



INTEGRITY AT OXFAM

October 2021 – March 2022

INTRODUCTION

Oxfam is deeply committed to improving the ways we foster a safe and inclusive place for the people we serve, our staff, partners, and all other stakeholders.

We report every six months on progress made to improve safeguarding and culture and disclose our global case data for that period. In the preceding report, April to September 2021, we published for the first time our globally consolidated case data on fraud and corruption and introduced our work in this area. In this report, covering 1 October 2021 to 31 March 2022, we continue that commitment and have increased our reporting on the progress made to prevent 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. It is crucial to us to have this regular moment of reflection to keep setting a higher bar for the future. We are working hard to improve our systems. We are changing our culture. We are determined to continue our journey, knowing that we will always have more to learn and further improvements to make.

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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

General

Delivering on our values and commitments is at the heart of our work, and integrity is therefore part of our DNA. This report reflects the steps Oxfam is taking to address Integrity as a whole and take an aligned approach across its various aspects. We aim to create a safe and inclusive workplace, manage funds carefully and adhere to our principles. An overview of progress made on integrity in general (below) is part of this approach.

- **Integrity-related training:** Oxfam now has the following mandatory training for all staff: Oxfam's Code of Conduct and Values, Gender Justice, Health and Safety, Safeguarding essentials, Anti-Fraud and Corruption, and General Data Protection Regulations (GDPR). In this reporting period, alongside these existing mandatory trainings, we developed several new integrity-related training materials across the confederation. For example, in Oxfam Intermón (OES, Spain) an Integrity Guide was produced, which will be translated and shared with all other affiliates in the confederation. And in Oxfam Canada (OCA), staff trainings were organized by Global Affairs Canada to strengthen staff understanding on compliance requirements, including integrity topics. Training sessions are also organized with Oxfam's in country staff and partners.
- **Safe and accessible complaint and feedback mechanisms:** Following qualitative research in four countries in 2018, into barriers to reporting misconduct, pilot projects were developed and run in Ghana and Iraq. The outcomes from the pilots have now been evaluated and are helping us to design safer and more accessible complaint and feedback mechanisms in the diverse range of contexts in which we work.
- **Oxfam Risk Appetite and Management Framework:** We updated our Framework to include more robust ways to understand risks based on indicators, including the risks related to integrity in Oxfam.
- **Improving Indicators:** We are redesigning and improving our country key performance indicators (KPIs). The aim is to have a better understanding of the progress of Oxfam in countries with respect to key strategic topics, including integrity. In line with Oxfam's values, the project is carried out in an inclusive way, consulting stakeholders from countries, regions, and other relevant groups.
- **Reflections and plans:** We realized that our KPIs in country management reports, including those relating to integrity, could be optimized and believe that the revised KPIs will improve Oxfam's overall country performance management. We will pilot the KPIs in Q3 of the 2022/23 financial year (October to December 2022) and launch them in Q1 of FY 2023/24 (April to June 2023).



Safeguarding

- **Survivor-centered approach:** Oxfam is committed to learning how we can improve our survivor-centered practices while maintaining objectivity and due process procedures in safeguarding investigations. We drafted a One Oxfam Survivor Support Policy and aim to complete this by September 2022. We are also conducting a feasibility study on establishing an inter-agency ombuds panel for protection from sexual exploitation and abuse (PSEA) and a reparations fund. We plan to pilot this scheme in three countries.
- **Safeguarding Focal Points trainings:** An integral element to supporting the rights of communities and survivors and to supporting safeguarding investigations is the appointment of two Safeguarding Focal Points in every Oxfam office, as required by Oxfam's Safeguarding Core Standards. After launching the Safeguarding Focal Point program several years ago, we revised this model in March 2022 by updating the master Safeguarding Focal Point list and handed over its management to the Regional Safeguarding Advisors. In the process, we updated the voluntary agreements, terms of reference and training package. The first in-person training in Latin America and the Caribbean (LAC) took place in March 2022. We will run additional regional trainings in the coming months in Horn, Central and East Africa (HECA), Southern Africa (SAF) and Asia.
- **Safe programming e-learning:** On 31 January 2022, Oxfam launched a new e-learning for all staff, the Introduction to Safe Programming, which is available in Arabic, English, French and Spanish. We also produced new guidance materials to better define and distinguish safe programming from similar yet distinct areas of work. Both materials are currently available for internal use, but we plan to eventually adapt them for external partners.
- **Reflections and plans:** Having built robust safeguarding and safe programming procedures, we are seeing these standards and approaches adopted more and more at country level, encouraged by further trainings for example, a workshop in HECA in November 2021 on principled humanitarian aid and partnerships. The regional and country-level risk assessments that took place in the previous reporting period also helped facilitate this. We hope our continued commitment to trainings in countries and regions will further cement these practices locally. Oxfam will continue to embed safeguarding and safe programming practices from global guidance into country and project-level activities. In the next six months, we hope to accomplish this primarily by rolling out refresher trainings to Safeguarding Focal Points in three regions and through the Introduction to Safe Programming and refresher Code of Conduct e-learning courses. We will host global webinars on the refreshed Safeguarding Focal Point program before September 2022. The Oxfam Shared Safeguarding Service will also continue with its key areas of work around investigations and rights, community engagement and feedback, and building capacity with partners on safeguarding.

People and Culture

- **Global Action Plan as a response to the Global Staff Survey:** Following the Global Staff Survey in July 2021 (highlighted in the last Integrity Report), the results were shared and discussed with staff to co-create global, regional, and national action plans. In March 2022 we launched the Global Action Plan, focusing on three areas: Wellbeing, Leadership, and Reward. To encourage colleagues to make their voices heard and embodying the feminist principle of 'nothing about us without us', we are planning regular 'pulse checks' to understand how Oxfam employees feel about their workplace. The first Pulse Survey will go live in June 2022. This will further enhance our ability to learn more about staff experiences in Oxfam, track progress on priorities and identify areas of concern.
- **The Baraza:** Oxfam launched the Baraza on 21 October 2021. This is a forum to address racism and power dynamics within Oxfam and to hold conversations on discrimination and



all types of prejudice. 'Baraza' refers to a public meeting place, and it is a concept familiar to African communities. At Oxfam the Baraza members are nominated and selected by staff across the confederation to represent them in the forum, but the meetings are open to all staff. They aim to provide a safe space for people to express their concerns and be heard, as we work through the underlying issues of diversity, equity, and representation at Oxfam. With a consultant, we devised a methodology and toolkit that the Baraza members are currently using as training materials. Reflections during the training sessions demonstrate the Baraza members' desire to see a shift in how Oxfam treats all types of prejudice. We ran the first 'mini-Baraza', to start off the conversations in micro settings, in Nepal in March 2022. The Baraza will run a calendar of activities in 2022 and beyond.

- **Aligning our management of HR misconduct cases:** As stated in our last Integrity Report, aligning our approach to HR misconduct is a priority in 2022. HR misconduct includes abuse of process, willful breach of HR policies and harmful behaviors or acts in the workplace not already covered under Safeguarding and Fraud and Corruption policies, and which negatively impact an employee's work, environment, or peers. Oxfam seeks to prevent such behaviors and acts through effective recruitment, policies, training, and communications. To ensure alignment across Oxfam affiliates and a unified approach to the management of HR misconduct cases, a working group met in March 2022, and continues to meet monthly. Members of the group, representing Oxfam affiliates, country offices and regional platform staff, are currently drafting definitions of HR misconduct, with the aim of providing a policy and Standard Operating Procedures that clarify roles and responsibilities for dealing with such cases across the confederation. The group will also assess existing guidelines, policies, processes, feedback systems and practices to identify any areas of overlap and inconsistency.
- **Oxfam's Culture Framework:** We have initiated the co-creation process for Oxfam's Culture Framework. This framework is a critical piece of work that helps us achieve our goal of implementing Oxfam's strategy. It will help us define the culture we want at Oxfam, plan the steps to achieve it, and agree on how we can hold ourselves accountable. We held eight culture sessions in March and April 2022, with 388 colleagues attending. The following themes were discussed: defining Oxfam's culture vision; identifying patterns that unite us at Oxfam; defining overarching principles that resonate with Oxfam colleagues and that are based on our values and feminist principles, and assessment of our individual, team, and organizational behaviors.
- **Reflections and plans:** Drawing on our values and feminist principles, we continue to have meaningful interactions with all staff, listening to our colleagues through initiatives such as the Baraza, the staff pulse survey and co-creation of Oxfam's Culture Framework. For the next six months the key focus areas for People and Culture will be, as identified above, wellbeing, leadership, and reward. In our last report, we highlighted the finding (from staff survey work) that more needs to be done to deepen and further socialize our feminist leadership principles. In addition to 360 feedbacks used for Executive Director performance management in many Affiliates, the Executive Directors' Forum has also committed to participating in a 360-degree leadership feedback process via an external provider in the next few months. The goal of this process is to provide Oxfam leaders with a constructive and candid evaluation of their individual and leadership styles against an agreed and common set of leadership competencies. Coaching sessions, provided by an external coach, will be held at the end of the process to assist the Executive Directors in their leadership development journey.



Gender Justice

- **Dialogue on a just economic COVID recovery:** 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). Working with allies and partner feminist organizations from across regions, Oxfam facilitated two meetings: Feminist Solutions to the Climate Crisis, and Feminist Solutions to Building a Caring Economy. Oxfam in Asia is developing a blueprint for a just feminist recovery, as a key future advocacy and engagement tool.
- **Generation Equality Forum commitments:** Oxfam's commitment to work on care, anchored in our Global Strategic Framework, is closely related to our work on gender justice and just economies. The Oxfam Care Organizing and Coordinating Group has now around 30 members from across the confederation. It plays an important role in the implementation of Oxfam's Generation Equality Forum (GEF) commitments and is operating through five working groups (on advocacy and campaigning; building evidence on what works; movement building; internal transformation; and a potential future global program on care). An initial repository of tools, reports and other resources has been established, and a first report on Oxfam's GEF commitments will be prepared in mid-2022.
- **Participation in the Global Alliance on Care:** Oxfam Canada and Oxfam Mexico continue to participate on behalf of the Oxfam confederation in the Global Alliance on Care. In March 2022, Oxfam Canada published a policy brief, [Donor Investment in the Care Economy](#).
- **IFI engagement and advocacy:** In December 2021, Oxfam launched the [Care Principles and Care-Responsiveness Barometer](#), a set of guidelines and toolkit for international financial institutions (IFIs) to promote, measure and improve the care-responsiveness of all their operations.
- **16 Days of Activism:** Marking the 30th anniversary of the 16 Days of Activism in December 2021, Oxfam released a briefing note, [The Ignored Pandemic: the dual crises of gender-based violence and Covid-19](#), as part of its campaigning on #ImagineIf (there was a world where violence was not the norm) and #ItStartsWith (calling for more commitments and actions by governments to tackle gender-based violence).
- **International Women's Day and CSW66:** On 8 March 2022 Oxfam joined partners and allies across countries and regions in spotlighting how sexist and racist systems use political and economic power to discriminate against women, transgender, non-binary people, and racialized groups. Oxfam affiliates and offices across regions also participated in marches for equality (in Europe), amplified the voices of women changemakers defying gender inequality, patriarchal gender norms, and social stigma in challenging contexts (in Asia) and organized dialogues to re-imagine practical and strategic ways towards a feminist Covid-19 recovery (in Africa), and joined allies to advocate against legislation discriminating against LGBTQIA+ people. Also in March 2022, Oxfam participated in the 66th Commission on the Status of Women and hosted several side events, for example, on feminist climate justice and standing in solidarity with activists, women's rights organizations, and feminist movements.
- **Reflections and plans:** We continue to build strong gender justice work through stand-alone and mainstreaming projects across the confederation. We are in the process of reviewing and updating the gender justice policy compendium, which will strengthen Oxfam's position on gender justice internally and externally. We are re-launching a confederation-wide platform with new membership that, in striving for diversity and inclusion, will reflect Oxfam's global footprint and commitment to shifting power within and beyond the confederation. Interacting closely with global executive leadership teams, the Gender Justice and Feminist Futures platform will provide feminist thought leadership and action both in Oxfam's external work as well as with regards to Oxfam's internal transformation. In our implementation of the OIS Horizon Plan, we will focus on the rights of women,



transgender, non-binary people and Black, Indigenous and people of color and seek to strengthen our partnerships with feminist movements and women's rights organizations to ensure our approach is intersectional. In the next six months, there are key opportunities for external influencing on gender justice; including during the United Nations General Assembly, United Nations Climate Change Conference (COP27), United Nations Women Peace and Security open debates, and 16 Days of Activism, which we are in the process of developing work around.

Fraud and Corruption

- **E-learning training for third parties:** We already include a clause about non-tolerance of fraud and corruption in our contracts with partners, suppliers and other third parties. Additionally, in March 2022, we re-designed the all-staff mandatory Anti-Fraud and Corruption training (introduced in 2019) to apply to third parties, including, but not limited to, partner staff members, consultants, service providers and beneficiaries. Third parties are encouraged to access the Learning at Oxfam platform.
- **Awareness raising in Oxfam offices:** We produced Oxfam-wide communication materials, such as posters, to increase awareness about bribery, nepotism, and fraud, and communicate what staff should do if they suspect misconduct. The materials will be translated into different languages and made available to all Oxfam offices across the confederation.
- **Further training and guidelines:** For staff to understand the importance of their actions around fraud and corruption, sexual misconduct and safe programming, further training and guidelines were developed and shared. For example:
 - Oxfam Great Britain (OGB)'s anti-corruption team held a webinar for staff to talk about the team's work, corruption and how to report it. The session was attended by 51 staff from across OGB. The team also published a new guidance document on corruption risks in cash and voucher assistance programming, to assist program staff across OGB's countries; and updated the anti-corruption risk assessment tool, and the anti-bribery risk assessment, and the OGB Integrity and Ethics Team is developing an 'integrity maturity model'.
 - In Oxfam Hong Kong (OHK), a finance team in Mainland China trained partners receiving EU Institutional funding on financial and internal controls, as required by the EU Institutional funding program in 2020 and 2021.
 - In Oxfam in The Democratic Republic of Congo (DRC), videos were developed and shared to spread awareness about preventing fraud and corruption.
- **Sector-wide work:** Oxfam is also taking steps to participate in the sector, for example by sharing experiences and supporting other organizations and initiatives. OGB's anti-corruption team participated in the Charity Fraud Awareness Week, an award-winning campaign run by a partnership of charities, regulators, and not-for-profit organizations, from 8 to 22 October 2021. During the week, the team shared videos in social media to address the impact of corruption on Oxfam and on society, exploring Oxfam's Anti-Fraud and Corruption Strategy, reviewing how to report corruption in Oxfam, and addressing what staff can do to fight fraud and corruption.
- **Compliance reviews and audits:** Compliance reviews and audits were carried out in affiliates across the confederation. For example:
 - In OCA a compliance unit now reviews all projects signed with donors.
 - In OGB a full internal audit was carried out in advance of the Oxfam anti-terrorism financing policy implementation.
 - In OHK internal audits were introduced for Oxfam shops' operations and cash and bank procedures, and in human resources, document control, and contract management. A



Monitoring, Evaluation and Learning (MEL) process was also conducted. OHK also designated program auditors to review and audit the use of funding received by our partners in Mainland China on a regular basis. It conducted more than 130 audits in the financial year 2021/22.

- **Reflections and plans:** We are committed to updating our policies relating to anti-fraud and corruption. Our approach is to introduce new tools and guidelines in the larger Oxfam affiliates first, and once tested there, they will be shared with other parts of the confederation. As part of continuous improvement, we are reviewing our Anti-Fraud and Corruption Policy and evaluating its the Terrorism Financing and Financial Crime Policy. We aim to have a new version of the two policies finalized before September 2022. Finally, we plan to hold internal audits to reinforce internal controls, for example in OIS financial, HR and procurement processes, and in OHK on IT security, partner management and grants administration.

Governance

As indicated in our last report, the Oxfam International (OI) governance structure of the Executive Board and Board of Supervisors was reformed with a new structure – an international nine-member Board, a multi-stakeholder Assembly, and the Affiliate Business Meeting (ABM). The new OI governance structure consolidates the confederation’s commitment to making Oxfam a safe and inclusive workplace, and reflect our aim to providing strong, accountable leadership that reflects the diversity of the confederation. As part of their induction, OI Board members undertake a series of mandatory e-learning courses, including those on safeguarding, gender justice and Oxfam’s approach to preventing fraud and corruption as part of their induction.

- **OI Board Charter:** In October 2021 the OI Board Charter was adopted by the Board and was signed by all its members as an expression of their individual and collective commitment to living Oxfam's values. An enhanced OI Board due diligence process was developed, including a self-declaration form, which asks Board members to declare anything that might not come up in our internal due diligence checks. In addition, the Board revised its governance Conflict of Interest and Related Parties Policy, to manage and mitigate any risk of actual, potential, or apparent bias in the decision-making processes.
- **OI Assembly Code of Conduct:** At the OI Assembly’s first meeting in December 2021, all delegates were taken through a due diligence process and an Assembly Code of Conduct.
- **Reflections and plans:** The new global governance structure is still being rolled out at Oxfam (the inaugural Affiliate Business Meeting will be held in June 2022), and we are committed to reflecting the highest standards of integrity in our new governance bodies. In line with the ‘test, learn and adapt’ approach that was agreed for transition to the new structure, a Governance Reform Learning Review will be conducted to allow for space for reflection on how the new structure has been established based on the original design principles of the governance reform. This review is scheduled to be completed in July 2022, with a final report to be presented to the Board in their August 2022 meeting.

SAFEGUARDING DATA, 1 OCTOBER 2021 – 31 MARCH 2022

For the period October 2021 to March 2022, a total of 95 cases were managed on the OI Safeguarding Register. This included 32 cases brought forward from the previous period and 63 cases that were registered during the reporting period. At the end of March 2022, 67 cases were closed, and 28 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. There were some cases where there was either more than one survivor, or more than one subject of concern. This is reflected in the breakdown numbers, though the number of closed cases remains as stated.

Closed cases	#	%
Fully investigated cases	24	36%
Initial review / assessment but not investigated	42	63%
Complainant did not want to go forward	1	1%
Total	67	100%

The 67 closed cases included:

Misconduct subtype	#	%
Allegations of sexual abuse	3	4%
Allegations of exploitation (including actions such as paying for sex)	12	18%
Allegations of sexual harassment	22	33%
Allegations that involved children	6	9%
Allegations of other internal reportable issues (such as bullying or other inappropriate conduct or a sexual or romantic relationship against the Code of Conduct and Conflict of Interest policy)	24	36%
Total	67	100%

The outcomes for the 67 closed cases were:

The outcomes of actions taken for 67 cases	#	%
Upheld	14	21%
Dismissed	2	
Disciplinary actions	8	
Non-disciplinary actions	4	
Partially upheld	4	6%
Dismissed	1	
Disciplinary action	1	
Non-disciplinary actions	2	
Not upheld	2	3%
Other actions	46	69%
Not upheld due to insufficient evidence	5	
Referred to other internal departments or teams (e.g. HR or fraud)	4	
Closed after preliminary review	37	
Closed as the complainant did not want to take the complaint forward	1	1%
Total	67	100%



A breakdown of the 67 closed cases show that the survivors (alleged)¹ are made up of:

Survivors (alleged)¹	#	%
Program participants	6	9%
Community members (not directly receiving Oxfam assistance)	6	9%
Volunteers	7	10%
Children	8	12%
Non-managerial staff	19	27%
Managerial staff	1	1%
Partner personnel	4	6%
Others	18	26%
Total	69	100%

NOTE: Some cases had more than one survivor, and therefore the number of alleged survivors is more than the total number of cases.

Of the 67 closed cases, the subject of the complaint (alleged perpetrator)¹ is made up of:

Subject of complaint (alleged perpetrator)²	#	%
Community members	3	5%
Volunteers	15	22%
Non-staff (contractors or consultants)	1	1%
Partner staff	4	6%
Non-managerial staff	18	26%
Managerial staff	9	13%
Unknown or undisclosed	18	27%
Total	68	100%

NOTE: one case had more than one subject of complaint, and therefore the number of alleged subjects of Complaint is more than the total number of cases.

Oxfam is committed to supporting survivors and remains committed 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 March 2022, Oxfam continued to investigate 28 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.

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



FRAUD AND CORRUPTION DATA, 1 OCTOBER 2021 – 31 MARCH 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 October 2021 to March 2022, there were 88 misconduct cases reported and 114 closed. Some of the closed cases relate to earlier reporting periods. Of the 114 cases closed, 54 were investigated and 60 underwent an initial review and assessment.

Closed cases	#	%
Fully investigated cases	54	47%
Initial review / assessment	60	53%
Total	114	100%

Closed cases of misconduct were classified as follows:

Misconduct allegation subtype	#	%
Bribery	13	11%
External crime or crime-related incidents	2	2%
Fraud	46	40%
Nepotism	10	9%
Fraud and corruption, other	27	24%
Theft	14	12%
Undeclared conflict of interest	2	2%
Total	114	100%

Of the 54 investigated cases, 70% were upheld (38 cases), and the remaining 30% (16 cases) were not upheld. However, all 114 closed case results were as follows (note that a case could have multiple outcomes):

The outcomes of actions taken for the 38 upheld cases	#
First written warning	2
Termination of employment	2
Referred to partner for action	2
Non-disciplinary Actions, e.g. control improvements, modification to processes and procedures.	23
Other disciplinary action	13
The outcomes of actions taken for the 16 not upheld cases	
Not upheld, no further action	14
Not upheld, referred to HR for action	3
Preliminary assessment	
Insufficient evidence to proceed	27
Informant did not want to proceed	0
Outside the organization's mandate	11
More information required	9



Referred to another affiliate	0
Referred to another department	7
Lack of resources	0
Other	7

Subjects of complaint amounted to 142 as follows:

Subjects of complaint	#	%
Non-managerial staff	56	40%
Managerial staff	43	30%
Community members	13	9%
Partner related	4	3%
Related personnel	14	10%
Others	12	8%
Total	142	100%

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