Dear Winifred Byanyima,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen your accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below. Before we share this with you, however, we want to highlight a few issues of concern that we found throughout most of the nine reports assessed in the last review round.

**Closing the feedback loop with stakeholders (NGO2, NGO9)**

A [recent study](#) on 40 international civil society organisations’ (CSOs’) accountability practices – conducted by the *direct impact group* on behalf of Accountable Now – revealed that only three out of these 40 CSOs responded with an appropriate answer to a complaint test within three weeks.

This is alarming. All Members of Accountable Now should have a fully functioning feedback mechanisms in place. However, when checking your reports we found a consistent lack of reporting filed complaints per type, quantity, and region as well as a total lack of information on how they were resolved. We believe this is not an acceptable level of accountability. CSOs should not only have a mechanism in place but should first be capturing complaints with the appropriate level of detail and then monitoring their resolution and agreeing what actions need to be taken to ensure the same issues do not arise.

[Feedback Labs](#), with whom Accountable Now collaborated on the [Digital Accountability project](#), also serve as a valuable source of information on how to close feedback loops.
Collaboration with partners, communities and networks (NGO6, EC7 & SO1)

As part of the 10 Accountability Commitments, Accountable Now Members commit to working in genuine partnership with local communities and partners. With increased globalisation of information, more empowered citizens engage and civic space is challenged, it becomes ever more important to help local communities and partners to thrive. However, we found that coordination with local communities is still an overall weakness area among the Accountability Reports we received. Some “common” ICSO practices can have intended or unintended consequences on local communities. We would thus like to particularly highlight a lack of contributions to building local capacity and resources. Do you take into account local market conditions and think about working alongside local organisations building their capacity? We suggest that ICSOs should start to consider their impact on the sustainability and independence of local civil society in all their work (such as planning, budgeting, economic impact, etc.).

Adding to what people do to improve their lives (NGO3)

To state the obvious, impact measurement is important. However, many evaluations mentioned in received Accountability Reports focus on collecting relatively large amounts of data on people reached, however, this does not tell us much about the improvement in their lives. Moreover, we should critically ask ourselves: What is the ICSO’s credit in this improvement and what positive impact is actually due to the people and beneficiaries themselves?

While we are of course aware that resources are limited, there is clearly no substitute for a robust and honest impact evaluation of our programmes and activities.

Organisation-specific feedback to Oxfam:

Oxfam International’s ninth accountability report to Accountable Now is again a very good, complete and self-reflective report. Case studies and illustrative examples from Affiliates (e.g. donor “stress testing” on page 12 or country governance groups on page 20) make it an enjoyable read based on an interesting story-telling. In combination with robust data and figures, this report shows a strong evidence base, often provided in additional boxes. It is also the first report for Oxfam in which they present data from all 18 Affiliates in one consistent comprehensive format (with the exception of Japan and Denmark, page 44). The Panel would like to commend Oxfam on this achievement.
Strong **institutional commitment** is highlighted in the Executive Director’s opening statement demonstrating how stakeholder engagement and strengthening accountability for greater impact is key to “Oxfam 2020”. It is moreover appreciated that Oxfam proudly presents membership to Accountable Now on their website (see [here](#)). This visualisation clearly strengthens their public commitment to accountability – also for stakeholders to hold them directly accountable towards the commitments made which can in turn be used for the planned alignment of affiliates’ approaches to monitor and manage complaints into their operations. Please update this public commitment using the **new logo and name**.

The alignment of this reporting process with Oxfam's “Accountability Framework” (3.5) is a **Good Practice** example. Also commendable is the high degree of attention that the report attaches to “Engaging with our stakeholders”, reflecting Oxfam’s work with no less than 3,515 partner organisations. Additionally, carrying out periodic Action Reviews as well as developing a shared power analysis together with stakeholders at the outset of any campaign (NGO5) are seen as Good Practices. Overall, it is clear that Oxfam takes the Panel feedback seriously and tries to incorporate it into ongoing or new initiatives or reviews.

On the other hand, some **weaknesses** remain in the areas of leveraging partners’ existing work and ensuring high standards of accountability from partners (NGO6) as well as providing information on how many staff actually receive performance appraisals throughout the reporting period. Moreover, while Annex A of the report presents a commendable overview of a total of 8,403 written complaints in 2015/16, please provide a further breakdown of the 1,119 complaints by programme-affected people (NGO2) as well as more information on incidents of corruption (SO4). The last issue has been raised in previous Panel feedbacks before. These concerns are summarised in the **Improvement Analysis** which will be the basis for Oxfam’s Interim Accountability Report on 2016/17. Please let the Panel know if you disagree with these suggested improvement areas or would rather prioritise other topics.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report – as it is the case with all previously reviewed reports. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by **31 January 2017**.

If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.
Yours sincerely,

Mihir Bhatt
Rhonda Chapman
John Clark
Louise James

Jane Kiragu
Nora Lester Murad
Michael Roeskau
Saroeun Soeung
**Profile Disclosures**

### I. Strategy and Analysis

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<th>1.1</th>
<th>Statement from the most senior decision-maker</th>
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<td>As in previous year, Winnie Byanyima, Executive Director of Oxfam International, provides a very strong institutional and strategic commitment towards accountability. Oxfam's Strategic Plan 2013-2019 (page 8) even includes an enabling change goal and strengthening accountability: “Oxfam will be able to demonstrate that our commitment to strengthened accountability contributes to greater impact.”</td>
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Oxfam understands that accountability to poor people will also require improved communications technology. Winnie Byanyima describes challenges to the legitimacy and sustainability of NGOs and the shifting geography of poverty. Oxfam’s response to this is shifting the attention to where poor people are, to increase activism and influence in the Global South, as well as to support local needs and local change agendas (“Oxfam 2020”). Oxfam could be more specific in future reports to describe the value of accountability to Oxfam, i.e. how accountability specifically helps Oxfam to become better.

Oxfam acknowledges the importance of stakeholder engagement within monitoring and evaluations of their programmes. This also includes better alignment of affiliates’ approaches to monitor and manage complaints into their operations. This is a focus area going forward.
# II. Organisational Profile

## 2.1 - 2.6

<table>
<thead>
<tr>
<th>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership</th>
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<td>Fully addressed</td>
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## 2.7

### Target audience

Addressed

While there is no direct information provided, the Contents page refers to page 6 for information on indicator 2.7 and the Strategic Plan (page 8) identifies the relevant audience for each goal. Moreover, terminology such as “people affected by poverty” and enhancing the “Power of People against Poverty” makes a strong case, and the world map on page 7 shows statistical information concerning the “direct beneficiaries” impacted by Oxfam’s work.

## 2.8

### Scale of organisation

Fully addressed

Usually, Oxfam’s affiliates raise a minimum of 20-50% of their income from their local community in order to guarantee independence from government and to demonstrate that the affiliate is strongly rooted in its own society with local community support. As asked two years ago, the Panel would be interested to know how well it works in practice.

The figures given on expenditure and staff match by and large with those provided on pages 33 and 44, i.e. a total of roughly 9,500 employees and a total expenditure of over € 1,000 million, with direct program expenditure at about € 750 million. However, if individual amounts in the table on page 10 are aggregated, income and expenditure would be above € 1,200 million. Regarding the pie charts on page 9, the Panel understands that 37% of income derives from official sources.

## 2.9

### Significant changes

Fully addressed

Oxfam is undergoing a major organisational transition called “Oxfam 2020” which focuses on three major goals: Simplicity, global balance and knowledge. The expected outcomes of this endeavour will lead to a more impactful, relevant, influential, legitimate and accountable organisation.

Moreover, Oxfam has focused on prioritising securing improvements to inter-affiliate (“mutual accountability”) within the confederation to further
strengthen their Accountability Framework. Among other things, this meant to progress in regard with common planning and reporting cycles.

2.10 **Awards received**

Not addressed

### III. Report Parameters

| 3.1 – 3.4 | **Reporting period / Date of most recent report / Reporting Cycle / Contact person**
|           | Fully addressed |

| 3.5 | **Reporting process**
|     | Fully addressed |
|     | Preparation and publication of Oxfam’s Accountability Reports are used to raise awareness of policies, procedures and future ambitions amongst the organisation’s dispersed workforce. Previous feedback from this process has led to the preparation of Oxfam’s “Accountability Framework”, which provides an index of all relevant internal policies and procedures. In turn, this framework has helped affiliates to contribute to this report and is thus considered **Good Practice** for other Accountable Now Members.  

It would be furthermore interesting to know more about how the report is being adopted throughout the whole confederation.

| 3.6 – 3.7 | **Report boundary / Specific limitations**
|           | Fully addressed |

| 3.8 | **Basis for reporting**
|     | Fully addressed |
|     | Oxfam is once again commended for the systematic work that has led to the consolidation of this report. The fact that Oxfam International as well as all 18 Oxfam affiliates (also representing Southern affiliates) have provided full information for this report is very commendable and a great improvement to the inclusion of seven affiliates in previous reports.  

The Panel would then also welcome more detailed information on how Accountable Now’s framework supported linking Oxfam’s global decentralised structure more closely?

| 3.10 – 3.11 | **Changes in reporting parameters**
Oxfam uses their own format and order to report on the indicator set. The reference table is included in the Contents page (see page 2).

IV. Mission, Values, Governance, and Stakeholder Engagement

4.1 - 4.3 Governance structure / Division of power between the governance body and management / Independence of Board Directors
Fully addressed
A helpful visualisation on Oxfam’s governance structure is provided on page 12; tables on page 15 provide a useful overview over the composition of the governing bodies of affiliates. In light of Oxfam’s envisaged changes and O2020, this is an important area to watch while the organisation develops.

4.4 Feedback from internal stakeholders
Fully addressed
Valuable examples are provided to illustrate how staff can give feedback to the highest governing bodies including staff and volunteer surveys, or senior staff representatives at Board meetings. Executive Board Committee Platforms have recently been set up to “allow for broader staff representation in recommending course of action”. Overall, concrete evidence (e.g. from the annual reflection on the new Platforms) on how effective those practices are in triggering positive management would strengthen this response in the next report.

4.5 Compensation for members of highest governance body
Fully addressed
Oxfam’s compensation procedures are generally well described (e.g. a set of common Oxfam Reward Principles). Members of the Board of Supervisors are not paid. Additionally, more details or a direct link to the salary policy mentioned in the 2014 report would have been useful.

The Panel looks forward to being informed on developments concerning the creation of a harmonised remuneration policy for all Oxfam staff. Moreover, information about other roles of senior executives outside of Oxfam, both paid and unpaid, would be interesting to know.
4.6 **Conflicts of interests**  
*Fully addressed*  
Oxfam’s [Code of Conduct](#) and [Employee Code of Conduct](#) safeguard against possible conflicts of interest. As raised in previous Panel feedback, further evidence that these provisions are well known by staff and followed in practice is appreciated for future reports.

4.10 **Process to support highest governance body’s own performance**  
*Fully addressed*  
The Governance Committee is in charge for the regular oversight of the Board of Supervisors’ performance. Focus in 2015/16 has been on ensuring that governance arrangements are fit for the O2020 transitions. Evidence that this practice triggered positive decision-making is appreciated for the next report.

4.12 **Social charters, principles or other initiatives to which the organisation subscribes**  
*Fully addressed*  
Oxfam provides an informative answer, explaining Oxfam’s external as well as internal auditing mechanisms. The Panel highlighted for the 2014 report that 40% of programme staff were not aware of the standard systems and that this should be critically reflected in Oxfam’s approach to subscribing to such a variety of initiatives. Has this awareness improved over the course of the last years?

4.14 – 4.15 **List of stakeholders / Basis for identification of stakeholders**  
*Fully addressed*  
The report provides ample information on the identification, selection and prioritisation of key stakeholder groups and on cooperation with partners. Moreover, the Malawi case study on page 27 shows how a programme ensured a shared vision with partners through a process of partner identification which included understanding the partners’ vision statements and how that matched Oxfam’s vision. The planned federation-wide Stakeholder Engagement Policy was put on hold until the precise modalities of the new operational model have been worked out in full. Is there an update on these modalities with regard to the policy’s design and development?
## PERFORMANCE INDICATORS

### I. Programme Effectiveness

<table>
<thead>
<tr>
<th>NGO1</th>
<th>Involvement of affected stakeholder groups</th>
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<tr>
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<td><strong>Fully addressed</strong></td>
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<td>As in previous years, stakeholder engagement features commendably strong in Oxfam’s report and the answer to this indicator demonstrates a serious commitment to “Engaging with our stakeholders”. This is well illustrated through various examples presented from Oxfam International and Affiliates (e.g. online knowledge-exchange platforms, surveys, various kinds of research and analysis, Oxfam Country Strategies, and partner consultation mechanisms). Adequate examples (e.g. from Nepal or Iraq) show how stakeholder feedback influences the strategic context and develops a broader understanding, putting forward consultation and participation as the most important condition for effective accountability.</td>
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Oxfam’s [Program Standards](#) provide clear guidance for all Affiliates on how to secure meaningful stakeholder engagement. A new diagnostic tool to annually assess progress in each program is to be launched in 2016. The Panel looks forward to an update on this “Program Quality Review” in the next full report.

The report (page 17) provides information on extensive consultations and the Consultative Forum as part of the development of the new Oxfam Strategic Plan. The actionable recommendations and key findings listed in the report greatly demonstrate the positive impact of this engagement process. Five new Knowledge Hubs were set up to enable better collaboration and knowledge sharing among the federation and the Panel looks forward to outcomes from the first review in late 2016.

<table>
<thead>
<tr>
<th>NGO2</th>
<th>Mechanisms for feedback and complaints</th>
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<td>A link to the mentioned common Oxfam Complaints Policy will be appreciated in the next report. Since 2015/16, all Affiliates complete an annual report on the number of complaints, themes in the nature of complaints and how they were responded to (see details in Annex A). This has significantly improved the availability of information in this area. However, Oxfam acknowledges</td>
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that the number of complaints recorded under-represents the total received given the size of their programme footprint.

In 2014/15, 70% of programmes were still lacking a formal mechanism for feedback and complaints. How has compliance improved in this regard? Moreover, the Panel would be interested to hear more with regard to progress of the pilot project using an app to ensure feedback follow-up.

While the “Analysis of Complaints” in Annex A is highly appreciated, the Panel would like to see more information on the nature of the 1,119 complaints by programme-affected people. The report states that these comprise a wide range of themes (and four are listed by way of illustration) but it should be possible to say what percentage related to e.g. beneficiary targeting, to sexual harassment or to corruption. Such information is usefully provided on complaints from supporters/general public. Moreover, is information gathered on repeated complaints – i.e. where people indicate they are not satisfied with the management response?

NGO3  
**Programme monitoring, evaluation and learning**  
*Fully addressed*

Oxfam’s Evaluation Policy sets the standard that evaluations improve the quality and impact of what Oxfam does, enhance mutual accountability, enhance the ability of beneficiaries to create opportunities, use processes and outcomes to influence the practice and accountability of other actors, strengthen Oxfam’s overall credibility, and promote processes of mutual learning and capacity building. An Evaluation Quality Assessment Tool has been developed to judge the quality of evaluations and monitor changes. Overall, feedback is a crucial part of the evaluation processes. Moreover, all Oxfam programmes and projects have to have a monitoring and evaluation plan and the executive summary and management response for all evaluations are posted on the Oxfam website. In contrast, 3.8 states that Oxfam policy requires Oxfam International and all Affiliates “to publish …evaluations”. The box on the MRMV evaluation says “key findings have been published” – suggesting that evaluation reports are not published in full?

As explained in the previous interim report, Oxfam’s Common Approach to MEL and Social Accountability (CAMSA) sets internal minimum requirements to be met in each phase of the project and programme management cycle (see also figure on page 28). Implementation of CAMSA is well underway across the confederation and progress is being monitored by a cross-affiliate working group. The Panel looks forward to learning more on the monitoring
strategy and how improvement plans will feed into annual country planning and reporting. Moreover, Oxfam is again asked to clarify in the next report what they understand by social accountability.

The report (page 14) provides a helpful graph of Oxfam’s strategic alignment, i.e. how the organisation measures its strategy implementation. The Panel looks forward to the mentioned development of financial and non-financial KPIs. It is moreover appreciated that evaluations of the ‘Sense-Making’ exercise are published online (here).

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<th>NGO4</th>
<th>Gender and diversity</th>
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|      | In addition to increased funding for women’s rights organisations, Oxfam has agreed to a set of common feminist MEAL principles and has launched an e-learning module on gender justice. The new global campaign on addressing violence against women and girls underlines Oxfam’s strong commitment to gender justice. Outcomes of Oxfam’s gender sensitive review of all Country Strategies demonstrate commendable areas as well as those for improvement (e.g. clear gendered programming objectives across all areas of strategic focus).
|      | Oxfam’s new [Sexual Diversity and Gender Identity Rights Policy](#) sounds like a very commendable approach. However, it will be interesting to know how “celebration and affirmation of sexual and gender diversity” are translated into practice in the traditional societies of developing countries. Depending on its application and practical experience in the future, this might be considered a Good Practice example in the future with regard to addressing gender diversity in all its dimensions. On the other hand, Oxfam is open about the fact that – except for Oxfam Australia - they do not have a strong focus on disability inclusion. Are there overall improvement targets in this regard? |

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<th>NGO5</th>
<th>Advocacy positions and public awareness campaigns</th>
<th>Fully addressed</th>
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<td>As in previous years, Oxfam provides a comprehensive account of how internal management processes ensure coherence and consistency in the organisation’s public campaigns and advocacy policies.</td>
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<td>All campaign and advocacy programs build accountability and meaningful stakeholder participation into all stages of the project cycle. The visualised cycle (page 23) provides an interesting overview of how Oxfam ensures proper MEL in in all campaigning stages. Corrective actions (page 22) and</td>
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different exit strategies (page 24) are outlined in this answer; most global campaign evaluations are published online (vs. the OI policy that all evaluations should actually be published – see 3.8).

In particular, carrying out periodic Action Reviews (page 24) as well as developing a shared power analysis together with stakeholders at the outset of any campaign are seen as Good Practice examples. At the same time, measuring the impact of advocacy campaigns will remain a challenge.

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<th>NGO6</th>
<th><strong>Coordination with other actors</strong></th>
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<td><strong>Addressed</strong></td>
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Oxfam counted no less than 3,515 partner organisations in 2015/2016 (page 25). As in previous years, the report provides relevant information on how Oxfam regards partnerships as well as examples of Oxfam’s successful cooperation work and how knowledge is shared among partners. The organisation’s partnerships are based on six Partnership Principles and Oxfam is aware that they need to allow partners to take risks and to make mistakes as their capacity develops.  

Oxfam used the Keystone Partnership Survey and lists the overall findings / improvement areas: supporting partners better to help them raise funds from other sources, developing joint strategies, as well as strengthening Oxfam’s support for women’s leadership development programs. Partners also challenged Oxfam to improve their direct accountability to local communities. Whereas first steps were already taken to improve in this regard, the Panel looks forward to further progress in future reports – including a second round of this survey in 2018. It is highly appreciated that partner engagement improvements are a focus of management attention going forward.

However, unfortunately, no clear information is given on how Oxfam conducts a situational analysis to ensure they fully take into account other actors already active in the field and how to best contribute. Progress is strongly encouraged by the Panel. Last but not least, it is not entirely clear how Oxfam ensures in practice that partners meet high standards of accountability.

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<th>II. Financial Management</th>
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<td>NGO7</td>
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audited reports are published on their websites – a link the international audited statements is required in the next report. A “Common Oxfam Norms, Standards and Objects in Ledgers” (CONSOL) tracks detail of the overall expenditure by all Affiliates. Moreover, Affiliate compliance with Oxfam’s internal Financial Standards are monitored through peer review every three years. The “Global Program and Influencing Investment Framework” (GPIIF – graph on page 34) guides decision-making and expenditure allocation. There are common financial standards the observance of which is the subject of bi-annual peer reviews (page 35).

The Panel would particularly like to commend Oxfam for their new Collective Resource Allocation (CRA) which will be in place from 2017/18 onwards. A proportion of Affiliates’ income will be shared fairly to support a new funding model and improved financial coordination. The Panel looks forward to progress updates after CRA’s implementation. Moreover, it was desirable if Oxfam shared data on the relative shares of staff, project, fundraising etc.

In 2015/16, only 69% of total expenditure was on programmes (including advocacy and programme management. Compared with the previous report, programme expenditure of €915 million out of total spending of €947 million (i.e. 97%). Is this due to different definitions of programme or different ways of calculating? Is 69% on total programmes considered within OI’s acceptable range?

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<th>NGO8</th>
<th>Sources of Funding</th>
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<td>Oxfam’s main funding in 2015/2016 came from: Home government institutions (19%), trading revenue (18% - please explain the asterisk), regular giving (16%) as well as EU institutions, other supranational institutions, humanitarian appeals and single gifts (each 6%). As indicated under 2.8 above, this confirms that Oxfam is an important arm of Official Development Assistance (ODA).</td>
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<th>III. Environmental Management</th>
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<td>EN18</td>
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Detailed and thorough information is consolidated for all Oxfam’s Affiliates; air travel accounting for the majority of emissions. Interesting initiatives are in place for most Affiliates.

**Initiatives to mitigate environmental impact of activities and services**

*Fully addressed*

Oxfam has a range of impressive initiatives in place, but is also open about challenges, i.e. with regard to sustainable driving behaviours.

**IV. Human Resource Management**

**LA1**  
**Size and composition of workforce**  
*Addressed*

In addition to the thorough breakdown of staff vs. volunteers of all Affiliates, a separation could also be made in terms of full-time vs. part-time staff and the different levels of responsibility.

Overall, Oxfam is committed to invest in their people as well as to increase shared services to ensure consistent approaches on HR issues with about 9,500 employees and 56,000 volunteers across the confederation (e.g. Oxfam Global Human Resources network to deliver on the Oxfam People Strategy).

**EC7**  
**Procedure for local hiring**  
*Fully addressed*

A detailed table on international vs. local staff is provided in the report (page 45). In the field, the proportion of non-nationals varies between 4% and 16%. Social media has helped to attract local talent. A total remuneration package that is relevant to the local market (market-relevant not market-driven) is part of the common “Oxfam offer”. The Panel looks forward to updates on the current review of senior staff salaries outside Affiliate headquarters. The Panel would also like to recommend writing down formal procedures with regard to local hiring.

It is positively noted that Oxfam sees capacity building of its own staff also to support other CSOs’ benefits once staff moves to another CSO. The response to this indicator has improved greatly in comparison to the previous report.

**LA10**  
**Workforce training**  
*Addressed*

Oxfam understands “training” to also include coaching and mentoring. There is evidence that this kind of mentoring as well as secondment opportunities
ensure that internal staff are developing and growing. Central training opportunities are available to all staff – be it international or local staff. Does Oxfam identify specific skills needed with regard to accountability?

While it is greatly appreciated to have such a detailed breakdown available, the figures provided (page 47) reveal again striking differences between the Affiliates in relevant expenditure when divided by staff numbers. What is the percentage of these figures in comparison to the overall administration budgets?

| LA12 | **Global talent management**  
**Addressed**  
In 2016, the common Performance Management Process was launched which aims to ensure that all staff “is supported to turn organisational strategies into action”. The figure on page 46 shows the proportion of workforce with annual appraisals. This varies between 40% and 90%. Disappointingly, the percentage at HQs is rather low with slightly over 50%. Has Oxfam set any internal improvement targets? |
|---|---|
| LA13 | **Diversity of workforce and governance bodies**  
**Addressed**  
Oxfam’s Diversity Statement requires that all employees adhere to the principle of non-discrimination in staffing decisions. A link to the Affiliate Equal Opportunities Policies would be appreciated in the next report.  
Detailed tables on pages 15 and 48 provide information on the (gender) composition of the Board of Supervisors and of the Executive Board of all Affiliates. Whereas the gender balance is overall good (with some individual exceptions such as WAF, HECA, ONZ or OIN), the Northern vs. Southern divide is quite obvious. The report mentions a new monitoring in place to improve the legitimacy and effectiveness of Oxfam’s Boards over time. The Panel is interested to be informed on progress in this regard. There are no targets at present to consistently collect diversity data beyond gender from all Affiliates. |
| NGO9 | **Mechanisms to raise grievances**  
**Addressed**  
Oxfam has common guidelines on Inter Affiliate Grievance, an Oxfam Health and Safety protocol (to be applied soon by all Affiliates), an Oxfam Secondment policy, an Oxfam Policy on whistle blowing and complaints, an
Oxfam Anti bullying & Harassment policy, and an Oxfam Disciplinary procedures in place. Links to these documents will be appreciated in the next report. Annex A (pages 50-51) presents a comprehensive “Analysis of Complaints” including 34 “formal written complaints by staff”.

Each Affiliate has its own policy for staff grievance. Oxfam admits that they do not have a process in place yet to verify whether concerns raised could be resolved. A starting point or benchmark, would be to publish the whistleblower policy very easily accessible on all Affiliates’ websites.

**V. Responsible Management of Impacts on Society**

**SO1 Managing your impact on local communities**  
*Addressed*

There is overall good information setting out the standards expected of programme staff in managing impacts of operations on communities and providing some case study evidence for how this has occurred in practice in 2015/16. However, the Keystone Partnership Survey revealed the necessity for Oxfam to improve their direct accountability to local communities (page 25).

It is appreciated that Oxfam Affiliates are expected to raise a minimum of 20-50% of their income from their local community in order to guarantee that the Affiliate is strongly rooted in its own society with local community support. While interesting examples are provided for community engagement, more information on the actual impact on these communities (intended and unintended) will enrich future reports. What kind of feedback has Oxfam received from communities and how has the organisation acted upon this? In line with first Global Standard draft, the Panel suggests asking community members for example: Did we help you in getting out of poverty? Have any of our actions caused any harm? Has our work created lasting positive change in your community? Do we provide you with good information to hold us to account or get involved in our work?

**SO3 Anti-corruption practices**  
*Fully addressed*

Oxfam has a federation-wide Code of Conduct and Anti-Corruption Policy in place; however, the link to the latter one is missing in the report. Oxfam Novib tests the new Integrity Management System to ensure compliance of both policies at country level. The Panel looks forward to findings from these pilots.
The last full report mentioned that an Internal Audit service was underway and the Panel would appreciate an update on this development. Evidence for successful trainings are provided – are there further improvement targets set by Oxfam?

| SO4 | **Actions taken in response of corruption incidents**  
*Partially addressed*  
The answer states that it is mandatory that all cases of (suspected) corruption are reported to the line manager next in line. However, the report omits information whether and how management responds to incidents throughout the whole confederation. Moreover, no information on the number and kind of incidents of corruption is provided. |

### VI. Ethical Fundraising

| PR6 | **Ethical fundraising and marketing communications**  
*Addressed*  
As in previous years, all Oxfam affiliates show exemplary initiative in their commitment to ethical fundraising, all working with the ‘informed consent’ approach. A table of national codes that affiliates have signed up to is provided in Annex B. Links to the mentioned Ethical Screening Policy and Ethical Purchasing Policy would be helpful in the next full report.  

The [UK Fundraising Regulator](https://www.ukfundraisingregulator.org.uk) lists an investigation from 2015 where they have ruled that one of Oxfam’s fundraising campaigns breached industry standards when external fundraisers applied ‘undue pressure’ on the public to donate (via telephone). Were there any other complaints with regard to Oxfam’s fundraising practice? And if yes, could these be resolved? |