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16 January 2012

Åsa Månsson
Manager, INGO Accountability Charter
Berlin Civil Society Center gGmbH
Agricolastraße 26
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Dear Åsa

Thank you for the Panel's review comments on our Accountability Report for the year to 31 March 2011. This is useful feedback that will inform our 2012 Report.

"1.1 Strategy and Analysis/Statement from the most senior decision-maker of the organisation about the relevance of sustainability to the organisation and its strategy."

Comment: The report does not include information on the organisation's vision and strategy; on key events/achievements/failures; or on views of performance with respect to goals/objectives/standards/targets.

Oxfam GB response: Paragraph 1.1 states "Our Annual Report and Accounts provide an outline of the work delivered in the year to 31 March 2011, the extent to which we met our objectives, and an account of the finances that enabled us to do this work. This Accountability Report for 2011 should be read in conjunction with the Annual Report and Accounts." This is our usual practice to avoid duplication. Each document cross-refers the other, and both are available in the same section of our website.

"4.4 Governance, Commitments and Engagement/Mechanisms for internal stakeholders (e.g. members), shareholders and employees to provide recommendations or direction to the highest governance body."

Comment: The report does not include information on issues raised through the mechanisms in place

Oxfam GB response: Paragraph 4.4 provides 5 examples of mechanisms in place, but we agree that the Report does not provide examples of the issues raised through these mechanisms. This is useful feedback for next year's Report.

"NGO1: Processes for involvement of affected stakeholder groups in the design, implementation, monitoring and evaluation of policies and programs."

Comment: The report does not include information on how the feedback from stakeholders affected the decisions and decision making processes or reshaped policies/procedures.

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Oxfam GB response: We agree that the content could provide more information on how feedback from stakeholders has reshaped policies and procedures, and that there are only some examples of where feedback has led to changes in procedures. A specific example being given was the result of the responses in Haiti and Pakistan, which have led to changes in procedures in relation to accountability.

"NGO2: Mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies."

Comment: The report does not include information on mechanisms for assessing complaints and for determining what actions are required in response.

Oxfam GB response: A link to the Complaints Policy was provided in the Report, and further procedures will be published in the current year. These procedures include the need for appropriate actions in response. However, the Report does provide some examples of actions taken in response to complaints (see pages 14 and 15).

"NGO3: System for program monitoring, evaluation and learning (including measuring program effectiveness and impact) resulting changes toprograms, and how they are communicated."

Comment: The report does not include information on adjustments to policy/programmes as a result of monitoring/evaluation/learning; or on how these were communicated.

Oxfam GB response: In relation to indicator NGO3 it is correct that the three pages of commentary provide more information about our systems and how these have changed during the year than about examples of specific changes that have resulted from those mechanisms, and how these have been communicated. The Panel's feedback is helpful.

"NGO5: Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns."

Comment: The report does not include information on the processes for arriving at public awareness/advocacy positions; or on processes for taking corrective actions on advocacy positions.

Oxfam GB response: In the Report we explained how the use of Theory of Change helps to arrive at advocacy positions. We agree that we could have said more on all of these issues, and our 2012 Report will address this more fully.

"EC7: Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation."

Comment: The report does not include information on the proportion of senior management from the local community.

Oxfam GB response: The final paragraph under indicator EC7 cross references to Table 4 at indicator 15 which provides data about the proportion of staff from OECD and non-OECD countries, which we explain is a proxy for information on local hiring. It is true that this is not expressed as the proportion of senior management; however, the tables do enable the reader to form a picture of numbers of staff from OECD and non-OECD countries. In 2012 we will consider including an additional table which provides the breakdown by senior grade.

"LA10: Average hours of training per year per employee by employee category."

Comment: The organisation is not in a position to report on the total/average hours devoted to training for employees/volunteers per year. The organisation states that the reason is that regions/countries are empowered to develop their own training programmes.

Oxfam GB response: This is correct. We do not keep at central level detailed data of all training; the role is decentralised.

"SO1: Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting."

Comment: The report does not include information on whether the programmes in place have been effective in mitigating negative/maximising positive effects; or on how feedback have informed steps toward further community engagement.

Oxfam GB response: As explained in the Report, a clearer picture should emerge as a result of the Global Programme Framework and the Logic Models for programme implementation plans. We hope to report progress in future reports.

"SO3: Percentage of employees trained in organization's anti-corruption policies and procedures."

Comment: The report does not include information on the percentage of employees who have received anti-corruption training.

Oxfam GB response: This is correct, as noted in the response to LA10; we do not keep at central level data of all training.

"PR6: Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications, including advertising, promotion, and sponsorship."

Comment: The report does not include information on the frequency with which the organisation reviews its compliance with its standards/codes.

Oxfam GB response: The comment is correct. The answer would be different for different areas. Our general approach is to review all policies every three years.

We thank the Panel for its input, and will seek to learn from this in our 2012 Report.

Yours sincerely

Joss Saunders
Company Secretary and General Counsel
Oxfam GB