater accountability. The components of the new governance architecture aim to provide greater agility in decision making and oversight as well as clearly separate the roles of management and governance. The new board has committed to put ensuring a safe and inclusive workspace at the top of their agenda.

Fraud and corruption

With global income of circa 900 million Euro and a presence in more than 90 countries, we are fully aware that Oxfam's challenges are both operational and strategic. The extensive cultural and environmental disparities challenge conventional ways of delivery; it necessitates more contextualised approaches to tackling the risk of fraud and corruption.

Our strategic focus is geared to steer better fraud resilience of the confederation, while embracing the joint Oxfam values of inclusivity, empowerment, and accountability.

Oxfam does not tolerate fraud and corruption and is committed to ensure that its systems, procedures and practices reduce the risk of occurrences to an absolute minimum. 'Reducing the risk of fraud and corruption occurring to an absolute minimum' conveys more accurately our intent to proactively and tirelessly squeeze the problem.

We recognise that success in tackling fraud and corruption is contingent on more than one activity, at more than one level of the organisation. Subsequently, we commit to the use of a holistic anti-fraud and corruption strategy. This will be supported and embedded at every level, from projects, divisions, countries, regions and affiliates. This is also in line with our Code of conduct and our values.

We have established the following policies and strategies:

- 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.

In this report, Oxfam publishes for the first time its consolidated case data on fraud and corruption. In the next Integrity Report, we aim to publish more about progress made to prevent corruption in line with our strategy.



SAFEGUARDING DATA APRIL – SEPTEMBER 2021

For the period April to September 2021, a total of 87 cases were managed on the OI Safeguarding Register. This included 38 cases brought forward from the previous period and 49 cases that were registered during the reporting period. At the end of September 2021, 55 cases were closed, and 32 have been carried forward as open cases.

Closed Cases

Closed cases are those where an allegation has been reviewed, investigated where necessary, 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	35	64%
Initial Review / Assessment	15	27%
Complainant didn't wish to go forward	5	9%
Total	55	100%

The 55 closed cases included:

Misconduct Subtype	#	%
Allegations of sexual abuse	4	7%
Allegations of exploitation (including actions such as paying for sex)	20	36%
Allegations of sexual harassment	13	24%
Allegations that involved children	8	15%
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)	10	18%
Total	55	100%

As stated above, of the 55 closed cases action was taken in 35 cases.

The outcomes of actions taken for 35 cases	#	%
Upheld	15	43%
Dismissals	3	
Disciplinary actions	5	
Non-disciplinary actions	7	
Partially Upheld	2	6%
Non-disciplinary actions	2	
Not Upheld due to insufficient evidence	9	26%
Referred to other internal departments (e.g., HR or fraud)	3	8%
Referred to external authorities (5	14%
Person resigned before the investigation could be completed - notifications made in personal files, to be noted for referencing requests	1	3%
Total	35	100%



A breakdown of the 55 closed cases show that the survivors (alleged)¹ were made up of:

Survivors (Alleged)¹	#	%
Programme participants	12	22%
Community members (not directly receiving Oxfam assistance)	4	7%
Volunteers	7	13%
Children	8	14%
Non managerial staff	12	22%
Managerial staff	5	9%
Partner personnel	1	2%
Others	6	11%
Total	55	100%

Of the 55 closed cases, the Subject of Complaint (Alleged Perpetrator)² is made up of:

Subject of Complaint (Alleged Perpetrator)²	#	%
Community members	5	9%
Volunteers	12	22%
Non-staff (contractors or consultants)	1	2%
Partner staff	2	3%
Non-managerial staff	16	29%
Managerial staff	12	22%
Unknown or undisclosed	7	13%
Total	55	100%

Oxfam is committed to supporting survivors and remains committed to creating a culture of zero tolerance, to do all we can to prevent abuse and exploitation, and to encourage 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 counselling, health care and legal support as required and wherever available.

Open cases

At the end of September 2021, Oxfam continued to investigate 32 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 APRIL – SEPTEMBER 2021

Closed cases are those where an allegation has been reviewed, investigated where necessary, 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 case transferred to other department among other reasons. Between the period from April - September 2021, there were 110 misconduct cases

¹ Closed cases include those where the allegation was not upheld, therefore we cannot consider all of them as victims or perpetrators... just alleged

² Closed cases include those where the allegation was not upheld, therefore we cannot consider all of them as victims or perpetrators... just alleged



reported and 87 closed. Of the 87 closed 56 were investigated and 31 underwent an initial review and assessment.

Closed Cases	#	%
Fully Investigated Cases	56	64%
Initial Review / Assessment	31	36%
Total	87	100%

Closed cases of misconduct were classified as follows:

Misconduct Subtype	#	%
Bribery	12	14%
Fraud	34	39%
Nepotism	13	15%
Fraud and Corruption Other	20	23%
Theft	8	9%
Total	87	100%

Of the 56 investigated cases 71% were upheld (40 cases) & the remaining 29% (16 cases) were not upheld. However, all 87 closed cases results were as follows: (A case could have multiple outcomes):

The outcomes of actions taken for the 40 upheld cases	#
First Written Warning	6
Termination of Employment	6
Referred to Partner for Action	8
Non disciplinary Actions e.g. control Improvements, modification to processes and procedures.	19
Other disciplinary Action	1
The outcomes of actions taken for the 16 not upheld cases	
Not up-held, no further action	14
Not up-held, referred to HR for action	2
Preliminary Assessment	
Insufficient evidence to proceed	19
Informant didn't wish to proceed	1
Outside Organization's mandate	1
More information Required	2
Referred to Another Affiliate	2
Referred to Another Department	5
Lack of resources	2
Other	2

Subjects of Complaint amounted to 121 as follows:

Subjects of Complaint	#	%
Non-Managerial Staff members	31	26%
Managerial level Staff members	41	34%
Community Members	5	4%
Partner related	12	10%



Related personnel	21	17%
Others	11	9%
Total	121	100%

ENDS