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# OXFAM GB STATEMENT ON MODERN SLAVERY

For the financial year 2015/16

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The UK's Modern Slavery Act 2015 requires organizations with an annual turnover of at least £36m to make a public statement on steps they are taking to identify and prevent modern slavery in their operations and supply chains. Oxfam GB advocated for this policy development, and this statement relates to steps taken in relation to our own operations and supply chain. We have opted to share detailed information about our current approach in order to demonstrate transparency on this challenging issue and to encourage greater transparency by others.

SIGNED BY MARK GOLDRING  
CEO, OXFAM GB



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## ABBREVIATIONS

ACAS	Advisory, Conciliation and Arbitration Service
CCS	Crown Commercial Service
CL1	Contingent Labour ONE
CSR	Corporate social responsibility
DD	Due diligence
ETI	Ethical Trading Initiative
HPC	Humanitarian Procurement Centre
HR	Human resources
ILO	International Labour Organization
IT	Information technology
ITT	Invitation to tender
ITUC	International Trade Union Confederation
KPI	Key performance indicator
LT	Leadership Team
M&E	Monitoring and evaluation
NGO	Non-government organization
OGB	Oxfam Great Britain
OJTUS	Oxfam Joint Trades Union Shop
PSEA	Prevention of sexual abuse and exploitation
PO	Purchase order
PRI	Principles for Responsible Investment
TAFG	Trustee Audit and Finance Group
TEB	Trading Ethical Board
SMETA	Sedex Members Ethical Trade Audit
WFTO	World Fair Trade Organization

## FOREWORD

The abolition of slavery in Britain occurred more than 200 years ago. Yet in 2015 the UK government was so concerned about slavery in the UK and in the overseas supply chains of UK companies that it passed the Modern Slavery Act, a testament to the severe exploitation of the weak by the strong made possible by today's global trade system.

Oxfam GB was one of a number of NGOs which worked in a coalition with trade unions, companies and investors, led by the Ethical Trading Initiative (ETI), to advocate to the UK government that mandatory disclosure by companies was the way forward.<sup>1</sup> The Act requires UK organizations with a turnover of £36m or more to report on the steps they are taking to ensure that modern slavery is not taking place in their operations and supply chains. This includes Oxfam GB.

For the Act to have a positive impact, organizations must address in their written statements the fundamental question: 'How are our operations or relationships with business contributing to the risk of modern slavery?' Given that slavery is such a difficult and a largely hidden issue, this is extremely hard to do. Oxfam GB has had a programme for addressing labour rights in its supply chain for almost 20 years, but has not until now focused on the specific risks of modern slavery whether in our supply chain or our own operations.

The Act highlighted the need for us to develop our work on labour standards and take on board known risk factors for modern slavery, which include social factors (such as poverty and migration, especially in countries with poor governance) and factors in the business model, such as short-term supply relationships lacking trust, parties in the supply chain earning very low margins and agency labour involving recruitment fees.

To date we have found no instances of modern slavery in our operations or supply chain. However, the limitations in our approach do not yet enable us to say unequivocally that there are no such instances occurring.

We have chosen to structure our statement in accordance with the guidance provided by CORE<sup>2</sup> Coalition, a civil society coalition that works to advance the protection of human rights and the environment with regard to the global operations of UK companies. CORE has critiqued the published statements of UK companies to date,<sup>3</sup> and has concluded that most are flawed and disclose too little meaningful information to assess their approaches.

Oxfam GB has therefore opted to share detailed information about its current approach in order to demonstrate its commitment to transparency and to encourage greater transparency by others.

In this first report, we are very aware that this statement falls well short of being an example of good practice. There are gaps in visibility of our supply chains and limitations in the tools used to identify and address risks to workers. We recognize we have work to do to review and address the risks in the countries where Oxfam GB has humanitarian or development programmes. We have sought to be open about these gaps, and we commit to learn and improve our practice over time and to report progress and challenges annually. We welcome feedback from those with expertise on these issues about ways in which our approach could be strengthened.

**Mark Goldring, CEO, Oxfam GB, September 2016**

## EXECUTIVE SUMMARY

The Modern Slavery Act 2015 is among the first pieces of legislation in the world designed specifically to tackle modern slavery. It requires UK organizations with an annual turnover of £36m or more to report on the steps they are taking to ensure that modern slavery is not taking place in their operations and supply chains, and to have the report signed off by a CEO or senior director and published with a link to the home page on its website. This includes Oxfam GB.

During the passage of the Modern Slavery Bill, the Ethical Trading Initiative (ETI), of which Oxfam GB is a member, convened a coalition of NGOs, trade unions, companies and investors and the British Retail Consortium to advocate to the UK government that mandatory, rather than voluntary, disclosure on company supply chains was the way forward; this resulted in the Transparency in Supply Chains clause being included in the Act.<sup>4</sup> Oxfam GB added its voice to this advocacy.

Modern slavery encompasses a spectrum of labour exploitation. Slavery, human trafficking, the worst forms of child labour and forced sexual exploitation fall at the severe end of a spectrum. But modern slavery issues are inextricably linked to other issues of labour exploitation, and need to be tackled as part of a holistic corporate responsibility strategy. In this first public report, we therefore share our overall approach to addressing labour standards, along with an overview and specific examples of the work we are doing, for instance in relation to involuntary overtime, sexual exploitation, wages and worker representation. This holistic approach provides the foundation on which we will build a more robust approach to identify and address the risk of modern slavery.



One of a series of posters produced for staff by Oxfam's Safeguarding team, 2015.

**Table 1: Risk factors for modern slavery and Oxfam GB's approach<sup>5</sup>**

Known risk factors for modern slavery	Oxfam GB's strengths	Oxfam GB's gaps	Oxfam GB's commitments
Poverty and migration, especially in countries with poor governance	Understanding of developing countries and holistic approach. Advocacy on labour issues in supply chains	Our UK procurement teams' sourcing frameworks need strengthening to ensure these risk factors are better integrated. We have not yet assessed risks in our humanitarian and development programmes or in developing country-based procurement	Revise the UK procurement framework informed by the ETI's Due Diligence Framework.  Extend risk assessment and visibility to our international programme operations and procurement
Disempowered workers keep silent about exploitation because workers are unable to organize and grievance mechanisms are not trusted. Gender inequality compounds this for women workers.	Recognition, information and consultation agreements with the Oxfam Joint Trades Union Shop (OJTUS) for UK staff. We also have agreements with a number of staff associations for staff outside the UK. Staff grievance mechanisms reviewed in 2015.	Many of our suppliers' workplaces are not unionized, particularly in developing countries, and Oxfam lacks leverage to influence this	Work with a trade union specialist on ways to remove barriers to worker representation in our supply chain, including in areas where there is a risk of modern slavery. We will also ensure gender analysis is integrated into our approach
Agency labour involving recruitment fees	95 percent of our staff in the UK are hired directly by Oxfam and we are not aware of any Oxfam GB workers based in developing countries who are employed through agencies.	Inconsistent checks for Oxfam GB's UK agency workers. We cannot categorically confirm there are no agency workers in our programme work	Ensure that risks around the 5 percent contingent labour in UK are carefully managed Conduct a risk assessment as to confirm if Oxfam GB uses contingent labour in our programme work
Short-term supply relationships lacking trust	We seek long-term relationships with suppliers, which are chosen through competitive tendering processes with ethical criteria	Some short-notice sourcing, e.g. for humanitarian response programmes and low value contracts. Variable supplier awareness about modern slavery	Targeted supplier workshops and ongoing collaboration
Historic under-reporting of serious systemic issues including slavery and sexual exploitation and abuse.	Transparency and disclosure of serious issues and how Oxfam identifies and tackles them.		Continued work in this area

## Governance

The most relevant Oxfam GB policy on modern slavery is our corporate Ethical and Environmental Policy,<sup>6</sup> which in 2013 brought together into a single policy our social and environmental standards covering both operations and supply chain procurement. The policy includes the ETI Base Code,<sup>7</sup> the first element of which is that 'Employment is freely chosen'. The policy explicitly acknowledges the potential link between purchasing practices and labour standards.

Responsibility for the policy sits with Oxfam GB's Head of Corporate Responsibility who is supported by a Steering Group of senior personnel. There is a devolved corporate responsibility model, in which operational and procurement teams are responsible for meeting Oxfam GB's commitments, with responsibilities embedded in organizational processes.

Accountability to assess, monitor and improve labour standards in our supply chain sits with the procurement teams and their management lines. Emphasis is placed on understanding by procurement staff of ethical issues, and developing tools which enable them to address labour risks and issues appropriately.

In recognition that modern slavery is often hidden and very difficult to identify, in 2015/16 we gave priority to building awareness of the issue among senior management staff and relevant functions, particularly procurement. The Corporate Responsibility Steering Group took part in a training session on modern slavery in March 2016. Twenty-eight personnel from across Oxfam GB – from Procurement, Human Resources, Retail, Logistics, International, and Campaigns, Policy and Influencing teams, the Independent Oxfam Union, the Finance and Trading directors, the Deputy CEO, and the CEO – were involved in developing this statement.

## Operations

Oxfam GB has 2,067 employees in the UK and a further 3,139 based overseas. The greatest risks of modern slavery relevant to Oxfam's operations lie in countries with high levels of poverty and migration, particularly fragile states with weak governance. We have not yet undertaken a full assessment of the risks of modern slavery in relation to our operations in developing countries, but commit to develop the risk framework by November 2017 and conduct the assessment by March 2019.

A particular area where vigilance is needed is sexual exploitation and abuse which may be perpetrated by Oxfam staff and partners. We are committed to transparency on this issue, and in 2015/16 the number of reported allegations increased from 26 to 64. Cases of sexual exploitation and abuse can fall under the category of Modern Slavery, in particular in cases where a person has been forced into performing sexual acts for another; however none of the cases reported to Oxfam fall under this category.

Under-reporting is recognized within the sector as the major barrier to tackling sexual exploitation and abuse in delivering humanitarian and development programmes. By establishing a dedicated Safeguarding team we have raised the visibility of our Protection from Sexual Exploitation and Abuse policy and reporting procedures. We believe that the overall increases in the number of allegations that we have seen in recent years show that we are improving awareness of this important issue and giving victims more confidence to report incidents.

We recognize that workers through sub-contracted, agency or other third-party hiring arrangements are more vulnerable to exploitative practices. In the UK, all but five percent of UK staff are directly employed. Our processes in the UK are designed to limit such arrangements to short-term or sporadic staffing needs. For our contingent,(contracted through agencies) workers, with the exception of the below mentioned category, we can confirm that contracts do

not allow for fines to be imposed upon workers; passports are copied and not retained; and information is provided to workers about their rights in a language they understand. We have identified one category of contingent workers (drivers, operations and warehouse staff) where there is a gap in our processes in terms of ensuring that agencies undertake appropriate checks, so we have set an action to rectify this.

We are not aware of any staff based overseas being recruited through agencies, but will check that this is correct as part of our commitment to assess risk in our international operations. Staff involved in recruitment are expected to attend a Recruitment and Selection course which includes diversity and right to work processes; Human Resources (HR) personnel check and maintain a record of all employees' proof of their right to work, to prevent the employment of illegal workers; and we have a range of policies relating to employees, including policies on grievances, disclosure of malpractice in the workplace, incident reporting, child protection, prevention of sexual exploitation and abuse, and complaints.

We fully recognize the importance of freedom of association and the right to collective bargaining to enable workers to realize all their rights, which is a known factor in the prevention of forced labour. We have a recognition, information and consultation agreement with the Oxfam Joint Trades Union Shop (OJTUS), which includes Unite and the Independent Oxfam Union representing UK workers. We encourage staff outside the UK to join a union or set up staff associations. We have agreements with a number of these.

We place a high priority on ensuring that employees can make their voices heard, including via a 24-hour confidential counselling and support line for all staff and confidential staff surveys. Grievance processes are based on the Advisory, Conciliation and Arbitration Service (ACAS) guidelines and were reviewed recently in consultation with the OJTUS.

Oxfam GB has been an accredited Living Wage Foundation<sup>8</sup> employer (a scheme open to UK-based employers) since 2013. The scope of accreditation includes all agency workers and on-site services. We also have a commitment to paying a living wage to international staff in our programme countries.

There are many other staff engagement opportunities, from confidential 'chat with CEO' slots every 6–8 weeks to a Women's Leadership Network that was established in January 2015 to enable women's leadership and influence at all levels within Oxfam GB.

## **Supply chains**

Oxfam GB's supply chains comprise retail New Products (from handcrafts to Christmas cards), UK-sourced (UK-sourced is used to mean sourced through Oxfam GB's UK procurement teams) indirect goods and services (from utilities to promotional items), UK-sourced humanitarian supplies (from tents to latrines) and procurement managed from 51 developing countries (from chickens to fuel), which includes sourcing for emergencies and in fragile countries. We have added the risk of modern slavery in our supply chain to the procurement risk register for 2016/17.

Our supply chain due diligence covers goods and services sourced by our UK-based teams and is not limited solely to products for retail. Where our spend is above £50,000, we also undertake competitive tendering processes, and any deviation from these processes requires a derogation from the Head of Procurement. Selection of suppliers is based on a balanced scorecard covering quality and delivery, value for money and corporate responsibility factors (social and environmental). Although our New Products (retail) team applies our due diligence framework to all suppliers, given the wide range of products and services we source through central and humanitarian procurement, we have developed a targeted framework in which only high risk or high spend suppliers (over £50,000) are within scope for due diligence. We have a limited due diligence process for our international programme procurement. This will be reviewed as part of our commitment to assess risks in our international programme



The Corporate Responsibility team works closely with procurement managers to ensure that they understand the risks both to Oxfam GB and to workers and build them into their category plans. We take into account purchasing practices, levels of unionization, skill levels in the workplace, national context and levels of outsourcing. A frequent challenge is our low degree of leverage to influence suppliers to maintain the labour standards we are looking for. We seek to maximize this influence through long-term stable mutually beneficial supplier relationships and take steps to reduce last-minute sourcing, which is known to introduce risks that are hard to manage. For instance, 40 percent of New Products suppliers have contracts running for more than three years and 30 percent of our Humanitarian suppliers have worked with us for over 20 years.

We have a longstanding commitment to Fair Trade, and over 50 percent of our retail suppliers supply Fairtrade-certified products or are based on the World Fair Trade Organization (WFTO) fair trade principles. We recognize that buying Fair Trade products does not remove the need for due diligence by Oxfam, but does provide a measure of assurance.

We ensure prompt payment on reasonable payment terms, generally 30 days, to minimize the risk that workers' employment terms could be negatively affected by our business practices.

In 2015 we hired a trade union specialist to identify where we could do more to enable freedom of association and collective bargaining in our supply chain.

In 2016 we undertook an assessment of the strengths and weaknesses of the different tools to assess labour standards including modern slavery, balanced with our leverage to agree the most appropriate way forward. These tools include supplier self-assessment questionnaires, audits, in-depth site assessments, continuous improvement programmes at supplier sites and consultation with trade union representatives.

Oxfam GB identified three active and one potential UK supplier, each with a UK site whose employment contract includes an obligation for shift workers to work overtime when required, a practice which is permitted under UK law. In each case, Oxfam GB followed up to understand whether overtime had been required, initiated a meeting with senior management to explain the importance of the issue for workers and agree appropriate action, and offered training and support.

## **Gaps and commitments**

This year's statement is based primarily on the due diligence frameworks that Oxfam GB adopted in 2013 and 2014, before we took on board an explicit focus on modern slavery and its inter-relationship with labour issues such as precarious work and low wages. In May 2016 the ETI published its human rights due diligence framework,<sup>9</sup> the output of a working group involving trade unions, NGOs and companies. We will use this framework from now on to inform our approach. For this year's report, we have mapped our current approach against the ETI's nine core principles and identified a range of gaps; in light of this we will revise our due diligence approach, informed by the ETI framework. See section 4, actions planned, for more information.

We recognize the need to assess risk, particularly in countries that we work in which have a higher risk of slavery; this was one of the issues highlighted to us in feedback on our draft statement from Anti-Slavery and ITUC. This is a complex task across a number of countries and therefore needs the time and training to enable an effective framework. We have therefore made a commitment to develop a framework for assessing risk by November 2017. Through our campaigns, policy and influencing work we raise awareness of the issues of labour exploitation, including modern slavery. However, we will do more in this area and will continue to collaborate with other NGOs, trade unions, companies and investors to ensure that Oxfam GB plays a role in achieving positive change for those who are systematically exploited and oppressed, and to ensure that we are putting these principles into practice in our own organization.

# INTRODUCTION

No organization wants to find modern slavery in its supply chain, let alone in its own business. With its mission to overcome poverty and suffering, Oxfam Great Britain is concerned about the issue both as a development organization and as an organization which itself has complex operations and supply chains. A survey of major UK companies by the Ethical Trading Initiative (ETI) found that 71 percent of firms questioned believed that there was a likelihood of modern slavery occurring in their supply chains, particularly in high-risk countries or sectors and at the lower stages of the chain.<sup>10</sup>

## What is the issue?

Slavery is a situation where a person exercises (perceived) power of ownership over another person. The term 'modern' is used to distinguish the phenomenon from historic slavery associated with the legal possession of one person by another. Related terms include forced labour, which covers work or services that people are not doing voluntarily but under threat of punishment; human trafficking, which involves deceptive recruitment and coercion; and bonded labour, which is demanded in repayment of a debt or loan.

Globally, at least 21 million men, women and children are in some form of slavery, according to the International Labour Organization (ILO). By gender this breaks down to 11.4 million women and girls and 9.5 million men and boys.<sup>11</sup> Of the 21 million, the ILO estimates that 10.7 million are victims of labour exploitation in private enterprises in the agriculture, manufacturing, construction, mining and utilities sectors; between them generating \$43.4bn in illegal profits per year.<sup>12</sup> Modern slavery encompasses a spectrum of labour exploitation. Slavery, human trafficking, the worst forms of child labour and forced sexual exploitation fall at the severe end of a spectrum. But modern slavery issues are inextricably linked to other issues of labour exploitation, which involves vulnerable workers being mistreated by those with power over them.

Slavery can be found in many ordinary workplaces: on farms, in factories, in private homes and in ancillary services, generally in undeclared or clandestine jobs. Well publicized cases include Thai seafood (migrant male sailors), Indian cotton (teenage girls working in mills), Malaysian electronics (migrant workers) and the Assam tea industry (teenage girls trafficked to domestic servitude).<sup>13</sup>

In the UK, the Home Office estimates that 10–13,000 people are trapped in modern slavery at any one time.<sup>14</sup> More than 3,000 people, including nearly 1,000 children, were referred to British authorities as potential victims of slavery in 2015, a 40 percent increase on the previous year. They came from 112 countries of origin, the top five being Albania, Nigeria, Vietnam, Romania and the UK itself. They include recent cases in the factories and fields of the UK, including a mattress factory near Leeds, chicken farms in Kent and leek fields in Lincolnshire. Many involve vulnerable migrant workers, often illegal, but cases also include UK citizens both as victims and as exploiters, for instance in Wales and Manchester.<sup>15</sup>

## What are the root causes of modern slavery?

The root causes of modern slavery lie in a combination of political, social and economic factors. It is a political issue, in that it is about power and exclusion from power, and touches on some of the most disputed areas of international law and policy. It is a social issue in that prejudice and discrimination against certain groups on the basis of caste, ethnicity, gender or religion allow the more powerful to exclude the more vulnerable from the processes of development and make them more vulnerable to slavery. And children are more vulnerable than adults everywhere.<sup>16</sup>

According to the director of Anti-Slavery International, 'slavery emerges at the conjunction of three common factors: individual vulnerability, usually, but not exclusively as a result of poverty; social exclusion; and failure of rule of law.'<sup>17</sup>

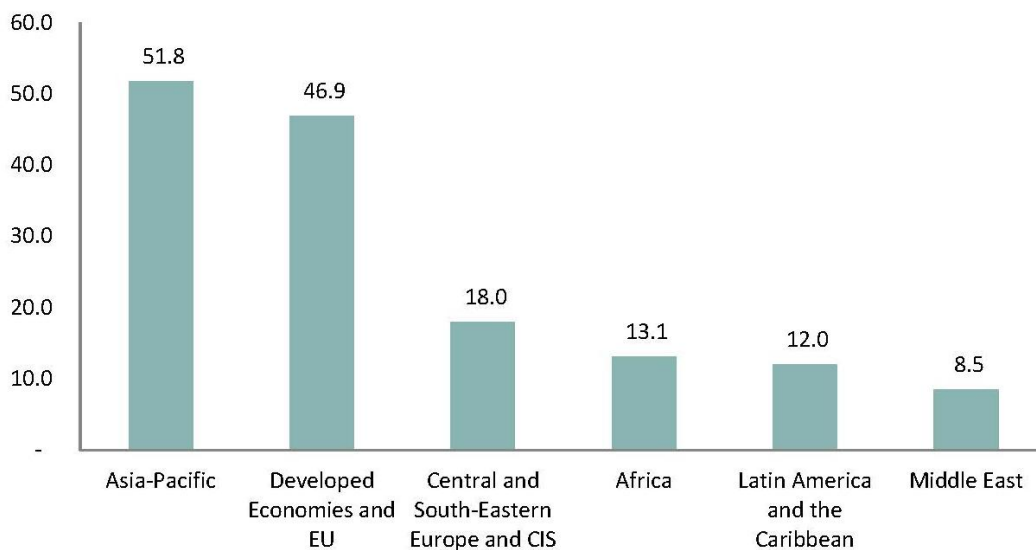
As Oxfam GB has argued in briefing papers<sup>18</sup> and articles<sup>19</sup> on labour issues in global supply chains, modern slavery is also a symptom of a wider malaise in workplaces across continents as governance gaps and skewed business models allow forced labour and poor quality jobs to thrive.

Governance gaps have opened up because we have a global system of production and trade without global protection for workers. Even countries where there are known problems, such as Uzbekistan and Turkmenistan, are able to take part in the trade system; these countries are the world's fifth and seventh biggest cotton exporters respectively.<sup>20</sup>

Gender inequality and gender norms influence the type of slavery that women and men are subjected to, for example women may be concentrated in sexual exploitation and men more vulnerable to forms of bonded labour in certain contexts. The vast majority of the 4.5 million people who are victims of forced sexual exploitation are women.<sup>21</sup> Sexual exploitation and abuse is a systemic issue affecting vulnerable people in all countries and sectors, including the development sector. Sexual exploitation happens on a continuum involving the exploitation of those more vulnerable by those who have power over them.<sup>22</sup> Sexual exploitation comes into the definition of modern slavery, where some individuals are forced by others to carry out non-consensual sexual acts for them. These cases often involve trafficked people.

Skewed business models also play a key role. Multinational companies owned by shareholders work to extract maximum profit in the short term, while externalizing negative impacts onto society and the environment. This gives rise to desperate economic conditions that open the door to exploitation, including modern slavery. The right hand (the corporate social responsibility (CSR) activity, the policy statements) gives the appearance of working to reduce the problem, while the left hand (the brutal exercise of commercial power, hard negotiation on prices and trading terms) generates the conditions in which forced labour emerges.<sup>23</sup>

**Figure 1: Annual profits from forced labour per region (US\$)**



ILO. 2014. 'Profits and Poverty; The economics of forced labour'<sup>24</sup>

### **Why is it so hard to detect and address?**

Slavery frequently involves organized crime groups systematically exploiting large numbers of individuals by coercing them into a life of abuse and degradation. The general approach to improving labour standards is predicated on there being sound reasons for better standards. In the case of slavery, this approach is not effective: criminal actors may be seeking to maximize illegal profits.

Monitoring systems which rely on highly vulnerable workers reporting issues themselves are known to be flawed. Audits can provide a helpful snapshot and be an input to risk assessment;

but they do not address the root causes of why abuses occur. Traditional audits have even less effectiveness in identifying slavery than other issues, since criminal perpetrators make every effort to conceal it.

## What is needed, moving forward?

Oxfam GB's own expectations of companies are that they use a two-pronged ethical trade strategy in order to ensure that their efforts help to create positive change, whether in relation to modern slavery or other areas of labour exploitation such as low wages, precarious work, deficiencies in freedom of association and gender inequality. This strategy should include companies:

- **Addressing the issues in companies' own operations and supply chains**, prioritizing those most salient to workers, taking into account the national context and the company's commercial leverage, drawing on available good practice frameworks and avoiding an over-reliance on audits and compliance;
- **Identifying the root causes of labour abuses, and tackling the systemic issues which keep workers poor**, in order to 'change the playing field' and not just tackle the symptoms. This may include collaboration with peers and other supply chain actors; advocacy to governments to protect human and labour rights; changing business practices and even business models that hinder human and labour rights; and removing barriers to worker representation and gender equality.

Oxfam GB's Corporate Responsibility team focuses on the first element of this approach (see case study 1) while the Campaigns, Policy and Influencing team focuses on the second element of this approach (see case study 2).

### Case study 1: Addressing the issues in companies' supply chains

When tendering for a supplier of promotional goods (e.g. tee-shirts, wristbands), Oxfam GB looked for a sourcing partner that could implement a progressive ethical sourcing programme. If a suitable partner could not be found, then it was agreed that we would reduce our promotional offer, and source and manage ethical issues directly. We included the following questions in our Invitation to Tender (ITT).

- Oxfam GB is interested in supporting its suppliers to develop an ethical trade 'beyond audit' approach which reduces audit duplication and enables sustained change for workers. We encourage suppliers to apply combined leverage and standards to create a simple, more impactful approach. Is this something you would be interested in developing?
- Is your company intending to develop a 'beyond audit' programme to support suppliers to make sustained changes to improve their ethical practices?
- Can Oxfam GB products be sourced from sites where you have sufficient leverage to adopt this approach?
- If you do not have a team on the ground in the countries where you work, how would you deliver this, support manufacturing sites and monitor progress?
- Please specify which items/categories you would be sourcing through an agent, based on order value and/or lead time.
- When you are sourcing through an agent, how do you ensure that your/our ethical and environmental standards are met throughout the supply chain?
- Please provide details of customers you work with who are asking for enhanced ethical checks or additional information, over and above identifying the source and/or country of origin, and give details of what they ask for and/or what you provide.

Shortlisted companies were invited to present to the Head of Corporate Responsibility, Corporate Responsibility Manager and Category Manager, who then visited the potential promotional suppliers' sites.

The tender was awarded at the end of March 2016, to The Sourcing Team and we have begun work with them to support their development of a progressive 'beyond audit' approach with their supply base. We are focusing on ways to increase freedom of association where possible to enable independent, democratic worker representation in the process.

## Case study 2: Identifying the root causes of labour abuses, and tackling the systemic issues which keep workers poor



Our Campaigns, Policy and Influencing team undertakes research and advocacy on labour issues in global supply chains in order to understand and tackle the systemic issues which keep workers poor and to 'change the playing field'.

We have highlighted in a range of publications the systemic nature of labour issues in global supply chains and have pointed towards solutions, most recently the briefing papers *In Work But Trapped in Poverty*<sup>25</sup> and *Steps Towards a Living Wage in Global Supply Chains*,<sup>26</sup> an article on *What would loosen the roots of labour exploitation in supply chains?*<sup>27</sup> and a study on poor quality jobs in Scotland, *Decent work for Scotland's low paid workers: a job to be done*.<sup>28</sup>

We engage with companies, suppliers, certification organizations and others on good practice based on Oxfam GB's research, programme experience and expertise, for instance working with Unilever on its management of labour rights in Vietnam<sup>29</sup> and engaging investors on the issues of a living wage and growing economic inequality.<sup>30</sup>

We highlight the role of governments to protect human and labour rights and engage companies and other NGOs in advocacy towards governments. For instance, we initiated advocacy by ETI towards the Myanmar government on the minimum wage to protect 300,000 garment workers from in-work poverty.<sup>31</sup>

Modern Slavery is going to take an approach that is very different from corporate responsibility 'business as usual'. The new legislation is a welcome step but for it to be effective organisations of all kinds will need to take on board the root causes of the issue and embed a more effective approach, and this includes Oxfam GB.

# 1 OXFAM GB, ITS ORGANIZATIONAL STRUCTURE, AND ITS SUPPLY CHAINS

In this section, we give an overview of Oxfam GB's mission, structure, governance, countries of operation and supply chains. We share our procurement processes in order to be transparent and to highlight the systems on which we can build a more robust approach for addressing slavery.

It is important to note that while this section refers to our checks on labour standards, it is more of a commercial overview of our organization and approach, including organizational challenges involved in delivering best value for our limited restricted and unrestricted funds.<sup>1</sup> More information on our approach to addressing labour standards and modern slavery can be found in section 3 on due diligence.

## Good practice highlights that reduce the risk of modern slavery

Only 5 percent of our UK staff are contingent (contract) labour hired through an agency, and we are not aware of any Oxfam GB workers hired through agencies overseas. We have a commitment to confirm this is the case. Our approach discourages the use of contingent workers other than for short-term or sporadic staffing needs.

We are a Living Wage Foundation accredited employer and we have a commitment to pay a living wage to our international staff.

We have long-term mutually beneficial relationships with suppliers and take steps to reduce last-minute sourcing. The majority of suppliers are long-term; 30 percent of Humanitarian suppliers have worked with us for over 20 years; 40 percent of New Products' suppliers have contracts for more than three years. The New Products team also has a strong commitment to supporting Fair Trade, with over 50 percent of our retail suppliers being Fair Trade (see Appendix 2) or supplying Fairtrade certified products. .

We have only one season for New Products, together with all-year-round products, and we value long-term mutually beneficial relationships with suppliers.

We have consistent and reasonable payment terms.

## Gaps and commitments

We have had a labour standards programme for our UK operations and supply chains, but until now we have not undertaken an assessment of these in our international programme, nor have we had a systematic approach to reviewing the risks of modern slavery. We recognize that there is a gap here and we have made a commitment to develop an assessment framework by November 2017.

## Who we are and what we do

Oxfam GB is one of the 18 Oxfam affiliates that make up the confederation of Oxfam International. The Oxfam International confederation is a worldwide development organization that mobilizes the power of people against poverty.

## Our vision and purpose

Oxfam's vision is a just world without poverty: a world in which people can influence decisions that affect their lives, enjoy their rights and assume their responsibilities as full citizens of a world in which all human beings are valued and treated equally.

Oxfam GB's purpose is to help create lasting solutions to the injustice of poverty. As stated in our Memorandum of Association, the objectives for which Oxfam GB is established for the public benefit are to:

- prevent and relieve poverty and to protect vulnerable people, including through humanitarian intervention;
- advance sustainable development; and
- promote human rights, equality and diversity, in particular where to do so contributes to the prevention and relief of poverty, in all cases working anywhere in the world.

## How we work

In 2015/16 we spent £320.4m on charitable activities in three interconnected ways.

- **Development:** we help communities and families lift themselves out of poverty.
- **Humanitarian:** when disaster strikes, we make sure that people can and do respond quickly and powerfully.
- **Campaigning:** we use our influence to challenge the issues that keep people poor.

Highlights from 2015/16 include:

- nearly 11.4 million people reached directly in 51 countries;
- 800,000 people globally took online campaign actions;
- nearly 9 million people supported in 31 humanitarian emergencies.



An Oxfam warehouse in the Philippines unloading supplies of water equipment shipped from our Bicester warehouse, 2013. Photo: Jire Carreon/Oxfam

## Our network

Oxfam GB is an independent organization, affiliated to Oxfam International, a global confederation of 18 independent Oxfams that share a single Strategic Plan for 2013–19: 'The Power of People Against Poverty'.

All 18 Oxfam affiliates are part of a global movement to build a fairer, safer world. We work together because we believe that we will achieve greater impact by working in collaboration. Currently Oxfam GB operates in more than 90 countries as part of the Oxfam confederation.<sup>32</sup>

As well as direct operational work, Oxfam GB partners with a wide variety of organizations in order to meet its goals, including (but not limited to); other International non-government organizations (INGOs) private sector partners, suppliers, academic institutions, community groups, disaster management groups, national non-government organizations (NGOs), women's groups and community support organizations (CSOs).

In 2015/2016 Oxfam GB made 1,168 grants to 737 such organizations.

## Our organizational structure and governance

Oxfam GB is a registered charity (registration number 202918) and is constituted as a company registered in England and limited by guarantee (registration number 612172). Oxfam GB is also a registered charity in Scotland (SC039042). Its objectives and powers are set out in its Memorandum and Articles of Association.

Oxfam GB has several subsidiaries, four of which are consolidated into our group accounts: these subsidiaries are Oxfam Activities Limited (our trading subsidiary), Finance for Development Limited (a micro-credit institution in Azerbaijan), Fripp Ethique SARL (a private sector enterprise in Senegal) and SEIIF Limited (an advisory company to a Small Enterprise Impact Investing Fund). Oxfam GB also has a dormant subsidiary, Just Energy Limited.

Of these subsidiaries, only Oxfam Activities Limited comes within the scope of this report along with Oxfam GB. Additional information on the other subsidiaries can be found in Appendix 1.

Oxfam Activities Limited raises funds by means of trading activities. Its principal operations are the purchase of goods from commercial suppliers to be sold at a profit. In 2015/16 Oxfam Activities Limited paid to Oxfam GB a profit of £0.8m (2014/15: £0.6m) and interest on working capital of less than £0.1m (2014/15: less than £0.1m).

Oxfam Activities Limited has a 10.8 percent (2014/15: 10.8 percent) interest in Cafédirect plc (a company registered in Scotland, with registration number 141496), which promotes Fair Trade, primarily through the marketing and distribution of tea and coffee.

Oxfam GB is a member of Oxfam International, a separate legal entity registered in the Netherlands as a charitable foundation (registration number 41159611). Oxfam International encourages and coordinates joint activities with 18 other affiliated international agencies, each separately constituted under the appropriate national regulations. Oxfam International has an Executive Board and a Board of Supervisors. Mark Goldring (CEO of Oxfam GB) is ex officio a member of the Executive Board, and Karen Brown (Chair of Trustees of Oxfam GB) is an ex officio member of the Board of Supervisors.

The Directors of Oxfam GB are the Trustees, collectively known as Oxfam GB's Council. This Council, Oxfam GB's governing body, comprises a minimum of 10 and a maximum of 14 Trustees.

The Trustees are responsible for everything that Oxfam GB does. However, to ensure that Oxfam GB is managed efficiently and effectively, the Trustees have delegated a range of day-



to-day decision making powers to the Leadership Team (the organization’s Executive Director and seven divisional directors), which reports directly to the Council. Trustees have also established appropriate controls and reporting mechanisms to ensure that the Leadership Team operates within the scope of the powers delegated to it. The delegation policy is updated on an ongoing basis and is formally reviewed and approved by the Trustees. The last review was in March 2016.

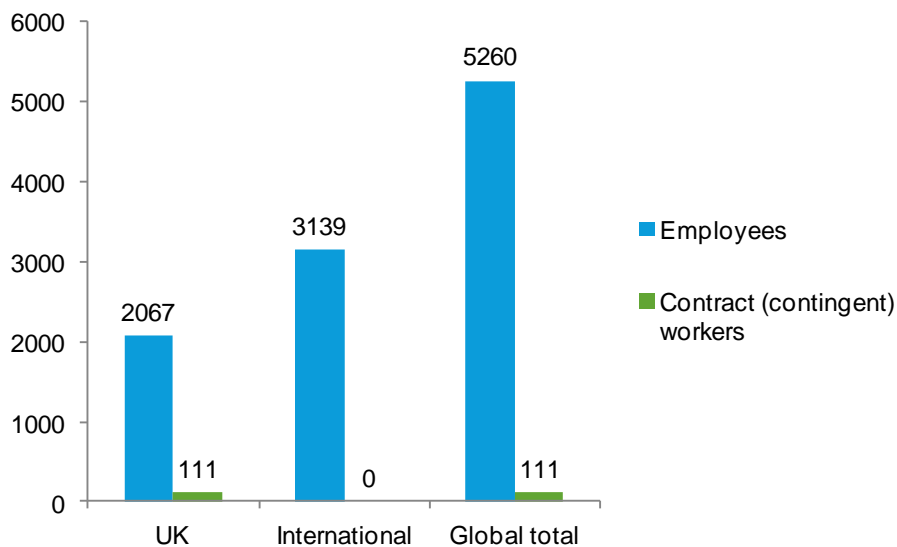
For more information on our governance, programme work and impact, please see our Annual Report and Accounts for 2015/16.<sup>33</sup>

## OVERVIEW OF OUR STAFF AND SUPPLY CHAINS

Oxfam GB has 2,067 employees in the UK and a further 3,139 based overseas. The vast majority of our workers are employed directly by Oxfam GB, with only 5 percent hired through agencies.

We have been an accredited Living Wage Foundation<sup>34</sup> employer (a scheme applicable to UK-based employees) since 2013. Scope for accreditation includes all agency staff and on-site services (where people work more than eight weeks consecutively for at least two hours per week). We also have a commitment to paying a living wage to international staff in our programme countries.

**Figure 2: Number of Oxfam staff and contingent (contract) workers<sup>1</sup>**



### Our supply chains

Oxfam GB has had a commitment to uphold labour rights in its supply chain since the late 1990s. Accountability for assuring and improving labour standards sits with the procurement teams and their management lines, in accordance with good practice. The management of labour standards is embedded within their processes and is reflected in their annual objectives.

<sup>1</sup> We are not aware of any overseas staff sourced through agencies however we are conducting a risk assessment across the programmes to confirm this is the case.

Detailed information on how this works can be found in section 3 on due diligence. Our procurement falls into four main categories, as shown in Table 2.

**Table 2: Oxfam GB's procurement structure**

Procurement category	Managed from	Value of spend 2015/16	Approx. number of suppliers	Purpose	Categories
1. Central Procurement	UK	£49.9m	2,525	To responsibly source and procure the goods and services Oxfam GB needs to enable it to deliver its mission	Facilities, Logistics, IT, Marketing, Fundraising, HR, Finance and Travel
2. New Products	UK	£4m	46 (93 final points of manufacture)	Retail New Products sold in Oxfam shops to raise unrestricted funds	Food, Everyday Essentials, Cards, Christmas ranges; 50 percent of our suppliers are Fair Trade
3. Humanitarian 31 emergencies in 2015/16, with Oxfam GB reaching 9 million people	UK	£5m	35	By providing equipment from our Equipment catalogue through Oxfam GB's Supply Centre Humanitarian Procurement Centre (HPC) to not only Oxfam GB and its affiliates but other NGO's including UNHCR, IOM	Water and Sanitation, Health and Hygiene, Shelter, Vehicles, Communications Equipment, held at the Oxfam Supply Centre in Bicester, Oxfordshire
4. International Programmes	51 developing countries	£77m		To support our development work on the ground	Direct, e.g. office equipment, fuel, chickens. Indirect e.g. utilities, legal advice
<b>Global total</b>		<b>£136m</b>			

### 1 Central Procurement

The Central Procurement team is responsible for setting corporate policy and processes. It follows a category management approach with the following overarching categories: Facilities, Logistics, Information Technology (IT), Marketing, Fundraising, Human Resources (HR), Finance and Travel. Our suppliers are based mainly in the UK; however, manufacturing for IT, logistics and promotional goods takes place mainly in Asia or Europe. The supply chains vary greatly in terms of industries, countries and supplier engagement. All Procurement works to the

following framework and any deviation requires a formal documented and approved derogation from the Head of Procurement.

**Table 3: Procurement’s competitive process structure**

Required competitive process	For all goods, works and services
Single quotation is acceptable: competition is encouraged however	Up to £5,000
Three quotations required	£5,000 to £50,000
Full commercial review (tender) required	Over £50,000 (over £20,000 for International Programme in-country procurement)

Contract length varies depending on the business requirement and to ensure overall value for money; however, the majority of contracts are for three years. We generally operate a 30-day payment term; our standard contract is on the basis of 30 days from the end of the month the invoice is submitted; and we endeavour to pay within those terms. This approach avoids typical purchasing practices of negotiating extended payment terms, which can negatively impact on suppliers and indirectly affect the employment terms of workers and result in late payment of wages.

## 2 New Products (Products for Resale) Procurement

Oxfam GB sells a range of products through its shops and online to raise unrestricted income for its activities.<sup>35</sup> While the majority of items sold in shops (approximately 90 percent) are donated goods, Oxfam GB also sells a range of new products, with sales of £8m (ex-VAT) in 2015/16.

The New Products supply base included 46 suppliers in FY 2015/16, of which 50 percent supply Fairtrade-certified<sup>36</sup> products or are Fair Trade<sup>37</sup> (assessed in line with 10 Fair Trade principles as defined by the World Fair Trade Organization (WFTO)<sup>38</sup>). Of the 93 final points of manufacture in Oxfam GB’s New Products supply chains, 40 percent were in the UK, 40 percent in Asia, 15 percent in Europe and 5 percent elsewhere e.g. Africa and America. Half of the African and Asian manufacturing groups or sites supply Fair Trade products.

We aim to build long-term mutually beneficial relationships with as many of our suppliers as possible, and currently over 40 percent of suppliers have worked with us for a minimum of three

years. The supply chain has an approximate churn of 20 percent each year, which is driven by the need for innovation. Last year, of the eight new suppliers selected, two were chosen on the basis of tender processes leading to three-year contracts. The remaining six were relatively low-spend. When selecting new suppliers, their willingness and demonstration of ability to assure and improve labour standards are highly weighted, and improvements are taken into consideration when deciding whether to extend contracts.

Working with suppliers on a long-term basis can bring year-on-year growth in business which can bring commercial as well as ethical benefits, such as better prices and a better understanding of our requirements. Suppliers are able to put forward suggestions for products and improvements, without this process being led solely by our buyers.

The New Products team buys in only one season, with new ranges each Christmas and 30 percent refreshes on our all-year-round ranges each spring. These refreshes do not necessarily mean new suppliers or manufacturing sites, as they include new card designs and new flavours and scents. Some 28 percent of our suppliers are purely seasonal (Christmas), of which 25 percent have three-year contracts.



Seasonal products at the Oxfam shop in Lincoln, United Kingdom. Photo: Oxfam GB

As the New Products range comprises only 10 percent of our shop offer, the remaining goods being donated, we have low spend and leverage with a number of our suppliers. During 2015/16, 35 percent of our suppliers had spend (from Oxfam GB) of less than £20,000 and only 20 percent a spend over £100,000. To address the issue of leverage with low to medium spends, we use a range of options; from asking our suppliers to share requirements and assessments from other clients so that we can support them through follow-ups, to corrective action plans to support them in meetings with other clients to ensure joined-up approaches. Section 3 below on due diligence provides more information on our approach to addressing labour standards for New Products.

New Products follows Central Procurement procedures. Any exceptions made for retail buying are outlined in a derogation form. New Products also uses a category management approach.

### 3 Humanitarian Procurement



The Oxfam Supply Centre team in Bicester load lengths of water pipe into a shipping container headed for Syria (2016). Photo: Phil Kirk/Oxfam

In response to 31 emergencies across the world in 2015/16, Oxfam GB worked at the most fundamental level to save lives when crises hit, to ensure that people got access to the essentials they needed to survive and that the most vulnerable were kept safe from harm. In all, we reached nearly nine million people through our humanitarian work last year.

The Oxfam GB Supply Centre has been in operation for over 25 years, and acts as a central stock-holding and supply centre for humanitarian equipment for programmes around the world. It operates from a 22,000 square foot warehouse located in Bicester, Oxfordshire. We supply a range of more than 300 items from our catalogue, with our product range covering Water and Sanitation, Health and Hygiene, Shelter, Vehicles and Communications Equipment, as well as numerous other items. Our catalogue can be viewed online.<sup>39</sup>

Humanitarian Procurement follows Central Procurement processes and sign-off procedures, with exceptions as outlined in the derogation form. The team has approximately 35 suppliers and a very low churn rate. Contracts resulting from tenders are typically for three years and competitive quotes are for two to three years, depending on spend and product category. We find long-term relationships can be mutually beneficial and therefore we have relationships of more than 20 years with approximately 30 percent of our suppliers.

In order to ensure that we have products ready in the event of a humanitarian emergency, we keep stocks of the items that are needed in a first-phase emergency in our warehouse. We also look at sending goods that we source from overseas suppliers direct to the location of the emergency. As we never know when or where the next emergency is going to happen or what the requirements are going to be, there may be some items for which we have to identify a new supplier or site at short notice. We proactively tender for suppliers of core products in our equipment catalogue to reduce the need to select suppliers during an emergency.

In addition to providing equipment to Oxfam GB's programmes, we also supply equipment to other NGOs. Our customers include ACF, the International Rescue Committee, UNHCR, Médecins Sans Frontières (MSF), Solidarités International and many others. All supplies are

made on a strictly not-for-profit basis. Oxfam GB formally adopted the status of a Humanitarian Procurement Centre (HPC) on 1 June 2015. Mandated by the European Union's Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), HPCs are not-for-profit organizations specializing in the procurement of supplies necessary for the implementation of humanitarian programmes. HPCs are subjected to a rigorous evaluation by ECHO before being awarded this status, focusing in particular on the procurement process and standards of ethics and integrity.

#### **4 International Programme (in-country) Procurement**

Oxfam GB's in-country procurement fits into two categories:

- direct expenditure for programmes (ranging from fuel to chickens);
- indirect procurement for support (ranging from utilities to legal advice).

Following procurement good practice, our international model seeks to consolidate our supply base using long-term relationships and framework agreements. However, the operating context is varied, with many fragile countries and/or levels of security requiring us to be flexible in our approach. In some cases our direct expenditure suppliers are also our beneficiaries, for whom we apply a programme approach to spending rather than a purely commercial one.

Everyday management of procurement and logistics in programme countries is embedded in the programme management line. Process policies and standards are maintained centrally through key reference documents.

## 2 OXFAM GB'S POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

In this section, we share our overarching policy, which applies to both our staff and supply chains. We include information on staff-related policies and our commitment to respect our staff members' right to freedom of association and to collectively bargain: a core principle of the ETI Due Diligence Framework and one of the most effective ways to mitigate modern slavery risks. Finally, this section provides a link to Oxfam GB's open information policy, through which readers of this report can request further information.

### Good practice highlights that reduce the risk of modern slavery

- Our main policy for addressing modern slavery applies to both our operations and our supply chains.
- We have a recognition, information and consultation agreement with the Oxfam Joint Trade Union Shop (OJTUS), which includes Unite and the Independent Oxfam Union.
- We seek to place a high priority on ensuring that all employees can make their voices heard, in terms of communication and grievance mechanisms.
- A Women's Leadership Network was established in January 2015 to enable women's leadership and influence at all levels within Oxfam GB.

### Gaps and commitments

While forced labour is addressed in our current Ethical and Environmental Policy, we recognize that this policy was written in 2012 and needs revising in light of the Modern Slavery Act. We have committed to rewrite this policy in consultation with key external parties such as the Ethical Trading Initiative by 2017/18.

### Oxfam GB policies relevant to modern slavery

Oxfam GB's commitment to workers' rights is clear from its policies and guidelines.

***Our Ethical and Environmental Policy applies to both our operations and our supply chains. Oxfam GB conducts its affairs according to the same policies***

Our Ethical and Environmental Policy, which applies to both our operations and our supply chains, is our most relevant overarching policy for addressing labour standards. The labour standards in this policy are derived from the ETI Base Code,<sup>40</sup> which includes elements on forced labour, child labour, discrimination, harsh and inhumane treatment and the right to freedom of association, among other key clauses relevant to modern slavery. Our policy also includes key principles that our procurement teams must follow to enable improved labour standards when sourcing, as outlined in one of its integrity principles copied below.

***To ensure we procure with integrity, Oxfam GB staff will recognize the impact of all supply decisions on meeting the labour and environmental standards outlined in this policy. We will involve our suppliers in addressing issues that may arise and expect them to assist us in minimizing any negative effects.<sup>41</sup>***

In addition to the Ethical and Environmental Policy, there are a number of policies that are relevant to modern slavery which are listed below. Oxfam's policies are clear: all examples of sexual abuse, exploitation, or harassment are an egregious breach of personal and professional trust, and are considered extremely seriously. All staff are required to read our safeguarding policies in full, which they will have signed up to when they signed the Code of Conduct.

- Recruitment Policy (and related guidelines on the right to work and agency workers)
- Whistle-blowing Policy (with a hotline for workers)
- Grievance Policy
- Employee Relations Policy
- Disclosure of Malpractice in the Workplace Policy
- Incident Reporting Policy
- Child Protection Policy
- Anti-Bullying and Harassment Policy
- Prevention of Sexual Exploitation and Abuse
- Diversity Statement
- Complaints Policy
- Procurement Policy – this directly refers to the Ethical and Environmental Policy
- Open Information Policy:<sup>42</sup> we are committed to being transparent in our work and accountable to our key stakeholders, in particular people living in poverty.

Oxfam recognizes the importance of freedom of association and collective bargaining to enable workers to realize their rights. We encourage staff outside the UK to join unions or to set up staff associations. We have agreements with a number of these. We also have a recognition, information and consultation agreement with the Oxfam Joint Trades Union Shop (OJTUS).

The representative bodies within OJTUS include Unite and the Independent Oxfam Union representing UK workers. Information about the two unions is included in the New Starter Pack for employees. In addition, the two unions have a 15-minute slot in the new starters' mandatory induction course and our employee relations policy includes the following paragraph to emphasize the right of Oxfam GB employees to participate in a union or staff association.

***All employees are invited to join a recognized staff association or trade union when they commence employment with Oxfam GB. OJTUS and the other recognized staff associations give Oxfam GB employees across the globe an opportunity to 'be heard' in the workplace. Collective staff associations are welcome and supported; however, Oxfam GB is committed to giving all employees the opportunity to be heard, whether they are members of any recognized staff body or not.***

There are many other staff engagement opportunities, from confidential 'chat with CEO' slots every 6–8 weeks to a Women's Leadership Network which was established in January 2015 to further enable women's leadership and influence at all levels within Oxfam GB.

Oxfam GB also offers a 24-hour confidential counselling and support line for all staff. This service includes a wide range of support to staff, including managing difficult situations at work. An intranet page with information about this service provides a direct link to our complaints policy.

## **Our policy process and communication**

All new or revised internal policies must be sponsored by a member of the Leadership Team and developed using a policy template designed to ensure that all internal policies contain key data and have a consistent appearance, regardless of which department or team they originate



from. When renewing and/or developing a policy, the author must ensure that related policies and standards have been taken into consideration. Internal policies must be authorized by the LT or the Council of Trustees.

All policies are available on our intranet. The Anti-Bullying and Harassment policy as well as the Grievance procedures are communicated to new starters, and all new employees need to confirm that they have read and understood them before their employment can be confirmed beyond the probation period. New employees also need to confirm that they have taken (or booked) the three-day induction training course, which includes a session in which staff can meet with representatives of both unions to understand how they work. The staff handbook for new starters includes the Oxfam GB policies on Equal Opportunities, Anti-Bullying and Harassment, Disclosure of Malpractice in the Workplace and Dealing with Problems at Work (Grievance), among others. All new procurement staff take part in a Corporate Responsibility induction meeting in which the Ethical and Environmental Policy is explained, along with related tools and processes.

### 3 OXFAM GB'S DUE DILIGENCE PROCESSES IN ITS BUSINESS AND SUPPLY CHAINS RELEVANT TO MODERN SLAVERY

We start this section by mapping our current approach against the key principles outlined in the ETI Due Diligence Framework, in recognition that this framework will inform our work moving forward. We outline Oxfam GB's governance structure for corporate responsibility, with director-level representation and devolved responsibility within operations and procurement teams to ensure that they understand the issues and can drive change, as they have the influence to do so. We describe our internal audit mechanism, which assesses our operations against our policies and processes and identifies gaps to our Trustees, with a clear action plan. We outline our commitment and approach to addressing the risk of sexual exploitation in our operations. We share our labour standards framework developed in 2013 and 2014, in which the issue of modern slavery is integrated but which does not explicitly address slavery or look at the relationship between slavery, wages and precarious work.

#### **Good practice highlights that reduce the risk of modern slavery**

- We have a number of mechanisms in place to address the risk and any occurrence of sexual exploitation and abuse in Oxfam's operations.
- When assessing suppliers, we take into account poor purchasing practices, union presence, employment relationships, outsourced work, the national context and low-skilled work – all of which represent risk factors for modern slavery.
- Oxfam GB's Corporate Responsibility team works closely with procurement managers to ensure that they understand the risks both to Oxfam GB and to workers, to assess the risks within their categories' supply chains and to ensure that they act in an accountable way in line with our processes and governance structure.
- We have undertaken an assessment of the strengths and weaknesses of current assessment tools, such as questionnaires and audits, to address modern slavery. We compare minimum wages in relation to the sourcing countries of retail products with the World Bank International Poverty Line, to identify where there is the greatest risk of in-work poverty, so that this can be managed.
- We share case studies of how we go 'beyond audit' to address labour rights.

## Gaps identified and commitments made

We recognize the importance of the ETI Due Diligence Framework, which was launched after this reporting period of FY 2015/16, and commit to use it to inform our approach moving forward. For this reporting period, we have responded to the ETI Due Diligence Framework's principles within the section below entitled 'Our approach'. This analysis enables us to identify top-line gaps. From the review of our current due diligence approach we also identify the following key gaps.

- Overarching policy: We commit to a new Corporate Responsibility Policy by 2017/18.
- Our programmes: By November 2017 we will have defined a process for assessing risks related to modern slavery in Oxfam GBs programme at country level, with a view to reporting against this framework by March 2019.
- Our staff: five percent of workers are contingent (contract) workers. We have a gap in our process to ensure the appropriate and consistent level of checks for our warehouse and drivers; we will address this by June 2017.
- Our supply chains: Our frameworks that were developed before the introduction of the Modern Slavery Act will be reviewed and informed by the ETI Due Diligence Framework.
  1. We will have a clear implementation plan for this analysis by June 2017.
  2. We will link up our supply chain strategy on freedom of association, living wage and modern slavery by December 2017.
  3. We will review mechanisms for ensuring remedy for workers by July 2017.
  4. We will provide training for the procurement teams in 2016/17 on the risk of slavery in supply chains and targeted training on our new modern slavery framework approach in 2017/18.
  5. We will review our in-country procurement questionnaire in 2017.



Checking water and sanitation equipment before shipping it to Goma, DRC, 2015. Photo: Ryan Witchalls/Oxfam

## Our approach

The ETI Due Diligence Framework<sup>43</sup> was launched in May 2016 and will inform Oxfam GB's due diligence approach moving forward. As the framework was not available until very recently, for our first year of reporting we have described the current due diligence process we have in place for addressing labour rights for our staff and supply chains, the gaps and steps to address them.

We recognize the need to assess the risk particularly in countries that we work in which have a higher risk of slavery. This is a complex task across a number of countries and therefore needs the time and training to enable an effective framework. We have made a commitment to develop a framework for assessing risk by Nov 2017.

### Initial benchmarking of Oxfam against the principles of the ETI Human Rights Due Diligence Framework

As a first step toward the ETI Due Diligence Framework informing our approach, we have responded to the key principles identified within the Framework for our UK-based operations and procurement functions.

#### ***Corporate leadership***

Oxfam GB established a Corporate Responsibility Steering Group in 2015, with director-level representation, to drive strategy and hold the organization to account on its commitments. The Steering Group took part in a training session on modern slavery in March 2016.

#### ***Establishing/revising appropriate policies, practices, strategies and decision making systems***

Our review of policies shows strong policies for our staff and supply chains based on the ETI Base Code.<sup>44</sup> However, we are committed to reviewing our Ethical and Environmental Policy (applying to both staff and supply chains) in 2017/18.

We have therefore made a commitment to develop a framework for assessing risk in our international operations by November 2017.

To date, we have identified gaps in our processes, particularly with hiring contingent labour and have an action to address this by June 2017.

We are aware of the impact of purchasing practices, the importance of long-term relationships and the critical role of procurement. This is reflected in our Ethical and Environmental Policy, the training we have offered our procurement teams on purchasing practices and our devolved model in which our procurement teams are accountable for addressing labour issues in their supply chains. We will be delivering more training to buyers in autumn 2016, with targeted follow-up training in 2017/18.

#### ***Increased transparency and visibility of supply chains***

Our supply chain due diligence is not limited solely to products for retail but includes central and humanitarian procurement.

Currently 50 percent of our retail new products' suppliers supply Fairtrade-certified products or are Fair Trade. For the remaining 50 percent, we currently have sight of the final point of manufacture and key sub-contracted sites. As part of our due diligence review, we will identify where we need to go beyond this first tier.

#### ***Acceptance and recognition of the universal right of all workers to freedom of association and collective bargaining***

We fully recognize the importance of freedom of association and collective bargaining to enable workers to realize their rights, as evident from our publication *Steps Towards a Living Wage in Global Supply Chains*.<sup>45</sup>

We have a recognition, information and consultation agreement with OJTUS.

We have recently hired a trade union specialist who is developing a key pillar of our labour rights supply chain strategy to give more attention to freedom of association and collective bargaining.

***Commitment to ensuring remedy***

While we have processes in place for our staff, we recognize that we have a gap in this area in terms of providing remedy for workers in our supply chains and we have action planned to start to address this. See section 4.

***Recognition of the importance of policy engagement with governments***

Oxfam GB was one of a number of NGOs which worked in a coalition with trade unions, companies and investors, led by the Ethical Trading Initiative (ETI), to advocate to the UK government that mandatory disclosure by companies was the way forward to address modern slavery. See case study 2 for an example of our work in this area.

***Stakeholder engagement and partnerships***

Oxfam GB is a founder member of ETI, with active Board and NGO caucus representation. We engage with companies on good practice in relation to labour rights in global supply chains, including prevention of forced labour, enabling freedom of association and the right to collective bargaining, and promoting understanding of the conditions needed for a living wage to become the norm in global supply chains. We work with a range of multinational and local companies, most recently publishing a progress report on Unilever's management of labour rights in Vietnam.<sup>46</sup>

We are developing a key pillar in our strategy to support and enable freedom of association and collective bargaining.

***Continuous improvement based on robust evidence, monitoring, evaluation and lesson learning***

The foundation of our approach is to question the effectiveness of audits, not contributing to audit duplication but adding more in-depth, targeted assessments and capacity building. Our approach to date includes working with labour rights specialists and working with our suppliers to develop effective continuous improvement programmes with training and root cause analysis. We are in the process of developing our strategy, which includes working more closely with trade unions, and we will review other opportunities to include rights holders in the assessment process.

***Open and honest communication***

We are being open about the gaps in our approach and we are sharing detailed information about how we work.

## **Our Corporate Responsibility governance**

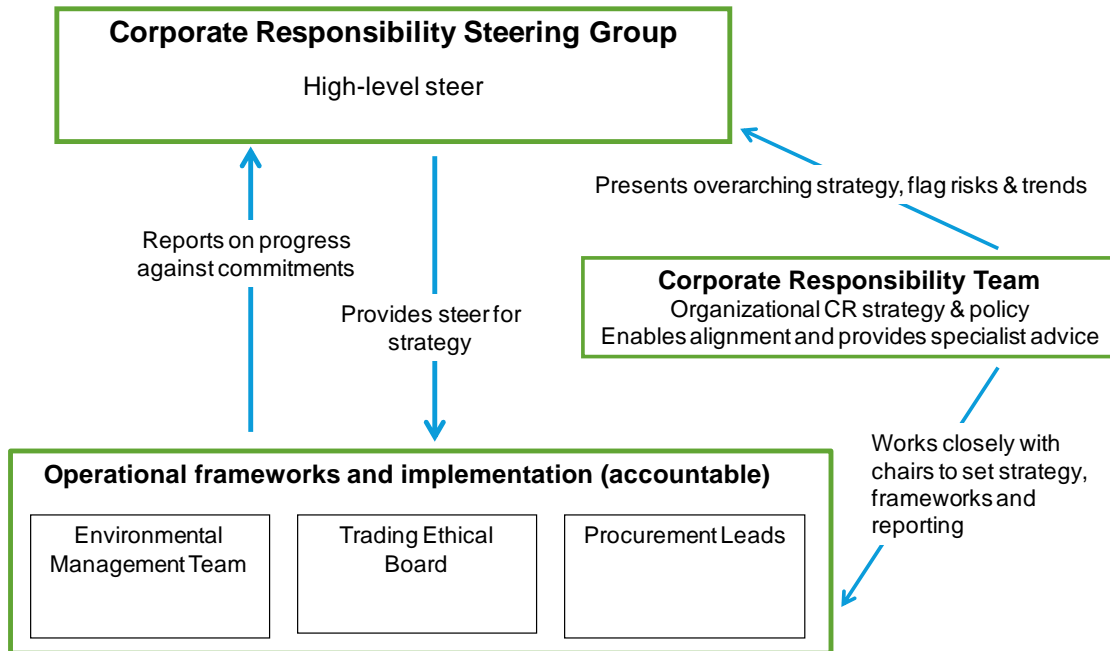
Oxfam GB takes labour rights very seriously, and we have director-level commitment to ensure that we have an effective Corporate Responsibility programme. We have had an ethical trade programme with a focus on labour rights since 1998, and in 2015 we created the Corporate Responsibility (CR) Steering Group, comprising the Trading Director, the Head of Private Sector (Campaigns), a member of the Recruitment and Development Group, a committee which reports to Council (Trustees) and an International Deputy Director. This group provides a high-level steer regarding Oxfam GB's commitment, signs off relevant policy and holds senior managers to account for corporate responsibility commitments.

Oxfam GB operates a devolved Corporate Responsibility Model in which operational teams are directly accountable for meeting its CR commitments. Therefore, the Heads of Procurement, New Products (Trading Retail), International Programme Supply and Logistics (Procurement),

Logistics (Trading) and Facilities all attend the CR Steering Group’s twice-yearly meetings, where they present their frameworks, gaps, plans and progress.

A central Corporate Responsibility Team provides training and specialist advice and ensures that the approach is harmonized across Oxfam GB. The team comprises both labour and environmental specialists.

**Figure 3: The Corporate Responsibility Steering Governance**



Our Trading Ethical Board (TEB), which meets quarterly, comprises the Trading Director, Ethical Trade Advisor (Campaigns), Head of Corporate Responsibility, Head of Logistics, Head of Corporate Partnerships, New Products Buying Manager and the Head of New Products. The main purpose of the group is to ensure that Oxfam GB’s Trading arm is delivering on its CR strategy and commitments (environmental operations issues are covered by the Environmental Management Team).

Our Procurement Leads cross-functional group is chaired by the Head of Procurement and attended by the Procurement Managers, Head of New Products, Head of Supply and Logistics, Supply and Operations Manager (Humanitarian) and the Head of Corporate Responsibility. The purpose of the group is to set organizational procurement standards, processes and define reporting standards. Labour rights management is embedded within this approach.

The Head of Corporate Responsibility also has direct relationships with senior managers in HR regarding operational standards.

**Internal audit**

Oxfam GB has an internal audit function whose role is to provide independent and objective assurance to the Trustees and senior management that the key risks facing the organization are identified and appropriately managed. Internal Audit performs this function by:

- facilitating the organizational risk management process and monitoring progress on key risk mitigating actions recorded on the strategic and operational risk registers;
- carrying out a programme of audit work that tests the key controls designed to bring risk down to acceptable levels. This programme of work covers International Programmes and UK operations; this includes protection against sexual exploitation and abuse;
- providing reports for senior management and Trustees on this work;

- implementing a counter-fraud strategy comprising four key strands (deterrence, prevention, detection and response).

The independence of the internal audit function is strengthened by the Head of Internal Audit having a reporting line to the Chair of Oxfam GB's Trustee Audit and Finance Group (TAFG), which is a sub-committee of the full Board of Trustees.

Internal audit coverage includes procurement, HR and logistics in every country audit. The findings of all audit reviews are shared with the TAFG. The audits include all internal policies and processes addressing labour rights applicable to the function being audited. As systems are strengthened within each function, internal audits will incorporate those changes moving forward.

## **Due diligence in operations**

We have in place the global policies and guidelines mentioned in section 2, Policy and Processes, which are audited, along with whistle-blowing and other key mechanisms for staff to flag concerns, and access to staff representative bodies.

### **Recruitment**

Oxfam GB runs a recruitment and selection course, which includes sections on diversity and right to work processes. At least one member of a recruitment panel must have attended the course. Recruiters are advised to attend the Recruitment and Selection course and a refresher after three years

In the UK, under Sections 15–25 of the Immigration, Asylum and Nationality Act 2006, Oxfam GB has a legal duty to check the right to work of all workers. It must ensure that it has a record of all employees' proof of their right to work; this is to avoid employing illegal workers. Right to work information is held on a central HR database.

The UK Home Office stipulates specific responsibilities required of organizations that wish to employ migrant workers, such as checking documents giving proof of right to work and copying and storing these correctly. There are implications for Oxfam GB if we fail to comply with UK Home Office requirements. We are audited by the Home office to ensure we are compliant.

### **Contingent/contract workers**

Only five percent of our UK workforce are contingent (contract) workers. We recognize that contingent workers can be particularly vulnerable to slavery and the important role that the agency worker regulations can play in reducing the risk to workers. We recognize the importance of providing regular work and appropriate contracts, and therefore we have clear guidelines for recruiting managers advising that agency work should only be utilized to fill short-term or sporadic employment needs. To ensure that Oxfam GB's approach to hiring contingent workers is consistent, we adopted the UK government's Crown Commercial Service (CCS) Contingent Labour ONE (CL1)<sup>47</sup> framework contract for the majority of our contingent labour from February 2014.

Our UK contingent workforce is in three categories: see Table 4.

**Table 4: Oxfam GB processes for hiring contingent workers in the UK**

Category and number of workers in FY 2015/16	Current processes
<p><i>1 Specialist contractors and senior management positions:</i> 26 workers</p>	<p>Workers are generally contracted on their own terms (independent contracts, via limited companies or umbrella company contracts) and are paid according to market rates, with contracts being flexible for the duration of the assignment. Minimum day rates are set in line with the market.</p> <p>Hired through Crown Commercial Service (CCS)'s Contingent Labour ONE (CL1) framework</p>
<p><i>2 Agency workers for admin and clerical roles:</i> 19 workers</p>	<p>Oxfam GB has a rate card for each role agreed in advance with the agency, which ensures that all temporary workers are given pay parity from day one. Agency workers are entitled to holidays from day one on an unpaid basis and Oxfam GB offers paid leave on a parity basis from week 13 of an assignment.</p> <p>Hired through CCS's CL1 framework</p>
<p><i>3 Agency workers for drivers, operations and warehouse staff:</i> 66 workers transport 24 warehouse 42</p>	<p>We have identified a gap in our processes to ensure that appropriate checks are in place and have set an action to develop more robust and consistent checks for this category of contingent workers.</p>

Our standard process is that Category 1 and 2 workers are hired through the CL1 framework, and a centralized recruitment and reporting process enables the Central Procurement team to identify any deviation from this process. In 2015/16, 93 percent of all workers in Categories 1 and 2 were hired according to the process.

For all three categories we can confirm that:

- Oxfam GB agency contracts in the UK do not include any form of accommodation or services packages such as transportation;
- Contracts state that overtime is on a voluntary basis only;
- Contracts do not allow for fines to be imposed on workers.

We can also confirm the following for Categories 1 and 2:

- The agencies are required to assure their own position on modern slavery independently, as they exceed the £36m annual turnover;
- Passports are copied and not retained;
- Information is provided about workers' rights in a language that they understand.

We will prioritize introducing consistent and appropriate checks across Category 3 agencies by June 2017.

### **Safeguarding against sexual exploitation and abuse**

Sexual exploitation and abuse provide one of the most egregious examples of what happens when an organization's staff and other representatives abuse their power. Safeguarding (also known internationally as PSEA) is the work we do to ensure that all allegations of this nature are taken seriously; that there are serious consequences for those who carry out these abuses; and furthermore to promote a safe environment in which we are all responsible for challenging abuse and exploitation.



The term 'PSEA' describes the coordinated international movement which came about in response to a scandal in West Africa in 2002. A joint United Nations–Save the Children report found that displaced people in the region had been sexually abused and exploited by UN and NGO staff. The report exposed the risk inherent in the work carried out by NGOs that some staff will commit sexual exploitation and abuse against the beneficiary community. It highlighted both the increased opportunity that NGO staff have to abuse their power, and also the vulnerability of those affected. The UN Secretary-General issued a bulletin outlining the responsibility shared by the UN and NGO communities to address SEA carried out by their staff. SEA is a sector-wide problem, and the Accountability to Affected Populations Task Team set up to address it looks for sector-wide solutions. We are signatories to the statement of commitment on the elimination of sexual exploitation and abuse of UN and non-UN personnel, an important statement of intent in this area (which also includes human trafficking).

A key aspect of prevention is to deter potential perpetrators from committing abuse. All staff should have read and understood the Code of Conduct (2012), which forms part of the employment contract with Oxfam, and provides grounds for disciplinary action if breached.

Oxfam is committed to investigating all allegations of sexual abuse and exploitation. Every disclosure is treated with the highest levels of care and professionalism. We use rigorous, fair, and impartial investigation procedures in respect of all parties to an investigation. However if an allegation is upheld the consequences can be very serious for the perpetrator. Our commitment to fully investigating every allegation is an important source of deterrence to potential abusers.

The prevention of sexual exploitation and abuse is Oxfam's primary aim. We use a range of tools to stop such abuses of power and trust. We have a global team of Safeguarding Focal Points available in all Regions and most countries. These are trained and committed staff who can hear concerns, support on reporting and next steps, and keep a strong link with the Safeguarding Team in Oxfam HQ in Oxford. We run Safeguarding Workshops in all countries and for Shop Teams which promote trusting and respectful working relationships, raise awareness around the issue of sexual exploitation and abuse, and educate staff on safeguarding processes, as well as their rights and obligations while working for Oxfam.

Oxfam's work requires a culture of trust, respect, and equality. One of the ways to achieve this is to recruit and retain staff who share Oxfam's values. Careful attention is paid at the time of recruitment to thorough reference checking and proper policy inductions for staff. Oxfam records all allegations of potential exploitation or abuse, as well as the outcomes of all investigations. Sexual exploitation and abuse perpetrated by individuals associated with Oxfam is considered gross misconduct and grounds for dismissal. Oxfam is part of the IASC Task Team on PSEA, which works to prevent perpetrators from working in this sector.

Sexual exploitation and abuse present a serious risk for both Oxfam and those to whom it has a duty of care; and it is a risk which is actively monitored. The Safeguarding Team is situated in Oxfam's Internal Audit Department and has a strong link with other compliance teams, including the Audit and Fraud and Corruption teams. These teams work together across the Oxfam confederation to ensure it is compliant and held to account in these critical areas of work.

## **Our international operations**

As a leading agency in the sector Oxfam GB is signatory to many standards and commitments to ensure that it is continuously improving its services and actions, and in addition has led on the development of new standards to improve the work of the sector.

For example, Oxfam GB has signed on to the commitments that came from the World Humanitarian Summit in Istanbul in May 2016. Many of these commitments focus on the responsibility to protect and safeguard the rights of communities and partners that Oxfam GB works with and staff that Oxfam GB employs.

In addition, Oxfam GB is a signatory to the Call for Action on Gender Based Violence. Over the next three years this will ensure that all Oxfam GB staff engaged in, or with responsibility for, the implementation of Oxfam GB's humanitarian mandate have an understanding and commitment to the global call to action objectives and goals, and skills to apply the Gender in Emergencies (GiE) Minimum Standards, the Inter-Agency Standing Committee (IASC) Gender Handbook and the IASC Gender Based Violence Guidelines.

As well as solid and robust performance management and grievance procedures, Oxfam GB also has had a whistle-blowing line/mechanism since 2011, which staff and volunteers can activate in order to make confidential complaints. There is also a team of staff, including counter-fraud experts, safeguarding experts, human resource specialists and management specialists who are able to be rapidly deployed to investigate any allegations – whether they are made through the whistle-blowing line or other means.

Based on currently available information, we are not aware of any international workers hired as temporary workers via agencies. This reduces our risk, given that we work in a number of countries where modern slavery is prevalent.

However Oxfam GB is aware that more can be done. As a result, by November 2017 we will have defined a process for assessing risks related to modern slavery in Oxfam GB's programme at country level, with a view to reporting on the assessment by March 2019. This will ensure that risks at the programme level can be identified and mitigated/managed. It will also help the organization understand the investments and capacity needed to implement the act robustly and responsibly.

## **Due diligence in our supply chains**

Modern slavery is often hidden in supply chains. There is no simple solution. More often than not, standard assessment approaches do not detect modern slavery or empower workers. To focus our approach for Central, Humanitarian and New Products procurement, we have identified the following factors which can result in a higher likelihood of workers being vulnerable to modern slavery in our supply chains.

### **Poor purchasing practices**

Buying companies need to be aware of the impact of their purchasing models on workers. For example, multiple seasons with short lead times can lead to sub-contracting or increased use of agencies and other mechanisms such as forced labour. Short-term relationships cannot enable sustained improvements for workers. Late payments can result in workers' payments being delayed or companies going into debt or folding, with workers being made redundant with no backdated pay.

Our procurement model is based on long-term mutually beneficial strategic partnerships with suppliers. A significant percentage of our non-retail suppliers are engaged for long-term contracts. For retail we have only one buying season, Christmas, along with our all-year-round products, which helps to reduce pressure on suppliers. In 2012/13 our buying teams took part in the ETI buyer training programme, which focused on the impact of purchasing practices. We will be delivering training on this relationship again later in 2016.

### **Limitations on freedom of association and the right to collective bargaining**

We recognize that mature industrial relations are the most effective, sustainable and appropriate mechanism to enable workers to realize their rights. We look for a union presence when assessing our suppliers, and we are including enabling freedom of association and collective bargaining as a key area alongside slavery and wages in our strategy for 2016–20.

## Employment relationships

We recognize that sub-contracted, agency or other third party hiring arrangements are more vulnerable to exploitative practices. All assessed suppliers provide information about the make-up of their workforce and existing recruitment practices. We prioritize our own contingent labour and key sectors in our supply chains in which agency labour is more common for more in-depth checks. As part of our revised due diligence framework, we will be reviewing our list of sectors to identify which are more likely to depend on agency labour.

## Outsourced work

Workers in outsourced companies are much more vulnerable to modern slavery practices. Sites are often less visible to the buying company; the arrangement may be last-minute; and the sub-contracted sites are more likely to have a fluctuating workforce through the use of agencies or other mechanisms. Apart from programme procurement, we ask if any work is sub-contracted for the goods and services we source. We include a contractual obligation to request permission if sub-contractors are going to change. For high-risk categories, we require visibility and an assessment of the sub-contractor or site. Our strong preference is for sub-contracting to be avoided; in the cases where it is proposed, we require additional information.

## National contexts

We recognize that national contexts and lack of government regulation or labour inspection resources result in increased vulnerability of workers. We are strengthening our assessment of high-risk countries and appropriate subsequent steps. For example, we have begun mapping sourcing countries where minimum wages are below the World Bank International Poverty Line to inform how we manage risks of in-work poverty.

## Low-skilled work and industry-specific risks<sup>48</sup>

We recognize that lower-skilled workforces are more vulnerable to exploitation, and we consider the industry and the likelihood of low-skilled workers to inform where to focus our work.

**Table 5: Overview of our supply chain due diligence process by procurement area**

Procurement category	Due diligence
<i>Central Procurement</i>	<p>All suppliers with an Oxfam GB spend of over £50,000 or with special risks must complete a Supplier Questionnaire as a minimum and contracts must include the Ethical and Environmental clause. Risks are assessed on a case-by-case basis. Higher-risk categories have bespoke questions and assessments as appropriate.</p> <p>All supplier contracts with a spend of over £100,000 or with Oxfam GB branded items or services must be signed by the Head of Corporate Responsibility and a member of the Leadership Team or a Regional Director; above £500,000 by the CEO, and above £5m by the Chair of Trustees.</p>
<i>New Products (retail)</i>	<p>The Head of Corporate Responsibility signs off all new contracts and has visibility of all 46 suppliers. Contracts above £20,000 must be signed off by the Trading Director.</p> <p>All manufacturing sites must complete a Manufacturing Questionnaire as a minimum. We use additional existing assessments along with the company's risk and leverage profile to agree bespoke approaches as appropriate.</p> <p>Half of our suppliers are Fair Trade or supply Fairtrade-certified products. Key suppliers, where there are known labour standards risks either in their sector or sourcing countries, are expected to have an ethical/environmental management programme which incorporates a 'beyond audit' approach.</p>

<i>Humanitarian</i>	Follows the Central Procurement model.
<i>International programmes</i>	Low visibility of spend and suppliers that are sourced via our in-country programmes. Currently we have low engagement with suppliers on corporate responsibility and use a supplier questionnaire and risk rating guidance tool

## **Effectiveness of social audits and other risk management processes**

The use of social audits is very common in supply chains. However, Oxfam GB is concerned that they are only a small part of the solution, and cannot be used as the main means of identifying and driving change for more complex and hidden issues such as slavery. Indeed, we have communicated our concerns about the limitations of audits in public debates and blogs.<sup>49</sup> Oxfam GB (and ETI in its human rights due diligence process) recognize that audits have varying degrees of validity depending on country context and the auditor's competencies, and can provide information to flag the presence of the factors mentioned in the previous section (e.g. agency workers, presence of unions, skill levels, as well as worker turnover, pay levels, deductions) and other useful information that can determine how we engage with the site.

Oxfam GB's concern with organizations strengthening audits to address slavery is that audits have inherent limitations that cannot be remedied by increased checks or better auditor training. In addition to this, bespoke audits required by sourcing companies are driving audit duplication and fatigue. Suppliers in many sectors are paying for and managing audits along with multiple and sometimes conflicting corrective action plans. This uses up precious financial and management resources on the part of the factory and there is very little evidence that it results in positive change in workers' employment conditions.

Our approach therefore is not to add duplication, but to add value to the assessment process in other ways. When applying the ethical frameworks for our procurement functions, we apply bespoke approaches with our higher-risk suppliers. To inform our approach, we take into consideration information from our questionnaires, any other assessments the supplier already has (which can often be audits), the above-mentioned factors and our level of influence with the supplier. In the period 2016–18 we will explore how to effectively ensure freedom of association and respect for the right to collective bargaining at key sites.

When using available assessments, we also consider the assessments' strengths and weaknesses, balanced with our degree of leverage, to agree the most appropriate way forward.

**Table 6: Methods used by Oxfam GB to assess suppliers**

<b>Assessment method</b>	<b>Modern slavery checks</b>	<b>Strength</b>	<b>Weakness</b>
<i>Oxfam GB questionnaire</i>	<ul style="list-style-type: none"> <li>• Number of agency workers</li> <li>• Right to work documentation</li> <li>• Is overtime voluntary?</li> <li>• Fines and deductions</li> <li>• Child labour checks</li> <li>• Union name</li> <li>• Policies</li> <li>• All workers have contracts</li> <li>• Percentage of women vs women in management</li> <li>• Sub-contracting</li> </ul>	<ul style="list-style-type: none"> <li>• Free</li> <li>• Increases confidence in site when it identifies no agency workers and a union presence</li> </ul>	<ul style="list-style-type: none"> <li>• No verification</li> </ul>
<i>Audit</i>	<ul style="list-style-type: none"> <li>• As above</li> <li>• Hours and wages</li> <li>• Policies</li> <li>• Collective bargaining agreement</li> <li>• No retention of documents</li> <li>• No fines</li> <li>• Age of youngest workers</li> <li>• Good young worker policy and process</li> <li>• Worker turnover</li> <li>• No migrant workers</li> <li>• Accommodation</li> </ul>	<ul style="list-style-type: none"> <li>• Third party</li> <li>• Includes worker interviews</li> <li>• Can identify fines and excessive overtime</li> <li>• Increases confidence in site when it identifies no agency workers and a union presence</li> </ul>	<ul style="list-style-type: none"> <li>• Audit fraud is common in Asia</li> <li>• Auditors often do not have the skills to identify harassment or poor agency hiring practices</li> <li>• Oxfam GB recognizes the limitations of audits and the need to move beyond audit</li> </ul>
<i>In-depth assessments</i>	<ul style="list-style-type: none"> <li>• As above and in-depth interviews with workers</li> </ul>	<ul style="list-style-type: none"> <li>• Third party – highly skilled specialists well known for achieving transparency</li> <li>• Can identify fines, discrimination</li> </ul>	<ul style="list-style-type: none"> <li>• Expensive, so only appropriate where leverage is high</li> <li>• We have not focused on modern slavery in assessments to date and will need to strengthen this</li> </ul>
<i>Continuous improvement on-site programmes</i>	<ul style="list-style-type: none"> <li>• Develop a close relationship with the site and build the capacity of the supplier</li> </ul>	<ul style="list-style-type: none"> <li>• Second of third party, highly skilled</li> <li>• Supplier can see business benefits of strengthening human rights</li> <li>• Can identify fines, forced labour</li> </ul>	<ul style="list-style-type: none"> <li>• Expensive, so only appropriate where leverage is high and relationship is long</li> </ul>
<i>Trade unions</i>	<ul style="list-style-type: none"> <li>• Directly, ask on-site unions for their view</li> </ul>	<ul style="list-style-type: none"> <li>• Free</li> <li>• Informed view of site</li> <li>• Workers are influential in the process</li> </ul>	<ul style="list-style-type: none"> <li>• Union presence absent in many sites</li> <li>• National laws and anti-union business practices often severely prohibit union activity</li> </ul>

## 1 Central Procurement

A major part of the role of category managers/buyers is to understand, assess and manage risks in their allocated areas. Labour standards management is embedded within this framework. While we have Oxfam GB tools to assess against the ETI Base Code labour standards, Category Managers meet with the Corporate Responsibility Team to identify key risks specific to their category and where appropriate advice on how to assess and support suppliers through a bespoke process of continuous improvement.

In 2013 we identified the following categories as having an increased likelihood of labour standards issues by assessing inherent risks, actual risks and our level of influence. For inherent risks, we used country and sector risk indicators, internal knowledge about the complexity of the supply chains and the presence of low-skilled workers or vulnerable workers. For actual risks, we drew on existing supplier data regarding the types of issue identified from assessments to date.

**Table 7: Identifying risks of labour issues**

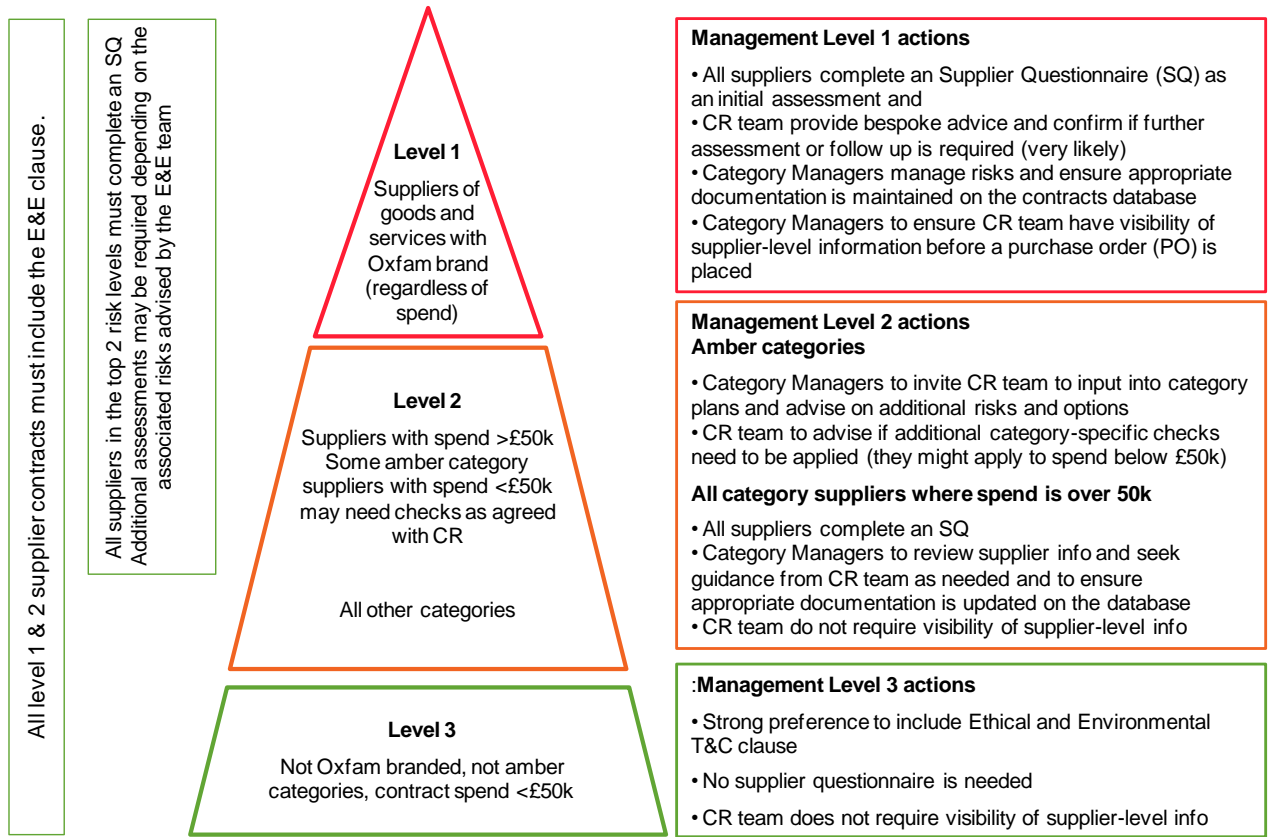
<b>Amber categories</b>	<b>Countries we source from</b>	<b>Type of risk</b>
<i>Facilities management</i>	UK	Wages, worker contracts
<i>Fundraising</i>	UK	Wages, contracts
<i>HR services</i>	UK	Wages, contracts, agency labour
<i>Printing</i>	UK	HR procedures and agency labour issues
<i>Promotional goods</i>	UK supplier with items from multiple countries	Many labour conditions
<i>Works contracts</i>	UK	HR issues

This framework was designed prior to our understanding of the prolific and hidden nature of modern slavery. While it identifies issues that relate to slavery, there is a need for a revised analysis to ensure that slavery is explicitly identified and that its relationship with wages, contracts, recruitment practices, skill levels, hours and HR issues is explicitly integrated into the model. This will be conducted as we revise our frameworks informed by the ETI due diligence framework. See section 4 – Actions planned – for more information.

The amber categories mentioned in Table 6 are also referred to in the framework shown in Figure 4. Note that the framework outlines the checking requirements but does not capture the way we work with our suppliers. Please see the case study examples in this report.

Figure 4: Central Procurement’s CR checks for suppliers

## CENTRAL PROCUREMENT’S CORPORATE RESPONSIBILITY CHECKS FOR SUPPLIERS



The Corporate Responsibility team attends the twice-yearly presentations for all categories and flags category-specific labour issues, taking into account the key factors described at the beginning of this section. In addition to this, Category Managers work with the CR team to incorporate bespoke labour rights questions into tenders for amber supplier categories.

### Case study 3: Due diligence in sourcing telemarketing suppliers

When sourcing new telemarketing suppliers, we were aware that the sector often hires workers on commission-only contracts and can have poor HR systems (contract management, grievance mechanisms, etc.), and on-site assessments are generally not conducted. We therefore included the following conditions of contract:

- All Oxfam GB fundraisers are to be paid a Living Wage Foundation rate, or a clear plan is put in place to reach this level within a reasonable timeframe. This includes all the suppliers’ agency workers working on Oxfam GB-related activities.
- The supplier must agree to commission an HR-focused on-site assessment which is based on the most relevant labour rights aspects of the UNI Global Union Call Centre Charter<sup>50</sup> and must commit to any actions within an agreed timeframe.

Regardless of category, the current assessment tools collect information about the breakdown of workforce, overtime, zero-hours contracts, agency workers and deductions, among other key data, to inform the risk of modern slavery. The Category Manager has clear guidance on what information to follow up on and when they are required to seek further guidance from the CR team. However, the guidance needs strengthening to ensure the risk of modern slavery is understood. This will be done when we revise our due diligence framework.

The Central Procurement Invitation to Tender (ITT) document clearly states its expectations of suppliers in terms of Oxfam GB's labour standards, including a link to our Ethical and Environmental Policy, details about the type of assessment needed and a copy of our contractual clause which includes the right to terminate business if the supplier does not show a willingness to remediate issues within an agreed timeframe.

As previously mentioned, all contracts worth over £50,000 must be signed off by the Head of Corporate Responsibility, who discusses the contract with the Category Manager and confirms whether the contractual clause addressing labour standards, the assessments and any follow-up on continuous improvement actions are all appropriate.

High-value contracts worth in excess of £100,000 must be approved by a Leadership Team member or a Regional Director, in excess of £500,000 by the Oxfam GB CEO, and in excess of £5 million by the Chair of Trustees. Signatories at this level will have visibility of the Head of Corporate Responsibility's sign-off and any conditions or significant concerns flagged at that point.

Assessment of labour standard risks were incorporated into our overall Supplier Risk Management Toolset in early 2016. We store the results of these risk assessments on our central supplier database and any suppliers flagged as overall high risk are reported to senior management as part of our quarterly review process

## **2 New Products for retail sale**

As with Central Procurement, accountability for managing labour issues sits with the New Products team and is embedded into its buying processes and reporting. This is reflected in the objectives of the Buyer and Buying Manager. The New Products team works closely with the Head of Corporate Responsibility, who has visibility of all suppliers (46 in 2015/16) prior to and during the course of contracts and who must sign off on all new contracts. Contracts with a value of £20,000 must also be signed off by the Trading Director, who will have visibility of the Head of Corporate Responsibility's signature and comments.

New Products' expectations of its suppliers are clearly communicated in its supplier manual and linked to the supplier contract, which includes our standards, expected level of assessment for both suppliers and sites, our continuous improvement approach and right to terminate business if the supplier is not willing to address labour issues within an agreed timeframe.

***Our key suppliers are expected to have an ethical and environmental management programme in place which incorporates a beyond audit approach – particularly where known/documented risks are present in either the supply chains or sourcing countries.<sup>51</sup>***

For Oxfam GB, 'beyond audit' involves understanding and supporting the development of the supplier's approach to assessing and enabling improvement in the sites it works with. We ask the supplier to share its ethical trade approach and expectations/demands from other clients and then we agree the most appropriate way to add value to the process. Often this takes the form of discussing the site profile with our supplier to identify the highest risks to workers and to agree a targeted assessment or capacity-building approach. For example, one site that was undergoing annual audits for another client of the supplier showed few health and safety issues but many inconsistencies with working hours. Therefore we asked the supplier to commission hours and wages specialist Impactt Limited<sup>52</sup> to work with the site to have full transparency of hours and wages, conduct root-cause analysis, to interview workers regarding their concerns and create an action plan.

Communicating and assessing supplier/sites standards is built into the buying process so that the supplier is aware of our standards, level of assessment and required steps as early as



possible. The individual buyer's sourcing plan includes a significant section regarding labour standards checks, for which the buyer is responsible for collating and assessing the information and meeting regularly with the Head of Corporate Responsibility to agree bespoke actions based on the supplier assessment, country, industry, type of organization, presence of unions and worker profile.

#### Case study 4: Due diligence in sourcing Oxfam-branded Christmas products (8 suppliers)

- All five European sites have had recent on-site audits (commissioned by other clients) and actions have been followed up. Three of the sites are unionized. Only one site has agency workers, all of whom have contracts. Only one site sub-contracts; we have an audit for the subcontracted site, which is unionized and has no agency workers.
- Of the three sites in Asia, two have had forensic assessments by Impactt Ltd, with long-term continuous improvement processes. The other is owned by the supplier; it has an annual audit (commissioned for another client) and there is a worker committee and hotline. This site has agency workers and, although the audit states that all workers are directly paid by the site, have contracts and no deposits or documents are held, we will further investigate its recruitment practices in 2016/17.



Oxfam shop selling Christmas products in Lincoln, United Kingdom. Photo: Oxfam GB

The current assessment framework was revised in 2014 and takes into consideration New Products' challenge of having low spend levels (and subsequent influence) with many of its suppliers and in particular its non-Oxfam GB branded ranges. Approximately half of our non-Oxfam GB branded range products spend can vary from £5,000–20,000 per year. We find that when engaging with suppliers we have limited influence particularly where other clients do not share Oxfam GB's concerns. We therefore prioritize asking questions to clarify employment conditions and seek to influence their existing continuous improvement processes.

New supplier sites cannot receive orders until appropriate steps to address high-risk issues and plans for continuous improvement for more complex issues are agreed. The ethical management of existing suppliers is revisited regularly and purchase orders (POs) may be held until the supplier has provided an appropriate update on steps taken. Sites are categorized as the following and reported to the Trading Ethical Board every quarter. This gives the Trading Director full visibility of any issues, delays and agreed steps.

- PO OK – all issues addressed or no issues

- PO with conditions to address issues as per agreement
- PO with condition – delayed actions
- Block PO

New Products takes a collaborative approach to supplier management, working together with suppliers to find solutions to the issues they encounter. Their eight key suppliers (68 percent of spend) are all invited to annual supplier review meetings, where we share two-way feedback. Feedback from these meetings has been generally positive and we are often noted as prompt payers.

Half of our suppliers are Fair Trade or supply Fairtrade-certified goods. See Appendix 2 for more information on their approaches.

### **Case study 5: Due diligence in branded range, supporting suppliers to develop ethical trade programmes and reduce audit duplication**

We have been working with our branded range supplier (Oxfam GB mugs, water bottles, etc.) since 2013. The ethical assessment in the tender selection process had 60% of the overall selection weighting. The ethical assessment steps included:

- Meeting the CEO to understand his commitment to ethical trade;
- A presentation from the supplier's Head of Corporate Responsibility on the approach, the skills level of its staff and which stakeholder groups it engages with; and
- A review of its capacity building and beyond audit approach.

As a condition of contract, all sites from which the supplier sources Oxfam GB products are included in its core programme, which includes regular capacity-building sessions and root cause analysis. In support of our supplier's approach and to reduce audit fatigue in the sites, we convinced one of its other clients not to commission additional audits at shared sites but to redirect the resources to supporting the supplier's ethical trade programme.

In terms of modern slavery checks, the supplier has confirmed that:

1. Oxfam GB sites do not use agency workers currently and they do not apply charges for worker accommodation;
2. There are no fines enforced. If workers violate any factory rules; they will receive oral or written warnings;
3. The factories do not retain any documents belonging to workers and only maintain ID copies and personnel files as required by law;
4. Regarding other checks to ensure that all employment is voluntary and there are no unreasonable deductions: the supplier also conducts irregular visits, conducts worker interviews and checks factory policies and resignation records.

To address excessive overtime, the supplier's sites (for Oxfam GB products) managed to reduce weekly working hours by an average of 5–10 hours. Steps to enable this included the supplier:

- providing training to factory management on how to set up realistic production plans;
- helping set up clear overtime targets and working hours alarm systems;
- carrying out root cause analysis in each site with high working hours to establish the reasons and contributing factors;
- highlighting the importance of good-quality control procedures and monthly analysis of work records to help prevent recurring issues;
- focusing on productivity and efficiency to identify wastage and improvement opportunities at each site and provided training to factory management on production line balancing and the most efficient layouts;
- helping to establish effective HR management systems to improve workers' satisfaction levels and reduce the worker turnover rate.

### **3 Humanitarian, and 4 International Programme Procurement**

Humanitarian Procurement follows the Central Procurement model for labour standards checks. The Humanitarian Procurement Team is based in Head office and as with the other procurement teams, accountability for managing labour risks sits with the humanitarian team and its management line. Suppliers where anticipated spend is above £50,000 are asked to complete a supplier questionnaire and any identified issues are followed up by the team with support from the Corporate Responsibility team.

The humanitarian Procurement Managers advise the Corporate Responsibility team of tenders and include any additional category-specific questions as agreed with the Corporate Responsibility Team. As an HPC we are bound by Annex 3 Article 3 of the ECHO Framework Partnership Agreement, which holds us to strict ethical procurement standards which include avoidance of child labour and the respect of basic social rights and working conditions based on international labour standards. All invitation to tender (ITT) documents are clear about Oxfam GB's expectations of its suppliers in terms of meeting labour standards.

For International Programme Procurement, everyday management of procurement and logistics in programme countries is embedded in the programme management line. Process standards are maintained centrally and issued through policies and guidelines.

We developed an ethical questionnaire in 2015–16 and piloted it in Sudan as part of a larger standardized toolkit project. Roll-out of the toolkit to countries where Oxfam GB is the lead affiliate (within the Oxfam confederation) will be completed in 2019. The tool includes labour rights questions regarding hours, pay, use of agency labour, contracts and freedom of association, among other key questions relevant to modern slavery. It will be revised and strengthened in early 2017.

## 4 RISK OF SLAVERY AND HUMAN TRAFFICKING AND STEPS TAKEN TO ADDRESS IT

The following analysis is based on applying our current due diligence process and focusing on key factors that can increase the risk of slavery in the UK and overseas, including lack of trade union rights, the use of agency workers, national contexts, outsourced activities and low-skilled work. We outline key steps for the period 2016–18 that will inform and shape our longer-term approach, internal monitoring and evaluation (M&E) measures, communication and reporting on modern slavery and analysis informed by the ETI Due Diligence Framework

### Gaps and commitments made

The purpose of this section is to clearly outline gaps and list our commitments in our analysis and action plan.

### Analysis of our operations and supply chains

Our analysis of operations included Oxfam GB staff in the UK and overseas and our agency staff. We did not identify any cases of modern slavery, but recognize that we need to strengthen our due diligence processes.

**Table 8: Our analysis identified the following priority risk areas and proposed action plans**

Activity	Risk of unidentified incident of modern slavery	Action plan
International operations	No risk framework in place for modern slavery	Commit to develop one by November 2017
Oxfam GB's UK agency workers	Gap in checks for our drivers, warehouse and transport agency worker	Ensure a consistent and appropriate approach for all UK agency workers by June 2017
Oxfam House (our HQ in Oxford) sources contracted services (facilities, café, security). Suppliers have been through a tender process and ethical assessment and all workers for Oxfam are paid at least the Living Wage Foundation rate	Low visibility of the due diligence process these suppliers use for hiring agency labour	Strengthen our due diligence regarding our suppliers' agency hiring processes in 2017
Oxfam GB's non HQ on-site contracted services	Supplier checks are overdue for a number of suppliers	We will conduct a new assessment of these long-term contracts, with a focus on recruitment and wage practices, during 2017/18.

Promotional items	Promotional items come from a sector with high labour risks and often from high risk countries.	We awarded the contract to a progressive supplier and will support them this year to develop a good ethical trade programme with appropriate checks for modern slavery and a beyond audit approach.
New products for retail sale	We have three branded sites that hire agency workers.	We will risk-assess these in more depth in 2016/17.

## Impact assessments and findings from engagement with rightsholders affected by the business's operations and other stakeholders

In relation to our operations we undertake regular anonymous staff surveys which cover work-life balance, pay, relationships with managers, hours and respect in the workplace, among other areas. Our Deputy CEO and Head of HR meet with the two workplace unions (OJTUS) every quarter.

In relation to our supply chains we do not currently undertake impact assessments, and we recognize this gap in our approach. When we conduct in-depth assessments working with Impactt Ltd we place emphasis on effective worker interviews and we support our promotional and branded range (retail) suppliers to develop impact assessment methodologies.

We are developing our strategy regarding how to increase respect for freedom of association and collective bargaining, based on our long experience of engagement with the tripartite ETI, including as active members of the NGO caucus and at Board level. Oxfam GB has also engaged with the sportswear industry on testing approaches to enable freedom of association and collective bargaining in the Indonesian sportswear industry, through the Freedom of Association Protocol.<sup>53</sup>

### Action planned

We recognize the need for a long-term strategy to address modern slavery effectively. We have identified key steps for 2016–18 that will inform and shape our longer-term approach.

## Organizational steps for 2016–18

### Embed our understanding of modern slavery and responsibility to address it across key functions of the organization

#### 1 Policy and strategy

- Information gathering on good practice policies in 2016/17 to inform the 2017/18 update of our Corporate Responsibility Policy
- Develop organization-wide modern slavery strategy involving accountable operational and procurement senior managers. This strategy will be directly linked to our work on wages and freedom of association. The strategy will be directly informed by the due diligence commitments identified below and be completed by Dec 2017.
- Include international programme work in the scope of our modern slavery strategy and reporting. By November 2017 we will have defined a process for assessing risks related to modern slavery in Oxfam GB's programme at country level, with a view to reporting against

this framework by March 2019. This will ensure that risks at programme level can be identified and mitigated/managed.

- Revise current due diligence frameworks informed by the ETI model for Central Procurement, Humanitarian Procurement and New Products. As the ETI Due Diligence Framework was launched in May 2016, and effective analysis requires involvement of procurement and operational senior managers and their teams, we will have a clear prioritized implementation plan and governance to support it in place by the end of June 2017

**While the larger strategic work mentioned above is underway, we will also meet the following commitments to move our work forward.**

## **2 Training and communications to embed understanding of modern slavery**

- Organization-wide communications on the importance of addressing modern slavery and what Oxfam GB's commitment and actions are (September–June 2017, and then again after the strategy is finalized).
- Follow-up training for all procurement teams and relevant stakeholders on Oxfam GB's programme to address modern slavery and their key responsibilities in this work (initial training September–December 2016, follow-up as per schedule from the due diligence plan that will be agreed by June 2017).
- Our recruitment training will include content about modern slavery (by March 2017).
- Identify appropriate ways to support suppliers.

## **3 Internal monitoring and evaluation**

- Develop indicators for measuring the understanding of modern slavery across procurement teams (initial benchmark autumn 2016).
- Seek good practice examples.
- Impact of training (early 2017 and then ongoing).
- Report risk indicators related to modern slavery in supply chains. (Timing for this will be included in the new due diligence framework plan that will be completed by June 2017.)
- Address any risks of modern slavery: actions by department

1. Contingent labour: increase the due diligence process for Category 3 agencies to ensure a consistent standard across all three categories by June 2017.

2. On-site contracted services: strengthen our due diligence regarding agency hiring processes for Oxfam House on-site services by March 2017 and trading estate in 2017/18.

3. Promotional items: develop appropriate beyond audit approaches with the supplier completing phase 1 by November 2017.

4. Retail products: focus on agency hiring practices with three key sites. We will provide training to the suppliers that identified forced labour risks in late 2016.

## **M&E measures in place**

We will develop key performance indicators (KPIs) to enable us to measure progress against our internal improvement plans and report on progress in our 2016/17 statement. We have added the risk of modern slavery existing in our supply chain to the procurement risk register for 2016/17.

## **Communications and reporting on modern slavery**

### **Reporting**

We will develop and report against KPIs to the Corporate Responsibility Steering Group on the progress we are making against commitments set in this statement every six months from December 2016, and we will include a section on modern slavery in our Annual Report and Accounts.

### **Communications**

We are developing a new Corporate Responsibility communications strategy, which will include raising awareness about modern slavery across the business and our supply chains and awareness training for procurement and recruiting managers.

Externally, we will continue to undertake advocacy on labour rights in global supply chains, and will ensure that this incorporates our learning and activities relating to modern slavery.

## 5 MITIGATING RISKS OF SLAVERY AND HUMAN TRAFFICKING

*...Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate*

We recognize and disclose issues related to modern slavery for Oxfam GB products. We describe the steps taken to address these issues and the support provided by Oxfam GB to create change for the benefit of workers, and we outline the gaps in our approach.

### **Gaps and commitments made**

The following commitments were made to address gaps identified in this section:

- We will follow up on all issues identified at our supplier sites mentioned below
- We will investigate remedy options for workers in our supply chains.
- We will introduce mechanisms to assess the effectiveness of internal training.
- We will develop more effective KPIs

### **Disclosure of any identified instances of modern slavery and the results of any corrective action plans**

We did not find any instances of modern slavery in our operations or supply chain. However, the limitations in our approach do not yet enable us to say unequivocally that there are no such instances occurring. Steps we have taken to address the previously mentioned allegations of sexual exploitation are found under the grievance sub-heading within this section, as none of them fall within the definition of modern slavery.<sup>54</sup>

Oxfam GB identified three active and one potential UK supplier, each with a UK site whose employment contract includes an obligation for workers to work overtime when required; a practice which is permitted under UK law. Workers at these four suppliers conduct shift work rather than more flexible roles such as office-based staff.

In each case, Oxfam GB followed up to understand whether overtime had been required and initiated a meeting with senior management to explain the importance of the issues for workers and discuss appropriate action. We offered training and help to develop an ethical trade strategy. At the first site, workers confirmed that overtime was voluntary. At the second, the site conducted a root cause analysis of overtime issues, hired an additional manager, provided supervisor training and introduced an automated clocking system to ensure accurate time-keeping. At the third, we are awaiting confirmation of action taken. The potential site adjusted its contract wording to reflect the voluntary nature of overtime prior to Oxfam placing a purchase order.

### **Remedy and compensation provided for labour rights abuses**

For Oxfam GB staff, the 'Dealing with Problems at Work' policy and guidelines provide a clear process for workers, unions and management to follow to ensure that appropriate investigation, hearings and remedial actions take place.



We do not have a formal mechanism in place for our supply chains, and we will seek examples of good practices by July 2017 to inform our approach.

## **Company-level grievance mechanisms**

As outlined in the policies section of this statement, we have a global grievance procedure for staff and managers, along with a whistle-blowing mechanism and a confidential support line. The OJTUS unions are available to support workers through the grievance process along with HR. The grievance guidelines are based on ACAS procedures and were reviewed recently in consultation with the unions.

We remain committed to transparency on allegations of sexual exploitation and abuse perpetrated by Oxfam staff and partners. In 2015/16 we saw an increase in the number of reported allegations from 26 to 64. As of year-end 2015/16, 38 allegations were investigated, 12 allegations are pending investigation and the remaining 14 allegations either did not require investigation or investigation was not possible. Ninety-four per cent of closed and upheld cases have resulted in disciplinary action so far. In eight percent of reported allegations we found insufficient evidence to uphold any part of the allegation, and in these instances other actions were taken to reflect the learning of the organization. Of the 64 reported allegations in 2015/16, 23 were received from our UK-based Trading Division, three were received from other UK divisions and 38 from the International Division.

Under-reporting is recognized within the sector as the major barrier to tackling sexual exploitation and abuse in delivering humanitarian and development programmes. By establishing a dedicated Safeguarding team we have raised the visibility of our Protection from Sexual Exploitation and Abuse policy and reporting procedures. We believe that the overall increases in the number of allegations that we have seen in recent years show that we are improving awareness of this important issue and giving victims more confidence to report incidents.

## **Key Performance Indicators**

Oxfam GB currently has risk and performance indicators for its assessment of labour standards risks in general (including forced labour), but we do not yet have KPIs specific to the issue of modern slavery. Our current framework applies high, medium and low indicators for each New Products supplier and for central and humanitarian suppliers with spend of over £50,000, or special risks. All high-risk issues are flagged to the Trading Ethical Board for retail suppliers and to the Head of Procurement for all in scope suppliers. Details of the nature of high risks are reported and a plan of action is agreed.

Our framework is based on the ETI Base Code, and any risk of modern slavery is categorized as 'red' risk needing immediate action. Action is taken on a case-by-case basis, which would normally include a high-level meeting with the supplier to explain our concerns and the implications for workers and withholding purchase orders until appropriate actions are taken. If we cannot reach an agreement to our satisfaction, we will terminate business with that supplier.

## **Evaluations of the effectiveness of training**

Informal feedback from participants on the modern slavery training that took place in 2015/16 was positive and showed an increased understanding in relation to the categories of spend managed. In December 2015 we recruited a Corporate Responsibility Manager to provide capacity-building support to relevant operational teams based on enhanced tools and training. The new manager is benchmarking knowledge and assessing the impact of training undertaken during 2016/17 more formally.

## 6 TRAINING AND CAPACITY BUILDING

### *Training and Capacity building about slavery and human trafficking in its business and supply chains*

#### **Training with Oxfam GB staff regarding hiring procedures**

Recruitment and Selection training is a course for all managers and anyone else involved in recruitment. It is a requirement that a minimum of at least one person on each recruiting panel must have attended this course, and staff attend a refresher course after three years.

The course covers key areas such as

- equal opportunities;
- legal requirements of recruitment documents;
- diversity;
- right to work checks;
- references.

During 2016/17 we will develop and include a section on raising awareness about modern slavery and recruitment.

HR teams receive regular updates from our lawyers regarding the right to work.

#### **Training with Oxfam GB staff regarding the risk of slavery in supply chains**

The Corporate Responsibility Manager and Head of Corporate Responsibility attended the ETI Modern Slavery training course, and the Head of Corporate Responsibility attended a half-day workshop run by Ergon Associates.<sup>55</sup>

The Corporate Responsibility Steering Group took part in two short sessions. The first covered an introduction to modern slavery, how pervasive it is and why it is an important issue for Oxfam GB. The second session provided more information about the hidden nature of modern slavery, the limitations of current assessment methods, a review of the strengths and weaknesses of Oxfam GB's systems and processes, and next steps.

The Procurement teams participated in a 45-minute introductory training session in December 2015 which covered what modern slavery is and where it is pervasive, and completed a group exercise on where it could be hidden in their sourcing categories and the next steps they will undertake to build their capacity to address this issue. This training builds on the foundation training on ethical sourcing that the teams took part in three years ago. The foundation training was delivered to all UK-based procurement teams and included 9.5 hours of training over the course of six modules covering labour rights, the ETI, purchasing practices, assessment tools, the limitations of audits and the benefits of in-depth and long-term programme approaches.

# APPENDICES

## Appendix 1: Oxfam GB companies

Finance for Development Limited is a limited liability company in the Azerbaijan Republic which provides financial services (mainly credit) on a sustainable basis to people with relatively low incomes who do not have access to other financial sources. The company made a small loss in-country in 2015/16, but due to the weakening of the local currency and provisions against loan balances, a loss of £3.2m was reflected in the consolidated accounts (2014/15: £0.3m profit).

SEIIF Limited provides advisory services to a Small Enterprise Impact Investing Fund to support Oxfam GB's development work and to raise funds for other business activities that promote and support the charity in the achievement of its fundraising and charitable activities. The Small Enterprise Impact Investing Fund is an innovative financial product based in Luxembourg, which aims to make a real difference to the developing world by investing in the small and medium enterprise sector. Profit and net assets for this company were less than £0.1m for both 2015/16 and 2014/15.

Frip Ethique SARL is a company registered in Senegal, which imports second-hand clothing (mainly from Oxfam GB), and then sorts and distributes it for resale in local markets. In 2015/16 the company made a loss of £0.1m (2014/15: profit of less than £0.1m).

## Appendix 2: Fair Trade organizations

### Fairtrade Foundation



Fairtrade is a global movement with a strong and active presence in the UK, represented by the Fairtrade Foundation. Fairtrade is about better prices, decent working conditions and fair terms of trade for farmers and workers. It supports small-scale farmers and workers who are marginalized from trade in a variety of ways, and carefully monitors the impact of Fairtrade on these communities. <http://www.fairtrade.org.uk/en/what-is-fairtrade>

There are more than 1.65 million farmers and workers spread across more than 74 countries participating in Fairtrade. There are over 4,500 Fairtrade products, from coffee and tea to flowers and gold, indicated by the FAIRTRADE Mark.

The Fairtrade Foundation and Fairtrade International have welcomed the UK Modern Slavery Act 2015 and have contributed to consultations on the draft bill, supporting the decision to include measures requiring businesses to report on actions to tackle modern slavery via the Transparency in Supply within its scope. The Fairtrade Foundation has published an initial **Modern Slavery Act guidance note** for its business partners and other stakeholders, while Fairtrade International has published more detailed **Guidelines on Child Labour and Forced Labour**. This states:

*'Fairtrade recognizes that Child Labour and Forced Labour are problems in many parts of the world in which they operate. Fairtrade is committed to playing a positive role in enabling producers, workers and process to adopt a rights based approach towards eliminating exploitative labour practices, by working cooperatively with Fairtrade Producer Networks and their producer and worker organizations, including suppliers, industry, non-governmental organizations, trade unions and governmental bodies.'*

International Fairtrade Standards (available at [www.fairtrade.net](http://www.fairtrade.net)) require compliance with applicable national labour laws and the fundamental ILO conventions, including conventions related to the worst forms of child labour and forced labour. Fairtrade audit and certification

cycles exist to monitor compliance against standards, and Fairtrade also operates a system whereby anyone may report an allegation that a standard has been breached. Breaches of standards may result in warning, suspension or decertification. However, Fairtrade recognizes that audit and certification alone are insufficient in tackling and preventing modern slavery, and the new Trader Standard also encourages companies to go beyond certification and commit to further proactive measures to address forced and child labour issues in the supply chain.

Fairtrade International believes that no person or product certification system, especially when it is working in poor, marginalized communities around the world, can provide a 100 percent guarantee that a product is 'slavery free' or 'child labour free'. However the Fairtrade system offers increased awareness, training, transparency and monitoring of supply chains in line with relevant legislation, plus a guarantee to act if breaches of standards are found, to investigate and if necessary remediate and protect vulnerable children and adults, working with human rights and child protection partner organizations. In addition, Fairtrade's unique approach to improving terms of trade, including agreed pricing mechanisms and payment of additional Fairtrade premiums, aim to address the underlying causes of exploitation and forced labour and improve the distribution of value back to primary producers, providing resources that can be deployed at local community level for awareness raising, training, protection, monitoring and remediation systems through farmer-led programmes and youth leadership development.

More information on Fairtrade International's Child and Forced Labour approach can be found at: <http://www.fairtrade.net/programmes/child-labour.html>

### World Fair Trade Organization



The World Fair Trade Organization is a membership organization and the largest global network of Fair Trade organizations in the world, <http://wfto.com/> There are 73 member organizations. WFTO operates in more than 70 countries across five regions (Africa, Asia, Europe, Latin America, and North America and the Pacific Rim) with elected global and regional boards.

Definition of Fair Trade: 'Fair Trade is a trading partnership, based on dialogue, transparency and respect, that seeks greater equity in international trade. It contributes to sustainable development by offering better trading conditions to, and securing the rights of, marginalized producers and workers – especially in the South. Fair Trade organizations have a clear commitment to Fair Trade as the principal core of their mission. They, backed by consumers, are engaged actively in supporting producers, awareness raising and in campaigning for changes in the rules and practice of conventional international trade.'

'No child labour/no forced labour' is one of 10 Fair Trade Principles that Fair Trade organizations must follow, <http://www.wfto.com/fair-trade/10-principles-fair-trade>

## NOTES

All websites were accessed in September 2016 unless otherwise stated.

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