

Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Winnie Byanyima,

Many thanks for submitting your accountability report to the INGO Accountability Charter. Before providing specific feedback on your organisation's report, let us highlight three areas of general concern that occurred in most of the 12 reports submitted for the fall review round:

1.) Be clear on why accountability is important for your organisation

For Charter reports to be meaningful, it is important to start with a clear description of the organisation's *specific* understanding of accountability and how this shapes strategic decision-making and operations in regard to governance, finance, programme, fundraising, campaigning, HR etc. Be clear about whom you are most accountable to and how communication with them improves achieving your strategic goals. Find [here](#) on our website the Charter's currently used definition. Throughout the report, let us know how you use accountability to continuously add value to your organisation.

2.) Moving from "GAP Analysis Table" to "Improvement Analysis"

It is the key aim of the INGO Accountability Charter to support continuous organisational improvements. Against this background the GAP Analysis Table was introduced to showcase at a glance where progress has been achieved and which areas need to be further addressed. We observed that this worked quite well for some, but not for all organisations. One difficulty being that it became overloaded with information without differentiating important and much less important issues. We therefore suggest that organisations for which this instrument has worked well, keep it as a very good internal document to follow up on progress. For the purpose of the reporting and vetting exercise, however, we suggest having a much more succinct "Improvement Analysis", capturing only the most relevant issues that need to be addressed. The Panel has tried to summarise these areas for your organisation at the end of this Feedback Letter. If this does not reflect your own priorities, please let us know. The "Improvement Analysis" is also considered to be the basis for the very brief interim reports of those organisations moving to biannual reporting.

3.) Level of Evidence

Our sector is often criticised for having very good intentional language, but few facts and figures to prove its claims. It is against this background that the Panel asks for compliance to be proven on three levels: (i) having a written policy, (ii) providing evidence that the policy is known and applied by staff and (iii) assurance that it leads to positive management response and helps improving effectiveness in achieving your organisation's goals. While much progress has been made at the policy level, evidence for application in practice and better impact is still relatively low. While we do acknowledge that it is not an easy task to provide this evidence for very large, international organisations, we have also seen some very good attempts. Some examples include: (a) reporting the percentage of national entities which comply with certain standards, (b) leveraging existing surveys that provide relevant hard data, (c) thorough globally set parameters, evidenced by random national level controls or d) illustrative case studies.

Please ensure that all the three points listed above are taken into consideration when collecting data for the next INGO Charter report.

Organisation-specific feedback to Oxfam International

Oxfam International's first *consolidated* report (and seventh overall) is very good, complete, and comprehensive. The organisation has now issued an Accountability Report separately from its Annual Report, which has substantially contributed to the clarity of the report and its focus on accountability. It can be regarded as a very accessible and free-standing document.

It is appreciated that Oxfam International and its affiliates are in a transitional phase towards "One Oxfam". Whereas the information presented in this report involving accountability practices consolidated from the whole confederation includes full input from seven affiliates (who make up about $\frac{3}{4}$ of the federation's overall income/expenditures) and only partial feedback from others, Oxfam will aim to present a full picture of accountability efforts by all affiliates in next year's (2014/2015) report, which is commendable.

Fulfilling promises made in previous reports, shows strong **institutional commitment** of Oxfam International to accountability (1.1, LA13). Efforts for 'strengthening accountability', as one of Oxfam's operational goals, are well demonstrated throughout the report. There is much **evidence** provided from a number of Oxfam affiliates to underline effective and self-critical implementation of mechanisms and policies, usefully presented in case study boxes. It is appreciated that Oxfam prominently presents Charter membership and the logo on their website (see [here](#)). However, the organisation is encouraged to update most recent reports and Panel feedback as well as a link to the new Charter commitments that were revised in 2014 (see [here](#)).

The very open approach towards stakeholder engagement (NGO1) is regarded as **Good Practice** for other Charter Members. The organisation is further commended for submitting the complete **Gap Analysis Table** (at the end of this document), for consistently cross referencing, and for providing web links navigating to the original sources. The Annex enclosed to the report is found to be succinct and very informative and Oxfam is commended for considerably reducing the size of the report in comparison to previous years.

There are still some areas which should be further developed, self-critically analysed or yet to be introduced as standards for the whole federation (e.g. incorporating aspects of diversity not only limited to gender into programme design; strong mechanisms to identify greater leverage through coordination with the partners; systematic performance reviews linked to the attainment of Oxfam's overall strategic goals; anti-corruption training for staff members; and effectiveness of mechanisms to raise grievances). Overall, although explained on p.5 of the report, it is sometimes not very clear which information is on the whole federation, the seven reporting affiliates or Oxfam's headquarter only (e.g. workforce training or anti-corruption practices).

The Panel would welcome feedback, acknowledging whether and how the new format of the report contributed to the reporting process. It would be further helpful to know whether and to what extent Panel feedback from previous years was adopted in newly developed processes and what benefits for the improvement of Oxfam's overall performance are due to its involvement with the Charter.

As explained in the generic part of this feedback letter, the Panel decided to replace the old format of the GAP Analysis Table with a more succinct "**Improvement Analysis**". Based on this report's assessment, we have written this for you and you find it attached to this letter. From now on we will use this format serving also as a baseline for you to summarise progress made in these areas and covered in more detail in the full report. Please feel free to adjust and complement this analysis from your perspective.

Overall, Oxfam is commended for a very high level of transparency and accountability to its key stakeholders and the Panel suggests **reporting every two years against Charter commitments**

from now on. In a very brief **interim report** the Panel would like to see only an updated CEO statement and information on progress highlighted by the Panel in the “Improvement Analysis” as well as clarifying in more detail which affiliates have contributed to the different areas in the report.

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website along with your report. You can find the reports that were previously reviewed on our [website](#). 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 10 January 2015.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat. We look forward to hearing your views.

Yours sincerely,



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Wambui Kimathi



Michael Röska



Jane Kiragu



Rhonda Chapman



John Clark



Saroeun Soeung

**Review Round October 2014
Cover Note on Accountability Report**

Oxfam International

Reporting period: Calendar year 2013 - 2014

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The message by the Chief Executive demonstrates a very strong commitment to accountability. Its importance for the organisation is highlighted by the statement that one of Oxfam’s strategic goals 2013-19 is to “strengthen accountability within its stakeholders; the communities we work with, the donating public and institutional funders”.</p> <p>For the first time, Oxfam presents a description of all accountability efforts across the confederation – a promise declared in previous years and now fulfilled, which is a sign of good institutional commitment. Even though Oxfam’s 17 organisations or affiliates have not yet incorporated a common approach to all elements of accountability, this will be pursued for the near future.</p> <p>Moreover, it is envisaged to improve the implementation of policies, which is sometimes challenging with heavy workloads and difficult environments. The Panel looks forward to more evidence on policies having been embedded in working practices and procedures next year.</p> <p>Oxfam’s dedication to amplify stakeholder voices in all they do is further underpinned by a fundamental move towards stronger influence from the Global South with more affiliates from developing countries and the headquarter moving out of Europe into the Global South.</p>
II. Organisational Profile	
2.1	<p>Name of organisation <i>Fully addressed</i></p>
2.2	<p>Primary activities <i>Partially addressed</i></p> <p>While comprehensive information is provided on the goals and geographic areas of engagement, Oxfam is encouraged to give more information how their activities support achieving its objectives.</p>
2.3 – 2.6	<p>Operational structure / Headquarter location / Number of countries / Nature of ownership <i>Fully addressed</i></p> <p>The graph on “Oxfam Architecture” (p.14) gives a seemingly comprehensive picture of responsibilities within the confederation. Yet, the role of the OI Secretariat and its Chair is unclear, the “Global Team” was meanwhile</p>

	“disbanded” (see 3.6 on p.15), and the “Governance Committee” (see 3.12 on p.17) does not appear.
2.7	<p>Target audience <i>Addressed</i></p> <p>There is no direct answer in the report to this indicator (it is also omitted in the reference table), but partial information is given on p.9 and p.10: the graph showing statistical information concerning the direct beneficiaries impacted by Oxfam’s work worldwide for the period of 2013/14 is very detailed and the efforts for collating this amount of statistical information are well appreciated.</p>
2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>Oxfam’s affiliates have the practice of raising 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. The Panel acknowledges the reasoning for this practice and would be interested to hear how well it works in practice. The answer lacks information on the capitalisation of Oxfam in terms of assets and liabilities.</p> <p>Moreover, it is noted that, according to figure 2, close to 40 percent of Oxfam’s funds come from governments or supranational institutions. Yet, in the list of “stakeholders”, governments appear only in their capacity as “targets of our advocacy”.</p>
2.9 – 2.10	<p>Significant changes / Awards received <i>Fully addressed</i></p>
III. Report Parameters	
3.1 – 3.4	<p>Reporting period / Date of most recent report / Reporting Cycle / Contact person <i>Fully addressed</i></p>
3.5	<p>Reporting process <i>Fully addressed</i></p> <p>The response to this indicator provides a thorough account on the consolidation of this report and what role it plays in terms of raising awareness amongst Oxfam’s “dispersed workforce of accountability policies, procedures, and future commitments”. The answer would have profited, however, from a more informative analysis on how the report is being communicated and adopted throughout the whole confederation, in order to summon all parties to consciously commit to raising awareness about accountability issues across functions and regions. This will be easier when looking back to the first aggregated report next year.</p>
3.6 – 3.7	<p>Report boundary / Specific limitations <i>Fully addressed</i></p>
3.8	<p>Basis for reporting <i>Fully addressed</i></p> <p>The answer to this indicator is comprehensive. Oxfam is once more</p>

	<p>commended for the systematic work that has led to the consolidation of this report, incorporating data from entities previously reporting to the Charter on an independent basis. This effort is exemplary and very much appreciated. Even though this report resembles just a partial disclosure of the whole confederation, the Panel recognises the challenges the organisation is confronted with and acknowledges Oxfam's commitment to rendering full disclosure in its future reports.</p>
3.10, 3.11	<p>Significant changes <i>Fully addressed</i></p>
3.12	<p>Reference table <i>Addressed</i> The reference table is not explicitly mentioned but can be found on p.43-45.</p>
<p>IV. Mission, Values, Governance, and Stakeholder Engagement</p>	
4.1	<p>Governance structure <i>Fully addressed</i></p>
4.2	<p>Division of power between the governance body and management <i>Fully addressed</i> The answer provides a very good overview of the division of power between the highest governance body, the OI Board and its Executive Directors. A strict division of power is also reported for the governing bodies of the six affiliates providing full disclosure in this report. Some more detail on whether and how the highest governance body supervises and evaluates the Chief Executives' work would have been appreciated at this point.</p>
4.3	<p>Independence of Board Directors <i>Fully addressed</i> All Boards of the six affiliates providing full disclosure to this report are non-executive bodies staffed by volunteers. Equivalent information is provided for the International Board under indicator 3.10.</p>
4.4	<p>Feedback from internal stakeholders <i>Fully addressed</i> Very good examples are provided to illustrate how staff can give feedback to the highest governing bodies including: staff and volunteer surveys, trustee visits, quarterly learning events or even a staff representative at Board meetings (Oxfam Canada). Some evidence on how effective those practices are in triggering positive management response is appreciated in the next report.</p>
4.5	<p>Compensation for members of highest governance body <i>Fully addressed</i> The organisation's compensation policies are well described; specifically, a salary policy is mentioned. A web navigation link to the published policy would have been useful. The Panel would be interested to follow up on developments concerning the creation of a common remuneration policy for all Oxfam staff in the federation's next report. Moreover, information about other roles of senior executives outside of Oxfam, both paid and unpaid, would be interesting to know.</p>

4.6	<p>Conflicts of interests <i>Fully addressed</i></p> <p>The answer provides a thorough account of the processes in place safeguarding against possible conflicts of interest. Relevant examples from the commendable Oxfam Code of Conduct and excerpts from the joint Oxfam Employee Code of Conduct are listed; provided their availability online/on Oxfam’s webpage, both Codes should be hyperlinked in this report for the future. Further evidence that these provisions are well known by staff and followed in practice is welcome for the next report.</p>
4.10	<p>Process to support highest governance body’s own performance <i>Fully addressed</i></p> <p>Relevant information is given to illustrate how Board effectiveness and strategy implementation are being monitored. There is a marked progress on the basis of creating an Oxfam International Governance Committee appointed (by whom?) for the regular oversight of the Supervisory Board’s performance. This committee is to review, among others, the Board’s collective roles and responsibilities and those of its committees, as well as its relations with the Meeting of Executive Directors, Committees, the Oxfam International Secretariat and affiliates. Evidence that this practice triggered positive decision-making is welcome for the next report.</p>
4.12	<p>Social charters, principles or other initiatives to which the organisation subscribes <i>Fully addressed</i></p> <p>An informative answer, explaining Oxfam’s external as well as internal auditing mechanisms. It includes relevant information on risk management which is asked for under indicator 4.1. The newly adopted “Aid Diversion & Counter Terrorism” policy to support compliance with good practice and the federation’s legal obligations in relation to money laundering and counter-terrorism is well received by the Panel and considered a good sign of effective organisational enterprise. A web link navigating to the source would be helpful. The Panel would like to highlight the fact that 40% of programme staff are not aware of the standard systems which should be critically reflected in Oxfam’s approach to subscribing to such a variety of initiatives.</p>
4.14	<p>List of stakeholders <i>Fully addressed</i></p>
4.15	<p>Basis for identification of stakeholders <i>Fully addressed</i></p> <p>Oxfam’s Strategic Plan (a link would have been appreciated), provides information on the identification, selection and prioritisation of key stakeholder groups.</p> <p>The Panel is interested to hear on progress in regard to the newly developed stakeholder engagement policy for all Oxfam affiliates in the next report. This will include publication of the different platforms currently used by affiliates to identify stakeholders.</p>
4.16 – 4.17	<p><i>Moved to NGO1.</i></p>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p><i>Involvement of affected stakeholder groups</i> <i>Fully addressed</i></p> <p>As in previous years, the answer to this indicator demonstrates a serious commitment to stakeholder engagement. This is well illustrated through the examples presented from some of Oxfam’s affiliates, providing evidence for a well-informed and flexible implementation of different formats of involvement, such as online knowledge-exchange platforms, surveys, various kinds of research and analysis, and partner consultation mechanisms.</p> <p>Oxfam is commended for conducting a review of Program Standards adherence and openly reflecting shortcomings such as stakeholders not being adequately included in the monitoring and evaluation process. Adequate examples 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. This answer is overall regarded as Good Practice.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i> <i>Addressed</i></p> <p>As much as 70% of programmes lack a formal mechanism for feedback and complaints (p.21). Efforts to synthesise affiliates’ policies into a common Oxfam Complaints Policy to be completed by March 2015 are well recognised. The Panel will be interested to follow up on the outcomes of this policy being implemented throughout the whole federation. Both Oxfam GB and Oxfam Intermón are commended for analysing trends in feedback and complaints biannually and for synthesising learning in an Annual Report to their respective Senior Management Teams and Boards. Moreover, the Panel would be interested to know if Oxfam has reasons for the increased number of complaints received.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Fully addressed</i></p> <p>The organisation has established sophisticated and functional MEL systems to ensure that learning from evaluations is fed back into programme design and development.</p> <p>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.</p> <p>Different affiliates use additional other methods with some tools by Oxfam GB being displayed in more detail in this report. It can be commended for the visual graph on “Changes made to projects following Oxfam GB’s Effectiveness Reviews” (p. 25), which provides good evidence of recommendations leading to management response. Self-critically Oxfam states, that evidence often has very limited influence on shaping projects in other countries. They will address this with “Knowledge Hubs” to support consistency of analysis, learning and ultimately impact across the federation. The Panel looks forward to progress report on this as well as the newly developed Evaluation Quality Assessment Tool.</p>

NGO4	<p>Gender and diversity <i>Addressed</i></p> <p>Following up on last year’s Panel feedback this indicator now reveals a marked progress in conceptualising “clear priorities, timelines and resources required or secured to deliver the Oxfam Strategic Plan commitment to promoting gender equality”. However, as pointed out previously by the Panel, the answer to this indicator should not be solely limited to gender equality, but needs to address other aspects of diversity, such as disability, ethnicity, poverty, illiteracy, age, sexual orientation, etc. Relevant input covering those aspects was given by Oxfam International in the last Panel Feedback Response Letter. It was also mentioned that, currently, there is “no overarching work to measure the success of diversity mainstreaming specifically, but it is addressed as part of the Program Standards Self-Assessment”. Progress report on improvements in this area will be appreciated in the future. Some useful information on how to move inclusion up the internal agenda can be found in the Charter’s archived webinar on: “<i>How can we live up to our promises of inclusion and non-discrimination?</i>”</p>
NGO5	<p>Advocacy positions and public awareness campaigns <i>Fully addressed</i></p> <p>The answer gives a comprehensive account of how internal management processes ensure coherence and consistency in Oxfam’s public campaigns and advocacy policies. They further ensure that policy positions are evidence-based, well grounded in the organisation’s work and guided by its ethical policies. Evaluations of all global campaigns are available on Oxfam’s website. The role of stakeholder consultation has been further strengthened. Some evaluation outcomes leading to corrective actions are shared. The overall information provided is very good: it is, however, advisable for the next report to also include a short account of the organisation’s processes for exiting a campaign.</p>
NGO6	<p>Coordination with other actors <i>Partially addressed</i></p> <p>As in previous years, the report provides relevant examples of Oxfam’s successful cooperation work. Moreover, Oxfam recognises the risk of potential imbalances (p.28). Oxfam Program Standards set clear expectations for mutually respectful and beneficial work with partners. No 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. Although they state under 4.10 that Oxfam only engages if they can “add value”. Finally, it is not entirely clear how Oxfam ensures in practice that partners meet high standards of accountability.</p> <p>A thorough response to this indicator in reaction to the last Panel feedback is given by Oxfam in January 2014; yet the information presented in the Response Letter has not been adopted in this report. The Panel looks forward to more information in the next report.</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>Substantial information is presented, describing a solid resource allocation framework and adequate financial risk management policies. Some real life examples showing if these work well in practice would have been useful. The efforts of affiliates to align their own planning processes and programmes with the</p>

	Global Programme and Influencing Investment Framework are well recognised and the Panel is interested in progress report on developments in this alignment process. Moreover, it was desirable if Oxfam shared data on the relative shares of staff, project, fundraising etc.
NGO8	Sources of Funding <i>Addressed</i> The reporting organisation is asked to identify the five largest single donors.
III. Environmental Management	
EN16	Greenhouse gas emissions of operations <i>Fully addressed</i> Oxfam can be commended for having environmental policies in eight reporting affiliates with senior management commitment on oversight and setting clear reduction targets.
EN18	Initiatives to reduce emissions of operations <i>Fully addressed</i> Detailed and thorough information is consolidated for all Oxfam's affiliates. The increases in both consumption and carbon emission are well explained and justified. The various examples of initiatives to reduce emissions of operations are accompanied by targets set for the future. Oxfam is commended on decreasing its air travel emissions by 13% year on year despite the addition of a new affiliate. The fact that three affiliates post "0%" of emissions seems rather surprising (figure 8b on p.35).
EN26	Initiatives to mitigate environmental impact of activities and services <i>Fully addressed</i>
IV. Human Resource Management	
LA1	Size and composition of workforce <i>Fully addressed</i>
EC7	Procedure for local hiring <i>Fully addressed</i> It is appreciated that the organisation commonly encourages the recruitment of local candidates; it is, however, not clear if there are any existing mechanisms in place to ensure this works well in practice. Currently only Oxfam GB are able to publicise information on the number of staff recruited from OECD and non-OECD countries which is stated as a proxy for information on local hiring (see Annex H, p.66). It would be also interesting to know if Oxfam has policies to ensure hiring practices do not undermine the local public and civil society sector (e.g. commitment to build new capacities and offering salaries that are in line with the local average).
LA10	Workforce training <i>Partially addressed</i> Full disclosure on the total expenditure on Learning & Development is given, but only a very brief outline describing the learning and development processes in place. While it is understood and acknowledged that the number of training hours is difficult to assess, it would be recommended to collect data on the percentage of

	<p>the overall administrative budget that is spent on workforce training and evidence that training modules have been effective.</p> <p>Oxfam states that serious training efforts are needed to accelerate the process towards “One Oxfam”. However, the figures provided (figure 12 on p.42) reveal striking differences in relevant expenditure when divided by staff numbers, varying roughly between € 50 and € 1.000 per staff member.</p>
LA12	<p>Global talent management <i>Partially addressed</i></p> <p>While it is stated that Oxfam affiliates should use performance management systems, there is no information on the percentage of total employees who received a formal performance appraisal. Oxfam International’s answer for 2012/13 is again to be found in the Panel Feedback Response Letter. Information on how the organisation’s performance reviews are effectively linked to the attainment of Oxfam’s overall strategic goals – how this helps to assess global talent needs and support its development – is still missing. Furthermore, the Panel looks forward to being informed about the common performance management system which is now being piloted.</p>
LA13	<p>Diversity of workforce and governance bodies <i>Partially addressed</i></p> <p>Oxfam had previously set a commitment to create a common Diversity and Equal Opportunities Policy and the current report shows this has been achieved, for which the organisation is commended; a link to this policy is welcome in the next report. The answer gives an overview of the federation’s common approach to inclusion, but – again – focuses mostly on gender, since “statistical analysis for the other characteristics of diversity are not currently available”. The Panel would be interested to know if the organisation has taken any steps for improvement in this area, or if it has set any targets for the future.</p>
NGO9	<p>Mechanisms to raise grievances <i>Partially addressed</i></p> <p>The answer demonstrates a thorough commitment to an informative approach utilised for raising awareness amongst Oxfam staff about grievance procedures. A number of solid mechanisms are reported to be in place providing meaningful guidance. The answer would have benefited, however, from sharing some evidence that those mechanisms are effectively employed and whether and how they have improved the quality of Oxfam’s work.</p>
V. Responsible Management of Impacts on Society	
SO1	<p>Managing your impact on local communities <i>Fully addressed</i></p> <p>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 2013/14. Annex C provides a more in-depth example of how the potential impacts are assessed through the Oxfam GB Accountability Effectiveness Review process.</p>
SO3	<p>Anti-corruption practices <i>Partially addressed</i></p> <p>The report announces that “there is currently no common system to track reported</p>

	<p>incidents of corruption or fraud across the confederation and practices for awareness raising, detection and investigation vary”; there is no mention of whether this is meant to be changed in the future or if any targets for improvement are set.</p> <p>In its last Panel Feedback Response Letter, Oxfam International made a commitment to introduce anti-corruption training into 2014 as a policy to be covered as a standard practice through Oxfam’s induction programme. The Panel looks forward to seeing progress in the next report on 2014 and whether it is applied to all staff or a certain percentage.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Fully addressed</i></p> <p>The answer assures that various training and communication channels are used to encourage staff to be vigilant and rigorously investigate alleged cases of fraud and/or corruption, whereby recent developments and strategy outcomes in Oxfam GB are given as an example. The Panel looks forward to progress report and specifically – whether and how reactive measures in response to incidents are being carried out throughout the whole confederation.</p>
<p>VI. Ethical Fundraising</p>	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Fully addressed</i></p> <p>As in previous years, all Oxfam affiliates show exemplary initiative in their commitment to ethical fundraising. A table of national codes that affiliates have signed up to is provided in Annex F.</p>

Oxfam International Gap Analysis Table – Areas of Commitments and Progress achieved

NOTE: The Panel decided to replace the old format of the GAP Analysis Table with a more succinct “Improvement Analysis”. Based on this report’s assessment, we have written this for you and you find it attached to this letter. From now on we will use this format serving also as a baseline for you to summarise progress made in these areas and covered in more detail in the full report.

This is the first year that six of the independent Oxfam affiliates have coordinated to produce a common Oxfam Accountability Report against the INGO Charter requirements. This GAP Analysis attempts therefore to consolidate comments from the Review Panel into the separate Oxfam International, Oxfam Canada, Oxfam GB, Oxfam Intermon, Oxfam NZ and Oxfam HK Reports that were submitted in previous years; as well as explain how these have been taken into account in the development of common approaches from 2013/14 onwards. It is not possible to directly address each of the Review Panel’s recommendations and stay within the recommended 40 page limit of the Report, but where we have failed to address the recommendations we have tried to provide a just reason for doing so within this table.

GRI - Performance Indicators	Commitment to improvement	Progress achieved reporting year 2011/12	Progress achieved reporting year 2012/13	Progress achieved reporting year 2013/14
Program Effectiveness				
NGO1: Processes for involvement of affected stakeholder groups.	<p><u>Oxfam NZ:</u> “is working towards improved information sharing and feedback with partners, stakeholders and allies. Clear agreements (...) on the partnership process and the commitment and obligations of both parties are developed in consultation with partners (...)”</p> <p><u>Oxfam International:</u> “At the end of 2011 we will begin a review of our Strategic Plan (...). As part of this process, we plan to conduct a series of consultative forums with our key stakeholders.”</p>	<p><u>Oxfam GB:</u> The report does not include information on how the feedback from stakeholders affected the decisions/decision making processes or reshaped policies/ procedures.</p>	<p><u>Oxfam International:</u> “We undertook an external consultation around the world with sector specialists, staff and a selection of allies (...) on the proposed areas for Oxfam to focus on in the next Plan period.”</p>	<p>Paras 4.2 to 4.13 detail the policies and processes to ensure that stakeholder and partner feedback were taken into consideration in the development of the new Oxfam Strategic Plan and in programme design; as well as reflections from the Programme Standards Self Assessment Questionnaires about the extent to which these policies and processes are well embedded in country programming.</p>

<p>NGO2: Mechanisms for feedback and complaints in relation to programs and policies.</p>	<p><u>Oxfam Intermon:</u> “The existence of [the ombudsman] has not yet been communicated to our main stakeholders and has not been launched (...). The aim is for the launch to take place in May/June 2012.” [...]</p> <p><u>Oxfam GB:</u> The report does not include information on mechanisms for assessing complaints and for determining what actions are required in response.</p>	<p><u>Oxfam Intermon:</u> “The creation of an Ombudsman was approved in March 2011, a neutral figure that defends the rights of our main interest groups and manages conflicts that cannot be managed through the usual procedures. However, we are still establishing its position”</p> <p><u>Oxfam GB:</u> Fully addressed. Good Practice: The organisation provides statistics on the different types of complaints received</p>	<p><u>Oxfam Intermon:</u> “...we are training employees of the Ombudsman with a view to extending this training to other government bodies.”</p>	<p>Paras 4.24 and 4.25 provide information on how to access individual affiliate complaints policies and procedures, with anecdotal examples from OGB and OCA. Only OGB are currently able to collate and publish analysis of the types of complaints received.</p> <p>A review into existing affiliate complaints policies is underway in 2014/15, with the aim of achieving a common, harmonised Oxfam Complaints Policy by March 2015.</p>
<p>NGO3: System for program monitoring, evaluation and learning.</p>	<p><u>Oxfam Intermon:</u> “(...) the MEL system must help us position ourselves as agents who learn and are efficient.”</p> <p><u>Oxfam GB:</u> The report does not include information on adjustments to policy/ programmes as a result of monitoring/ evaluation/ or on how these were communicated.</p>	<p><u>Oxfam Intermon:</u> No progress reported.</p> <p><u>Oxfam GB:</u> Good Practice: The organisation has put in place a Global Performance Framework, for improving the quality and measuring the impact of programming work. It asks beneficiaries’ for approval and strengthens partners’ capacity. To ensure that this learning (from the Effectiveness Reviews)is acted on, Oxfam intends to implement a management response system from June</p>	<p><u>Oxfam Intermon:</u> No progress achieved.</p>	<p>Paras 4.7- 4.13 detail the MEL framework that has been developed and aligned across all affiliates. This provides the framework to ensure that learning from evaluations is fed back into programme design/ development; as well as reflections from the Programme Standards Self Assessment Questionnaires about the extent to which the common MEL framework and policies are becoming embedded at the country level.</p>

<p>NGO4: Measures to integrate gender and diversity into programme.</p>	<p><u>Oxfam Intermon</u>: “We must know which factors influence gender relations and identify which gender relations are established in a given context. [...] We must take into account the specific opportunities that an intervention is going to generate for women and how women organise themselves in their spaces [...].”</p> <p><u>Oxfam NZ</u>: “To improve practice in and identify improved targeting of programmes ONZ is improving its baseline design and data collection in order to disaggregate target populations.</p> <p><u>Oxfam GB</u>: The report provides a lot of information on gender, but not on other type of diversity.</p>	<p>2012”</p> <p><u>Oxfam Intermon</u>: No progress reported.</p> <p><u>Oxfam International</u>: “In the coming years, we will expand our work to strengthen women’s rights organizations (...) that enable women to influence the decisions and structures that impact their lives.”</p> <p>The working group on diversity “will present recommendations to affiliates who will be required to address these by March 2013.”</p>	<p><u>Oxfam Intermon</u>: “(...) in Chad instrument have been developed to ensure the effective participation of women in our actions. However, we still have to make improvements in certain areas, such as how to obtain a breakdown of figures by gender and how to simplify the many accountability systems so that we can learn from them.</p> <p><u>Oxfam International</u>: “Our new Strategic Plan outlines key objectives to guide our work on gender justice through to 2019.” No progress reported regarding the working group on diversity.</p>	<p>Paras 4.14-4.15 detail the objectives set by the Gender Justice Working Group which has been operating since mid-2013 with representatives from each affiliate, to drive forward improvements to ensuring gender equity in Oxfam’s programming across the confederation.</p> <p>Data on the total number of beneficiaries met directly by Oxfam’s programmes (para 2.7) has been further disaggregated by gender. The full set of output reporting data, including nos. of women and women’s rights organisations supported by Oxfam worldwide is detailed in the Oxfam Annual Report, which will be available on the OI website from November 2014.</p> <p>Whilst progress has been made in reporting on the integration of gender issues in program design and implementation, there has been less progress in reporting against other strands of diversity.</p>
<p>NGO5: Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns.</p>	<p><u>Oxfam Intermon</u>: “We are in the process of revising the [campaign’s manual] and adapting it to our campaigns in Southern countries.”</p> <p><u>Oxfam GB</u> - The report does not include information on the processes for arriving at public awareness/ advocacy positions; or on processes for taking</p>	<p><u>Oxfam Intermon</u>: No progress reported.</p> <p><u>Oxfam GB</u> - Partially addressed. The report provides information on the process for arriving at advocacy positions, but not information on the process for corrective adjustments, where the positions are</p>	<p><u>Oxfam Intermon</u> No progress reported.</p> <p><u>Oxfam International</u>: “Looking forward, a new consolidated partnership policy will support our internal and external assessments</p>	<p>Paras 4.16 – 4.20 detail efforts that have been taken forward in the 2013/14 financial year to improve the cross-confederation approach to partner consultation in our advocacy work, including evidence from a number of recent large campaigns.</p> <p>Para 4.10 describes work to consolidate partnership policy; and paras 4.6 & 4.7 to assess whether partnership policies are being adhered to in country programming.</p>

	<p>corrective actions on advocacy positions. “Oxfam GB has focussed, throughout the reporting period on how to increase accountability in our campaigning and advocacy work. Work on this will continue in the year to come”.</p>	<p>published or on the process for exiting a campaign.</p>		
<p>NGO6: Processes to take into account and coordinate with the activities of other actors.</p>		<p><u>Oxfam GB</u>: The answer provided under this indicator is complete but vague and could be strengthened if further details were provided</p>	<p><u>Oxfam International</u>: “Oxfam is conducting research and protection surveys, and building the capacity of our partners in country to press for better governance, accountability and security sector reform.”</p>	<p>Para 4.21 details the work that has been undertaken within the last year to develop common guidance on coordinating with other actors through the Program Standards.</p> <p>Evidence is provided in a number of case studies of work that is underway to ensure consultation with other actors.</p> <p>The common Partners Survey referenced in paras 3.13 and 4.10 provides a useful baseline of views from our partners of the extent to which Oxfam is coordinating effectively with them.</p> <p>However, we acknowledge that this provides only a partial answer to the Indicator as there is not currently a systematic way of measuring and aggregating the extent to which coordination takes place. In large part, this reflects the hugely complex, often fast-moving environments in which Oxfam often operates and therefore the difficulty/ usefulness in comparing the types and extent of coordination with actors across such different contexts.</p>

Economic				
NGO7: Resource allocation.	<u>Oxfam Intermon:</u> “(…) we have since 2011 established a reserves policy (both book and cash reserves) that establishes a framework for action, together with indicators and limits which should ensure the balance, solvency and viability of the asset and financial structure, and the treasury structure and liquid assets.”	<u>Oxfam Intermon:</u> No progress reported.		<p>Para 5.8 provides detail of the reserves policies and financial standards frameworks that govern affiliates’ use of resources.</p> <p>Para 5.6 sets out the work underway to align behind a common resource allocation framework, with “In this first year of the Oxfam Strategic Plan period, there has been a transitional approach with affiliates working to align their own planning processes and programs with the GPIIF and to co-ordinate their activities with other affiliates who are present in the same country or region. This coordination process is expected to be complete by 2016/17. In the future, our intention is for a proportion of affiliates’ income to be shared, and to be allocated to common priorities and programs. This will increase the importance of the GPIIF, to be used in a more active way for resource allocation, at least for this proportion of our income”</p>
EC7: Procedures for local hiring and proportion of senior management hired from the local community.		<u>Oxfam GB:</u> The report does not include information on the proportion of senior management from the local community.		Para 7.5 sets out the information on different Oxfam practices for local hiring, with only Oxfam GB able to provide data on non-OECD as a % of the total workforce. There is not currently the capacity to collect and collate information on the proportion of senior management from the local community across the confederation.
Environmental				
EN16: Total direct and indirect	<u>Oxfam International:</u> “Reduction recommendations for	<u>Oxfam International:</u> The report now provides	<u>Oxfam International</u> “We intend to fully	All affiliates but one (Oxfam Intermon) have fully complied with the new

greenhouse gas emissions by weight.	<p>2011/2012 include: using a portable power meter to identify big energy users (and) .. practical measures such as performing a paper audit trail will help to increase paper recycling around the office.”</p> <p><u>Oxfam NZ</u> “ will focus specifically on staff commuting and may make separate goals within this area to get each staff member involved.</p>	<p>information on gas usage for heating.</p> <p><u>Oxfam NZ</u> is committed to a 2011/2012 GHG reduction target of lowering emissions by 15% relative to the number of FTEs. This goal has been achieved and well surpassed, having reduced emissions / employee by 38% this year in comparison to the base year.</p>	implement the new recording methodology in the 2013-2014 reporting year.”	recording methodology in this Report. Oxfam Intermon are only able to provide full reporting biennially.
EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.	<p><u>Oxfam International:</u> “We calculated our carbon footprint in the 2010-11 fiscal year and in 11-12 we are working to reduce it, although we won’t know if we have reached that goal until the following year.” “Conscious of the fact that about 95% of our emissions are due to the trips we make to the field, we are trying to reduce their number and impact, although a high percentage of them are essential to fulfil our mission.“</p>	<p><u>Oxfam International:</u> “We continue with the efforts that we implemented in the previous year of promoting good practice in our team regarding electricity consumption, air conditioning, use of paper, switching off computers and monitors, and waste management.”</p>	<p><u>Oxfam International:</u> “We are committed to improving our knowledge and reporting methodology in the succeeding years (...) and develop strategies in reducing our carbon emissions.”</p>	Section 6 provides a number of examples of new strategies that have been developed to reduce carbon emissions by a number of affiliates; and Annex G a summary of areas of focus being pursued by different affiliates.
Labor				
NGO9: Internal feedback and complaints mechanism.			<p><u>Oxfam International:</u> “A Confederation-wide staff survey has been agreed by HR Directors to run in 2014, for which a core set of questions and indicators will be established.”</p>	The staff survey is due to take place in late-2014.

<p>LA10: Average hours of training per year per employee.</p>		<p><u>Oxfam GB:</u> “not in a position to report on the total/ average hours devoted to training for employees/ volunteers per year as regions/ countries are empowered to develop their own training programmes. “</p>		<p>Data is provided by affiliates providing full disclosure on the total expenditure on Learning & Development; but there are no plans to allow for the collection of data on the total/average hours devoted to training. The size of the total workforce, and the decentralised nature of training provision (being confirmed at a country level) makes this difficult to do.</p>
Society				
<p>SO1: Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities.</p>	<p><u>Oxfam Intermon:</u> “continuous process to strengthen programme’s capacities for fully implement MEL systems and design logical models. Nevertheless, at present we can say that up to 60 programs (50%) and up to 200 projects managed by one partner (75%) may be applying this.</p> <p><u>Oxfam International:</u> “Going forward we will monitor and review adherence to these guidelines. This learning, in addition to feedback from the communities where we work, will be used to inform our strategies going forward.”</p> <p><u>Oxfam GB:</u> The report does not include information on whether the programmes in place have been effective in mitigating negative/ maximising positive effects; or</p>	<p><u>Oxfam Intermon:</u> No progress reported</p> <p><u>Oxfam GB:</u> Partially addressed - the report does not include information on whether the programmes in place have been effective in mitigating negative and/or maximising positive effects; or on how feedback has informed steps towards further community engagement</p>	<p><u>Oxfam Intermon:</u> No progress reported</p> <p><u>Oxfam International:</u> Feedback from local communities is used to modify Oxfam’s programmes and strategies.</p>	<p>Section 4.21-4.22 sets out the standards expected of programme staff in managing impacts of operations on communities; and provides some case study evidence for how this has occurred in practice in 2013/14. Annex C provides a more indepth example of how the potential impacts are assessed through the Oxfam GB Accountability Effectiveness Review process.</p>

	on how feedback have informed steps toward further community engagement. Organisation's response: A clearer picture should emerge as a result of 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 organisation's anti-corruption policies and procedures.	<p><u>Oxfam Intermon:</u> "During the 2011-12 fiscal year, we created a Policy against Corruption and Fraud in order to raise awareness within our team and also in our local partners. Via periodic training, in the next fiscal year, guidelines will be provided in order to avoid possible cases and to facilitate their detection, investigation and response."</p> <p><u>Oxfam GB:</u> The report does not include information on the percentage of employees who have received anti-corruption training. Organisation's response: This is correct we do not keep at central level data on training.</p>	<p><u>Oxfam Intermon:</u> No progress reported.</p> <p><u>Oxfam NZ:</u> "identified the need for staff training in fraud and corruption and plan[s] to undertake training for all relevant staff in the forthcoming financial year".</p> <p><u>Oxfam International:</u> "The Secretariat plans to raise further awareness of anti-corruption issues through its quarterly learning event."</p> <p><u>Oxfam GB:</u> "This year we had planned to roll out further training, but this will now take place in 2012-13, and will target all staff in awareness raising"</p>	<p><u>Oxfam International:</u> No progress reported.</p>	Para 5.11 "There is currently no common system to track reported incidents of corruption or fraud across the confederation and practices for awareness raising, detection and investigation vary.
Product Responsibility				
PR6: Ethical fundraising.	<u>Oxfam Intermon</u> "Nowadays we cannot give the	<u>Oxfam Intermon</u> No progress reported.	<u>Oxfam Intermon</u> For the fiscal year 2012-13,	Annex F provides for the first time an overview of all Oxfam affiliates'

	<p>concrete number of complaints received for the breaches of standards because we have recently changed our customer relationship management system... we can affirm the amount is not relevant</p> <p><u>Oxfam International:</u> “as part of ethical framework, we are in the process of reviewing our communication and relationship channels which could become more adapted to the possibilities and requirements of the different groups we have relationships with.”</p> <p><u>Oxfam GB:-</u> The report does not include information on the frequency with which the organisation reviews its compliance with its standards/ codes. Organisation’s response: The answer would be different for different areas. Our general approach is to review all policies every three years.</p>	<p><u>Oxfam GB:</u> Partially addressed No further information on the frequency with which the organisation reviews its compliance with its standards/ codes is included in this report.</p>	<p>we have not received any complaints with regard to breaches of standards.”</p> <p><u>Oxfam International:</u> “We will enforce (...) a coordinated best practice approach to humanitarian fundraising (...).”</p>	<p>membership of relevant national codes on ethical fundraising.</p> <p>Affiliates will ensure adherence to these codes in different ways, depending on the different requirements of each Code.</p>
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