Dear Members of the Independent Review Panel of Accountable Now,

Thank you for the opportunity to comment on your feedback on our ninth accountability report, and for your commending our achievement in successfully consolidating the reporting of all eighteen Oxfam affiliates into this common report on the work of the whole Oxfam confederation.

We are pleased with the progress that we have made in our ability to address all 10 of the Charter’s Accountability Commitments (more often than not ‘fully’ addressing those, and only showing ‘partial’ addressing status on only one indicator now). We also appreciate your particular acknowledgement of the focus of our attention and strong
commitment to ensuring we are at the forefront of best practice in engaging with our stakeholders in programme design, delivery and ensuring feedback loops through the review cycle.

You identify four areas where our approaches could be strengthened:
1. Leveraging partners’ existing work and ensuring high standards of accountability from partners (NGO6)
2. Ensuring we have information on how many staff receive performance appraisals (LA12)
3. Providing greater transparency on the nature and themes in feedback/complaints received from programme-affected people (NGO2)
4. Providing greater transparency on confirmed incidents of corruption (SO4)

We don’t disagree that these are the right areas for us to make progress against, but wanted to take the opportunity for some further explanation of our plans/approaches:

You also ask for some follow-up analysis in terms of our Expenditure figures, which is provided at the end of this letter.

1. Partners
As stated in our 2016 Accountability Report, partner engagement improvements are a focus of management attention, with the Keystone Partners Survey and our Management Response providing us with a strong platform from which to make progress. You have asked for further information on:

- how we conduct situational analyses to ensure we fully take into account other actors already active in the field and how to best contribute; and
- how we ensure in practice that partners meet high standards of accountability.

During our Country Strategy development process, a thorough contextual analysis takes place, which addresses all external factors, including a power analysis which indicates the presence and impact of other actors in the field. With this in mind, a Theory of Change is then developed, where Oxfam’s unique contribution and role is articulated. Once the country-level strategy is defined, a similar process is followed to determine more specific program design and development processes.
At both levels the whole process should involve all relevant stakeholders. At program level the extent that this is taking place is monitored through the Program Quality review, which asks teams to reflect (and to propose future improvements) on the following areas:

- To what extent were partners engaged in the program design?
- To what extent were affected communities consulted in the design of the process? How have these, tangibly, informed program design?
- Who are the other development actors working in the area? How is Oxfam work different from their work?
- What is Oxfam’s unique contribution in this program? What is the added value of Oxfam engagement?
- Is this something that Oxfam must continue to be engaged in (given its influencing/leveraging ambition)? Why or why not?

Guidance for the Country Strategy development and Program Quality Review processes are available and widely communicated to staff.

It should also be noted that we are currently piloting the Program Leadership Journey, which is intended to increase capabilities on program design and development, and which involves both staff and partners as equal participants in the process.

2. Staff appraisals

Our report showed that the proportion of Oxfam’s workforce with annual appraisals varies between 40% and 90%, with the percentage at HQs rather low with slightly over 50%; and you asked for information on whether we have set any internal improvement targets. As the Report stated, 2015/16 was a strong foundational year for this, with the establishment of a common “one Oxfam” Performance Management Process. We have set targets to achieve: 60% of country staff members below Country Director, 80% of Country Directors and all Regional Platform members to comply with this common Performance Management process by the end of 2017/18. At least 50% of affiliates implement the Oxfam Performance Management Process at their Headquarters level. Many, if not all, of the remaining Affiliate HQs will have their own staff appraisal systems.
in place, and we are gathering information on the utility of those through our common reporting cycle.

3. Feedback/Complaints

You asked for our interim report next year to provide information on:

- Whether the no. of programmes still lacking a formal mechanism for feedback/complaints has improved on the 2014/15 figure of 70%.

The 70% figure was produced from a process that we undertook in 2014/15, which we called the Program Standards Self Assessment (PSSA). That process has now been replaced by the Program Quality Review (PQR). We would be very cautious to compare any findings from the new PQR with the PSSA due to the different methodologies used. There have been some delays in launching the Program Quality Review, as a result of competing priorities within the system, and linked to the overall significant organisational change process underway, but once we have a body of evidence from the PQ Review, we will know the following for each program:

- **Stakeholders are informed of their right to give feedback about projects, and to make complaints, and are offered at least one way of providing such feedback.** Program staff ask for informal feedback from stakeholders
- **Program has formal feedback and complaints mechanisms in place;** actively encourages stakeholders to give feedback and make complaints; and records all feedback/complaints
- **Feedback and complaints systems are designed with stakeholders,** building on respected local ways of giving feedback. They encourage the most marginalised people to respond, and cover many areas including sexual abuse
- **Feedback and complaints always receive a response**
- The program demonstrably **seeks continuous improvement in the quality and use of the complaints mechanisms**
- **Trends are monitored and learning is fed to the wider organisation.**

- Information on the pilot project that uses an app to ensure feedback follow-up. This will be provided at the interim report stage.
- More information on the nature of the complaints received by us from programme-affected people (e.g. percentages of those complaints that relate to beneficiary targeting, sexual harassment, corruption etc.; whether it is possible to state how many were repeated complaints i.e. where people indicate they are not satisfied with the management response; and what kind of feedback received from communities and how this has been acted upon?

As the Report stated, the focus in 2015 was on introducing a common Oxfam Complaints policy. The underpinning processes to monitor this policy have been introduced through the “one Oxfam” common Country Annual Report, which includes a section asking Country Directors to provide information on the themes in the nature, type and response to complaints received. That common reporting template was in its first year of implementation in 2015/16; and we intend to put in a range of management actions to aim to improve the quality of data that Country Directors input into it; and the quality of the overarching analysis produced from that data, over the next reporting period (May-August).

4. Actions taken in response of corruption incidents
You asked for further information at interim report stage on whether and how management responds to incidents throughout the whole confederation, and on the number and kind of incidents of corruption. We are working towards putting in place a centralized One Oxfam Aid Diversion check system; and to start phased implementation of a confederation-wide approach to reporting corruption cases (and coordinating follow-up actions) by 2018.

Error from the 2014 comparators on total Oxfam expenditure on programs.
We have discovered a misprint from our 2014 Accountability Report, which incorrectly quoted a figure of 97% of our total (Oxfam-wide, i.e. all affiliates) expenditure spent on programmes. The correct comparator figures are provided in the following Table, and show consistency of approx. 70% of total expenditure spent directly on programmes (as opposed to Trading, Fundraising and/or ‘Management and Administration’):
You also asked for some further information on the centrally-held Learning & Development budgets as a percentage of overall administration budgets. This is provided in the Table below:

<table>
<thead>
<tr>
<th></th>
<th>No. of staff</th>
<th>Total expenditure on Mngt &amp; Administration (€m)</th>
<th>Central L&amp;D spend* (€m)</th>
<th>(as % of total Mngt &amp; Admin budget)</th>
</tr>
</thead>
<tbody>
<tr>
<td>OXFAM</td>
<td>9545</td>
<td>73.20 €</td>
<td>0.06 €</td>
<td>0.6%</td>
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<tr>
<td>OIS</td>
<td>128</td>
<td>11.20 €</td>
<td>0.06 €</td>
<td>0.6%</td>
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<tr>
<td>OGB</td>
<td>5238</td>
<td>36.89 €</td>
<td>0.20 €</td>
<td>0.6%</td>
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<tr>
<td>ONL</td>
<td>853</td>
<td>10.20 €</td>
<td>0.32 €</td>
<td>3.2%</td>
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<tr>
<td>OES</td>
<td>891</td>
<td>5.45 €</td>
<td>0.10 €</td>
<td>0.6%</td>
</tr>
<tr>
<td>OUS</td>
<td>460</td>
<td>7.30 €</td>
<td>0.07 €</td>
<td>1.2%</td>
</tr>
<tr>
<td>OAU</td>
<td>311</td>
<td>5.58 €</td>
<td>0.07 €</td>
<td>1.2%</td>
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<tr>
<td>OHK</td>
<td>186</td>
<td>1.70 €</td>
<td>0.02 €</td>
<td>1.1%</td>
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<tr>
<td>OGB</td>
<td>237</td>
<td>2.79 €</td>
<td>0.02 €</td>
<td>0.6%</td>
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<tr>
<td>OBE</td>
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<td>OCA</td>
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<td>1.80 €</td>
<td>0.01 €</td>
<td>0.6%</td>
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<tr>
<td>OIE</td>
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<tr>
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<tr>
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<tr>
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<td>1.1%</td>
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<tr>
<td>OIT</td>
<td>240</td>
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<td>0.02 €</td>
<td>1.1%</td>
</tr>
</tbody>
</table>

We are cautious about reading too much into this data however, since it is patchy (many of the large affiliates use different definitions of what constitutes spend on Learning & Development; and were therefore not able to provide information); and, as noted in our Report, “training” is more often that not techniques such as coaching,
mentoring, secondment opportunities etc, which are not captured by analysing traditional, centrally-held training budgets.

We are grateful for the opportunity to comment on your recommendations; and thank the Panel again for their useful insights into our progress. We will shortly issue a print-set version of our Report, with images to complement the analysis. When this is available we would be grateful if that is the version you use on the Accountable Now website.

Yours sincerely,

Winnie Byanyima
Executive Director
Oxfam International