

COMMITTING TO CHANGE, PROTECTING PEOPLE

Toward a more accountable Oxfam



Final Report
**Independent Commission on Sexual Misconduct,
Accountability and Culture**

June 2019

Independent
COMMISSION | ON SEXUAL MISCONDUCT,
ACCOUNTABILITY & CULTURE CHANGE

LETTER TO THE READER

Following the 2018 reports of sexual misconduct by Oxfam staff in Haiti and elsewhere, and Oxfam management’s mishandling of such cases, Oxfam International’s executive board and board of supervisors mandated the establishment of the Independent Commission on Sexual Misconduct, Accountability and Culture Change. The remit of the Independent Commission is to conduct a confederation-wide review of Oxfam’s culture; accountability; and safeguarding policies, procedures, and practices.

The nine independent experts comprising the Independent Commission represent a cross-section of civil society, government, multilateral institutions, international organizations, and the private sector.¹ The commissioners all have deep expertise in forensic accounting, human resources, humanitarian protection, women’s rights, survivor support, law, and civil society. Their different yet complementary areas of expertise ensured a holistic and innovative approach to carrying out their mandate.

The journey began in May 2018 and took the commissioners to nineteen countries and through hundreds of conversations with Oxfam stakeholders worldwide, including but not limited to the community members Oxfam serves, Oxfam management, technical and administrative support staff, former staff, donors, government authorities, and community leaders, as well as regular inputs from a Survivor Reference Group. This work has served as a reminder that systemic failures in safeguarding and power abuses—at Oxfam and across the aid sector—have contributed to impunity for perpetrators, weakened accountability to survivors, and eroded trust within the organization and between Oxfam and its stakeholders.

The work of the Independent Commission also shows that Oxfam’s mission and efforts have had a positive impact on the lives of some of the world’s most vulnerable peoples. The commissioners all believe in Oxfam’s mission and propose in this report a pathway forward that will rebuild trust between Oxfam and all of its stakeholders—in particular, its staff and program participants—as well as lead to a safer, stronger, and more effective organization for all.

We thank you for your confidence,

Zainab Bangura, *co-chair*

Katherine Sierra, *co-chair*

James Cottrell, *commissioner*

Shannon Mouillesseaux, *commissioner*

Rt Hon Sir Oliver Heald, *commissioner*

Birgitta Ohlsson, *commissioner*

Musimbi Kanyoro, *commissioner*

Katharina Samara-Wickrama, *commissioner*

Marie-Laurence Lassegue, *commissioner*

June 2019

¹ Please see https://www-cdn.oxfam.org/s3fs-public/oxfam_ic_bios_en.pdf for a list of commissioners.

EXECUTIVE SUMMARY

COMMITTING TO CHANGE TO REBUILD TRUST

The Independent Commission on Sexual Misconduct, Accountability and Culture Change (IC) was established in February 2018 and was mandated by Oxfam to conduct a confederation-wide review of Oxfam's culture; accountability; and safeguarding policies, procedures, and practices. The IC has now concluded its research among current and former staff, partners, communities and other stakeholders worldwide.

The IC found that Oxfam has prioritized its program goals over how it realizes its core values and the principle of "do no harm" with communities, partners, and staff. At the heart of the issue is how power is managed and trust earned and kept. Oxfam operations have suffered from a lack of robust, confederation-wide safeguarding and related policies and procedures. The IC found ineffective reporting mechanisms, safeguarding process failures, and accountability gaps. Beyond sexual misconduct, the IC found issues related to work environments; although a large number of surveyed staff across the confederation pointed to positive work environments, this situation was not universal. Indeed, although recognizing that many Oxfam staff operate in healthy environments, the IC also found that staff across multiple country programs struggle because they operate in toxic or unsupportive environments. The IC believes that Oxfam's environment and processes for preventing and responding to harassment and bullying across the confederation are deficient, and that the well-being of staff requires immediate attention. The IC also found that Oxfam is a highly complex confederation with many different organizational cultures, and it is essential for the organization to realize its ambition to be "One Oxfam" in line with its "One Oxfam 2020 Vision." Incongruent systems and governance challenges hamper Oxfam's ability to comprehensively address the safeguarding and organizational culture challenges it faces.

The IC also finds, however, that Oxfam has tremendous will, energy, and commitment to reform. Since February 2018, the organization has taken important steps, including but not limited to new confederation-wide prevention of sexual misconduct and child protection policies, a standard operating procedure for reporting misconduct, and an executive board agreement to resource the development of a single Oxfam-wide safeguarding network. Notably, it recently developed its first survivor support guidelines.

Oxfam has tremendous will, energy, and commitment to reform.

Oxfam also recently updated its annual performance review approach, embedding it within Oxfam values, safeguarding, its code of conduct, and leadership skills.

Regarding its partners, Oxfam has developed a partner code of conduct that will accompany a standard partner contract, which outlines obligations for managing misconduct. Oxfam also has developed a new confederation-wide partnership assessment tool to identify partners' levels of capacities and support needs, and a fund to support partners in safeguarding.

Finally, in March 2018, Oxfam's boards committed to adopt feminist principles and mandated the development of a strategy and program to transform its organizational culture. The confederation has been restructured in line with its One Oxfam Vision 2020 strategy, which aims to distribute the power and management of its work between the secretariat and the affiliates.

These steps are important and to be commended; however, the IC also cautions far more work is needed to make these changes a reality across the ninety countries within which Oxfam operates. As the IC has learned through its research, the challenge lies in implementation, which is essential if Oxfam is to regain the trust of communities and staff, rectify historical injustices, and honor the organization's mission and staff.

Culture change must be at the core of Oxfam's transformation; therefore, the organization must reflect on the root causes of the issues it confronts and consider how to fight injustice within. Its recent culture survey, and the bottom-up program of dialogue and action resulting from it, is an important step in this direction. The recommendations presented in this report are designed to help Oxfam undertake the critical task of culture change, guided by transformational leadership approaches that address the nature of relationships between people; how leadership is demonstrated; and how systems are developed and implemented so Oxfam can rebuild as a safer, stronger, more ethical, and more effective organization for all.

Oxfam has taken the important step of publicly committing to change and being transparent in its work as a means to examine the way it must reform to address sexual misconduct. Oxfam is making progress in developing One Oxfam safeguarding policies and tools. Staff remain passionate about and loyal to Oxfam values, and have stated that they want to see Oxfam change and grow. The task at hand, however, should not be underestimated. Oxfam is facing some hard truths about its internal power dynamics and must be courageous as it continues to undertake internal reform. It must work hard and at pace to implement change throughout the confederation, as well as systematically collaborate with partners and communities to safeguard the communities they serve. Maintaining transparency throughout this journey is imperative to rebuild trust.

The challenge lies in implementation if Oxfam is to regain the trust of communities and staff, rectify historical injustices, and honor the organization's mission and staff.

The IC believes that Oxfam can transform itself into an organization that is more accountable to and better protects the people it serves. With commitment and a keen focus on implementation, Oxfam has the potential to become a voice of leadership in wider sector reform.

Although the IC's remit was to review Oxfam exclusively, it recognizes that sexual harassment, exploitation, and abuse are found throughout the aid sector; they are symptoms of wider power abuses that exist in all public and private spheres. Community research by the aid sector and the IC shows that seventeen years on from the 2002 sex-for-food scandal, the sector has a long way to go in realizing its commitment to zero tolerance of sexual misconduct and abuse. To that end, the IC hopes this report can foster both reflection and action more widely across the aid sector.

Committing to Change to become a voice for wider sector reform.

The IC believes that a commitment to change for Oxfam means to:

- 1) Admit publicly to errors the organization has made in the past
- 2) To propose a way forward
- 3) To systematically implement new and improved policies and procedures, ensuring they are there to stay.

RECOMMENDATIONS OVERVIEW

A. Reinvent the system

Oxfam requires a complete overhaul of its confederation-wide safeguarding system to combat and respond to sexual and other forms of misconduct at every level—with staff, partners, and in communities; this overhaul is underway but requires further investments. Oxfam must also show that there are real and visible consequences for acts of misconduct for anyone operating under its brand.

Recommendations include the following: Reform the board of supervisors to drive greater accountability; create the role of a chief ethics officer to oversee the implementation of a single, confederation-wide safeguarding system; implement a standards-based maturity model; build survivor leadership, including the appointment of a lead survivor expert to ensure a survivor-centered approach; operationalize Oxfam's zero tolerance policy; provide a program of support to Oxfam's partners, thus ensuring they have the capabilities to carry out the safeguarding roles expected of them; and mainstream safeguarding into all of Oxfam's work.

B. Support survivors to recover and rebuild their lives

Sexual exploitation and abuse can inflict long-term or even permanent damage. Survivors have a right to the support they need to recover and rebuild their lives.

Recommendations include the following: Ensure access to specialized and survivor-centered support services; use a survivor-centered approach to pursue justice; and make reparations to help survivors rebuild their lives on their own terms.

C. Co-create community reporting systems

Oxfam urgently needs to comply with pre-existing commitments to affected populations regarding accountability. It must take action to ensure that program participants have access to safe and responsive complaint mechanisms that reflect their needs and preferences.

Recommendations include the following: Be accountable to *all* affected populations by establishing multiple channels for reporting sexual exploitation and abuse that align with community preferences; conduct annual reviews of safeguarding systems with partners and the communities Oxfam serves; and bolster the annual reviews with external reviews.

D. Create a supportive environment

Oxfam must create a supportive environment in which staff can challenge the organization to improve. Successful safeguarding requires a focus on an ethical, safe, and healthy environment for both staff and program participants.

Recommendations include the following: Establish an internal ombuds system to provide staff with an independent, neutral, informal, and confidential place to air concerns and seek advice; invest in surveys to continuously monitor staff satisfaction; foster and support staff dialogues around culture, power dynamics, inequalities, and discrimination; invest in programs to address these issues and transform the organization's culture; tackle staff work-life balance concerns meaningfully; and review contractual approaches to staff hires.

E. Make it personal

Oxfam must take aggressive steps to realize its organizational values in all areas of its work. All staff must be held accountable for realizing its values, and the code of conduct must be truly understood and embraced by all staff, partners, and the communities in which Oxfam works.

Recommendations include the following: Implement a leadership development model that supports Oxfam's values and required competencies, while also strengthening and diversifying its leadership team. Action should include undertaking a management cadre refresh process. This process could be implemented over time in cycles, whereby the organization groups together and advertises for competition those managerial posts for which the incumbents' contracts are concluding or open posts are anticipated; uses performance management processes to deal more decisively with poor managers, including linking performance more clearly to expected behaviors; strengthens the organization's leadership training programs; and takes practical steps to operationalize the code of conduct.

F. Model transparency

Oxfam leadership can show that it is living up to the organizational values only by demonstrating complete transparency, whenever it is safe to do so.

Recommendations include the following: Continue public reporting of safeguarding cases, taking care to do so in line with survivor-centered principles; undergo an audit to assess its compliance with the expanded Core Humanitarian Standard on Quality and Accountability; publish its policies so all in the sector can access them; track and share progress on gender justice commitments; and engage in a continued and public independent review of the organization's progress in safeguarding and culture change.

G. Work together within the sector to realize systemic change

The development and humanitarian sectors still face significant challenges in some of the most fundamental areas of safeguarding, such as prevention, reporting, and response. Even if Oxfam undertakes important reforms to its safeguarding approach, these efforts will have limited impact if Oxfam and its peers do not have an enabling environment to support reform.

Recommendations include the following: Encourage all aid organizations to join the Inter-Agency Scheme for the Disclosure of Safeguarding-related Misconduct in Recruitment Process within the Humanitarian and Development Sector (Misconduct Disclosure Scheme); promptly establish interagency reporting systems that comply with Inter-Agency Standing Committee guidance; incorporate humanitarian safeguarding tools into development settings; incorporate safeguarding into the localization agenda; and address the ways in which donors assume further safeguarding costs.

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BACKGROUND

Oxfam has a rich history of fighting injustice and poverty, with more than 75 years of experience in development and humanitarian programming, spanning more than 90 countries. Oxfam prides itself on being a rights-based organization that prioritizes gender justice campaigns and women's empowerment, and asserts that the right to gender justice underpins all of its work.²

Given this foundation of values and approach, the revelations that staff members had sexually exploited women (and allegedly abused girls, although investigations were unable to substantiate this charge) in Haiti during the organization's earthquake relief operations, and that several staff members subsequently had been allowed to resign, were all the more shocking.

These revelations are not unique to Oxfam. As evidenced by the 2002 sex-for-food and other sexual abuse scandals involving a multitude of international nonprofit organizations, United Nations (UN) agencies, and UN peacekeepers,³ the aid sector has not managed to resolve the organizational, cultural, environmental, and legal challenges to successfully implementing safeguarding⁴ strategies and hold perpetrators fully accountable. In fact, the United Kingdom (UK) Parliament's International Development Committee said in 2018 that "*whilst there are clearly actors within the aid community who are dedicated to tackling SEA [sexual exploitation and abuse], the overall impression is one of complacency, verging on complicity.*"⁵ Nonetheless, the media coverage of Oxfam's failings in this regard created an inflection point for the aid community, with donors, peers, and partners coming together to commit to real change, as evidenced in the October 2018 Safeguarding Summit, hosted by the UK government.⁶

2 "How We Fight Poverty: Our Goals and Values," Oxfam International, accessed April 28, 2019. <https://www.oxfam.org/en/explore/how-oxfam-fights-poverty>.

3 See, for example, Sexual Violence and Exploitation: The Experience of Refugee Children in Liberia, Guinea and Sierra Leone, United Nations High Commissioner for Refugees/Save the Children-UK, accessed January 2, 2019. <https://www.parliament.uk/documents/commons-committees/international-development/2002-Report-of-sexual-exploitation-and-abuse-Save%20the%20Children.pdf>.

4 The aid sector does not have a common definition of safeguarding. It originated as a UK term meaning "protecting people's health, well-being and human rights, and enabling them to live free from harm, abuse and neglect." See <https://www.cqc.org.uk/what-we-do/how-we-do-our-job/safeguarding-people>. Oxfam has no specific definition of safeguarding but uses the term to summarize policies on sexual exploitation, abuse, harassment, and other misconduct policies, such as human trafficking, bullying and intimidation, violations of the code of conduct, use of pornography, and not disclosing sex offenders.

5 Sexual Exploitation and Abuse in the Aid Sector: Conclusions and Recommendations, UK Parliament, Parliamentary Business, paragraph 2, accessed January 2, 2019. <https://publications.parliament.uk/pa/cm201719/cmselect/cmintdev/840/84019.htm>.

6 Safeguarding Summit 2018, UK Government, <https://www.gov.uk/government/topical-events/safeguarding-summit-2018>.

For its part, Oxfam publicly acknowledged that it failed “to properly prevent and investigate sexual misconduct” and embarked on a “10-Point Plan” to strengthen its safeguarding policies and practices, and transform its organizational culture.⁷ As part of that plan, the Independent Commission on Sexual Misconduct, Accountability and Culture Change (hereafter referred to as the IC) was established with a mandate “to conduct a confederation-wide review of Oxfam’s culture, accountability and safeguarding policies, procedures and practices, and propose recommendations on how Oxfam can better align with its values and strengthen its systems to prevent and respond to all forms of abuse of power, harassment, and interpersonal misconduct, including sexual misconduct, by anyone involved with Oxfam.”⁸

The evaluation of Oxfam’s response must consider that Oxfam is a large, heterogeneous organization with many different organizational cultures. Oxfam has more than 10,000 staff and some 40,000 volunteers worldwide, and operates in 90 countries. Since 2011, it has moved from a loosely-confederated model, in which affiliates worked on different programs and in different offices in the same country, to today where Oxfam is One Oxfam at the country level and all of the confederation’s work is building toward a more equal structure and greater connection and collaboration.

An important part of Oxfam’s response in its 10-Point Plan was its declaration of zero tolerance⁹ for sexual misconduct. In parallel, the confederation has been undergoing restructuring in line with its One Oxfam Vision 2020 strategy over the past five years. This new model aims to better distribute the power and management of the organization’s work between the Oxfam International secretariat, its nineteen legally distinct affiliate organizations, and all of its country programs. The safeguarding crisis has been part of a catalyst for debate on whether ongoing reforms are enough to create the organization that Oxfam aspires to be.

In January 2019, the IC released an interim report, which shared its emerging findings, informed primarily by conversations with Oxfam staff in affiliate and country offices, as well as former staff. The IC has subsequently evaluated new and developing Oxfam policies and procedures, and assessed findings from field research with partners and the communities Oxfam serves. It recognizes those areas in which Oxfam has made progress, which is important for the organization and the sector as a whole. At the same time, the IC’s findings continue to highlight that power abuses—coupled with an absence of the systematic application of a protection lens and procedures to all programming—are at the root of Oxfam’s safeguarding crisis and that of the wider aid community.

7 “Safeguarding in Action: Our 10-Point Plan,” Oxfam International, accessed April 28, 2019. <https://www.oxfam.org/en/oxfams-commitment-stamping-out-sexual-harassment-and-abuse>.

8 See <https://www-cdn.oxfam.org/s3fs-public/independent-commission-terms-of-reference.pdf> for Terms of reference.” Independent High-Level Commission on Sexual Misconduct, Accountability and Culture Change at Oxfam.

9 The IC took this term to mean that zero tolerance requires that every staff member, volunteer, consultant and representative, and partner of Oxfam at all levels of the organization take on the responsibility to act on rumors of and possible incidents of sexual harassment, sexual exploitation, and other forms of abuse, such as bullying. It requires that the organization respond to all verified incidents with disciplinary action, including dismissal, when appropriate.

OVERVIEW OF RESEARCH METHODS

Insights from Desk Review

- Case information
- Current and draft safeguarding and survivor support policies and procedures
- Oxfam-commissioned external investigation review of the Oxfam case management system
- Humanitarian Quality Accountability Initiative evaluation
- Sector documentation

Quantitative Research

IC SURVEY OF SELECT COUNTRY PROGRAMS ON SAFEGUARDING & SEXUAL MISCONDUCT

142

people participated in the survey from...

9

country offices (31% response rate average)

2017 GLOBAL STAFF SURVEY

67

program operations countries

5

affiliate headquarters and the secretariat staff

2018 CONFEDERATION-WIDE CULTURE SURVEY

3,771

staff (out of 10,000)

2018 PARTNER SURVEY

447

partners (out of 3,600)

Qualitative Research

SURVIVOR INPUT

10

-person survivor reference group that met 4 times

1

survivor commissioner

STAFF INTERVIEWS

Approximately

660

discussions with staff and former staff

Visits to

18

offices (9 country offices, 3 Oxfam International secretariat offices and 6 affiliates)

IN-DEPTH COMMUNITY & SURVIVOR RESEARCH

21

interviews with local government officials and staff of other aid agencies

21 focus group discussions with

168

3

countries across Africa & Asia

women, girls, boys, and men in refugee camps, 1 refugee host community, and 1 community in which Oxfam operates a development project

ROUNDTABLES

4

roundtables with experts

See Annex A for the details of the research methodology.

THE CHALLENGE

Sexual exploitation and abuse are about power and control. They are egregious manipulations of power, trust, and vulnerabilities to reap monetary, social, political, or sexual benefit from the sexual exploitation of another. The challenge is societal and confronts all actors in the sector. Recognizing that sexual exploitation and abuse take place at all levels, the challenge that Oxfam faces is fundamentally rooted in how formal and informal power is managed and trust earned and kept in all of its relationships.

These challenges—and how they affect the people Oxfam serves, its partners, and the staff at its heart—are explored below. Further, the IC has noted the actions Oxfam is taking to address these challenges.

A. THE PEOPLE OXFAM SERVES: EXPOSED AND UNSUPPORTED

Sector overview

Structural violence—the systematic ways in which social structures and/or institutions harm and disadvantage people by preventing them from meeting their basic needs—which gives rise to sexual exploitation and abuse—is present everywhere in the Global North and South.¹⁰ Thus, an understanding of local norms and behaviors in each community in which Oxfam works is an important factor in understanding power abuse risks and safeguarding approaches. In humanitarian settings, the need for this understanding is heightened because of the specific vulnerabilities people face in crisis and displacement, and the changes in community power structures and norms.

Since the 2002 sex-for-food scandal, in which some of the aid sectors' largest agencies, the UN, and international nongovernmental organizations (NGOs) were implicated,¹¹ the *humanitarian* sector has established several initiatives and produced a plethora of policies and procedures to address the issue.

Despite enormous investments, the aid sector still has a long way to go in realizing its safeguarding commitments in its programs. Subsequent to the revelations of sexual exploitation in Oxfam Haiti operations in 2011, renewed interest and scrutiny into

¹⁰ "Structural Violence," accessed on April 28, 2019,

<http://www.structuralviolence.org/structural-violence>.

¹¹ "Experience of Refugee Children in Liberia, Guinea and Sierra Leone,"

<https://www.parliament.uk/documents/commons-committees/international-development/2002-Report-of-sexual-exploitation-and-abuse-Save%20the%20Children.pdf>.

safeguarding within Oxfam and the sector as a whole developed, leading to a range of new initiatives and commitments—many of them with Oxfam’s active participation. For example, the latest initiatives include the UK Government’s Department for International Development’s October 2018 conference to organize collective action on sexual exploitation and abuse in the sector,¹² and InterAction’s¹³ new three-year From Pledge to Action project, which focuses on organizational change to improve organizational culture, policies, procedures, and training.¹⁴ Work is also underway to provide a sector-wide solution that more effectively prevents perpetrators from moving around in the system and to test external accountability mechanisms, like the Dutch government proposal for an independent aid ombudsman. There is also an interagency referencing system that aims to prevent continuous employment of abusers in the humanitarian field by exchanging relevant sensitive information on candidates who have perpetrated acts of sexual misconduct while respecting applicable legal and regulatory requirements.¹⁵ That said, as the UK Parliament’s International Development Committee noted, progress could stagnate, as demonstrated in the aftermath of previous reports and scandals.¹⁶

The face of sexual exploitation and abuse

Against this backdrop, the IC set out to better understand the dynamics of sexual exploitation and abuse in those settings in which Oxfam and other humanitarian and development agencies operate by commissioning in-depth research within refugee and host communities in three countries.¹⁷ It is imperative to note that in such settings, community members cannot always distinguish between the different humanitarian and development organizations. Thus, the experiences of alleged sexual misconduct¹⁸ shared by community members may have been perpetrated by employees and associates of any one of a multitude of UN agencies and international and local NGOs. For this reason, the IC’s findings should be of concern to the whole aid sector, not just Oxfam. Similarly, recommendations put forth by community research participants are for all actors operating in their communities and, by extension, the wider humanitarian and development sector.

“The Oxfam story did not reveal to aid organisations that SEA was a problem, but it did highlight the impact of a media exposé. The sector has been aware of the problem of SEA for years, but and even the UN Secretary-General, have indicated, action only seems to come when there is a crisis. A reactive, cyclical approach, driven by concern for reputational management, will not bring about transformational change.”

UK Parliament’s International Development Committee

<https://publications.parliament.uk/pa/cm201719/cmselect/cmintdev/840/84019.htm>

12 “Safeguarding Summit 2018.”

13 InterAction is the largest umbrella NGO coalition of international organizations and partners in the United States. See more at www.interaction.org.

14 Helen Pleger and Soshana Hashmie, “Zero Tolerance for Doing Nothing,” *Interaction*. Accessed April 29, 2019. <https://www.interaction.org/blog/zero-tolerance-for-doing-nothing>.

15 Steering Committee for Humanitarian Response, “The Inter-Agency Scheme for the Disclosure of Safeguarding-Related Misconduct in Recruitment Process within the Humanitarian and Development Sector,” Accessed April 29, 2019, <https://www.schr.info/the-misconduct-disclosure-scheme>.

16 “Sexual Exploitation and Abuse in the Aid Sector,” paragraph 4.

17 Two countries in Africa and one in Asia were chosen on the basis of (a) geographical spread, (b) mix of humanitarian and development programs, and (c) ongoing protection or gender-based violence work to ensure that established referral mechanisms are in place if participants need support.

18 The remit of the consultancy firm contracted by the IC to carry out this body of research did not include conducting investigations. Thus, the IC is not able to verify alleged acts of sexual exploitation and abuse shared throughout the course of this research. However, with the informed consent of the complainants, the IC referred these cases to the relevant organizations operating in the area. Those that involved refugees were referred to the UN Refugee Agency, bearer of the global refugee protection mandate.

The objective of the research was to ground the IC's recommendations by asking these questions:

- What is the nature and level of sexual exploitation and abuse in these three settings?
- What systems are in place to prevent, report, and respond to allegations of sexual exploitation and abuse?
- How do beneficiary communities understand these systems?
- What barriers or challenges do beneficiaries experience in reporting sexual exploitation and abuse?

The research team found that sexual exploitation and abuse allegations were pervasive in two of the three research sites, with coercive transactional sex accounting for the main form of sexual exploitation. This exploitation included both aid to which they were already entitled free of charge and employment offers in exchange for sexual favors.

The focus group participants told the research team that those who do not agree to sexual exploitation suffer penalties, including withholding humanitarian assistance, termination of employment, and withholding payment for work completed. Some women stated that their husbands lost their jobs because the women refused to have sex with "the boss." In addition, in focus group discussions the research team conducted, some elderly and disabled women stated they had to wait longer in the sun in distribution lines than those considered "attractive" or those engaged in a transactional sexual relationship with aid workers. Sexual abuse also figured prominently in the research; participants stated that adolescent girls were under significant pressure to engage in sexual relationships.

Alleged perpetrators belong to many humanitarian and development organizations. Although the majority are national staff—they account for the largest share of staff in any aid operation—refugees and other community members (notably daily and incentive workers) also allegedly perpetrate acts of sexual exploitation and abuse.

The research team also found a substantial lack of effective, accessible safeguarding mechanisms in the communities it visited. Alleged perpetrators represent a variety of aid actors, so community members often have a hard time understanding which organization employs an alleged perpetrator; also, interagency reporting mechanisms are not widely available, and people may not even know about them. At the time of writing, one of the research countries has no interagency mechanism in a major humanitarian operation underway. General feedback and reporting mechanisms exist in most of the program sites visited, but community awareness of these mechanisms is weak, information is not always available in local languages, and its use is hindered by the low literacy levels among the local people. At each refugee camp site the research team visited, an extremely small number of participants received any kind of awareness raising regarding sexual exploitation and abuse, and the number of focal points for such information was extremely limited.

"The research found that SEA by humanitarian and development actors is pervasive [in the research sites visited in two of the three study countries]"

Proteknôn Consulting Group

Perpetrators reportedly target schoolgirls and young women who lack the funds to pursue a university education. Girls fall prey to men who promise to pay their way through school—a highly sought-after gateway to economic independence and a respected profession—in exchange for sex.

For example, in one refugee camp, the ratio was one sexual exploitation and abuse focal point per 10,000 people. This lack may explain in part why focus group participants demonstrated little understanding of the scope of prohibited conduct, their right to report incidents, how to report, consequences for perpetrators, and the support and protection available to survivors and whistleblowers.

As noted previously, the research team gathered stories and perceptions of communities but did not investigate them. At the same time, the research team also found little evidence from the focus group discussions that sexual exploitation and abuse reports, when made, were handled appropriately by the responsible organizations, nor whether appropriate assistance was provided. Focus group participants expressed frustration that reports either went unacknowledged ("*into a black hole*") or were dismissed outright. The team heard of multiple cases of women or girls whose "relationship" with an NGO employee resulted in pregnancy. Participants said that in one case, an organization refused to take any responsibility; in another, they said the organization fired the alleged perpetrator but took no other actions. The team also heard that survivors usually were not provided with any support. This finding was echoed in separate IC research with Oxfam staff, several of whom highlighted recurring concerns that survivors were not being provided with adequate support.

Informal reporting on sexual exploitation and abuse was found in one research site. This community had completely given up on formal mechanisms and established their own means of reporting via a female community leader who they trusted to take their reports seriously, maintain confidentiality, and refer the reports to agency focal points. The community leader then records their allegations and tries to channel them to NGO representatives in the camp. At the time of the research, the leader was unaware of any action that NGOs may have taken in response to the reports.

Messages from communities

1. Act on what communities are telling you

During focus group discussions, participants expressed frustration and made sincere pleas for assistance in addressing sexual exploitation and abuse. They wanted the information they disclosed to be kept totally confidential and acted on. A refugee woman explained:

“We used to write in the suggestion box. They go nowhere; they go absolutely nowhere. What we are begging for now is that you please pass the message to someone...”

“What we want at the end of the day is help. We want someone who will help us.”

2. Reduce the risk: Empower women

Female refugees would like every organization to place senior female focal points for preventing female sexual exploitation and abuse in refugee camps; these focal points then can be contacted directly or through a trusted community intermediary. They also recommend that female national staff recruit the incentive workers and operate food and non-food item distributions. Further, they recommend that organizations do the following:

- a. Hold regular, gender-segregated meetings at which target beneficiaries participate in reviewing sexual exploitation and abuse procedures and reporting mechanisms.
- b. Provide regular updates to communities on the progress of investigations and the measures being taken to sanction perpetrators and support survivors.

Finally, they request that skills training, income-generating and livelihood opportunities, and access to higher education be made available and/or built into program design to reduce their vulnerability to sexual exploitation.

3. Build awareness and train all community members on sexual exploitation and abuse

In both humanitarian and development programs, focus group participants advocated placing billboards and posters in strategic locations around project sites to explain sexual exploitation and abuse and how to report it. Suggested locations included high traffic areas, water points, distribution sites, women’s safe spaces, child/woman-friendly spaces, schools, churches, and clinics.

An elderly refugee woman noted:

“It is very good to have posters because each time you pass by a poster, you read it, and you are reminded of a certain message.”

The signage was not seen as a stand-alone approach, however. Participants wanted posters and flyers to be incorporated into live trainings. They warned that pictorial images must be explained to avoid misinterpretation.

4. Train all beneficiaries on sexual exploitation and abuse, and how to report them

The focus group discussions revealed that for many organizations, there is a gap around training on sexual exploitation and abuse and reporting, although beneficiaries are entitled to and want such information. In one focus group, adolescent girls clearly requested that

“training and awareness should be for the whole community”

—not just focal points—to ensure that this critical information reaches everyone. Concurrently, members of both the humanitarian and development programs suggested strengthening community-based mechanisms for preventing sexual exploitation and abuse.

5. Make it easier and safer to report sexual exploitation and abuse

Focus group participants expressed a fear of interfamilial/intertribal violence in response to sexual exploitation and abuse incidents or retribution by perpetrators. Survivors also feared that if they reported sexual exploitation and abuse and others learned what happened to them, they would be shamed and face stigma from the community. Participants mentioned that organizations can protect survivors and those who report sexual exploitation and abuse by relocating them to another camp. In addition, they requested occupational protection to safeguard job security after reporting.

Some focus group participants requested direct access to senior staff tasked with handling reports of sexual exploitation and abuse, and wanted senior staff to make regular monthly visits to their communities. In refugee camps, participants suggested establishing information desks for preventing and responding to sexual exploitation and abuse, staffed by female personnel. Others, especially adolescents and young women, raised the possibility of using social media, such as Facebook, to report sexual exploitation and abuse. Although some technologies, such as mobile phones and access to the internet, may provide a safe reporting mechanism for those who are literate, access to these resources is still very limited at the research sites visited, so this mechanism should be used as only one of a number of channels for reporting.

6. Provide feedback on reports received

A recurring complaint from women, specifically those in the refugee camps, was reporting multiple cases to different organizations over an extended period without receiving any feedback:

“We have been reporting, and there has been no response; nothing at all. We are getting sick because we don’t know who to hold accountable.”

They request that organizations establish two-way reporting mechanisms: the first step would be to communicate to informants that the report has been received and action will be taken, along with an estimated timeframe. Adolescent boys in one focus group discussion stressed that assurances of acting on reports must translate into action:

“We would also like to see a situation where, if the bosses hear of such a thing, they are seen physically following up the case.”

They cited such action at a senior level as a prerequisite for organizations to regain their trust and confidence. In addition, organizations must identify the enabling factors that allow sexual exploitation and abuse to occur in the first place, and make systemic changes to prevent similar incidents from occurring.

7. See that justice is done

Almost without exception, focus group participants in humanitarian and development settings—female and male alike—recommended firing the perpetrator, reporting abuse to the police (where it is safe for the survivor to do so), and ensuring that the perpetrator cannot obtain employment in another aid organization. The key message is that perpetrators must be seen to face consequences for their actions and be held accountable by the organization and the law so their experience serves as a deterrent to other would-be perpetrators. As part of ensuring justice, focus group participants proposed that access to immediate medical treatment and other longer-term forms of support be facilitated for survivors, as well as offering protection mechanisms. They cited relocation of survivors to other camps as one option. For women and girls impregnated as a result of sexual exploitation and abuse, focus group participants advocated for medical, financial, education, livelihood, and psychosocial support for the mother, and provision for the resulting children until they become emancipated. Participants proposed that when a woman is coerced into a transactional sex arrangement to secure employment and the perpetrator subsequently fails to pay the promised wages, the woman should be paid her outstanding wages.

These findings and message themes that researchers collected reflect the realities of those served by a multitude of humanitarian and development organizations across three countries, two of which are currently among the world's largest emergencies. However, it is likely that these findings represent only a fraction of the abuse taking place against community members, which often goes unreported. These research results, along with those from other reviews such as the UK Parliament's International Development Committee, when taken together, amount to an indictment of the sector. Thus, this situation is a wake-up call for the entire aid sector, including Oxfam and its partners.

What these findings mean for Oxfam

In Oxfam's case, the IC notes that from 2011-2018, the vast majority of the roughly 500 recorded allegations were reports of various forms of misconduct or improprieties *within* Oxfam, not sexual exploitation and abuse perpetrated *against* Oxfam's program participants.¹⁹ Over the past three years, subsequent to the introduction of a new database, recorded allegations of sexual exploitation and abuse perpetrated against Oxfam's program participants accounted for roughly twenty of 255 reported incidents; one of them involved the exchange of goods or services for sex, 40 percent involved sex for employment, and 35 percent involved sexual or romantic relationships that violated Oxfam's code of conduct. The other cases related to staff-on-staff incidents. Separately, in a December 2018 Oxfam culture survey of nearly 4,000 staff members, the vast majority stated that they had not witnessed Oxfam staff exhibiting any behaviors associated with bullying, discrimination, or abuse in the communities they serve.

These figures are inconsistent with the research the IC commissioned and conducted, or what the sector already knows about the prevalence of sexual exploitation and abuse. Those working in the sector acknowledge that underreporting is a serious and widespread issue. Within Oxfam, there is an obvious issue of underreporting in the confederation and/or serious gaps in how Oxfam is collecting and collating reports of sexual exploitation and abuse in its programs, and reporting them up the chain of command to head offices. The external investigators stated in their report that they suspect there are problems in how cases of community-level sexual exploitation and abuse, and wider program accountability mechanisms, are prevented and reported, and solutions integrated into Oxfam operations. This suspicion is buttressed by IC research, which found different approaches to capturing reports even within the same country. In one country it visited, for example, the IC found that whistleblower telephone lines were set up only for the people served in those projects funded by donors that required them, such as the European Civil Protection and Humanitarian Aid Operations (ECHO).

"Because very often, they [perpetrators] do it when the country is going through difficult times [humanitarian emergency.] All institutions are at half-mast and the perpetrator thinks they will not be prosecuted because they work for an international NGO."

Oxfam staff member

¹⁹ Report by external investigators commissioned to conduct a review of the handling of sexual harassment, exploitation, and abuse cases through January 2019 at Oxfam. On file.

These concerns are backed by the Humanitarian Quality Assurance Initiative (HQAI) audit of Oxfam programs in Ethiopia, Uganda, and Bangladesh to evaluate their compliance with the Core Humanitarian Standard, which found weaknesses in Oxfam's accountability systems.²⁰ Specifically, it found that "documented feedback and complaints mechanisms are not implemented in a systematic and timely manner in humanitarian responses"; Oxfam's "organizational culture around complaints is variable across the confederation, and practice also varies between affiliates and humanitarian responses, including around sexual exploitation and abuse"; and "Oxfam does not ensure that communities are aware of its commitments on preventing sexual exploitation and abuse, and the expected behavior of Oxfam and partner staff." Through its own research, the IC heard similar themes, particularly the concern that safeguarding in the field is contingent on the will and commitment of the senior managers on site, rather than an institutional approach by an affiliate.

Steps Oxfam is taking

Oxfam has outlined its commitment to accountability along five dimensions: information sharing and transparency, beneficiary participation, feedback and complaints, staff competencies and commitment to international standards, and a commitment to continual improvement.

Pursuant to the HQAI audit, the confederation's humanitarian team is working to disseminate its safeguarding commitments to program participants, has developed guidance on establishing community feedback mechanisms, and is now introducing innovative solutions to collecting and reporting feedback that may serve as an entry point for capturing and referring reports of misconduct. Oxfam is also studying how it can bring its accountability mechanisms and learnings from humanitarian settings into its development programs, with plans to roll out later in 2019. Furthermore, Oxfam recently developed its first survivor support policy; it is analyzing how to embed a survivor-centered ethos into all Oxfam departments, including the legal, human resources, and program departments. The first in a series of workshops on survivor-centered approaches was held in December 2018 in Oxford, and they will soon be rolled out in other regions of the world as well.

Some of these initiatives are the minimum required of any aid agency, whereas some are innovations that warrant further study and dissemination. It is apparent that there is no universal application of reporting standards and mechanisms, investigations, and survivor support within the sector. Effective prevention, reporting, and response mechanisms must address barriers to reporting. Listening to the community is a critical first step.

²⁰ "CHS Initial Verification Audit Report," p. 14, Oxfam International, June 18, 2018, accessed January 2, 2019. <http://hqai.org/wp-content/uploads/1.-Oxfam-CHS-Summary-Report-Final.pdf>.

B. OXFAM'S PARTNERS: CRITICAL ROLE, SKILLS, AND SYSTEMS INVESTMENT REQUIRED

Supporting partners

Oxfam has more than 3,600 formal partnerships, many of which are with organizations on the front lines of Oxfam's programming. They are deeply rooted in the communities Oxfam seeks to support and they understand the challenges and opportunities in doing so; they can serve as mentors to Oxfam as both co-design program interventions. However, as is the case with Oxfam's staff or that of any organization, they can be protectors, perpetrators, and/or survivors. This truth was reflected in the in-depth research and IC's phone interviews and visits with staff and partners in the field, as well as the surveys Oxfam and the IC administered.

Some of Oxfam's partners are highly skilled and high-performing gender justice organizations; in some instances, they also provide peer review for Oxfam's work. Yet, some partner staff and those they hire have been implicated in sexual exploitation and abuse; one Oxfam investigation confirmed a case of a partner staff member who sexually abused a community member in distress. (The Oxfam country office subsequently severed its partnership agreement with that NGO.)

The reality of the partnerships

Given Oxfam's long-term strategic decision to increasingly work with partners as bridges to the communities Oxfam serves,²¹ it must support those partners in fulfilling their safeguarding roles. Meanwhile, the reality in many countries—as confirmed by IC field research and an Oxfam survey in which some 450 partners participated—is that partner capacity and Oxfam support for their safeguarding policies and systems is mixed. In some countries, the Oxfam affiliate leading the program has clearly made important safeguarding investments with partners, such as initiating training, developing risk assessment matrices, and launching complaints mechanisms. In other countries, however, partners have not received safeguarding policy support or training, despite Oxfam staff assertions to commissioners.

In one country the IC visited, for example, Oxfam convened a meeting with partners to share that it planned to prioritize safeguarding, but partner staff did not understand what that meant functionally, and no training took place. Only 46 percent of Oxfam's partner survey respondents affirmed that they undertake

21 This approach is outlined in the 2013-19 OI Strategic Plan, https://www-cdn.oxfam.org/s3fs-public/file_attachments/story/oxfam-strategic-plan-2013-2019_0.pdf, p. 11. Through the 2016 Charter for Change, there is a commitment to ensure that 30 percent of Oxfam's humanitarian funding goes to local actors by 2018. https://www.oxfam.org/sites/www.oxfam.org/files/file_attachments/bn-commitment-to-change-whs-220416-en_0.pdf. As of April 2019, Oxfam's investment in local partners was at 13 percent.

a safeguarding risk assessment for all projects and activities to identify and mitigate risks to children and other vulnerable people with whom they work or encounter. In fact, in one country, partner staff explicitly asked the visiting IC members for tools and trainings to integrate protection and safeguarding into their programming. This issue is particularly troubling because the country program in question has a history of alleged cases of sexual misconduct.

ENABLE INCLUSIVITY BY PROVIDING ACCESS TO TRAINING IN THE LOCAL LANGUAGE

In one Francophone country the IC visited, Oxfam held a safeguarding training in English because management assumed that all participants, including local partner staff, spoke English. This was not the case, however, and management told a partner staff member who requested an interpreter that there was no budget for translations. A staff member shared the following:

“Oxfam should not just talk about inclusivity or make a slight effort toward it but examine—from the start—who needs to attend each event and what steps need to be taken by when to ensure those individuals can attend and actively participate.”

Nearly 90 percent of respondents to Oxfam’s partners survey affirmed having a zero-tolerance policy against sexual harassment and exploitation and abuse, but only 65 percent actually reported having a safeguarding policy. This finding begs the question as to whether perception and policy really meet. The vast majority affirmed they had a code of conduct, but their understanding around the code of conduct that is part of the contractual agreement with Oxfam is unclear. In one country, of seven partner organizations interviewed by the IC, not one could affirm having seen or signed a code of conduct as part of its contractual agreement with Oxfam. In other countries, Oxfam staff told the IC that the partners signed the code of conduct, but it was not explained to them at the time they signed.

Similar to Oxfam, partners’ survivor support is a significant concern. In the Oxfam partners survey, most respondents (60 percent) did not respond to whether they provide for, or facilitate through referrals, the immediate needs of identified survivors of sexual exploitation and abuse. Twenty-eight percent replied that they have provisions for support (12 percent said they did not); 33 percent replied that they have links to referral mechanisms (7 percent said they did not).

One of the thorniest issues with which Oxfam and the sector as a whole must contend is how structural violence and cultural norms differ in each country setting and inform behaviors regarding safeguarding and a system to detect and address abuses. Concerns around some partner commitments to gender equality—or lack thereof—and how that might impact safeguarding efforts and partnerships came to light through the IC’s research. Although in some countries, Oxfam works with partners to understand what

In one country, of seven partner organizations interviewed by the IC, not one could affirm having seen or signed a code of conduct as part of its contractual agreement with Oxfam.

behaviors are acceptable as per agreement obligations, some Oxfam and partner staff are more reluctant to accept the terms of the code of conduct as a policy. They cite, for example, concerns regarding the freedom to solicit a sex worker's services and engage in relationships with coworkers and community members.

Similarly, some partners question why Oxfam must superimpose its own policies and regulations on organizations that already have their own. This question reflects an ongoing tension between some INGOs' partnership principles that commit to honoring local partners' independence and the need to enforce safeguarding standards expected by the donors and INGOs. It also demonstrates the existence of a high cost for partners who may be required to sign different codes of conduct with multiple INGOs.

IC research found that the continuum of power abuses extends from Oxfam staff to partners, with staff across a range of countries identifying this as an issue. Although some partner staff were happy with their relations with Oxfam, others highlighted bullying, power abuses, and disrespectful behaviors toward them. The IC also documented partner anger at Oxfam senior management for allowing such behaviors to continue in some countries for years without redress.

Finally, the IC found that although some of Oxfam's local partners have great skills and expertise, and Oxfam can learn from them, some Oxfam staff were concerned that the pressure to prioritize localization of aid can lead to premature partnerships with organizations lacking the capacity to carry out the work, much less the capacity to integrate safeguarding into programming. This pressure has increased with Oxfam's laudable commitment to transfer 30 percent of its own humanitarian financing to partners.²²

Steps Oxfam is taking

In late 2018, Oxfam developed a partner code of conduct that it will roll out in 2019. It will be accompanied by a standard partner contract that outlines obligations for managing misconduct, planned for development by the end of 2019. Further, Oxfam has developed a new and strong confederation-wide partnership assessment tool to be used by Oxfam program staff in collaboration with partners to identify the latter's level of capacities and support needs, although the IC is not aware of how these assessments will be verified by staff with safeguarding expertise. It also plans to apply this assessment tool retroactively in a phased approach to current partners as well; at the time of writing, however, the details were still being developed. As part of this effort, Oxfam must decide the level of safeguarding support it can provide its partners. With respect to safeguarding, Oxfam is establishing a Global Integrity Fund of £500,000 to support partners and cross-sector efforts at the country level to improve safe programming, including safeguarding prevention and reporting. There is a deliberate attempt for this to be cross-sectoral and not just benefit Oxfam.

"I am determined that Oxfam will be a better partner—less super tanker and more of a dockyard—ready to use our resources and platform to empower and enable others, including many in the sector, to speak up for the people and causes that matter... It is by shifting power in this way, by recalibrating our accountability, by making more meaningful connections, that we will begin to rebuild trust."

Dhananjayan Sriskandarajah, chief executive, Oxfam Great Britain

<https://www.civilsociety.co.uk/news/systematic-and-cultural-changes-needed-at-oxfam-says-danny-sriskandarajah.html#sthash.M80LDONj.qe7WlQ83.dpuf>

²² "Oxfam's World Humanitarian Commitments," accessed April 29, 2019. https://www.agendaforhumanity.org/sites/default/files/OXFAM_commitments.pdf.

OXFAM PARTNERS SURVEY FINDINGS

In 2018, Oxfam surveyed its partners on integrity issues, including safeguarding and the code of conduct. A self-selecting survey of 447 organizations asked for self-assessment on safeguarding policies, procedures, and capacities. Its findings reinforced the messages heard in IC's own meetings with partners in country programs:

- **Partners have strong internal values and intentions; however, these need to be translated into policies.** Although a number of partners have policies and procedures on safeguarding and community feedback, as well as codes of conduct, a significant number do not. Partners expressed a need for support from Oxfam to develop these policies and review those already in place. Oxfam will need to direct particular attention to smaller organizations, which are less likely to have policies in place.
- **Partners need an investment of resources to implement policies and procedures.** These resources include developing staff responsibilities and the skills needed to train all staff in understanding safeguarding as a concept, instilling safeguarding in focal points, developing an investigative capacity, and working with communities to set up and maintain reporting mechanisms. This investment also includes resources to set up and run whistleblowing hotlines—a critical need, given that partners are the ones who liaise with community members on a daily basis. Partners are particularly interested in Oxfam support to help with training and raising staff awareness.
- **Partners want more support.** The survey results indicated three capacity-strengthening priorities for safeguarding and beyond: (1) develop/review policies, (2) set up systems and procedures, and (3) raise awareness and train staff. Both partner organizations with policies already in place and those without asked for support in evaluating these policies.

C. OXFAM: STRONG VALUES, FRAGILE ENVIRONMENT

Oxfam's greatest asset is its staff. A 2017 Oxfam Global Staff Survey showed that Oxfam's highly skilled staff are deeply committed to the organization's mission and vision, and believe it has strong values. Yet staff have faced many challenges in recent years because of change management fatigue, governance challenges, incongruities between policies across the confederation, and an onerous path to implementing One Oxfam. On top of these pre-existing challenges, the level of media coverage resulting from the 2018 reports of sexual misconduct by Oxfam staff in Haiti has taken an immense toll on staff. The IC found staff morale to be affected in some parts of the organization, especially but not limited to those in the media spotlight or affected by donor funding freezes. However, the crisis also opened up a space for more sincere dialogue around power and accountability in the organization, which can lead to positive organizational change. It is in this context that the IC conducted its research and heard about the traumas and challenges for which staff request solutions, in which they wish to be a part.

Staff responding to surveys report working in well-functioning environments, but this situation is not universal: those same surveys and IC interviews revealed a more troubled landscape as well. Indeed, the abuse of power and trust in any of Oxfam's relationships can manifest itself in a multitude of ways incompatible with Oxfam's mission and values. The IC's research demonstrates that sexual exploitation and abuse in Oxfam are symptoms of several power abuses, manifested in varying degrees as elitism, racism, colonial behavior, sexism, and patriarchy, all of which have given rise to cases of toxic work environments in which safeguarding is compromised, policies and procedures cannot be implemented robustly, and accountability thus falters. For this reason, Oxfam systems and processes are important but not sufficient. Unwritten ways of working, hidden and informal power, and the culture of an organization all underlie the current challenges and solutions.

Knowledge of code of conduct and implementing safeguarding and zero-tolerance principles

Although many staff seem to be aware of Oxfam's code of conduct and general safeguarding objectives, the code often is seen as a theoretical concept with only limited real-world implementation. The IC observed fundamental differences in the understanding of safeguarding concepts, what constitutes code of conduct violations, and the implications of such violations, indicating the need for further training.

Part of this issue can be ascribed to how teams share and discuss these policies. For example, the IC confirmed that in one country the code of conduct and associated policies had not been translated into the local language; in another, staff were asked in a team meeting

“The root cause of Oxfam’s appalling safeguarding failures in Haiti lay not only in faulty procedures and policies, but in an institutional culture that privileged and protected certain people and practices. The changes we need to make are both systemic and cultural.”

Dhananjayan Sriskandarajah, chief executive, Oxfam Great Britain

<https://www.independent.co.uk/voices/oxfam-haiti-prostitution-scandal-danny-sriskandarajah-a8850856.html>

to read the code as individuals but with no group discussion; in yet another, a staff member had forgotten to submit a signed form and no one ever followed up with him/her. Worse yet, in at least one country the IC visited, the code of conduct's ancillary policies—the One Oxfam child safeguarding, One Oxfam PSEA, and the sexual diversity and gender identity rights policies, among others—had not been distributed. This meant that staff had signed off on a code of conduct and a list of policies they had never read and did not understand. The IC queried human resources staff in country, who said that staff could look up the policies on Oxfam's intranet and that they did not have authorization to print them out for staff. Such an answer was unhelpful for the vast majority of staff in that country who do not work at a head office that has computers and printers available. Current safeguarding training schemes, which are not open to all, do not always help to improve understanding or guide how to make safeguarding policies and procedures operational in the head office and beyond. For example, the IC met international volunteers who were not permitted access to safeguarding capacity-building opportunities because they are "*only there for a year,*" yet one of them was selected as a safeguarding focal point.

All of these barriers directly impact staff members' clear understanding of Oxfam's commitment to safeguarding, its safeguarding policies, and, by extension, whether staff members choose to report safeguarding incidents they either experience themselves or witness in the communities Oxfam serves.

The absence of a clearly communicated zero-tolerance policy and action plan has meant that some staff have yet to take safeguarding seriously or demonstrate a lack of clarity on what is permissible, despite local norms. One commissioner was disturbed to learn that in more than one country, senior managers (including a country director) had dismissed what occurred in Haiti, shifting the blame to the women involved while using misogynistic language.

In another country, some national staff told IC members that they would respect the code of conduct only insofar as it did not contradict their cultural values, which they consider to be more important. In other countries, staff note that employers are not allowed to prohibit behaviors outside of the workplace. Regarding prostitution, staff in some places described it as traditional practice and socially acceptable, and that staff should be able to do what they wanted in their private lives. In fact, of the roughly thirty phone calls in which one commissioner participated, ten reported having seen Oxfam colleagues and partners paying for sex. Some staff also described it as normal to solicit or provide favors in exchange for a job or a promotion.

Experience of Oxfam's safeguarding systems

Successful safeguarding begins with protecting, empowering, and being accountable to staff. The IC has found ample evidence of country programs in which safeguarding reporting procedures are not prioritized or are misunderstood; also, the organizational

capacity to increase awareness and effect immediate procedural changes is still limited. In fact, the development and *uniform* implementation of sexual exploitation and abuse prevention and response policies and procedures *across* the confederation had been largely absent, though recent work to address this gap is described below.

The 2018 culture survey, developed by staff as part of a process of preparing the ground for a series of reflective dialogues on how Oxfam staff can live its values, revealed that 79 percent of staff who participated felt safe in reporting sexual exploitation, harassment, or abuse, supporting the 2017 global staff survey results indicating that staff generally feel comfortable in reporting cases. At the same time, the surveys also showed that a significant number of staff are not comfortable in reporting them. Staff across several locations—mostly in country programs—shared real and perceived fears of reporting sexual and other forms of misconduct. They shared views and examples of investigations into violations of the code of conduct or safeguarding incidents being treated as discretionary, depending on the perpetrator and survivor. They also shared fears of possible negative impacts on their reputation in the organization at best and losing their jobs at worst.

The IC heard multiple statements about cases of staff suffering reprisals for reporting and whistleblowing on cases of sexual misconduct. The people who shared these concerns had not heard whether the organization had dealt with their complaints. The IC did not investigate these allegations and hence cannot confirm whether the organization addressed these complaints or acts of retaliation but did not inform the complainant or, worse still, never addressed them at all.

Even when staff reported identifying and being ready to report safeguarding violations, they demonstrated deep confusion over how and to whom to report them, particularly in country programs. They were unclear as to which violations should be reported to safeguarding focal points, human resources personnel, staff with accountability portfolios, and/or a whistleblowing hotline. This confusion has led to multiples instances in which trusted colleagues are treated as informal reporting channels and must try to navigate opaque systems, repeating sometimes distressing information, to find someone in the confederation who will respond to their concerns. The IC found that this confusion also existed among safeguarding focal points, senior leadership, and human resources departments within some countries.

A fundamental issue is that different Oxfam affiliates have entirely different safeguarding systems for reporting, responding, and case management. This means that reporting systems vary depending on the country, affiliate, and project with which a staff member works; also, the absence of a single uniform system across the confederation means there is no uniform approach to investigating complaints and levying penalties. People may experience a different process and outcome simply based on their location. In fact, external

investigators commissioned to review the different affiliates' handling of investigations noted: *"There are some well-developed policies, procedures, guidelines, tools, and some good practice in terms of conducting investigations, but again this is very patchy and it is clear that organizational structures and 'politics'... have also presented obstacles to cases being pursued in a more timely and effective way."* Such variability in response to abuses affects trust among staff and between staff and the system.

Staff also shared concerns around how past investigations were conducted. The IC heard of a number of violations of confidentiality by managers and staff involved in cases subject to investigation processes, often accompanied by rumor and speculation. Multiple staff members who had submitted complaints told the IC that their safeguarding-related complaints had been disregarded or left unresolved, or they simply did not hear back.

Organizational culture and working environment

In December 2018, Oxfam conducted a confederation-wide culture survey, in which nearly 4,000 staff—roughly 40 percent of Oxfam—participated. There were a number of areas in which Oxfam staff expressed themselves positively. For example, 75 percent of staff feel they could raise difficult issues with their managers, and 78 percent feel that their manager behaves in line with Oxfam values. However, a third of respondents indicated they had seen bullying, discrimination, or abuse directed toward staff. The survey identified the top four underlying drivers of this abuse as hierarchy, gender, power over resources, and race. Indeed, although the IC principally set out to evaluate safeguarding, power abuses take many forms, and the issues the IC has identified transcend sexual misconduct to include elitism, sexism, patriarchy, racism and colonial behavior, and bullying. The IC visited almost 20 percent of all countries where Oxfam is present and has visited or spoken with current and former staff from a number of offices. Thus, it has reason to believe the abuse of power is a systemic issue. It also understands that these issues have deeply affected morale, trust, and accountability throughout the organization.

Bullying was the most prevalent concern in all of the IC's research with staff, who shared stories of witnessing or directly experiencing peers or senior management behaving aggressively and undermining, belittling, and intimidating staff. In addition, some complaints could be traced back to perceived bullying by line managers when addressing a mismatch in their expectations of performance or skills, or as part of performance management processes. In a related issue, some staff spoke of a culture of silence, in which witnesses to bullying and power abuses sympathized with the affected people but could not or would not act.

IC interviews across the world elicited examples of structural racism and elitism, with staff expressing significant concerns about national staff being paid significantly less and having fewer opportunities for professional development and other opportunities

than their international (and often younger, less educated, and less skilled) counterparts. Staff gave examples in which they had to push head offices to invite other staff from the Global South to meetings and trainings. In one instance, national staff participation received approval only when it was too late for staff to obtain the requisite visas for the country hosting the meeting. Staff also said they perceived that racism (across both national/international lines and races) is reflected in how rules are applied and penalties levied. In a plenary meeting in one country visited by an IC team, a national staff member mused that s/he would have been fired had s/he violated security protocols, as his/her international colleague reportedly had at the time of the IC's visit.

FACING THE UNCOMFORTABLE TRUTH: BEHAVING BADLY WHILE DOING GOOD

The Non-Profit Paradox occurs when people working in highly mission-driven organizations, who often have strong values and are prepared to make sacrifices for their work, are at best blind to their faults or at worst believe they have the moral authority to behave badly because of the cause for which they work. Working in values-driven organizations attracts similar types of people; this uniformity can often mean that introspective thinking is missing or people feel unable to raise issues. Nonprofits need to actively look for this paradox by employing internal review mechanisms and asking questions about their purpose, values, power dynamics, interpersonal relationships, and processes. It requires looking for uncomfortable truths and discussing them openly.

SOURCE: "The Non-profit Paradox," David La Piana, *Stanford Social Innovation Review*, Summer 2010

It is important to recognize that the power imbalances and abuses outlined above are not unique to Oxfam. Many organizations in the aid sector face similar challenges, in which they internally exhibit the very inequalities they claim to be trying to eradicate.

The need to focus on organizational culture to eradicate discrimination and power abuse has been acknowledged by aid organizations recently; thirty-two aid organizations, including Oxfam, have made a joint commitment to *"demonstrate a step change in shifting organizational culture to tackle power imbalances and gender inequality; policies alone are not enough to prevent abuse. The responsibility lies with Board and management, not survivors[,] to tackle all forms of sexism and discrimination and hold individuals to account."*²³ It is also important to note that both the 2017 global staff survey and 2018 culture survey results underscored the gravity of staff work-life balance concerns.

²³ Bond, "NGOs and Government Jointly Commit to Improving Safeguarding Standards," accessed April 30, 2019. <https://www.bond.org.uk/news/2018/03/ngos-and-government-jointly-commit-to-improving-safeguarding-standards>.

A significant proportion of staff feel they do not have a good work-life balance; even more believe the workload is too great and prevents them from doing a good job. These issues undoubtedly have an impact on staff time and capacity to take on new learning, such as safeguarding and their part in implementing safeguarding structures. Safeguarding focal points, for example, are expected to undergo training, participate in establishing systems in their offices, and serve as referral coordinators on top of their already overstretched workloads. Focal points with whom the IC met spoke of the significant stress this additional burden causes.

Impunity for poor behavior

One of the findings of the culture survey was that almost half of the respondents believe that people who violate Oxfam's values are not held to account. The IC heard this from both current staff during its field visits and confidential conversations with aggrieved former staff. Commissioners also learned of alleged terminations, discontinued contracts, intimidation, demotions, denials of promotions, withholding of merit increases, and other reprisals for reporting or speaking out on sexual and other forms of harassment. Staff shared frustrations that bullies, particularly those in positions of hierarchy, do not suffer consequences for their actions. For example, the IC heard from staff of one senior manager who had an apparently established reputation for harassing and intimidating staff in front of all department members in public spaces. The IC is aware that multiple complaints have been submitted to line managers over the course of three years, but this manager's behavior did not change. This case was not an anomaly in the IC's research. Former staff, including survivors, whistleblowers, and safeguarding experts, expressed frustration and sadness at the lack of accountability they experienced or witnessed; in some cases, they reported being pushed out of the organization or having no choice but to leave. Some leaders actively protect others in senior positions, even when these colleagues exhibit bullying behaviors toward their staff. Some problem managers and staff suffer no penalties; others are simply moved to positions elsewhere in the organization.

It is concerning that the IC also heard a multiple testimonies in which senior international staff who have bullied or harassed others, or engaged in inappropriate behaviors have kept their roles or even been promoted.²⁴ A number of current and former Oxfam staff contacted the IC to share significant concerns regarding the poor leadership of several country directors. The IC heard about examples of verbal abuse, intimidation, manipulation, and power abuses carried out over the course of several years. This alleged conduct has not only adversely affected the morale in several offices, but also forced people to leave Oxfam's employment. It is not in the IC's remit to investigate response systems for misconduct other than sexual misconduct, but from cases about which the IC teams has heard,

"I feel unsafe to voice my opinion as there have been perceived instances of staff being targeted if they voice their opinion."

Oxfam staff member

"Perpetrators or suspected perpetrators often seem to be protected by their positions. Those in more senior-level posts seem to have a green card to treat their staff as they wish, including in abusive (demeaning/manipulative) ways, or to treat beneficiaries likewise (including SEA) and to get away with it."

Commissioner Shannon M

²⁴ IC confidentially, and with the permission of the person(s) who brought these cases to its attention, has brought such incidents to Oxfam leadership for review, with the understanding that the IC has not done any independent investigation.

significant issues seem to exist regarding how the human resources system does—or does not—effectively and systematically tackle cases of bullying and harassment that need to be addressed.

Realizing gender justice

Putting women’s rights at the heart of what it does is a core part of Oxfam’s identity. However, the IC heard experiences from various staff members indicating that Oxfam does not fully honor its commitment to gender justice. Various gender justice staff and champions commented that the organization did not seem to take seriously their work and expert recommendations and judgement. For example, the IC heard of multiple examples of under-resourced gender justice programming and programming without any gender justice advisory capacity. Major country programs were missing the basics: building basic gender mainstreaming into program and monitoring and evaluation design, gender budget allocation, experienced and sufficient gender justice staff, and gender-disaggregated program data and audits. Staff said the organization repeatedly shifted concerns they raised about these shortfalls around different departments at the country and regional levels without addressing them. Gender justice staff also noted that senior affiliate-level gender experts have limited influence over strategic programming approaches and wield only “soft power,” meaning their contributions are easily dismissed or diminished. Although staff raised some examples of good practice, Oxfam lacks a confederation-wide approach to its gender justice commitments: gender justice is not mainstreamed into all programming, and the organization dedicates insufficient resources to it. More widely, many staff expressed a desire to participate in the fight for gender equality but feel they do not know how to champion women’s rights, indicating that basic discussions within teams around gender justice and ending violence against women are missing.

Bottom-up approaches to reform

As discussed throughout this section of the report, it is clear that Oxfam is taking steps to reform, which is encouraging. The IC has heard many positive examples of teams and groups of Oxfam colleagues having very thoughtful discussions to air issues around power abuse, workplace culture, and approaches to safeguarding. However, the IC remains concerned about the implementation of a confederation-wide approach to reform.

Some managers within Oxfam are reluctant to accept some of the IC’s findings and those of other work streams, such as the culture survey. In fact, key staff have confided in the IC their concern that some Oxfam’s senior management believe that power abuses do occur in other parts of Oxfam—but not in their own affiliate or country program. The IC urges all staff, particularly senior management, to understand that power abuses are not always easily identifiable as

“I found myself in an increasingly difficult work environment that repeatedly failed to address the exercise of power and dominance of some senior management members over staff, thereby severely compromising staff well-being and mental health. It manifested with breaches of confidentiality to the detriment of staff members[;] I faced repeated verbal abuse and (non-sexual) harassment. The persistent failure to address critical concerns that were raised had an impact on program delivery.”

Former international staff member

they manifest themselves in different ways and can be insidious. Management across the confederation needs to recognize that there can and must be a united response to the myriad ways in which abuses and discrimination occur.

This scattered approach is evidenced by the fact that there is no single confederation-wide message on reform. It is encouraging that Oxfam Great Britain's new chief executive pronounced unreservedly and without qualification that racism and power abuses have marred Oxfam's way of working. Oxfam International's chief executive stated "*It is painfully clear that Oxfam is not immune from sexual and other forms of abuse that stem from the abuse of power.*"²⁵ However, it is a concern that some senior officials from other parts of the confederation have spent an inordinate amount of time in challenging the methodology through which the IC has arrived at its findings and, by extension, their validity.

Transparency and inclusion in reform discussions

The IC heard consistent praise from staff and peers alike for Oxfam taking a public and transparent approach to its reforms around the 10-Point Plan released in February 2018, sharing its learning with other organizations, and its commendable decision to publicly share the number of reported safeguarding cases every six months. The IC found, however, that the merits of this approach have been neither clearly understood nor adopted across the organization. In some countries the IC visited, management actively discouraged any conversations related to the Haiti crisis outside of the organization and sharing articles on social media, to "*protect the organization's image.*" In some countries, the IC learned that administrative support staff were excluded from staff meetings related to the crisis; they learned what was happening only from the media or staff in other organizations. The IC has found that a number of teams were open to sharing the information it requested (while respecting confidentiality), although not on all topics. It is also concerned that the external investigators commissioned to review different affiliates' handling of past safeguarding cases encountered significant obstacles to accessing case information—there were gaps in documentation, inaccurate recording of cases, and reluctance to share information on the part of some affiliates.

²⁵ Rebecca Ratcliffe, "Oxfam Failed to Address Sexual Misconduct and Bullying, Finds Review," *The Guardian*, January 17, 2019, accessed April 30, 2019. <https://www.theguardian.com/global-development/2019/jan/17/oxfam-failed-to-address-sexual-misconduct-and-bullying-finds-review>.

Steps Oxfam is taking

Oxfam is now going to great lengths to strengthen its approach to safeguarding. Since February 2018, it has taken important steps, including but not limited to new *confederation-wide* policies on prevention of sexual misconduct and child protection, a standard operating procedure for reporting misconduct, and an executive board agreement to develop a single Oxfam-wide safeguarding network. It has also trained all country safeguarding focal points on how to provide advice on prevention and act as a first point of contact until professional support is obtained.

Oxfam has identified *some* of the ways power abuse manifests itself in the organization and is taking steps to address them, although it is still too early to determine the impact of these steps. Oxfam has asked all staff to re-sign the code of conduct and has committed to increasing its budget for addressing organizational culture. The culture survey was a critical first step; it was staff-led and embedded feminist principles from its onset. Oxfam also has made plans for a roll-out of dialogues, starting in May 2019, across the organization to enable teams to discuss issues around inequalities and how to address them. Oxfam has enlisted the assistance of the Community Development Resource Association for this effort. The IC has yet to see plans that outline how senior leadership will respond to the organizational culture issues raised in these discussions. Encouragingly, several affiliates are also undertaking a gender action learning process, including some of their senior leaders. Oxfam has also updated its standard recruitment documents and processes to integrate values and safeguarding at the job description, advertising, and interview stages. However, there are no requirements in the job specifications for leaders to cultivate values or safeguarding systems into their team and program objectives. Oxfam has also very recently updated its annual performance review approach by embedding Oxfam values, safeguarding, code of conduct, and leadership skills more explicitly into objective setting, discussion guidelines, and feedback systems. This new approach was implemented for the first time in April 2019. At the same time, Oxfam currently has no confederation-wide diversity leadership plan, nor is it addressing the significant concerns around work-life balance.

FOSTERING CHANGE

The Oxfam America and Belgium affiliates (at the head office level and in some country programs) are currently engaged in Gender Action Learning (GAL), a process designed by Gender at Work,²⁶ which contributes to fostering change around gender and power dynamics and organizational culture change. In GAL, select staff members, or “change team members,” participate in an 18- to 24-month participatory process in which gender is used as an entry point to explore multiple issues around power, organizational culture, organizational identity, and core components of an organization’s work.

Staff partake in exercises to unpack how they experience Oxfam and listen and strategically analyze what inhibits change within the organization. Tools are introduced to help participants think about the changes they seek to promote at personal, organizational, and systemic levels. Participants devise individual and collective change projects that they work on throughout the course of GAL; the projects build on current streams of work or Oxfam priorities, and can be made operational immediately.

Oxfam America and Oxfam Belgium have found that the program has fostered a creative space to increase understanding of issues related to gender and highlight that understanding as a catalyst for change, thus deepening gender justice work processes with Oxfam partners around the world. This change is possible because of the emerging, peer-to-peer learning nature of the process. It also shows that the program is practical and actionable because it allows participants to experiment and structure their change projects based on how they think the investment will yield the greatest and most relevant results at work. Finally, Oxfam America sees GAL as an investment in current and future leaders by helping its change agents develop transformative leadership skills and positively improving the work of the organization both internally and externally.

“GAL opens up a field of experimentation to question power far beyond gender, and also to learn how to function differently as individuals/groups/organizations. In this sense, it makes it possible to identify the mechanisms of power but also, through experimental projects and the practices they propose, to test other ways of being and acting together. One can also see here the strong link with the feminist principles that underlie GAL.”

GAL participant from Oxfam Belgium

²⁶ The Gender at Work website can be accessed at <https://genderatwork.org>.

The IC understands that in 2017, gender justice staff within Oxfam set a series of key performance indicators on how Oxfam can make measurable progress in realizing its ambition for increased gender justice—a welcome step. However, because a senior gender justice post remained vacant for more than a year, Oxfam did not follow up on this baseline in 2018. Oxfam also has set a target for increasing investment in gender programs, from its current 5 to 15 percent of total program budget. Meeting this goal will be an important step in realizing its commitment to gender justice work.

In March 2018, Oxfam’s executive board and Oxfam International’s board of supervisors committed to *“rebuild the consensus of our work into the future and to utilize feminist principles,”* agreed to be more proactive in emphasizing women’s rights in program work, and mandated the development of a strategy and program to transform organizational culture.²⁷ In addition, Oxfam Canada, which had developed its own strategy for becoming an organization entirely oriented toward feminist principles in collaboration with the Gender Justice staff, has been directed by Oxfam’s executive board to develop guidance for operationalizing feminist principles for the confederation as a whole and assist in their rollout. The executive board also directed affiliates to provide updates on their progress in this regard, and Oxfam International is obliged to do the same for its areas of responsibility, including the global humanitarian team and the secretariat. Finally, the newly formed global strategy development team, charged with developing the 2020-2030 Oxfam strategy, announced that feminist principles and the living Oxfam values of empowerment, inclusiveness, and accountability will guide the process.

“We cannot use old methodologies to challenge patriarchy which may be embedded into our processes.”

*Winnie Byanyima,
executive
director, Oxfam
International*

²⁷ Message to Oxfam Staff, executive board meeting, Delhi, March 2018. On file.

Messages from staff:

We want...

...a supportive and responsive environment,

based on clear rules and codes of conduct, that proactively fights and effectively responds to sexual misconduct. Oxfam should actively develop and support a culture that tackles other forms of misconduct such as elitism, sexism, patriarchy, racism and colonial behavior, and bullying among Oxfam staff and between Oxfam staff and its partners and program participants.

...a culture of accountability and transparency,

in which leaders hold both the staff who betray Oxfam values and themselves accountable for this mismanagement. There must be zero tolerance for impunity, and silence should not be tolerated.

...simplified safeguarding processes and procedures

that eliminate confusion as to who, where, and how to report a case confidentially, no matter which affiliate one works for or which country within one works in.

...gender justice honored

by seeing Oxfam's specific commitments to gender justice and women's rights enforced, and supporting all staff in the organization to become women's rights champions in their own work.

GUIDING PRINCIPLES FOR TRANSFORMATION

Acting as One Oxfam

The successful implementation of transformational change hinges on Oxfam's capacity to overcome institutional challenges specific to it. The Oxfam confederation has extraordinarily complicated institutional and governance arrangements that attempt to bring together a secretariat and nineteen legally distinct organizations with different backgrounds, longevity, ethos, capacities, resources; these differences lead to disparate notions of power and trust. Those fundamental organizational differences, coupled with the power imbalances among them, and between affiliates and country programs, dictate access to funding, decision making, and operations. Staff see tensions between different affiliates and Oxfam International, as identified in the 2017 global survey and conversations held with the IC. These tensions undermine Oxfam's efforts to improve accountability and lead to the organization making decisions that are negotiated, but at the lowest common denominator instead of reaching for the bold transformative change required. Implementation can be slow and uneven—a major barrier when people's safety is at risk. Oxfam has recognized this issue, and in 2017 began a governance review process at the confederation level by analyzing how it can streamline its country program model and build a governance structure that allows for a greater southern voice and global power balance. Oxfam's ability to operate in line with its One Oxfam ethos is crucial to successfully implementing the recommendations outlined below.

A framework to drive change

In putting forth recommendations, the IC has drawn on two sets of transformational leadership principles that aim to shift Oxfam's focus to prioritize *how* it operates as well as *what* it does. They have a very similar basis. Using these transformational principles of leadership, the recommendations are intended to serve as a vehicle for changing the organization.

ONE OXFAM STRATEGIC DIRECTION



Global Structure

- Align with One Oxfam standards
- Collaborate together on country activities
- Streamline service delivery models
- Ensure consistent, high-quality service to those Oxfam serves



Behavior/Culture

- Commit to shared goals and standards as an Ethical Feminist Organization
- Cascade and encourage commitment as One Oxfam
- Demonstrate borderless behaviors internally and externally

1. Driving a culture of ethics through the organization

A strong culture of ethics and integrity²⁸ aims to take values from paper to practice. This approach requires that senior leadership set a strong tone showing how ethics and integrity are embedded into every facet of the organization by making decisions and setting strategies that have clear links to the organization's purpose, values, and principles, and requiring staff's unwavering commitment to those values and principles. It requires leadership qualities such as being candid, visible, responsible, trustworthy, decisive, and respectful. It requires an investment in taking codes of conduct and ethics from theory to practice through staff conversations and embedding them in all parts of the organization's process. Additionally, such a culture must create a work environment that supports and encourages people to speak up through trusted and confidential reporting systems with multiple channels, and a no-retaliation policy. This approach has five components:

- Leaders speak openly about integrity and make decisions based on the organization's values.
- All employees are alert to ethical risks and feel responsible for upholding values that define the organization and to protect each other.
- People consult stakeholders to make the best professional choices.
- People speak up when they see behavior that runs counter to the organization's values.
- Organizations act in the face of misconduct.

2. Setting a culture of ethics within Oxfam's feminist leadership principles

Feminist leadership principles are widely accepted as fundamental to an approach that recognizes and addresses power dynamics, intersectionality, and the context in which people work. This way of working requires valuing relationships, investing in people, reflecting on practices, and learning together in horizontal collaborations, all aimed at building greater equality for *all* people. The IC has used a bottom-up, transformative, and feminist leadership framework to present its recommendations—a concept that Oxfam has already explored:²⁹

- Modeling a feminist purpose and principles
- Inspiring a shared vision based on personal and collective reflection

These tensions undermine Oxfam's efforts to improve accountability and lead to the organization making decisions that are negotiated, but at the lowest common denominator instead of reaching for the bold transformative change required.

28 Drawn from Deloitte Touche Tohmatsu Limited, "Deloitte Ethics and Integrity Imperative," accessed April 30, 2019. <https://www2.deloitte.com/global/en/pages/about-deloitte/articles/ethics.html>. On file.

29 Shawna Wakefield, "Transformative and Feminist Leadership for Women's Rights," Oxfam America Research Backgrounder, accessed April 30, 2019. https://www.oxfamamerica.org/static/media/files/Transformative_and_Feminist_Leadership_for_Womens_Rights.pdf.

- Empowering and enabling others to work in a way that embodies the principles identified
- Challenging patriarchal norms and oppressive power in the organization’s business, and in relationships
- Encouraging the integration of self-care, professional support, and relationship building

AN ACCOUNTABLE ONE OXFAM

To act in the face of misconduct and create an accountable One Oxfam the organization needs to model feminist principles and a culture of ethics.

FEMINIST PRINCIPLES	ETHICAL CULTURE
A shared vision is inspired through personal & collective reflection	Leaders speak openly about integrity & model values
People are empowered so work embodies values and principles	All are alert to ethical risks & uphold values
People challenge patriarchal norms and oppressive power	People speak up when they see behavior that runs counter to oxfam values
Self care, professional support and relationship building are integrated	People consult to make the best professional choices
SHARED VALUES	
Integrity & social justice in everything we do	
Outstanding service to those we serve	
Commitment to each other	
Strength from cultural diversity	

RECOMMENDATIONS

A. REINVENT THE SYSTEM

Oxfam must empower and enable communities, partners, and staff to combat sexual and other forms of misconduct. This requires a complete overhaul of the confederation's disparate safeguarding mechanisms to a One Oxfam, confederation-wide safeguarding system—a process already underway. This overhaul will be a test for the confederation and its governance structure as it moves toward implementing newly agreed-upon common safeguarding policies and standard operating procedures for reporting and responding to misconduct. The following recommendations address the changes needed to ensure clear processes, roles, and responsibilities for preventing and responding to safeguarding issues at all levels and for all stakeholders; communities, partners, and staff.

1. Reform the governance structure

The IC recommends the following steps:

- Move from a consensus-driven large board of supervisors to a more independent, smaller board. The Oxfam International executive board and board of supervisors are in the process of reforming the overall governance structure to strengthen Oxfam governance and accountability, and deliver a One Oxfam confederation. The IC believes this reform should move from the consensus-driven model of a large board composed of the nineteen affiliate trustees and one independent director, to a smaller, more independent board empowered to drive change. This new model may include a rotation of affiliates to help ensure a North-South balance. It also requires a larger number of independent, diverse, and external experts to help Oxfam drive strategy to ensure that the skills related to integrity (regarding sexual misconduct, fraud and corruption, and ethical behaviors) are well represented, and to hold the organization accountable.
- Create a new global position of chief ethics officer at the director level. That officer should already have demonstrated the standing and leadership qualities needed to support Oxfam's drive to instill unified expectations for ethical values and practices throughout the confederation. The chief ethics officer would report directly to the executive director but would have matrix-managed reporting and full access to the board of supervisors. The chief ethics officer would oversee the safeguarding system, including overseeing and working in close collaboration with a lead survivor expert, and ensuring that the system complies with all integrity and ethics

standards. The chief ethics officer also would be responsible for supporting Oxfam's leadership's drive toward an ethical culture throughout the organization.³⁰

- Adopt a standards-based maturity model to build a One Oxfam approach to high-quality safeguarding excellence in programs across the confederation. This model should build and apply confederation standards. These standards will guide the confederation on how to embed safeguarding and ethical behavior by helping the confederation's senior leadership identify strengths and areas for development over a series of "levels" of work to further enhance their program. The IC further suggests that this standards-based maturity model act as a broader model to the confederation's broader operations as it aims to realize its One Oxfam ambition. *See Annex B for a more detailed outline of maturity model approaches Oxfam can adopt.*

2. Embed survivor leadership at Oxfam—nothing about us without us

Oxfam must embed survivor leadership in its safeguarding approach to ensure that the confederation's sexual harassment, exploitation, and abuse prevention and response work is survivor centered and sensitive. This approach requires having survivors work closely with the safeguarding leadership (described in the next section) in developing and rolling out policy and procedures, and formulating integrated survivor support mechanisms and the organization's capacity-building and programming streams of work. To accomplish these goals, Oxfam should do the following:

- Establish an in-house Advisory Forum for Engagement (SAFE) coordinated by a lead survivor expert. This expert should be a senior, full-time, dedicated employee reporting to the chief ethics officer and tasked with driving a survivor-centric focus throughout Oxfam's systems and practices. The SAFE will be composed of a core team of part-time staff, as well as staff, partners, and program participants serving in *ad honorem* advisory roles. The group's overall responsibility would be two-fold:
 - Ensuring survivor mainstreaming so a survivor-centered approach is embedded throughout all safeguarding activities and beyond, across departments, programs, and activities
 - Driving the survivor support stream of work: policy, guidance, and standard operating procedures for an integrated response to incidents that ensures effective, supportive, and holistic responses, in which each survivor is supported adequately and each branch of the organization assumes its responsibilities for support and accountability

³⁰ Although this post ultimately would have the capacity to oversee the fiduciary elements of ethics, including fraud and corruption, the IC recommends that its shorter-term focus be on safeguarding so as to build up the organization's capacity in this area of misconduct.

This proposed program of work is unique in that it is specific to representing the perspectives, needs, and rights of all survivors (staff, partners, and program participants) and will mean that all safeguarding work is co-created with survivors. Under the leadership of the lead survivor expert, survivors will have a voice in designing training and awareness programs, reporting systems, response approaches, survivor immediate and long-term support, and accountability. *See Annex C for a proposed survivor advisory forum for engagement terms of reference.*

3. Overhaul the safeguarding system

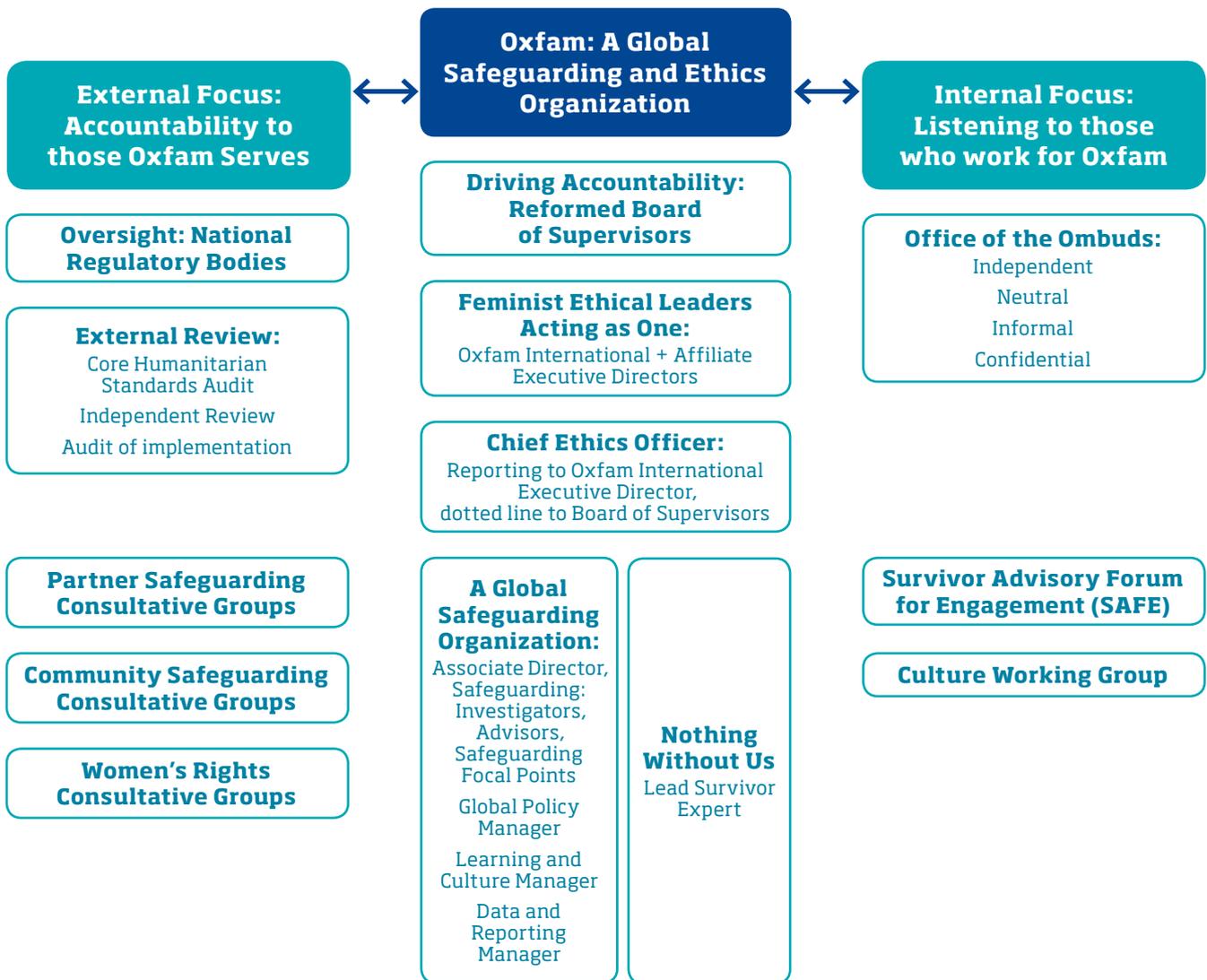
Oxfam's executive board recently made a significant and welcome decision to prioritize and protect safeguarding across the confederation by establishing a single, unified, confederation-wide and streamlined safeguarding system that uses the same case management database. Oxfam also recently approved a One Oxfam protection from sexual exploitation and abuse policy and a new One Oxfam child safeguarding policy. As Oxfam elaborates the design of a confederation-wide approach to preventing and responding to sexual exploitation and abuse, it should consider the following components:

- **Architecture**—The architecture of the new safeguarding system would be structured as follows:
 - Make the chief ethics officer the gatekeeper. As outlined in the section on governance, the chief ethics officer should become the broker and gatekeeper of the global safeguarding system by building an ethos of collaboration, particularly through working with those who bring the voices of survivors to the table.
 - Form a safeguarding unit consisting of an associate director for safeguarding, a global policy manager, a culture and learning manager, and a data and reporting manager, to create a multidisciplinary safeguarding team.
 - Coordinate the work of SAFE through a lead survivor expert, who also should lead survivor mainstreaming in the organization.
 - Train and/or hire safeguarding investigators to lead Oxfam's investigations worldwide.
 - Institute reporting by safeguarding advisors in each region and in affiliates to the central team; these advisors also should be responsible for safeguarding mainstreaming, capacity building, and program quality in their regions.
 - Shepherd people through the reporting process and referral mechanisms via safeguarding focal points in the secretariat and each Oxfam affiliate and regional and country office.

- **Reporting**—Reporting would be done through the following mechanisms:
 - Report through multiple field-level channels in local languages and make the reporting accessible to those who are illiterate. Oxfam should ensure the data confidentiality of staff and community reporting.
 - Put in place a centralized human resources management system to process and aggregate information and complaints from multiple channels so Oxfam is properly alerted of repeated allegations of sexual and other forms of misconduct, and can make informed disciplinary decisions.
- **Investigations**—Investigations would be handled as follows:
 - Invest in building the confederation’s in-house safeguarding investigations capacity.
 - Retain the services of external investigators for cases involving senior management or to assist when internal capacity is stretched.
- **Case management**—Case management would be improved as follows:
 - Institute processes whereby case management would be housed in one central database and decision making on disciplinary actions escalated from country management authority to higher management, thus ensuring consistency and alignment with confederation-wide standards.
- **Referral pathways**—Referral pathways would be connected in the following way:
 - Connect referral pathways with every Oxfam presence, secretariat, affiliate office, country offices and field offices, and the presence of existing service providers to ensure that survivors have access to the services they need.
- **Feedback loops to complainants**—Modify the investigation protocol:
 - Modify the investigation protocol, or case management standard operating procedures to include a final step, in which complainants and survivors receive timely feedback on investigation outcomes, communicated by the senior safeguarding official in the organization.
- **Collaboration**—Promote collaboration among the following groups:
 - The relevance, quality, and impact of the safeguarding unit’s work should be heavily dependent on collaboration with proposed internal and external advisors, such as the existing internal Oxfam workplace culture group, complemented by these newly formed advisory groups: SAFE, partners and community safeguarding consultative groups, and women’s rights consultative groups.

- **Knowledge hub**—Create a knowledge hub:
 - Oxfam should create a repository with the names and contact and other information of all those involved in safeguarding—past and present—to ensure institutional knowledge and build on existing efforts. These individuals can also be the building blocks of a community of practice under the leadership of the lead survivor expert.
- **Ombuds system**—Create an ombuds system:
 - The safeguarding system would benefit from the recommended internal ombuds system, a separate but key stakeholder. An internal ombuds system can help rebuild trust if it can raise strategic issues and send a clear signal from management that Oxfam wants to support its staff. *See Building a Successful Ombuds System Based on Trust, on page 50 for more information.*

GLOBAL SAFEGUARDING AND ETHICS FRAMEWORK



See Annex D for more detail on this framework.

4. Operationalize zero tolerance

Oxfam has a comprehensive policy for preventing sexual exploitation and abuse but must make strides to ensure its consistent implementation and realize its zero-tolerance commitment. Leadership across the organization (secretariat, affiliate, region, and country) should formally and consistently hold to account those who violate safeguarding policies, the code of conduct, and its values. Steps leadership can take to further operationalize a zero-tolerance policy include the following:

- Proactively act on incidents and rumored incidents, and communicate to staff when action is taken, both to signal that the organization does not tolerate misconduct and to encourage people to report.
- Develop confederation-wide disciplinary standards and guidelines with the objective of ensuring the consistent application of standards and parity regarding repercussions. Use these standards and guidelines to employ staff and measure staff performance and behavior. Disciplinary actions for proven cases of sexual exploitation and abuse will not be taken at the regional or country level, but instead by the accountable affiliate or Oxfam International executive director, with processes in place to ensure conformity across the confederation.³¹ Guidelines must be developed for the following:
 - Determining the range of expected administrative and disciplinary actions per type and severity of offense; this determination should include sanctions for retaliation against whistle-blowers.
 - Clarifying to staff the “red-line” transgressions that will result in dismissal under the zero-tolerance policy (e.g., payment for sex, exchange of goods or services for sex, rape/sexual assault).
 - Establishing disciplinary action committees that would advise the executive director. The committees should be composed of representatives from legal counsel, human resources, and one senior manager from Oxfam International charged with sitting on all such committees to ensure consistency of approach.
 - Enforcing disciplinary action for those Oxfam staff at the C-grade level and above who are bystanders but choose not to report.
 - Keeping the board of supervisors and regulators apprised in a timely basis.

³¹ The IC is not recommending a single Oxfam Global decision maker, recognizing that staff have contracts with individual affiliates, each one operating in different jurisdictions with different labor laws.

- Amend the One Oxfam code of conduct policy as follows:
 - Specifically include and define “zero tolerance.”
 - Edit Standards and Values No. 2 to read that “I will also not exchange money, offers of employment, employment, goods or services for sex or sexual favors, or any other forms of humiliating, degrading or exploitative behavior...”
 - Add “I will not engage in transactions with sex workers” or “I will not pay for the services of sex workers.”
 - Add “I recognize that as an Oxfam staff member, I am representing the organization at all times, whether or not I am undertaking official Oxfam duties, including outside of working hours. I commit to protecting the best interests and needs of the communities I serve and of my colleagues, in the interests of the organization and its reputation, by adhering to the highest standards of conduct.”

5. Support Oxfam partners

- Incorporate safeguarding policies and procedures into existing and new partnership agreements: Each Oxfam country office should incorporate these policies and procedures, which should include but not be limited to the following: sexual exploitation and abuse prevention activities as a core programming component, and a standard operating procedure for case identification and management, investigations protocols, and responsibilities for providing the requisite immediate and long-term support to survivors.
- Provide training: Each Oxfam country office, with the support of donors, must provide the commensurate financial and training support to partners participating in community-based complaint mechanisms and protocols as defined in the partnership agreement. Training costs must be included as budget line items in program proposals, recognizing that initial and annual refresher training will be required.
- Assess partners’ capacity: The new One Oxfam partnership assessment is a strong tool. Oxfam International and the affiliates should provide technical mentorship to country teams to conduct assessments consistently, fairly, and equitably. Oxfam should develop a prioritized and structured plan to evaluate, benchmark, and build partners’ capacity in safeguarding prevention and response systems, as well as organizational culture commitments. The IC is pleased to learn that Oxfam plans to conduct this assessment with partners every four years, along with an annual review, and monitor the capacity-building plan every six months.
- Prioritize plans for developing partnership capacity: Country teams must prioritize development plans for current partnership capacity on safeguarding before any further partner and program expansion in country.

6. Mainstream safeguarding

Safeguarding is everyone's responsibility. With the support of the lead survivor expert, global safeguarding unit, and the regional safeguarding advisors, every department should incorporate safeguarding principles into its work. This means consistently applying the Do No Harm lens and incorporating safeguarding risk assessments, mitigation, and interventions into every stage of program design. Careful consideration should be given to conducting participatory consultations with the communities in which an intervention is planned, with a view toward understanding power structures, risks and vulnerabilities, and barriers to reporting and seeking assistance. Such integration can and should be done as an integral part of protection mainstreaming, in both humanitarian and development settings.

B. SUPPORT SURVIVORS TO RECOVER AND REBUILD THEIR LIVES

Sexual exploitation and abuse perpetrated by and/or with Oxfam staff, funds, goods, or services is the responsibility of the organization, which therefore bears the responsibility of ensuring that survivors have immediate access to specialized services. Oxfam is currently finalizing comprehensive One Oxfam survivor support guidelines that encompass core principles for survivor support, services to which survivors are entitled, guidance for ensuring comprehensive protection and support to survivors, and the roles and responsibilities of Oxfam offices and staff—from the director of safeguarding to the field. In its 10-Point Plan, Oxfam announced they would review previous cases and encouraged witnesses and survivors to report prior incidents, as well as come forward if they felt their cases were mishandled. The IC believes that Oxfam should consider survivor support for these cases as warranted.

1. Provide localized immediate support

Each survivor has a right to access specialized and survivor-centered health care, including comprehensive sexual and reproductive health services, psychosocial support, legal counsel, and safety and security services. This care should be provided locally unless doing so compromises a survivor's safety. In particular, local counseling options need to be sourced as opposed to relying on global services.

2. Support survivors to access options for justice

A key message from community members was the desire to "see justice done," whereby the organization takes action to dismiss perpetrators of sexual exploitation and abuse, and all people involved in Oxfam's work, including individual workers, are also held to account for sexual and other misconduct via the code of conduct. Their message highlights the importance of a range of responses,

such as sanctions for breaches of the code of conduct, contractual agreements, and employment law, as well as criminal prosecution, ensuring real and visible consequences for misconduct.

- Provide a survivor-centered approach: Survivors are entitled to information about how to bring perpetrators to justice and the significance of reporting. Oxfam has standard operating procedures for reporting misconduct that set out protocols for reporting misconduct in country, and note the option of reporting via extraterritorial jurisdiction. However, the IC feels more emphasis on a survivor-centered approach is warranted. To that end, Oxfam should do the following:
 - Discuss with the survivor her/his preferred method of justice, including criminal justice.
 - Work with survivors through a person with survivor-centered training to ensure that they fully understand the risks and benefits of participating in criminal proceedings so they can weigh these for themselves, recognizing how difficult it can be to make decisions in the immediate aftermath of a traumatic incident.
 - Consider what support must be provided for survivors so they can report safely to police and stay safe throughout the proceedings.
 - Prioritize survivor well-being by ensuring their informed and *ongoing* consent throughout judicial proceedings.
- Offer a full range of support to a survivor while a case is being adjudicated through the criminal justice system of the country where the act took place or the home country of the perpetrator in cases in which extraterritorial jurisdiction applies.
- Create an internal panel of experts to manage the presentation of sexual exploitation and abuse cases to local criminal justice authorities and the resulting range of complex issues that may arise when considering local context and legal systems and respecting international standards. The affiliate executive director should make the final decision, advised by the affiliate general counsel and the global chief ethics officer. Leaving this task to local decision makers may result in inconsistencies at odds with the One Oxfam model. Although the panel should be international, local representation in each case is required so survivor safety and protection is not put at risk and to incorporate contextual knowledge.
- Provide appropriate support during the investigation process to the subject of complaint as well as the complainant, including access to legal advice and counseling.

3. Provide reparations

Sexual exploitation and abuse can inflict long-term, if not permanent, damages. Such damage includes but is not limited to physical and mental health concerns, ostracizing and stigma, and financial losses.

- Strongly consider establishing a fund dedicated to providing survivors with reparations; by definition a fund would acknowledge fundamental injustices and seek to provide redress to the wronged individual. The aim of this fund would be to help survivors rebuild their lives on their own terms. There is some precedence for reparations, such as the UN Trust Fund in Support of Victims of Sexual Exploitation and Abuse, which supports specialized services for survivors. These services in some cases include education and vocational training for those survivors who have been alienated and stigmatized in their communities.³² The proposed fund, supported by organizational unrestricted funding, could support any survivor of sexual exploitation and abuse offenses—staff member, partner, program participant—committed by anyone using or operating under the Oxfam brand. This latter category would include but not be limited to board members, staff, partners (where there is an identifiable and specific link to an Oxfam program), interns, short-term consultants, and volunteers. The chief ethics officer should solicit external and internal expert opinions, including that of the lead survivor expert and SAFE, to establish the parameters of the reparations. Parameters should include management of reparations; the mechanisms for accessing them; and the design of the support, including type, caps, statute of limitations, and duration. This proposal should be presented to the executive directors and, given the sensitivity of this recommendation, to the Oxfam board of supervisors for their consideration as well.

C. CO-CREATE COMMUNITY REPORTING SYSTEMS

Oxfam urgently needs to comply with its pre-existing commitments on accountability to affected populations. Oxfam has recognized its shortfalls related to program participants' access to safe and responsive mechanisms to handle complaints, as highlighted by the HQAI audit of its compliance with the Core Humanitarian Standard on Quality and Accountability. The organization also recognizes the need for its new draft survivor support policy to include steps for facilitating a supportive environment in which to make complaints. As it finalizes this policy, Oxfam is considering how to increase the availability and types of channels for survivors to report sexual exploitation and abuse. In addition to those efforts, Oxfam should also consider the following recommendations:

³² See more at United Nations, "Preventing Sexual Exploitation and Abuse," accessed May 3, 2019. <https://www.un.org/preventing-sexual-exploitation-and-abuse/content/trust-fund>.

1. Ensure accountability to *all* affected populations

- Establish complaints mechanisms with multiple channels for reporting in all programs, regardless of donor requirements. Accountability to program participants—not donors, the media, or its organizational reputation—should drive Oxfam’s safeguarding system in the field. These systems should be co-created with the communities Oxfam serves to ensure that they are appropriate for the context, consider barriers and risks involved in accessing complaints mechanisms, and are tailored to the specific needs of the communities. Meeting donor requirements, although important, should be secondary to the needs of the communities Oxfam serves.
- Redouble awareness-raising efforts around the responsibilities of Oxfam staff, partners, and interlocutors, as well as the rights of Oxfam’s direct and indirect program participants.
- Work to integrate practice and learning into its development programs even though standard commitments on complaints and feedback mechanisms often are associated with humanitarian settings.

2. Conduct community and partner system reviews for continuous improvement

- Conduct annual reviews (done by program teams) of reporting mechanisms with communities and program participants in each country to evaluate how reporting systems are functioning; co-design modifications as needed.
- Conduct partner meetings every six months (Oxfam country offices), moving to an annual schedule after five years, to evaluate partners’ safeguarding systems, identify capacity-building needs, share learning and best practices, and improve systems.
- Consider the issues and recommendations raised by partners and communities in this report to help them improve their reporting systems.

D. CREATE A SUPPORTIVE ENVIRONMENT

The viability of Oxfam’s mission—serving people—is dependent on the strength of its most valuable asset—its own staff. Oxfam must protect and serve its staff with the same impetus and importance it professes to place on doing so for communities. To this end, Oxfam must create a supportive environment in which staff can challenge the organization to improve. Successful safeguarding requires a focus on an ethical, safe, and healthy environment for both staff and program participants.

1. Establish an ombuds system

- Establish an internal ombuds system³³ with the goal of building trust and sending a clear signal that Oxfam will support its staff and managers in managing conflict and provide an independent, neutral, informal, and confidential place to air concerns and seek advice. Such a system would create a safe space for people to talk about issues, raise concerns, and process advice on how to access formal systems. It also could provide an analysis of trend issues, including organizational culture and power imbalances, that management must tackle strategically. Using participatory methods, Oxfam should design a system that fits its organizational structure and needs, with the support of ombuds expertise and based on industry-wide standards and criteria.

BUILDING A SUCCESSFUL OMBUDS SYSTEM BASED ON TRUST

As part of its work, the IC facilitated a peer review between Oxfam and ombuds experts, and organizations that had implemented such systems. The overriding message was that a successful ombuds system is built on the trust of staff, who see it as an investment in staff well-being and creating a safe space to talk through issues; and management, who see it as a critical part of building a healthy workplace. Ombuds teams have helped guide staff to ensure that issues are handled appropriately; an ombuds system also can help organizations generate savings by improving staff retention and identify trends that senior management need to address. A system's success lies in the independence of the ombuds staff, who need access to staff across the organization and regular opportunities to provide feedback and input at the highest levels. There is no one-size-fits-all ombuds system; creating one requires time and investment to ensure it is accessible and can function across the organization, including at the most senior levels, and in line with its four principles—*independence, neutrality, confidentiality, and informality*—which provide essential foundations for success.

³³ The proposed internal ombuds system is different from the proposed aid ombudsman system being discussed at the sector level, which is an independent accountability mechanism.

2. Conduct surveys

In recent years, surveys at Oxfam have proven invaluable for taking the temperature within the organization and identifying issues that need greater attention and investment from management. Oxfam should continue to conduct surveys, specifically as follows:

- Undertake global staff surveys every two years, starting in 2019, with no options for affiliates to opt out; and ensure these surveys are managed externally to increase staff trust.
- Conduct pulse surveys in off years, focusing on discrete topics, such as sexual exploitation, culture, power imbalances, work life/balance, and others as needed.
- Invest in marketing the surveys to all staff across the confederation and support country offices to help them access the resources and technology required to do the surveys.
- Systematically publish the results of the surveys to staff, including a clear action plan to address concerns, and update staff regularly on progress in taking the actions to which the organization has committed.

3. Create space for staff dialogues

Oxfam is creating the required space for internal dialogue on issues raised in the culture survey and through IC's work. To ensure these dialogues are inclusive, participatory, and results oriented, the IC recommends its senior management do the following:

- Fully support and provide resources for the process needed to conduct the planned culture survey dialogues so they will discuss the findings around hierarchy, gender, racism, bullying; and leverage and expand the positive aspects of Oxfam's culture. Staff should co-own this process and be empowered to set conversation agendas.
- Allocate increased funding to facilitate these dialogues, especially in country programs, which up to this point have had a low level of participation in the culture survey. Management in the secretariat and affiliate offices should provide feedback to the secretariat and affiliate offices, given this low participation.
- Conduct a detailed power mapping process to identify hidden and informal as well as formal power, and how it is used. Such mapping should unpack how ideas reach top decision makers and whose ideas are considered; who is invited to or occupies speaking time in meetings; and how human resources policies are implemented and impact different staff.
- Communicate clear commitments to staff to support continued conversations beyond the lifespan of the dialogue, including sharing with staff action plans on how they will advance actions identified by the survey and dialogues process; commit to regular staff updates on progress. Continued conversations should include regular team conversations on culture, power dynamics and inequalities, biases, and the code of conduct. Team leaders

and department managers should receive guidance and support regarding how to promote these controversial conversations in an environment that is safe for all. In addition, Oxfam should develop anonymous online spaces for this purpose. These conversations should include discussions of policies; the consequences of violating them; and individual, team, and organizational dynamics.

- Identify and train culture conversation change agents within the organization to support additional team conversations as required, particularly in situations involving tensions within teams or when there is a need for external and neutral guidance for the conversations.
- Invest in expanding staff access to the GAL program throughout the confederation to deepen staff sensibility and capacity for engaging in more gender-just interactions in the office and field.
- Invite staff and key partners representing or with expertise in diversity (particularly in gender and lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI) concerns to impart their learning and guide conversations.

4. Include work/life balance topics in culture dialogues

Discuss work-life balance: Although evaluating work-life balance and staff care at Oxfam was not part of the IC's remit, it is noteworthy that the former arose as a major issue in internal surveys. Work-life balance is an indicator of organizational culture and negatively impacts staff time and the ability to take time to reflect and act on power imbalances, biases, and other negative aspects of the culture. The IC encourages Oxfam to include work-life balance in its culture dialogues so it can explore this issue in greater detail and develop recommendations.

5. Review contract types and duration

Review short-term contracts: Reviewing Oxfam's approaches to staff contracts was not part of the IC remit; however, the IC heard repeated concerns that short-term consultants and volunteers are a large part of the employment model, and that people on short-term contracts are more vulnerable to power abuse and exclusion. A significant number of survivors of bullying and other forms of abuse of power with whom the IC spoke were staff with short-term or irregular contracts. The IC encourages Oxfam to review its contractual processes to address this hidden power dynamic.

E. MAKE IT PERSONAL

Oxfam affirms that as it strives to achieve its goals, it will lead by example and demonstrate the same values—empowerment, accountability, and inclusiveness—it wishes to see in the people with whom it works and hopes to influence. Oxfam should consider the following actions:

1. Refresh the leadership model

- Review Oxfam’s leadership model—from core competencies to selection and development of leaders to performance management—to ensure that feminist and ethical leadership qualities are emphasized sufficiently.
- Undertake a time-limited talent management drive to diversify leadership by drawing from all parts of the organization, taking into account gender, age, and other forms of representation. As a first step, Oxfam should conduct an immediate diversity audit across the organization to underpin this talent drive.
- Create an outreach and recruitment plan for a deliberate management cadre refresh process. The plan could group managerial posts scheduled for contract renewal or otherwise open vacancies in yearly batches and re-advertise them as a cohort in a deliberate, competitive process to identify strong leaders with the vision and competencies to drive change. This refresh process, however, should not delay the decisive pursuit of improved performance management, including such tools such as counseling; reassignment to non-managerial roles; and exits, if warranted, after appropriate processes in the cases of managers who do not foster a positive environment.
- Embed values into the leadership hiring processes:
 - Ensure that support for Oxfam values and behaviors are recognized in leadership hiring processes and build on the recently agreed-upon hiring approaches. The organization should modify its guidelines for hiring processes across the confederation to provide guidance on specific requirements for senior management hires. It must provide such guidance on how to test for knowledge, skills, and aptitudes related to safeguarding and instilling values in the organization.
 - Include staff panels in leadership position interviews, with panel members having input into the final decision-making process.
- Provide support to leadership. Human resources should strengthen and deepen the organization’s leadership training programs, such as the Transformative Leadership Journey (TLJ), to embody feminist principles, ensure a safe workplace and enhance knowledge of safeguarding, managing power, and building positive behaviors. It must include modules on ongoing reflection, self-assessment and seeking feedback from others. They should be living programs that can be updated continuously to reflect

the learning and recommendations emerging from the staff-led culture and gender work streams. In addition, this training should be mandatory for all people in management positions and supported by coaching in the workplace; its successful completion should be linked to performance evaluations.

2. Modify performance management processes to hold all staff accountable

In addition to recent modifications of the Let's Talk performance management process, Oxfam should consider the following recommendations:

- Mandate that all leaders (C/D-levels and above) undergo a comprehensive 360-degree feedback review that allows for all staff (or, for large teams, a well-developed random sample) under the manager to rate and comment anonymously on their manager's performance. Reviewers should include peers and supervisees, and both line and dotted supervisees. Oxfam also should take steps to incorporate partner staff as reviewers. Performance reviews and personal development processes should be conducted with the support of experienced coaches.
- Require that the human resources department and all department managers strategically leverage and incorporate staff surveys and 360-degree feedback into performance management systems to identify leadership that is exemplary in modeling values and providing a safeguarding ethos; and preventing bullying, harassment, and other abuses of power. Feedback also could help identify specific needs to support senior-level action in addressing hotspots.

3. Make the code of conduct real

- Invest more financial and human resources to make the code of conduct and its ancillary policies accessible to all, including but not limited to the One Oxfam child safeguarding, One Oxfam PSEA, and the sexual diversity and gender identity rights policies. The organization should design context- and barrier-specific materials. The code of conduct and policies should be made available in local languages and for people who are illiterate. In addition, explanatory documentation should be developed in both written and audiovisual form and easy-to-understand language; discussed with staff, clearly explaining any nuances; and made available in local languages.
- Give all individuals working with Oxfam in any capacity access, both on and offline, to Oxfam's full package of safeguarding policies, procedures, and educational materials, regardless of their employment status.
- Require all staff should to re-sign the code of conduct every year and attend refresher trainings. Also, all job applicants should be exposed to and sign the code of conduct and its ancillary policies before their offers are finalized, so they understand Oxfam's expectations for staff behavior before joining the organization.

- Provide support for partners in prioritizing the code of conduct and its related policies:
 - Modify contractual agreements to include a code of conduct and contractual obligations to encompass sexual exploitation and abuse.
 - Engage partners in dialogues around expected culture and behaviors on an annual basis.
- Provide special support to volunteers in the communities in which Oxfam serves so they understand behavior requirements and responsibilities for preventing and reporting sexual exploitation and abuse. Oxfam should explain and socialize the code of conduct at the onset of partnerships with communities and before signing the code of conduct, regardless of the length or official/unofficial nature of the contractual arrangement.

F. MODEL TRANSPARENCY

As Oxfam continues to reform, it should consider the following ways in which leadership can demonstrate it is living up to its values and models accountability:

1. Through the chief ethics officer, continue to publicly release reports of anonymized safeguarding cases, disaggregated by type, every six months. The release should be comprehensive and consolidate secretariat and affiliates' case reports. Oxfam should release an annual report that includes an end-of-year tally on cases by type and status of investigation.
2. Design the public annual report so that it briefly describes each proven case of sexual exploitation and abuse in a way that maintains confidentiality but allows the reader to understand the role and level of the perpetrator in the Oxfam hierarchy (e.g., manager at level x; administrative staff at level y), the substantiated transgression, and the resulting disciplinary action.³⁴ The report should affirm that feedback has been provided to complainants.
3. Undergo an expanded Core Humanitarian Standard on Quality and Accountability audit of ten country programs by June 2020 to assess progress in co-creating community reporting mechanisms. HAQI should select these countries, which should represent both development and humanitarian settings.
4. Place all of its new and evolving safeguarding policies and procedures in an open-access system, both for transparency and to share its learning with partners and the wider sector.
5. Require that management report back regularly on actions taken in line with gender justice advisors' recommendations to improve programming. Such reporting should include transparent reporting back to staff on the key performance indicators agreed on between the gender justice platform and Oxfam management.

³⁴ An example of such a report can be viewed at <http://pubdocs.worldbank.org/en/172361546547469758/EBC-AR18-FINAL-Web1.pdf>, accessed April 14, 2019.

6. Continue to seek independent reviews, possibly through the IC in a revised form, composition, and modified remit. This process could provide an independent review and real-time advice on Oxfam's progress against the 10-Point Plan and the IC's recommendations, and provide annual public progress reports for the next two years.

G. WORK TOGETHER WITHIN THE SECTOR TO REALIZE SYSTEMIC CHANGE

Oxfam can and must continue its reforms to become a more protection-oriented organization with robust safeguarding structures and a healthier organizational culture and work environment for its staff and the people it serves. However, its impact in the overall safeguarding arena and at the individual level in the communities it serves will be extremely limited if not complemented by that of its peers throughout the rest of the development and humanitarian sector. The sector needs to approach this body of work with coherence; the IC encourages Oxfam to help lead these efforts. The following are the most salient concerns for the sector to consider:

1. Get the basics right

All international aid organization should do the following:

- Formally join the Inter-Agency Scheme for the Disclosure of Safeguarding-Related Misconduct in Recruitment Process within the Humanitarian and Development Sector, which establishes a minimum standard for organizations to exchange information during recruitment processes about candidates who have perpetrated acts of sexual misconduct. At present, only thirteen organizations, alliances, or confederations have formally subscribed to the scheme; Oxfam is a subscriber.
- Ensure that a senior staff member overseeing all safeguarding initiatives and reporting directly to the highest levels of management.
- Collaborate within the aid sector. The aid sector, including donors, the UN, international nongovernmental organizations (INGOs), and NGOs, must collaborate to make reporting easier for the communities it serves. An interagency community-based complaints mechanism (available in local languages and to people who are illiterate) must be established in every humanitarian setting at the onset of the response, without exception. Communities and people affected by crisis should be consulted about the design of complaints-handling processes as the programs are being designed, and the system should be rolled out in tandem with program activities. Aid agencies must establish these mechanisms in accordance with the same standards and procedures their principals have endorsed on the Inter-Agency

Standing Committee (IASC),³⁵ including the IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse's³⁶ 2016 Best Practice Guide Inter-Agency Community-Based Complaints Mechanisms,³⁷ and its 2016 Global Standard Operating Procedures on Inter-Agency Cooperation in Community-Based Complaint Mechanisms, 2016.³⁸

- Mandate that public annual reporting of cases becomes standard; reporting should include the numbers of published cases being investigated and concluded, along with an outline of each transgression, level of staff, and resulting disciplinary action.
- Collaborate with donors and industry regulators to ensure clear, consistent standards for reporting misconduct and high standards of data protection and confidentiality when cases are reported to ensure that people are not put at risk or discouraged from reporting abuse. One platform for discussing agreed-upon standards would be the Development Assistance Committee.³⁹

2. Think outside the box

- Incorporate prevention of sexual exploitation and abuse into development work: Development agencies must bring prevention of sexual exploitation and abuse tools and learning into their work; it is not a dilemma confined to the humanitarian side of the sector. There should be one set of standards for the entire aid sector.
- Eliminate discourse that implies that all perpetrators are men and all survivors are women. Although women and girls are impacted disproportionately, survivor profiles differ. They include but are not limited to men, LGBTQI, and those who identify as nonbinary. An artificially gendered focus on survivor and perpetrator profiles puts an organization's approach to safeguarding at risk of bias, which may hinder reporting by male or nonbinary survivors, or cases involving female or other perpetrators.
- Focus on the "how" of operations: Members of coalitions such as the International Council of Voluntary Agencies and InterAction, together with UN agency platforms (such as the IASC Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse) should engage in dialogues to identify concrete ways they can operate differently, with a greater focus on *how* they operate than on *what* they deliver.

35 The Inter-Agency Standing Committee is the primary mechanism for inter-agency coordination of humanitarian assistance. For more information, see www.interagencystandingcommittee.org.

36 For more information, see "Protection from Sexual Exploitation and Abuse by our Own Staff." <http://www.pseataaskforce.org>.

37 For more information, see IASC, "Guideline: Inter-Agency Community-Based Complaint Mechanisms: Protection against Sexual Exploitation and Abuse." https://interagencystandingcommittee.org/system/files/best_practice_guide_inter_agency_community_based_complaint_mechanisms_1.pdf.

38 For more information, see IASC, "IASC Standard Operating Procedures on Inter-Agency Cooperation in Community-Based Complaint Mechanisms, 2016." <https://interagencystandingcommittee.org/node/17906>.

39 The OECD Development Assistance Committee is a forum for many of the largest providers of aid, including thirty members. It has established its own Prevention of Sexual Exploitation and Abuse taskforce. For more information, see: <https://www.oecd.org/dac>.

They must be honest conversations about power imbalances, structural racism, colonial behavior, discrimination, patriarchy, and sexism within the aid sector. These coalitions should regularly share learning on how to improve organizational culture and foster internal self-awareness.

- Explore the influence of norms: Aid sector stakeholders should explore ways in which norms can be influenced in humanitarian settings. With donor support, aid organizations should collaborate with research scientists to conduct a multicountry longitudinal study on impacting norms and effecting behavior change among local aid purveyors in humanitarian settings that come from the affected population. At present, the aid sector has a very limited understanding of how long-term behavior change and communication interventions could be adapted to influence behaviors in alignment with protection requirements.
- Expand avenues for justice: When responding to cases of sexual exploitation and abuse, aid sector organizations should expand their efforts to provide avenues for legal justice. In some legal jurisdictions, reporting crimes locally or securing prosecutions can be difficult; in such places, states may need to appropriate extraterritorial jurisdiction to prosecute nationals and residents when they commit crimes abroad. For example, both of the following have been used to prosecute successfully perpetrators of sexual offences: *Article 44 of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, 2011 (the Istanbul Convention)* (with respect to sexual violence); and *Section 72 of the UK Sexual Offences Act 2003* (with respect to sexual offences against children).

3. Resourcing at the local and headquarters levels

Supporting partners is a sector-wide responsibility of both donors and NGOs. Local organizations may carry an increased risk and responsibility for safeguarding because they will have an increasing role in delivering assistance. As rigor around safeguarding policies and procedures increases, so do the requirements for what organizations must have in place to receive donor funding:

- Support local organizations' capacity for safeguarding: Aid actors (donors, NGOs, and UN agencies) should help realize the Grand Bargain's⁴⁰ localization agenda safely by working together to support local organizations in scaling up their capacity for safeguarding. All of these aid organizations should work together on a national level to build capacity and agree on the procedures used in humanitarian and development settings.

40 The Grand Bargain is an agreement between more than thirty of the biggest donors and aid providers; it aims to get more resources into the hands of people in need. It includes a series of changes in the working practices of donors and aid organizations that would deliver an extra billion dollars over five years for people in need of humanitarian aid. See more at Agenda for Humanity, "Initiative: Grand Bargain," <https://www.agendaforhumanity.org/initiatives/3861>.

- Coordinate within the aid sector: Unless the sector can agree on a core set of principles and related policies, partners will be bombarded with a plethora of different codes of conduct, policies and procedures, and reporting expectations, which will add unsustainable costs and reduce effectiveness.
- In recognition of the scale of investment required, the IC understands that a significant change in resources will be required and proposes that a percentage of each donor grant to INGOs and NGOs be earmarked for safeguarding activities throughout all operations—from head offices to programs. The scale and parameters should be discussed between donors and aid agencies. However, an absence of donor contributions toward this goal does not absolve organizations of their safeguarding responsibilities.

CONCLUSION

The IC believes that Oxfam has the potential to transform itself into an organization that is accountable to and protects the people that it serves. Oxfam has committed to change and has the potential to become a voice of leadership in wider sector transformation.

This possibility exists because Oxfam:

To protect and be accountable to people and demonstrate leadership, Oxfam needs to do the following:

- 1. Recognizes and commits publicly to change.** Oxfam has displayed leadership by accepting that a problem exists and taking advice from an independent body.
- 1. Face hard truths and have the courage to undertake fundamental reform.** It is imperative that Oxfam recognize how power abuse manifests itself in the organization by listening to current and former staff. Driving an ethical culture, in concert with ongoing efforts to build feminist leadership principles into Oxfam's DNA, can be the lever of change. Without fundamental culture change, progress will be limited.
- 2. Is transparent in its work to address sexual misconduct.** Oxfam's process of reform is one of the few in the sector taking place in the public eye; this point is important to acknowledge and credit.
- 2. Maintain transparency and share learnings across the sector.** Oxfam's experiences over the past year and the work it is doing now can provide guidance to others on how to apply transformative principles to prevent and respond to sexual misconduct and abuse.
- 3. Is investing in One Oxfam policies and tools to tackle these issues across the entire confederation.** Oxfam has a history of each affiliate taking different approaches; this lack of coherence is problematic. The efforts to build a One Oxfam approach are critical if the organization plans to tackle sexual misconduct systematically across the entire confederation in the future.
- 3. Live up to its commitments by implementing policies throughout the confederation and with communities and partners.** Oxfam is developing many One Oxfam policies and procedures, but its complex structure requires a strong sense of urgency, discipline, and continued monitoring to implement them properly. These changes must be made and owned by the entirety of Oxfam, regardless of the affiliate, its power within the confederation, or the staff hierarchy level. These parameters are essential if Oxfam is to rebuild trust.
- 4. Has dedicated staff with a strong desire for change who want to build long-lasting partnerships in communities.** Its staff are Oxfam's greatest asset; they are eager to contribute to building a safer Oxfam.
- 4. Work together with communities, partners, and staff to deliver on its commitments.** Oxfam has committed to adopting feminist leadership, but this approach is not yet inherent in its work. The entire confederation must embrace collaboration and co-creation with communities, partners—especially women and feminist organizations and leaders—and present and former staff so it can build systems and approaches that will work and make a real difference to the people comprising Oxfam, those with which it works, and those for which it exists.

ANNEX A: METHODOLOGY

The IC's aim was to embody listening leadership—that is, being available to listen to current and former staff, communities, partners, survivors, experts, and aid sector workers. For this reason, it used a variety of research methods including insights gathering, quantitative and qualitative research.

In total, IC teams visited nineteen countries, conducted more than 700 staff and former staff interviews, engaged in conversations with more than 240 community members and commissioners or researchers working on behalf of the commission, and hosted four round tables with sector experts.

In its remit, the IC did not include in its research Oxfam's trading division (shops) located in affiliate countries. The IC made this strategic decision to create a more manageable workload and because country programs and affiliate offices are where the vast majority of Oxfam investment takes place.

The IC incorporated ethical and safety considerations and conducted all interviews following receipt of the informed consent of interview subjects. The IC also made clear to current and former staff that the IC was not carrying out investigations of any current or former cases. However, if commissioners felt an incident or trend of behaviour warranted immediate action, and with the informed consent of relevant staff, the IC sent letters of concern to Oxfam International senior management for further review and action. In cases of research with program participants in humanitarian and development settings, however, IC shared information bilaterally with the leadership of the named organization when specific allegations were made, the alleged perpetrator's organization was known, and the survivor gave informed consent. The survivor's/ informant's anonymity was always maintained.

A listening leader is a person who is responsive and able to act, who is compassionate and wise.

A listening leader is a servant to the mission and humble to the constituents—putting them above all else.

From the IC Communications Strategy

The following material outlines IC's research methods:

1. INSIGHTS FROM DESK REVIEWS

- Case information: The IC country visits were triangulated with available sexual harassment, exploitation, or abuse case information provided by Oxfam.
- The IC reviewed many Oxfam current and draft safeguarding and survivor support policies and procedures.
- The IC was unable to review the UK Charity Commission's investigation into Oxfam Great Britain's practices in Haiti and the subsequent commitments for improvement because its report has not been published yet. The IC has reviewed an Oxfam-commissioned external investigation review of the Oxfam case management system, including a focus on the nature of cases reported, quality of the investigations, and the safeguarding systems the confederation has in place across affiliates. This information helped to inform the IC's analysis and recommendations. The IC also reviewed the Humanitarian Quality Accountability Initiative evaluation of Oxfam programs in Uganda, Ethiopia, and Bangladesh, and other sector initiatives and best practices.
- The IC has conducted a review of other relevant sector documentation, such as the UK international Development Select Committee report.

2. QUANTITATIVE RESEARCH

- The IC commissioned Proteknôn Consulting Group to administer a survey on safeguarding and sexual misconduct in each of the nine country offices the commissioners visited before their arrival. The survey was designed to assess the workplace environment, familiarity with Oxfam's safeguarding policies, perceptions of sexual misconduct, likelihood of using existing reporting mechanisms for suspected and actual cases of sexual misconduct, and Oxfam's efforts to raise the awareness of and/or train partners. The survey was administered in English and the national language(s) of the country; also, it was administered electronically, with a request to country teams also to make the survey available to staff unable to access the internet. In total, 142 people participated in the survey, representing an average 31 percent response rate, although some country teams had a much higher rate of completion, and some a much lower one. The IC used the survey results to inform both the commissioners' interviews once in country and the recommendations in the IC's reports.
- The IC also studied the results of three confederation-wide surveys—a 2017 global staff survey of all program operations countries (sixty-seven) and five affiliate headquarters, a 2018 confederation-wide culture survey completed by 3,771 staff (out of 10,000), and a 2018 partner survey completed by 447 partners (out of 3,600).

3. QUALITATIVE RESEARCH

■ Survivor input

- a. One of the commissioners is a survivor who has contributed to improving survivor support systems. She took the lead on all recommendations related to survivor-centered leadership and survivor support policies.
- b. The IC commissioned a 10-person survivor reference group that met four times during the course of its research to provide input on key topics, such as survivor support, and ensure that its recommendations are grounded in their experiences. Several members of the reference group are current or former Oxfam staff who have had direct experience with Oxfam's safeguarding system.

■ Staff interviews

- a. The IC conducted visits to nine country programs to carry out semi-structured interviews with staff on safeguarding perceptions and procedures. In the field, commissioners personally interviewed an estimated 520 staff and former staff, spanning all professional levels from administrative support staff to senior management. The following countries were chosen across a spread of regions, under the management of different affiliates, across both development and humanitarian programs, and having high and low reporting rates: Haiti, Peru, Papua New Guinea, Philippines, Jordan, Zimbabwe, Kenya, Nigeria, and Benin. While in Kenya and Jordan, the IC also met with regional teams covering the Horn, East and Central Africa, and the Middle East and North Africa.
- b. The IC visited three Oxfam International secretariat offices and six affiliates, representing larger and smaller and southern and northern affiliates. IC affiliate visits covered Italy, Mexico, Novib (Netherlands), Great Britain (Oxford office), and a limited visit to Intermon (Spain) and Oxfam Quebec. Secretariat visits were made to Oxford, Brussels, and Nairobi. The IC spoke to 140 people across these offices.
- c. Commissioners held video and telephone conversations with current and former staff across the world; staff requests were channeled via the commission's website, direct emails, and word of mouth.

■ Key informant interviews

- a. In each of the nine country program visits, commissioners or IC consultants held semi-structured interviews with government officials; donors; UN and INGO peers; local partners; program participants; and other key informants, such as community members. Commissioners sought to understand their perceptions and gather recommendations for Oxfam and the wider sector.

- b. Commissioners and IC support staff held one-on-one interviews with donors and industry leaders in protection, gender justice, safeguarding, and survivor support to collect lessons learned and best practices to understand the challenges the commissioners should consider during the elaboration of their recommendations.
- c. The IC convened four roundtables with experts on a variety of topics related to realizing women’s rights, misconduct, organizational change, and accountability systems, in addition to consultations with the private sector.

■ **In-depth community and survivor research**

- a. The IC commissioned Proteknôn Consulting Group to run in-depth community safeguarding research in three countries in which Oxfam operates across Africa and Asia. These countries were selected based on geographic spread, thus ensuring a mix of development and humanitarian programming in countries that had active protection and/or gender-based violence programs and referral systems that could be used if participants required support. The consultants conducted twenty-one sex- and age-disaggregated focus group discussions with 168 women, girls, boys, and men in refugee camps, a refugee host community, and one community in which Oxfam operates a development project. The discussions included survivors, people who knew survivors, and other community members. Proteknôn used the following research questions:
 - What is the nature and level of sexual exploitation and abuse in humanitarian and development settings?
 - What systems are in place to prevent, report, and respond to allegations of sexual exploitation and abuse?
 - How do beneficiary communities understand these systems?
 - What barriers or challenges do beneficiaries experience in reporting sexual exploitation and abuse?
 - What recommendations do beneficiaries have for strengthening sexual exploitation and abuse prevention, reporting, and response mechanisms?
- b. In addition to the focus group discussions, researchers conducted twenty-one key informant interviews with local government officials and staff of other aid agencies that had sector-wide roles in the locations visited.
- c. It was not the remit of the researchers to investigate or verify alleged experiences of sexual misconduct. In line with ethical research approaches, when cases of misconduct arose during these conversations, researchers raised the issue through referral channels to the appropriate organization after they received the person’s permission. Because this body of research was gathered in settings where multiple

humanitarian and development agencies operate, any incidents of alleged experiences of sexual misconduct that were shared may have been perpetrated by employees and associates of any one of a multitude of UN agencies, INGOs, and local NGOs. Similarly, the recommendations put forth by participants encompassed all actors operating in their communities and, by extension, the wider humanitarian and development sector.

LIMITATIONS

- The IC's work was mainly qualitative and not statistically representative. Staff self-selected to complete surveys and contact the IC, and the IC was able to visit only nineteen of ninety countries where Oxfam has offices (21 percent), although it exercised care to select a representative cross-section of humanitarian and development programs across a range of regions and managed by different Oxfam affiliates, and a range of larger and smaller and new and more established affiliates. Conversations with current and former staff also went beyond these nineteen countries.
- As noted in its 10-Point Plan April 2019 update, Oxfam took concrete measures to make safeguarding and culture changes over the course of 2018. It can take time for staff to perceive or benefit from such changes (for example, with respect to the efficacy of new safeguarding policies); likewise, management may not immediately see that new policies are having the intended positive impact. Inevitably, there is a lag time between changes in processes, policies, and culture and seeing those changes bear fruit.
- The IC regrets having less of a youth voice in its work than it initially envisaged. Unfortunately, the commissioner with youth expertise was unable to continue with the IC. To compensate, the IC held a roundtable with young women human rights activists and has tried to consider power dynamics that affect young people in particular. The IC does, however, note this absence as a gap.
- The external investigators commissioned by Oxfam noted that they had limited access to the level of case information desired, which affected the comprehensiveness of their review, limiting it to desk reviews and select interviews with major affiliates. This limitation was an important technical issue for the IC. As a result, the IC has considered the findings provided and triangulated the issues the external investigators raised through its own qualitative research.

ANNEX B: DEVELOPING A STANDARDS- BASED MATURITY MODEL

A number of examples exist within international organizations, NGOs, private and public corporations, and others that could provide definitive, concrete, and successful examples of standards and maturity model approaches.⁴¹ Below is an outline of time-tested options as to how Oxfam can apply these approaches across the confederation.

DEVELOPING STANDARDS

Oxfam should implement agreed-upon confederation-wide standards that support its common pursuit of excellence in its safeguarding work. These standards should emphasize fundamental responsibilities required of every affiliate to continuously protect and enhance One Oxfam's ethical feminist practices; service delivery; and care for its people, partners, and those it serves—both within the respective affiliate operations and globally.

These standards should be principle based. They should describe expected outcomes rather than specify the detailed policy and processes required to achieve them. Consequently, the assessment and interpretation of the extent of affiliate compliance with these standards are subjective processes involving the judgment of senior leadership. The standards should be supported by a compliance framework and governance process that set out the action steps open to Oxfam's senior leadership and the chief ethics officer to address any identified noncompliance.

Properly crafted and implemented, the standards could accomplish the following:

- Further international alignment, cooperation, and cohesion on safeguarding among the affiliates as part of realizing the One Oxfam Vision
- Assist affiliates in conforming to standards of the highest consistent quality
- Advance the international and national leadership of the affiliates in rendering services to stakeholders
- Foster shared values, ethical feminist principles, a mission, and a vision for One Oxfam

⁴¹ Outline, template, and certain suggested approach criteria used with permission of Deloitte Touche Tohmatsu. Another example is the Ethics Compliance Initiative's high-quality ethics and compliance program: <https://www.ethics.org/resources/high-quality-ec-programs-hqp-standards>.

STANDARDS-BASED MATURITY MODEL

The model provides a means of benchmarking and comparing affiliates' current capabilities. It should be designed to raise the bar on affiliates' safeguarding and ethical behavior across the confederation's programs by helping affiliates' leadership identify strengths and areas for development, and envision what they might do at the next level to further enhance their programs.

The model should be divided according to defined areas of responsibility. The descriptions for each category would be broken down into a scale of maturity (generally accepted to be a five-point scale: ad hoc, evolving, comprehensive, integrated, and strategic), with level three, comprehensive, being compliant with One Oxfam policies. The expectation would be that over time, the affiliates would move further up the model scale in each area. The IC recommends that the model be consistent with the guidance or requirements of the jurisdictions within which the affiliate operates and should reflect the highest common threshold.

See below for examples of the kinds of categories for areas of responsibility:

- A. Policies, procedures, and guidelines
- B. Training and communications
- C. Safeguarding programs' effectiveness and efficacy
- D. Risk assessment
- E. Testing and monitoring programs
- F. Consultations, incident responses
- G. Governance
- H. Hiring and human resources

ANNEX C: TERMS OF REFERENCE: THE SURVIVOR ADVISORY FORUM FOR ENGAGEMENT

BACKGROUND

As part of its 10-Point Action Plan to strengthen its safeguarding policies and practices and transform its organizational culture, in February 2018 Oxfam established the Independent Commission on Sexual Misconduct, Accountability and Culture Change (IC). Its mandate was to conduct a confederation-wide review of Oxfam culture, accountability and safeguarding.

In its recommendations, the IC highlighted that survivors should co-create the safeguarding and accountability policies and procedures that Oxfam puts in place. The aim is for Oxfam survivors to influence current and future Oxfam policies and procedures, with a view toward making them both effective and survivor centred. The following terms of reference (ToR) outline the roles and responsibilities of a Survivor Advisory Forum for Engagement (SAFE).

KEY OBJECTIVES

- Review and improve current policy and practice on safeguarding, accountability, and culture.
- Collaborate with Oxfam senior management and staff to develop new policies and procedures on safeguarding and accountability.
- Monitor implementation of new policies and procedures, and provide feedback to Oxfam senior management regarding issues requiring attention.
- Provide informal support to community members and staff who survive incidents going forward, upon specific request from the survivor.
- Support, either indirectly or directly, safeguarding training where the survivor has first-hand training experience and adds value.

MANAGEMENT

The lead survivor expert will coordinate with SAFE and its members to (1) identify policies, procedures, practices, and training materials that require improvement; (2) identify survivors needing organizational and/or peer support; (3) take recommendations forward and advocate with senior management for improvements in the prevention of sexual harassment, exploitation, and abuse and survivor support.

COMPOSITION

SAFE will be composed of a small number (approximately 8-10) survivors, including community members and both current and former Oxfam staff, partner staff, and community members. Interested individuals are expected to approach the lead survivor expert to express their interest in engagement on SAFE and will be selected on the basis of (1) any experience in sexual harassment, exploitation and abuse policy and procedures and (2) their motivation to support Oxfam as it seeks to prevent and respond to sexual harassment, exploitation and abuse, and model leadership toward preventing sexual harassment, exploitation and abuse for the humanitarian and development sector.

SAFE ROLES AND RESPONSIBILITIES

Policy Development and Improvement

- Identify policies that need to be developed or existing policies that require improvement.
- Advocate for policy development/improvement.
- Support Oxfam to ensure that the perspectives and experiences of staff survivors, as well as survivors in the communities in which Oxfam serves, are integrated into all Oxfam policies, including those unrelated to SHEA.

Monitoring Policy and Program Implementation, and Culture Change

- Provide survivor oversight of Oxfam's implementation of policies, practices, and programming, as well as its efforts to improve organizational culture in the aftermath of the Haiti crisis.
- Document findings and ensure their inclusion in regular reports and advocacy measures.

Trainings and Awareness Raising

- Support the development and delivery of survivor-centered SHEA awareness-raising sessions and trainings, and related materials.
- Play the role of a steward by advocating for and supporting organizational culture shifts around SHEA; help equip Oxfam individual staff, partners, and community members with the knowledge and capacity to identify risks and cases in offering support with sensitivity and empathy; identify improvements to prevention and response programming; and build a culture of accountability.

Informal Peer Support

- Serve as a forum for survivors to seek survivor support, information, guidance, and access referrals to relevant services (administrative, medical, therapeutic, human resources, security, legal, etc.).

Relationships

- Work in close collaboration with the lead survivor expert, meeting monthly and through an online network for regular exchange.
- Collaborate closely with the IC until it completes its work and continue this collaboration with the monitoring body put in place thereafter.
- Coordinate with senior managers and other staff as necessary.

COMMITMENT TO SAFE CARE

Oxfam will provide SAFE members with professional counseling and support and, when requested, for direct and vicarious trauma.

REPORTING

The lead survivor expert will be responsible for quarterly reports on SAFE's adherence to these ToR and Oxfam's commitment to the IC's recommendations, including the recommendation for Oxfam's measures to be survivor centered.

CONFIDENTIALITY

The lead survivor expert and each SAFE member will sign a letter of commitment to respect the confidentiality of all survivors on SAFE, at Oxfam, among community members, and beyond. Any breach of this commitment will be considered a breach of the Oxfam code of conduct and will be grounds for action, including removal from the group.

ANNEX D: SAFEGUARDING FRAMEWORK

A proposed framework for a stronger, global, and survivor-centered safeguarding organization

Oxfam should take a comprehensive approach to building its safeguarding systems, which include external and internal components of its framework.

At the center is an organizational structure that includes the following:

- A reformed **board of supervisors** and **executive board** that models feminist ethical leadership, as outlined in this report.
- **A chief ethics officer:** The director-level chief ethics officer will support leadership efforts to embed and operationalize safeguarding as a fundamental part of Oxfam's operations and culture. The aim is to strengthen the way Oxfam is accountable to communities, establish clear expectations of and support to Oxfam's partners, and nurture the conditions for a safe and respectful work environment. This area of work will be embedded in an overall framework of institutional ethics, building on and supporting the good work already established in parts of the Oxfam community.

S/he will lead staff responsible for global policies, including the code of conduct and survivor-centered safeguarding policies and procedures; culture and learning, with a focus on embedding ethical behaviors and the code of conduct throughout the learning chain; data and reporting, with a focus on implementation and maintenance of systems; and development and issuance of public progress reports every six months on safeguarding prevention and response activities, as well as case management.

S/he will incorporate staff input solicited from staff unions and associations, and by systematically including a diagonal group of staff from various levels and parts of the organization in the policy development phase. Policy development that focuses on community safeguarding will benefit from other consultative groups, including the survivor advisor group, thus bringing in the voices of communities and partners.

- **A lead survivor expert:** The lead survivor expert, who will report to the chief ethics officer, will coordinate the work of the survivor advisor group, thus ensuring survivor mainstreaming throughout the organization, and drive the survivor support stream of work. S/he also will support the chief ethics officer in monitoring Oxfam's commitment to the IC's recommendations.

- **A global safeguarding team and network:** A central staff team led by an associate director of safeguarding will consist of a global policy manager to oversee safeguarding policies and procedures, a culture and learning manager to strengthen organizational culture, and a data and reporting manager to oversee case management. These four positions, which report to the chief ethics officer, will comprise a multidisciplinary team, representing responsible safeguarding, culture, and training and learning staff. They will be responsible for implementing the safeguarding strategy and policies, overseeing the safeguarding investigators, providing the requisite support to the regional safeguarding advisors, ensuring safeguarding mainstreaming throughout the confederation, and collaborating with the Survivor Advisory Forum for Engagement (SAFE) on developing survivor-centered policies and procedures.
- **Safeguarding investigators:** Individual investigators could be co-located with affiliates and regional offices, with dotted line-reporting to their leadership, but must be available to work globally as caseloads warrant. They would operate under a single set of investigative procedures. These procedures could be supplemented to meet any additional legal requirements or steps in any given country.
- **Safeguarding advisors:** Full-time regional safeguarding advisors, who will report to the associate director for safeguarding, will be responsible for capacity building regarding safeguarding, overseeing the program quality aspects of safeguarding and safeguarding mainstreaming in their regions, and supporting the safeguarding focal points. In the event that candidates with the right qualifications and regional expertise cannot be found, the confederation should invest in cultivating staff who desire to take on the role.
- **Safeguarding focal points:** Safeguarding focal points will remain in the affiliate/regional/country offices. Their role will be limited to shepherding people through the reporting process and referral mechanisms; they will not take on investigative duties, training, or building the country office safeguarding program.⁴²

To ensure that this structure is accountable to staff, Oxfam should develop and support internal structures so management can listen and learn of insight, trends, and issues of concern to which the organization can respond. The following features should be included:

- An internal **ombuds system:** An ombuds system provides a safe space for people to talk about issues, raise concerns, and receive advice on how to access formal systems. It can also provide an analysis of trend issues that management needs to tackle strategically.

⁴² Their work as focal points would be evaluated by the associate director of safeguarding as an input into their performance evaluations. Along with covering the costs associated with the time they spend on this work, it would be a way to properly recognize their contributions.

- **A Survivor Advisory Forum for Engagement:** SAFE is a group of survivors, composed of part-time and *ad honorem* staff, partners, and community members, with a mandate to advise Oxfam as it continues to refine, develop, and implement policies and procedures.
- Oxfam's internal **culture working group:** This group, already established, is composed of employees who work together to actively contribute to building a cohesive, empowering Oxfam culture.

To ensure that this structure is accountable to the people Oxfam serves, its partners, and other stakeholders, Oxfam also needs to build a robust external accountability component into its approach, which should include the following:

- **National regulatory bodies:** Oxfam should comply with regulations it has the responsibility to meet.
- **External review processes** to demonstrate its progress: Such processes would include the Core Humanitarian Standards audit, reviews by an independent review body (as recommended in this report), and an implementation audit of its progress in meeting the 10-Point Plan and IC recommendations.
- **Stakeholder consulting groups:** The safeguarding unit and Oxfam programs should continuously consult with the rich expertise available among key stakeholders to ensure its systems are responding to their needs and context. In particular, Oxfam should establish partner and community consultation groups and women's rights organisations.

