



**Accountable  
Now**

GLOBAL STANDARDS LOCAL TRUST



## **Oxfam International Independent Review Panel Feedback**

**Accountability Report 2017/18 and 2018/19  
Review Round July 2019**



# Oxfam International

## Feedback from the Independent Review Panel

### Review Round July 2019

22 July 2019

Dear Winnie Byanyima,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to strengthen 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.

Oxfam's eleventh accountability report, covering the financial years 17/18 and 18/19, is detailed, open, and has a focus on learning and increased accountability to stakeholders, in the wake of the "safeguarding crisis" faced by the organisation. The Panel appreciates the openness, self-reflection, and motivation expressed by CEO Winnie Byanyima in her opening statement, which sets the tone for the rest of the report.

The **Panel commends** Oxfam's efforts to improve safeguarding processes and organisational culture. The detailed [open reporting](#) of safeguarding cases and progress against Oxfam's 10 Point Action Plan, and in particular the reporting of the handling of complaints from across the Oxfam country programmes is a good practice that other AN members might learn from. The Governance Review, the appointment of an Associate Director for Safeguarding and the development of several new protection related policies seem to point to a significant corporate effort to address the major reputational challenges the network has experienced. Oxfam is paying attention to its accountability with regard to communities, partners and its own staff. Efforts to take up the conversation with peers in and beyond the sector are also noted positively.

As described in the report, Oxfam has launched many new accountability initiatives in 2017/18 and keeping track of how well these new mechanisms are working presents a challenge in itself. The Panel looks forward to the future reporting of Oxfam's progress in these mechanisms. Here again, other AN members might learn from their application.

**Areas for improvement** to focus on in the next interim report include: inclusion of a self-assessment against the reporting framework, more information on Oxfam's efforts to mitigate negative environmental impacts of their work (C5), how feedback is gathered from staff and the communities Oxfam works with (E1), how stakeholders



beyond partners are engaged in Oxfam's work (E2), and complaints mechanisms for internal stakeholders (J4).

In general the report would also benefit from some **examples** of how the policies and procedures described actually work. The report is rich in examples described only at a high level without explanation of the processes involved. This would be powerful learning for the Oxfam network and for other members of Accountable Now. Concrete decisions or changes that have been implemented using the new procedures could be highlighted.

While a link is provided to the [10 Point Action Plan](#), including a summary list of the key points in the next report would be helpful, given that the plan is crucial and is referenced many times.

In the next report, the Panel expects Oxfam to include a self-assessment against the reporting questions, as required in the [reporting framework](#). This is a key part of the learning process for Accountable Now, in part because it will allow Oxfam to provide more focused responses to the questions in the reporting questions.

While the Panel appreciated the reference table indicating where information relating to each question can be found, it was still at times difficult to find relevant information. For some questions, there was further relevant information under sections of the report which had not been listed against that question in the reference table. There were also some areas in which the exact reporting question was not answered, but other information relating to the broader topic was provided, e.g. F1 and F2. While each AN member is free to devise its own report format, all of the reporting framework questions still need to be addressed.

The report and the cover letter are undated but the report refers to the results of the Independent Commission (IC) on Sexual Misconduct, Accountability and Culture Change not being available in time to reflect its findings in this report (its interim report was produced in January 2019). The Panel anticipates that its findings will be summarised in Oxfam's next accountability report.

Finally, this report is (for understandable reasons) focused on recovery from the 'safeguarding crisis' but future reports could situate Oxfam's commitments to accountability in the broader external policy environment, for example the SDG commitment to 'leave no one behind' or the World Humanitarian Summit/Charter-4-Change commitments. The report makes reference to IATI and to increasingly resources going direct to local organisations but without rooting these in the relevant international commitments.

We look forward to discussing our feedback with you in a follow-up call, which the Secretariat will be in touch to schedule. This conversation will form the basis for your



response letter, which will be made publicly available on the Accountable Now website along with your report and this feedback letter.

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,

Accountable Now's Independent Review Panel





# Oxfam International's Accountability Report 2017/18 and 2018/19

Review Round July 2019

## Opening Statement from the Head of Organisation

The opening statement from Executive Director Winnie Byanyima is very comprehensive and acts as an executive summary of the report, covering key accountability related changes in the organisation; updates relating to safeguarding, impact, stakeholder involvement, and organisational effectiveness; and responding to recommendations previously made by the Panel.

It is evident that accountability is seen as key to Oxfam's work and that there is a push to improve both organisational processes and culture, and a determination to challenge design flaws in existing humanitarian and development models. Oxfam is working, through its new global strategy process, to build a new model, and the Panel notes that a stakeholder-led approach based in shared values is being taken.

## Cluster A: Impact Achieved

### A. The impact we achieve

A1	<p><b>Mission statement and theory of change</b></p> <p>Oxfam's vision and mission are outlined, and the theory of change is explained. Oxfam challenges the structural causes of poverty, enables transformational change, and takes an influencing approach to achieve long-term and sustainable results. More details are available in Oxfam's 2013-2019 <a href="#">strategic plan</a>.</p>	4
A2	<p><b>Key strategic indicators for success</b></p> <p>Oxfam's 2013-2019 <a href="#">strategic plan</a> outlines six external change goals, each with an impact statement and set of objectives. The objectives and expected impact are descriptive. The Panel would be interested in knowing how these are measured. The next report could helpfully include strategic indicators with targets.</p> <p>Section 4.1 of the report explains that Oxfam is consulting a wide range of stakeholders, both internal and external, in the development of its new global strategy. In the next report the Panel would like to know what this looks like in practice – how are the different stakeholders engaged (e.g. surveys, workshops) and how far does their input extend (broader level</p>	2



	goals or also specific indicators)? Are stakeholders also involved in reviewing the strategy and indicators after they have been adopted?	
A3	<p><b>Progress and challenges over the reporting period</b></p> <p>Oxfam's progress towards its strategic goals is monitored and reported on in an internal Oxfam Operational Report. The report presents some key highlights for FY 17/18, covering people and partners Oxfam worked with, which change goals were most and least focused on, and the kinds of activities undertaken. Helpful figures and graphs/infographics are provided to support the explanations.</p> <p>The report includes a useful section at 3.2 on challenges, successes and lessons learned based (largely) on an Outcome Area Review into each of Oxfam's strategic change goals, which was conducted in February 2019. Shrinking civic space, a reduction in funding and subsequent downsizing and restructuring of the Global Humanitarian Team, and engaging on a relatively new topic (migration and refugees) are some of the challenges Oxfam has faced. The report explains how the organisation is responding to these and outlines lessons learned (elaborated on further in B2 below).</p> <p>In addition to these explanations, it would be interesting to know how these results align with the objectives/expected impact for each goal, e.g. through a comparison to specific indicators or targets that have been set. An example of how this can be presented in future reports can be found in CARE's <a href="#">2017 report</a> (pg. 12) or IPPF's <a href="#">annual performance report</a> (Annex B).</p>	3
A4	<p><b>Significant events or changes regarding governance and accountability</b></p> <p>A detailed explanation of changes in Oxfam is provided. This includes updates on organisational transformation, with a changing role for the Secretariat (from coordination to strategic leadership for the Confederation) and the relocation of OI's head offices and key staff from the UK to Kenya, as well as a global governance review which is developing proposals for a new two-tier governance model.</p> <p>A "country map review" has been implemented to evaluate Oxfam's strategic program footprint and be more locally relevant and responsive. It is expected that the review will lead to a diversification of local business models.</p>	3



	<p>Updates on confederation development are given, including new affiliates in Turkey and Colombia, the closing down of Oxfam Japan, and exploration of opportunities in Senegal and Tanzania (though these have been put on hold).</p> <p>Oxfam's continued response to the "safeguarding crisis" is outlined, with more information including quarterly updates on the implementation of their 10-Point Action Plan available on their <a href="#">website</a> – this is considered a <b>good practice</b>. An update on global risk management is also provided.</p>	
<p><b>B. Positive results are sustained</b></p>		
<p>B1</p>	<p><b><i>Sustainability of your work</i></b></p> <p>The report refers to the Outcome Area Reviews of Oxfam's Strategic Plan conducted in February 2019 into each of Oxfam's six strategic change goals and shares key findings relating to sustainability from the evaluation. In general Oxfam's programmes were found to be contributing to enhancing capacities, empowering vulnerable and marginalised people, creating shifts in policies and institutions, and achieving changes at scale through broad reach and long-lasting, sustainable outcomes.</p> <p>Examples are provided of both strengths and areas flagged for improvement or further attention – such as the need to identify and explain transformative capacities more regularly in programme documents, or to strengthen local institutional relationships.</p> <p>Finally, results from Oxfam's Partner Survey are shared; the results support and drive Oxfam's efforts to invest in building partners' influencing capacities. Most partners have experienced capacity strengthening through Oxfam's work, that these capacities are applicable to other projects, and that Oxfam's support has contributed to improving effectiveness in other projects.</p> <p>The Panel would like to know if there are exit strategies embedded in projects and programs, to ensure project/program sustainability doesn't rely on Oxfam's ongoing support.</p>	<p><b>3</b></p>
<p>B2</p>	<p><b><i>Lessons learned in the reporting period</i></b></p> <p>Section 3.2 of the report presents detailed findings from "Outcome Area Reviews". Key lessons are highlighted, both in terms of what has worked well and what Oxfam can improve in future. Some takeaways include prioritising partnering with organisations that have a large membership</p>	<p><b>3</b></p>



	<p>base to extend reach, having more nimble grant and program management, emphasising contextual analyses and MEL with a gender lens, giving more attention to developing organisational stability in the organisations Oxfam supports, and collecting experiences across regions to develop an overarching policy framework on natural resources.</p> <p>The Panel would also like to know what steps Oxfam is taking in response to these lessons, and looks forward to updates in future reports.</p> <p>Oxfam undertakes many evaluations and reviews and (we assume) generates synthesis reports from them. Focusing this section just on the Outcome Area Review seems therefore rather narrow as the source of learning. The Panel suggests the next report draws more widely on Oxfam's meta-analysis. (This also pertains to references to MEL later in the report).</p> <p>In the next report the Panel suggests including some information on how lessons are shared internally and externally and how learning is systematised in Oxfam's approach. At the start of the response it is stated that Outcome Reviews and annual internal reporting serve as an opportunity for all of Oxfam to reflect on successes, challenges, and lessons learned – how are staff and key external stakeholders involved in these processes and in discussing findings?</p>	
<p><b>C. We lead by example</b></p>		
<p>C1</p>	<p><b><i>Excellence on strategic priorities</i></b></p> <p>Section 3.4 of the report provides two examples of Oxfam's leadership in the sector. A report on extreme economic inequality is released every year to coincide with the World Economic Forum meeting, and external evaluators have found that discussions around inequality have shifted as a result. This is evidenced by good media coverage and the pick-up of Oxfam's ideas in political leaders' speeches.</p> <p>Another example is the WE-Care project, a strong approach which combines research, evidence, and tools to demonstrate that unpaid care and domestic work are key factors in gender equality and economic development. It is stated that WE-Care has contributed to narrative change, and influenced the thinking and actions of organisations at various levels.</p>	<p><b>3</b></p>



	Further examples of achievements and excellence on strategic priorities are covered under section 3.2 of the report.	
C2	<p><b>Expertise is recognised and welcomed by peers and stakeholders</b></p> <p>Oxfam's contributions are valued by peers and stakeholders, as mentioned in some of the examples in section 3.2 of the report. For example, regarding their goal on financing for development and universal essential services, the Outcome Area Review found that Oxfam is "seen as having a unique position among peers, with a powerful global voice and increased potential for influence".</p> <p>Section 5 of the report has further findings from the Outcome Area Review, highlighting that Oxfam's evidence-based research is a widely-recognised strength, and that stakeholders also found Oxfam's advocacy – specifically its ability to listen to and speak on behalf of communities – to be strong.</p>	3
C3	<p><b>Inclusivity, human rights, women's rights and gender equality</b></p> <p>Oxfam's work is underpinned by a commitment to human rights and the report provides a detailed insight into the organisation's work on women's rights and gender equality, and safeguarding.</p> <p>Women's rights and gender equality is one of Oxfam's six change goals and is also mainstreamed into all other areas of work. There is an emphasis on feminist principles guiding women's leadership. An example is provided of Oxfam's work with other human rights and feminist organisations in Tunisia to campaign for a new law to eliminate violence against women and girls.</p> <p>The organisation's 10-Point Action plan commits it to strengthening safeguarding and transforming organisational culture. Again, partnering with feminist and women's rights organisations is seen as key to address gender injustice. Investment into gender programming is also being increased across programmes, and a Gender Justice Platform and Committee works on these issues both across the confederation and in Oxfam's external work. A new <a href="#">Guide to Feminist Influencing</a> was produced in 2018, and the Global Humanitarian Team is increasing gender and protection capacities.</p> <p>The Panel commends Oxfam's strong approach when it comes to gender issues. However, this section is rather aspirational and general. There is a lot about commitments but little about what is being achieved. The</p>	2



	<p>organisation is aiming for 15% of programme spend to standalone gender justice programmes, but without stating the current percentage.</p> <p>Also, the Panel would like more information about other aspects of inclusivity such as disability and minorities in the next report. Are there specific efforts to engage those at risk of being excluded from Oxfam's work?</p>	
C4	<p><b>Minimising negative impacts on stakeholders</b></p> <p>Oxfam has taken action to introduce new policies and mechanisms on safeguarding, including the One Oxfam <a href="#">PSEA</a> and <a href="#">Child Safeguarding</a> policies – these are not linked in the relevant section of the report, but can be found on Oxfam's <a href="#">website</a>, together with a <a href="#">Code of Conduct</a>. A Standard Operating Procedure for Reporting Misconduct is being rolled out, and further policies are being developed on Survivor Support, Digital, Youth and Vulnerable Adults. The panel notes that the aim of having these policies applicable across the whole organisation is to improve standards and consistency.</p> <p>The report also describes how Oxfam is working to improve recruitment processes, including a central system for the provision of references.</p> <p>Confederation-wide Program Quality MEL systems are set up to assess the impact of Oxfam's programmes and ensure they are not inadvertently causing harm – case studies have been developed and turned into training materials. The Panel suggests that the next report summarises Oxfam's lessons learned on 'do no harm'. The lessons learned from the nine case studies on the potential for inadvertently causing harm could usefully have been summarised here or in the earlier lessons learned section.</p>	<b>2</b>
C5	<p><b>Responsible stewardship for the environment</b></p> <p>The report explains Oxfam's work lobbying for policy changes and supporting communities in their resilience against climate change, with very relevant examples cited. A number of reports Oxfam has published are linked .</p> <p>However, there is little information about how environmental impacts of Oxfam's day-to-day work and programmes are assessed and mitigated. The report states that digital engagement is being strengthened and virtual meetings are prioritised over in-person meetings to reduce carbon footprint. This is a very light treatment of the organisation's own</p>	<b>1</b>



	<p>environmental impact. Are there any targets in terms of reducing air travel or CO2 emissions? And are there any other measures in place in Oxfam's offices, such as recycling, using energy efficient appliances, vegetarian/local catering for events, etc? Are there any policies in place which guide these approaches?</p> <p>The Panel would like to see more information on this in Oxfam's next interim report.</p>	
<h2>Cluster B: Stakeholder Involvement</h2>		
<h3>D. Key stakeholders are identified with great care</h3>		
D1	<p><b>Key stakeholders and how they are identified</b></p> <p>Oxfam's primary stakeholders are people living in poverty or suffering in the countries in which the organisation works. The Panel would like to know how these people are identified and prioritised (by age or gender for example) as well as how Oxfam chooses which countries it works in.</p> <p>How are Oxfam's stakeholders mapped and prioritised? Other stakeholders Oxfam engages with are listed, including partner organisations, governments, individual supporters and publics. It would be helpful to know how for example local partners are chosen (some of 4.3 is relevant here but is not linked in Annex 1: Reference Table). Are there any documents that guide how Oxfam identifies which partners to work with and how roles are defined to build on existing capacities? How are advocacy targets chosen?</p>	<b>1</b>
D2	<p><b>Reaching out to those impacted or concerned by your work</b></p> <p>The report explains how Oxfam reaches out to and involves its partners, staff, and other external actors in its global strategy process and in providing input on programmes. Oxfam's Program Standards aim to ensure that program strategies are created in a participatory manner with stakeholders, and that programs have explicit feedback mechanisms in place. Oxfam is also piloting frameworks to better capture informal feedback, in response to the learning that people prefer to give feedback in person to someone they trust. 4.1 and 3.3 reference Oxfam's partner survey. Meeting the CHS commitments is being advanced</p>	<b>2</b>



	<p>through 'Your Word Counts', which aims to provide quality feedback from all humanitarian responses.</p> <p>The explanation in 4.4 of Oxfam's feedback mechanisms is limited. To the Panel members' personal knowledge, Oxfam has consultation mechanisms at country level not discussed here.</p> <p>Future reports could usefully discuss how Oxfam partners are incentivised to ensure community consultation/feedback.</p>	
D3	<p><b>Maximising coordination with others operating in the same space</b></p> <p>In section 3.5, the report states that 'Oxfam works in partnership and coordination with local actors, donors, NGOs and INGOs' and provides examples of how Oxfam tapped into existing advocacy coalitions in Vietnam, shifted its approach in Zambia to focus on working through networks, and co-founded the global VUKA! Alliance on civic action.</p> <p>The examples are good illustrations of Oxfam partnerships and alliances, but the Panel would also like to hear how Oxfam ensures that it works with other actors to maximise the use of resources overall. What policies does Oxfam have to ensure the success of collective efforts of local or national or international actors (a theme of the WHS)?</p> <p>Section 3.2 of the report refers to Oxfam's efforts to work with partners and flags that there is a focus on partnering with organisations with large membership bases in order to maximise reach and impact. One of the lessons learned in this section states that "how to best define roles and complementarities with... partners... merits further debate".</p> <p>Sections 4.2 and 4.3 are also relevant here, talking about how Oxfam is experimenting with new forms of partnership and seeking to move from transactional to transformational partnership models.</p>	2
<b>E. We listen to, involve and empower stakeholders</b>		
E1	<p><b>Stakeholder feedback</b></p> <p>Oxfam receives feedback from its external stakeholders through partner surveys, program feedback mechanisms, and monitoring and evaluation processes, and is exploring ways of better capturing informal feedback. Examples are provided in sections 4.2, 4.3 and 4.4 of the report and the Panel notes positively the emphasis on learning from the inputs received.</p>	2



	<p>Section 4.5 of the report outlines how Oxfam has been engaging with the public, particularly after the “safeguarding crisis”, and has been recording peoples’ expectations and suggestions for improvement. Some key learnings in terms of what the public wants to see from the organisation are shared.</p> <p>The Panel would like to see more information on how Oxfam gathers feedback from the communities it works with in the next report. For example, are there regular community consultations, satisfaction surveys, what other feedback mechanisms can the people Oxfam is working with and for use? Are there any key findings from their feedback, and has any action been taken in response?</p> <p>The Panel also requests information about how internal stakeholders, i.e. staff, are able to provide feedback, e.g. through staff surveys, an internal feedback and complaints mechanism, or staff meetings on certain issues. Section 9.2 of the report makes references to staff surveys; it would be interesting to know more about this.</p> <p>These are points to focus on in the next interim report.</p>	
E2	<p><b>Stakeholder engagement</b></p> <p>Section 4.4 of the report mentions that Oxfam’s Program Standards provide guidance on how to secure good quality stakeholder engagement in the design and delivery of all programmes. Could Oxfam provide a link to the Standards or summarise the key recommendations?</p> <p>In general there is a focus on participatory and collaborative efforts to develop programme strategies. More details on engaging stakeholders in the implementation, monitoring and evaluation of programmes is requested in the next interim report (brief reference is made to supporting increased awareness and use of MEL processes by affected communities in 2019). Humanitarian settings are covered to some extent but others much less.</p> <p>The report also explains how Oxfam engages its stakeholders in strategy review and development (internal and external stakeholders are mentioned but the descriptions focus mainly on partners).</p>	2
E3	<p><b>Main likes/dislikes from stakeholders and organisation’s response</b></p> <p>Key likes and dislikes from Oxfam’s partners are outlined in section 4.2 of the report, taken from the results of a 2014 Keystone Partner Feedback</p>	2



	<p>Report and a more recent survey of women's rights organisation (WRO) partners. Areas where Oxfam could improve (from the 2014 report) included capacity building, non-financial support, invitations to co-shape strategy, and flexibility to adapt support to partners' needs. The more recent survey revealed that partners appreciate Oxfam's amplification of the work and voices of WROs and the approach of working through networks and alliances, and recommended that Oxfam form partnerships based on feminist principles. The report explains how Oxfam is exploring new, transformative forms of partnership in response.</p> <p>The Panel would also like to know about key likes and dislikes received from the people and communities Oxfam works with.</p> <p>Section 4.5 of the report mentions that Oxfam has kept a record of what the public has been saying about their expectations and how Oxfam can improve – the Panel would have liked to see some examples here too.</p> <p>Finally, what are key likes or dislikes expressed by staff, for example in the staff survey, and how is Oxfam responding to this feedback?</p>	
E4	<p><b><i>People and partners have gained capacities that last beyond your immediate intervention</i></b></p> <p>Sustainability relating to partnerships is addressed previously in the report under question B1 (section 3.3 of the report), with findings shared from the Outcomes Area Reviews of the Strategic Plan and from Oxfam's Partner Survey.</p> <p>Specifically relating to capacity building, it was found that Oxfam's programs contribute to enhancing transformative capacity and that individual and group capacity building in community based organisation led to increased proficiency, confidence, and organisational abilities.</p> <p>Partner Survey results showed that most partner organisations experienced capacity strengthening and that the majority also agree that these capacities are applicable to other projects.</p> <p>As noted above, there is a heavy reliance on the Outcome Area review (half of section 3.3). Ideally a wider set of sources should be drawn on.</p> <p>Given the centrality of capacity building to Oxfam's mission, the treatment of E4 is unexpectedly light. The Panel would like to see a more analytical explanation in the next report, including what models Oxfam</p>	3



	employs for capacity development and how the organisation knows how well these work.	
<b>F. Our advocacy work addresses the root cause of problems</b>		
F1	<p><b>Evidence regarding the root causes of the problems you address</b></p> <p>Oxfam invests in research for evidence-based influencing, and the report refers to the Outcome Area Review's findings that research is a key factor feeding into Oxfam's strategy. The review also found that Oxfam's research is widely recognised as a strength, and recommended that Oxfam engage further with academic and research institutions.</p> <p>On this point, the Panel would like to see some more information in the next report as to how Oxfam uses its research results in its programmes , and what other actors are involved. Also, are there any documents that underpin An example to refer to is the <a href="#">CARE International Advocacy Handbook</a>.</p>	<b>2</b>
F2	<p><b>Stakeholders support your advocacy work and value changes achieved</b></p> <p>The report mentions that Oxfam is collaborating closely with partners in alliances in its advocacy, and provides an example from tax reform and budget advocacy work. The Outcome Area Review also found that stakeholders appreciated Oxfam's ability to listen and speak on behalf of communities in its advocacy efforts.</p> <p>Section 5 of the report provides a number of compelling examples of what the organisation considers to be successful Oxfam advocacy. However, the low score here and above are a reflection of the report not answering the two questions in the Accountability Framework, which are:</p> <p>F1. How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions? and</p> <p>F2. How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?</p> <p>In future reports the Panel would like to see these questions addressed, with more information about how communities are involved in either or both developing and delivering/taking part in advocacy work. A good example to refer to on this point is Sightsavers; see pp. 12 and 19 of their <a href="#">2017 report</a>.</p>	<b>1</b>



G. We are transparent, invite dialogue and protect stakeholders' safety		
G1	<p><b>Availability of key policies and information on your website</b></p> <p>Oxfam's annual reports and financial accounts are published on its <a href="#">website</a>, along with the Oxfam constitution, code of conduct, strategic plan, and an evaluation of the strategic plan.</p> <p>Oxfam affiliates' annual reports and finances are published on their own websites. A number of affiliates also publish data to the IATI registry and the Panel notes positively Oxfam Novib's development of an interactive tool to more easily showcase project data for both internal and external stakeholders.</p> <p>While not mentioned in the relevant section of the report, a number of policies are also available on the <a href="#">safeguarding page</a> of Oxfam's website, including the PSEA, Safeguarding, Security, and Sexual Diversity and Gender Identity Rights policies.</p>	<b>3</b>
G2	<p><b>Pay scale, gender pay gap and top salaries</b></p> <p>The report describes how Oxfam aims to ensure fair pay scales which are in line with local markets, competitive, attractive, but also affordable for the organisation. Each country location has a single pay scale, and a One Oxfam grading structure takes into account roles of similar size and scope to ensure rewards are in line with work undertaken.</p> <p>A Global Reward Project is underway to harmonise international rewards, move towards a more localised model, and with the aim of reducing the number of international positions in the organisation. A set of Reward Principles aim to ensure fair pay, equity, and transparency.</p> <p>It is stated that gender pay analysis is underway in some locations, though it is not mentioned what the outcomes of this analysis are. Under the Global Reward Project, each country location will be required to undertake gender pay analysis. The Panel hopes to see some initial findings in future reports.</p> <p>In Oxfam's <a href="#">financial statements</a>, pg. 43, there is an overview of salary scales for higher paid employees, and the salary of the Executive Director is also listed.</p>	<b>3</b>
G3	<p><b>Ensuring privacy rights and protecting personal data</b></p>	<b>2</b>



	<p>Oxfam recognises data privacy as a fundamental right and is committed to using data responsibly. A multi-level compliance programme was implemented in 2018 to comply with EU GDPR legislation, and a framework to improve data protection standards across the confederation. A data rights team has been formed to produce tools and materials to support staff in implementing good data.</p> <p>Whilst not mentioned in the report, there is also a <a href="#">privacy notice</a> on Oxfam's website which outlines what data is collected by the organisation, how that data is used and protected, and how people can request that Oxfam amend or remove their data from their databases.</p> <p>In the next report, the Panel would like to hear Oxfam's analysis of the risks to data privacy, how these are being managed and whether breaches have occurred. It would be good to know if there is a regular training program for staff, partners and allies on data privacy, as data used by Oxfam could be collected in remote countries where there is no data privacy regulation.</p>	
G4	<p><b><i>Largest donors and their contributions</i></b></p> <p>An overview is provided of income received in FY17/18, broken down by broad categories under institutional and public fundraising. However, the top five single donors are not specified, information that would otherwise be in the public domain.</p> <p>Oxfam is asked to provide this information in its next report, drawing on, for example, the annual report and accounts. The 2017/18 report lists on page 30: '£20.9m in direct income from the UK Department for International Development (DFID) • £29.1m in direct income from the European Commission (across both their humanitarian and development directorates) • Approximately £40m in direct income from key UN humanitarian agencies including the World Food Programme, the United Nations Children's Fund (UNICEF), the United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA) and the United Nations High Commissioner for Refugees (UNHCR). It would be a small step to conform to the requirement to list the top 5 donors.</p>	2



Cluster C: Organisational Effectiveness		
H. Staff and volunteers are enabled to do their best		
H1	<p><b>Recruitment, employment and staff development is fair and transparent</b></p> <p>The response refers to improvements Oxfam has made in 2018 with regards to recruitment and referencing processes across the confederation, to help identify any inappropriate applicants. Recruitment processes also include mandatory questions on Oxfam's values, gender justice and safeguarding.</p> <p>The next report could usefully explain Oxfam's policies and processes for ensuring equal opportunities for candidates and employees, and what efforts are made to ensure fair and accessible interview and work environments. Examples to refer to include Restless Development's equal opportunities policy (in their <a href="#">Global Employee Handbook</a>, pg. 30) and Sightsavers' <a href="#">Global Diversity and Equality Policy</a>.</p> <p>The report also provides key diversity statistics, with a breakdown of gender and geographic (southern/northern) representation in various committees and offices. The number of female leaders in senior leadership positions and the board are provided, with more than 50% women in most cases. Oxfam is part of the Fair Share initiative which works to match the percentage of women in leadership positions with the percentage of women employees overall. These are all notable good practices.</p> <p>The Panel notes that data collection and reporting systems have recently been revised to comply with GDPR and better capture data on diversity. Can future reports also include statistics on age and local hires, and how the latter is represented in senior leadership positions? The Panel would be interested in seeing trends over time in future reports.</p> <p>The report states that gender pay analysis is underway. Does this mean that such analysis has not previously been undertaken? In future reports, the Panel would like to see information on gender pay trends over time.</p>	3
H2	<p><b>Staff development</b></p> <p>The learning and development opportunities offered by Oxfam are explained. The online learning platform is a key resource particularly given the distribution of staff across the globe, and over 75% of the workforce</p>	2



	<p>use the platform. An annual learning catalogue also promotes learning opportunities for staff in different locations.</p> <p>A Global Head of Talent and Resourcing was recruited in 2017 to develop a talent management framework.</p> <p>Section 7.3 is brief and purely descriptive. There is no analysis of challenges or top priorities for staff development. The Panel would like to know in the next report how learning and development needs are identified, and how performance appraisals are conducted (i.e. how regularly, who is involved).</p>	
H3	<p><b>Safe working environment</b></p> <p>The report provides a comprehensive overview of Oxfam's efforts to improve safeguarding practices over the past years, including several strategies, action plans, revision of policies, and hiring of dedicated staff to focus on the issue. Oxfam's engagement externally to strengthen safeguarding across the sector and in other institutions is also explained. The Panel appreciates the open and self-reflective nature of this response. The organisation seems to be demonstrating a very strong commitment to avoiding past failings in this area.</p> <p>Information on how concerns can be reported is provided on the <a href="#">safeguarding page</a> of Oxfam's website, and the report explains Oxfam's commitment to publishing safeguarding data (also published on the same webpage).</p> <p>In future reports the Panel would also like to know what policies or procedures Oxfam has in place to cover issues apart from safeguarding – such as on bullying/harassment within the workplace. Oxfam's <a href="#">security policy</a> is also of relevance here.</p>	4
<b>I. Resources are handled effectively for the public good</b>		
11	<p><b>Resources are acquired in line with your values, globally accepted standards and without compromising independence</b></p> <p>Oxfam has an <a href="#">Ethical and Environmental Purchasing Policy</a> which guides the purchasing of goods and services that are produced under fair and safe conditions. The report states that there are a wide range of policies and processes guiding ethical fundraising – can any of these be linked in the next report? Donations from corporations are also screened to ensure</p>	3



	<p>the organisations adhere to Oxfam's values. An informed consent approach is taken when using a person's testimony or images.</p> <p>The report also lists the national and regional fundraising codes that various Oxfam affiliates have signed up to. The next report could usefully specify how adherence to these national standards is tested by the affiliates. Does this, for example, form part of their internal or external audits?</p>	
12	<p><b>Monitoring of progress and re-allocation of resources</b></p> <p>The report explains how resources are shared across the confederation through the Oxfam Investment Fund and a collective resource location process.</p> <p>A global Investment Fund Manager oversees cross-portfolio management, with quarterly and annual reports analysing investment and returns. A Global Program and Influencing Investment Framework guides expenditure allocations in specific countries and programmes.</p> <p>The Panel would also like to know whether/how resources can be re-allocated in response to emerging needs or priorities, if needed, within individual affiliates and (if relevant) across affiliates.</p> <p>The Panel would like to understand the CRA better. What proportion of total income goes to this mechanism? The inner workings of the GPIIF are probably too complex to be of interest to the Panel but a little more explanation of how the mechanism ensures that resources go to top priority countries and priority sectors would be of interest in answering the question on 'reallocation of resources to optimise impact'.</p>	3
13	<p><b>Minimising risk of corruption, bribery and misuse of funds</b></p> <p>Oxfam has a set of financial standards which apply across the confederation, and compliance is monitored through biennial peer reviews amongst affiliates. The Finance, Risk and Audit Committee is responsible for monitoring the financial health of affiliates and is able to commission investigations if needed.</p> <p>Oxfam's <a href="#">Code of Conduct</a> expresses a zero tolerance approach to bribery, as it is contrary to the organisation's values, integrity, transparency and accountability. Workshops were organised for staff to translate these values into daily work life.</p>	3



	<p>There is also an Anti-Corruption Policy which applies to staff as well as other stakeholders including consultants, board and committee members, and partners in a funding agreement with Oxfam. The Panel encourages Oxfam to include a link to this policy online.</p> <p>Oxfam encourages the reporting of instances of malpractice, and the report states that these may be reported 'without fear of reprisal'. How does Oxfam know that its staff or partners have no such fear? Could the next report be clearer about how the whistleblower mechanism works, and include a link to the whistleblower policy? This will also provide insight into how reported cases are handled.</p> <p>An overview of reports under the whistleblower mechanism (amongst other complaints mechanisms) is provided under section 9.4 of the report, but as the categories of reports are not provided, it is not clear how many of these might relate to corruption/fraud.</p> <p>It would also be interesting to know about any lessons that have been learned and changes that have been implemented in response to past incidents. An example to refer to here is Plan International, which publishes summaries of all completed cases <a href="#">on their website</a> with quarterly reports including actions taken and lessons learned.</p>	
<p><b>J. Governance processes maximise accountability</b></p>		
<p>J1</p>	<p><b>Governance structure and recruitment of trustees/board members</b></p> <p>The report explains the legal status and structure of Oxfam, its affiliates, and country offices. The Board of Supervisors governs the organisation, and there is an Executive Board comprising the Executive Directors of each affiliate. The roles of these bodies are explained in the <a href="#">OI Constitution</a>, but it would be helpful to provide a very brief summary in the next report for ease of understanding.</p> <p>Members of the Board of Supervisors are not paid. The report does not answer the question from the framework 'what policies and practices guide replacing and recruiting board members?' How are Board members recruited? Are there targets relating to gender, age or geographic representation, or is consideration given to certain skill sets? Are Board members representatives of affiliates or are there also independent Board members?</p>	<p><b>2</b></p>



	The report could usefully, in 1-2 sentences, state the difference between the Board of Supervisors and the Executive Board.	
J2	<p><b>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</b></p> <p>The governance mechanisms seem to be well developed and mature. The Board of Supervisors' decision-making processes are explained. Various Board Committees have oversight of finances, effective governance, and programmes.</p> <p>The Executive Board meets at least twice a year in person, with teleconferences between meetings. All Board Committees report at the face-to-face meetings. Are there other standing items at these meetings, e.g. on complaints? Are policies reviewed periodically by the Board?</p> <p>Section 9.3 of the report outlines how confederation-wide performance on strategy and finances is evaluated and reported on.</p> <p>The Panel is pleased to see that results from staff surveys are shared with the Executive Board and that there is an effort to allow broader staff representation in decision-making and recommending courses of action.</p> <p>The Platform structure sounds an interesting way of achieving broader representation in decision making. Could this be explained better with 1-2 examples of how platforms have influenced decision making?</p>	3
J3	<p><b>Complaints handling mechanisms and overview of complaints (external)</b></p> <p>The Panel repeats its recommendation from its previous feedback letter to make information about complaints mechanisms more easily accessible on Oxfam's website. The accountability report states that information relating to complaints processes is found in the website's FAQ section, which provides links to the Board Accountability Policies, where more information is provided.</p> <p>Actually, more relevant, dedicated policy documents which include information on the process and timeline for dealing with complaints is to be found on a separate <a href="#">complaints webpage</a>. Whilst this is an improvement from previous years, the complaints webpage is still not so easy to locate – one has to scroll to the bottom of the "<a href="#">contact us</a>" page to find a link to it. The Panel encourages further improvement here with the introduction of a dedicated/more visible complaints/feedback button on the homepage (or higher up on the "contact us" page) to further increase</p>	3



	<p>accessibility. It is also suggested to provide the contact information of Oxfam's country offices on the complaints page, so that it is as easy as possible for complainants to submit complaints related to programmes or country level activities.</p> <p>A detailed overview of complaints received from country offices in FY17/18 is provided – 72% of offices provided statistics and the aim is to have all offices do so in future years. The overview includes number of complaints, the channel they were submitted through, complainant category (affected individuals, partners, staff, general public), and resolution status. In future years, could usefully include information on what category complaints broadly relate to, e.g. fundraising, safeguarding, communications, and whether complaints in various categories are increasing or decreasing compared to previous years.</p> <p>The Panel suggests that the next report also includes some analysis of what has been learned from both the process of receiving and addressing complaints and the content of the complaints, and the actions taken in response.</p> <p>Overall this is a strong area of the report and the open reporting of the numbers of complaints and whether they have been resolved is exemplary. This section would have received the highest rating of 4 if not for the abovementioned difficulty in locating information on the website on how to make complaints.</p>	
J4	<p><b>Complaints handling mechanisms and overview of complaints (internal)</b></p> <p>Some information is provided in section 8.3 of the report, explaining that internal stakeholders are encouraged to report malpractice and that whistleblowers will be protected. Otherwise complaints mechanisms for internal stakeholders, such as the whistleblower mechanism are not well described. The Panel requests further information and recommends that Oxfam upload the whistleblower policy online.</p> <p>Does each affiliate have a nominated focal point for receiving complaints that comes via a country programme or via the OI secretariat?</p> <p>As mentioned under J3 above, an overview of complaints received is presented, and includes numbers on reports received through the whistleblower mechanism, but it is not specified what broad topics these complaints related to (e.g. fraud, safeguarding).</p>	2



J5	<p><b>Protecting confidentiality and anonymity of those involved in complaints</b></p> <p>Section 8.3 of the report explains that Oxfam will protect whistleblowers from victimisation and dismissal, and that if it is not possible to address a concern without revealing the complainant's identity, this is discussed with the complainant in order to decide whether to proceed with an investigation. It would be useful to clarify if Oxfam allows for anonymous reporting through any of its complaints channels.</p> <p>Section 7.4 of the report also explains how data on safeguarding cases is handled; in line with a survivor centred approach, Oxfam ensures confidentiality in all public reporting.</p>	2
<p><b>K. Leadership is dedicated to fulfilling the 12 Commitments</b></p>		
K1	<p><b>The governing body and management are held accountable for fulfilling strategic promises including on accountability</b></p> <p>The performance of the Board of Supervisors, and its relations with other bodies, is reviewed by the Governance Committee. How frequently is this done, who is consulted in the process, and are there any key findings from past reviews?</p> <p>The OIS Governance Team tracks progress on action items from Board meetings, and Board Committees report twice yearly on their work against Committee Workplans. Information on the work of the two Boards is made accessible to all staff on Oxfam's intranet.</p> <p>The Panel would like to know more about how the performance of senior leadership is assessed. The report states that the Board of Supervisors evaluates the Secretariat through annual reporting against a common Oxfam Operational Plan. Is there a specific evaluation of the performance of the Executive Director? Is contribution to/performance against the Accountable Now reporting framework included?</p>	2
K2	<p><b>Inclusion of staff in discussing progress toward organisational accountability</b></p> <p>The report explains that Oxfam staff have been involved in efforts to improve and change organisational culture. This includes online and in person workshops where staff could discuss how organisational values translate into their daily work, and staff participation in and leadership of initiatives to improve Oxfam's culture. The global strategy process is led by a cross-regional, cross-functional, cross-hierarchical strategy development team, composed of staff from across the organisation. The Panel</p>	2



	<p>appreciates this inclusive approach. Can Oxfam also provide some concrete examples of decisions or changes made due to staff input?</p> <p>In the next report, the Panel would also like to see some information about how staff are involved in the accountability reporting process: do certain staff members provide input on the draft report, is the Panel's feedback shared with staff, and are recommendations for improvement discussed with staff?</p>	
K3	<p><b><i>Scope of this accountability report and influence over national entities</i></b></p> <p>The report covers the whole Oxfam International confederation, with information provided by each of the 19 affiliates and the Secretariat. Throughout the report, reference is made to common (One Oxfam) policies and processes, and efforts to improve organisational culture and safeguarding practices across the confederation is evident. The organisation is commended for the considerable lengths it is going to to ensure common policies are addressed and that information on performance against (many of) them is being centralised for reporting.</p>	4