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Decision

Charity inquiry follow-up: Oxfam GB progress on safeguarding

Published 25 February 2021

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Background

On 12 February 2018, the Charity Commission (“the Commission”) opened a statutory inquiry (“the inquiry”) into Oxfam GB (“the Charity”) to examine its governance, including its leadership and culture around safeguarding, and its management, policies and practices.

This followed very serious concerns surfacing publicly, including around serious sexual misconduct by the Charity’s staff in Haiti in 2010. Concerns were also raised around the Charity’s handling of allegations about a senior member of staff in Haiti. The inquiry consisted of two parts; the first examined the Charity’s handling in 2011 of complaints about its staff in Haiti; the second part examined the Charity’s wider approach to safeguarding which included supervising an independent review (“the Ineqe Review”) around safeguarding in the Charity.

The inquiry concluded on 11 June 2019 with the publication of a [statement of the results of an inquiry](https://www.gov.uk/government/publications/charity-inquiry-oxfam-gb) (<https://www.gov.uk/government/publications/charity-inquiry-oxfam-gb>) (“the inquiry report”). That report was critical of the Charity, finding that its governance and culture with regard to safeguarding repeatedly fell below standards expected. That report found that the Charity had a culture of tolerating poor behaviour and failed to heed warnings, including from its own staff, and its culture and response around keeping people safe was inadequate. The inquiry concluded that some of the failures and shortcomings amounted to mismanagement. The Commission identified the need for “significant further cultural and systemic change” at and by the Charity to address the failings and weaknesses identified by the inquiry.

During the inquiry, in addition to the issuing of an Official Warning to the Charity, on 10 June 2019, the Commission made an order under section 84 of the Charities Act 2011 (“the section 84 direction”) directing the trustees of the Charity to take actions to address the Commission’s findings and improve the Charity’s oversight and management of safeguarding. In accordance with the section 84 direction, the Charity submitted to the Commission an action plan (“the Action Plan”) setting out the steps and timelines by which it would:

- implement the outstanding actions [\[footnote 1\]](#) relating to recommendations made by the [Ineqe Review](#) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807946/INEQE_Independent_Safeguarding_Review_Oxfam.pdf) which worked alongside the inquiry
- in respect of the Charity’s shops, address safeguarding risk management and assurance matters identified in the [Inquiry report](#) (<https://www.gov.uk/government/publications/charity-inquiry-oxfam-gb>)
- address relevant matters identified by the [Independent Commission on Sexual Misconduct, Accountability and Culture](#) (<https://www.oxfam.org/en/what-we-do/about/safeguarding/independent-commission>) [\[footnote 2\]](#)

Under the terms of the section 84 direction, the Commission required the Charity to provide regular progress updates to the Commission, during a period of statutory supervision as it implemented the Action Plan.

Follow up scrutiny and engagement by the Commission

Approval of the Charity’s Action Plan

The Commission and the Charity have engaged extensively since the conclusion of the inquiry, for the Charity to provide assurance on the content of the Action Plan, for the Commission to then oversee the Charity’s progress in implementing the plan, and for the Charity to demonstrate it has

been delivering the required improvements to the oversight and management of its safeguarding arrangements.

Initially, the Commission provided regulatory advice and guidance to the Charity on the sufficiency of the Action Plan as the Charity developed it. On 23 July 2019, the Commission approved the Action Plan submitted by the Charity pursuant to the terms of the section 84 direction.

Scrutiny of the Charity's progress

The Charity provided regular progress updates during the period of statutory supervision. Where necessary, the Commission sought clarification on these progress reports, and held the Charity to account for delivery of the specified actions. Example areas include:

- the Commission closely liaised with the Charity and its external safeguarding auditors to ensure that improvements in the quality of its safeguarding case management was embedded and implemented to the timetable set out in the Action Plan
- the Commission issued regulatory advice and guidance to the Charity to improve its serious incident reporting to the Commission. This helped to reduce the follow up needed to gather further information and enable regulatory risk assessments about incidents to be completed earlier. The Charity has implemented improvements to its serious incident reporting as a result
- engagement on work being carried out by the Charity to better understand barriers faced by beneficiaries of aid programmes in reporting allegations of sexual exploitation, abuse or harassment, or other misconduct. The inquiry was critical of efforts in this area between 2015 and 2018 and the Action Plan incorporated an action to “Better understand why people in our Programme countries are reluctant to report misconduct to us – so that we can start to break down the barriers to reporting.” The Charity published three research studies examining the barriers in Iraq [\[footnote 3\]](#), Myanmar [\[footnote 4\]](#) and Ghana [\[footnote 5\]](#), plus an overarching analysis [\[footnote 6\]](#). Findings from these studies were disseminated to various stakeholders in the sector
- the Commission has obtained assurances on the practical steps the Charity will take to embed the findings into its programme work in those countries and will continue to receive updates in 2021

Appointment of an independent assessor

In total, the Charity committed to implement and address 100 actions and recommendations (collectively referred to as “actions” in this report) arising from the inquiry, the Ineqe Review, and the Independent Commission on Sexual Misconduct, Accountability and Culture.

Given the nature and scale of these actions, the section 84 direction required that their successful implementation within the Charity and its trading arm be verified. The Charity's trustees and the Commission agreed that an independent assessor, approved by the Commission, should be appointed.

The Charity identified a shortlist of three suppliers to tender for the assignment, and each tender was evaluated by the Charity and the Commission against an agreed common criterion. The Charity and the Commission also interviewed each of the three suppliers to explore the tender proposals in further detail. Following a robust selection process, the Commission approved the appointment of GCPS Consulting (“GCPS”) by the Charity to independently examine and assess the effectiveness of the Charity's implementation of the Action Plan.

Oversight of the independent assessment process

While GCPS was appointed by the Charity, the Commission maintained oversight throughout the process. The Commission approved GCPS’ terms of reference, methodology and work plan, and also maintained oversight through regular progress management meetings with the Charity and GCPS, as well as engaging directly with GCPS.

The Commission had agreed with the Charity that this verification work should start shortly after 31 March 2020, the designated date for completion of the Action Plan. Understandably, the COVID-19 pandemic impacted on the completion of some of the actions, which in turn affected the timescales and GCPS’ approach to the assessment. A measure of the scale of the assessment work is that GCPS has reviewed nearly 3,500 documents in addition to conducting numerous virtual interviews and meetings in order to arrive at their findings.

Engagement with the Charity on the emerging findings from the independent assessment process

The Commission initiated early engagement with the Charity in response to the emerging findings of the GCPS report. Some of these matters are set out in more detail in the section below.

The Commission also sought details from the Charity in respect of its wider safeguarding work and the additional actions it will take to address the areas falling short of full completion. This resulted in the Charity producing a workplan which set out its response to the GCPS report and the further actions it will take to reach full completion (included as Appendix 2 to this report).

Findings of the independent assessment

On 10 December 2020, GCPS produced its final report based on the Charity’s position in September 2020. A summary report can be found at appendix 1.

GCPS took a thematic approach to the review, splitting the actions into 8 thematic areas. A summary of the Charity’s attainment, before further action was taken by the Charity, is set out below: [\[footnote 7\]](#)

Strategy and planning

These 6 actions broadly relate to the development of a 3-year safeguarding strategy and business plan, succession planning for key safeguarding staff, the adoption of a standards-based maturity model (SBM) for the Charity's safeguarding work, and developing links with key safeguarding structures in the UK.

The Charity fully completed 4 of these actions.

GCPS found that there was evidence that the Charity had made serious and sustained efforts to address the remaining 2 actions but that they required more work for full completion. GCPS reported to the Commission these related to the development of a training evaluation framework, and the development of links with various UK safeguarding organisations, such as the various safeguarding boards and multi-agency safeguarding hubs.

GCPS confirmed the Charity had established some links with safeguarding bodies, but it considered that to fully meet the commitment, broader collaboration with these bodies was required, including providing opportunities for staff to participate and contribute towards strengthening local practice across the UK.

The Charity has since committed to developing an appropriate evaluation framework in 2021. The Charity has also confirmed it will continue to build links with UK safeguarding organisations and has included the identification of suitable safeguarding networks with which to build links as a strategic objective.

Systems and procedures

The Action Plan required that the Charity strengthen its Safeguarding Adults, Safeguarding Children, Bullying and Harassment, Preventing Sexual Exploitation and Abuse (PSEA), and Survivors policies, and associated procedures.

Two of the actions relate to specific changes to the Code of Conduct. By agreement with the Commission, these were excluded from the assessment on the basis the Charity was unable to unilaterally make the amendments; the Charity sits within a broader Oxfam International confederation and the document belonged to Oxfam International. The Charity has acknowledged the importance of embedding responsible behaviours and conduct. The Commission is satisfied that the Charity has addressed the intent of the recommendations by a number of actions. This includes strengthening the delivery and content of its Code of Conduct training. The training is mandatory to new starters, and existing staff receive mandatory biannual refresher training. The Commission has received assurances that staff are held to account for their behaviour through strengthened performance management processes and strengthened policies including in relation to safeguarding, and bullying and harassment. Oxfam International has also made some revisions to the Code of Conduct.

GCPS found that of the 6 remaining actions, the Charity achieved full completion on 5; the Action Plan required that the Charity amend the PSEA policy to broaden the criteria for reporting safeguarding cases to the statutory authorities. The policy states that safeguarding cases should be reported to statutory authorities in circumstances where "someone's life is in danger or the matter relates in any way to a child or adult at risk"; the amendment sought to include "potential risk of harm"

to an individual or others as a consideration. GCPS found that there was evidence that Oxfam had made serious and sustained efforts to address this recommendation but that further work was required to achieve full completion. The Charity was unable to unilaterally amend the document because it is an Oxfam International document.

The Charity has since confirmed that agreement throughout the Oxfam confederation has been reached for a change to the PSEA policy that will be fully compliant with the action. This has been implemented in the Charity and will be implemented throughout the Oxfam confederation later this year.

Risk management

The Action Plan had required that the Charity strengthen its internal audit function relating to its shops in Great Britain and complete overdue audits in its UK shops. The Action Plan required also that risk assessment frameworks be improved to prioritise safeguarding.

GCPS found that the Charity fully completed all actions in this thematic area.

Given the Charity operates a substantial trading arm consisting of over 600 retail shops, with attendant volunteers and workers, the Commission sought additional assurance about the Charity's trading arm's internal audits and risk management. The Commission engaged the Charity in particular on how it was risk assessing volunteers engaged as part of community service orders. This resulted in the Charity's trustees reviewing the Charity's arrangements with Community Rehabilitation Companies. The Commission is satisfied with the revised arrangements put in place by the Charity to strengthen the trustees' oversight of risks in this area.

Recruitment, vetting and performance management

These 14 actions sought to ensure safeguarding and the Charity's values were embedded into its recruitment literature and processes, including strengthening the Charity's vetting regime and safeguarding risk management within its trading arm. The actions also sought to promote staff dialogues about the Charity's culture, and hold the Charity's leaders to account for promoting and demonstrating the Charity's values.

GCPS found that 12 of these actions were fully completed.

GCPS told the Commission that although there was evidence that the Charity had made serious and sustained efforts to meet the action to integrate within its recruitment and selection policy a set of minimum standards applicable to safer recruitment, further work was required to achieve full completion:

- inserting a definition within each job description of the nature of supervision a post-holder will receive
- implementing the requirement to conduct repeat checks every 3 years on every member of staff who works directly with, or has regular contact with, children and young people
- availability of management information tracking whether staff involved in interviewing have received appropriate training

The Charity outlined that in practice, it already conducts checks on staff working directly with children and young people, but it has now formalised the practice in a revised Recruitment Policy. The Charity confirmed also that it has now included a description of the supervision role-holders will receive in relevant job descriptions.

The Charity further outlined that as its new learning management system has gone live, better management information will be more readily available.

GCPS further found that the Charity only partly met a requirement to use the International Child Protection Certificate (ICPC) as part of its recruitment process overseas.

The Commission sought and received assurance from the Charity that the ICPC has, since July 2020, been mandatory for new starters when recruiting UK nationals and those who previously worked in the UK, where they work with children overseas. The Charity also reported to the Commission that it had retrospectively applied for ICPC checks for all qualifying staff, less those on furlough, who will be checked as and when they return to work. Further the Charity has embedded the ICPC in its revised Recruitment Policy.

Capability and capacity

The 26 actions in this thematic area related broadly to ensuring trustees, managers and other key staff received appropriate safeguarding and case management training and development, and ensuring sufficient global safeguarding and case management capacity.

GCPS found that the Charity fully achieved 15 of these actions. In relation to 9 actions, GCPS found that there was evidence that Oxfam had made serious and sustained efforts but further work was required. In summary, GCPS told the Commission the further work required includes:

- providing accredited training (or a formal leadership training programme that approximates an accredited safeguarding provision) for the Charity's leadership
- aligning safeguarding risk management with the Charity's learning and improvement framework
- developing a safeguarding focussed learning and improvement framework
- developing a defined programme of training, scheduled to run annually, published in advance and planned to maximise attendance
- improving the Charity's safeguarding learning package, including ensuring consistency across all divisions, building in tests into the training, and developing an evaluation framework to monitor and coordinate safeguarding training delivery

Two other actions were found by GCPS to be partly met. They relate to:

- developing effectiveness reviews for safeguarding, and
- ensuring that the Charity's learning management systems will provide prompts for refresher training.

The Charity outlined, among other things, that:

- an externally facilitated safeguarding governance development session took place in December 2020 for all Strategic Leadership Team (SLT) members and trustees. A training programme for the SLT and senior managers is scheduled for 2021, along with further externally-facilitated training for trustees
- the development of the learning and improvement framework is contingent on the successful implementation of other projects, such as the implementation of their new learning management system, which was launched in January 2021. The learning and improvement framework will therefore be developed later in 2021

- it will bring forward proposals in 2021 for a “comprehensive review” of the effectiveness of how it is measuring the impact of its safeguarding and prevention work. The Charity outlined that it will engage a consultant to support this work to ensure that the review is sufficiently robust, particularly to ensure it takes into account the different streams of work. It is mapping and analysing training needs within the Oxfam Confederation and new course materials have been developed. In January 2021, alongside the new learning management system, the Charity introduced a new safeguarding induction course with built-in assessment. The learning management system also has the functionality to prompt for refresher training

The Commission engaged with the Charity on several issues relating to this thematic area. The Commission sought and received assurance from the Charity that safeguarding will continue to be prioritised and adequately resourced following a restructuring by the Charity in 2020. The Commission also engaged with the Charity on, among other things, mitigating the impact caused by the pandemic on the delivery of training to country directors and focal points. The Charity delivered in November 2020 a series of webinars on the new One Oxfam Safeguarding Core Standards, which were widely attended by country directors and other senior country staff. The Charity has assured the Commission that further webinars for country directors are scheduled for February 2021, together with further country director focussed training to be delivered by June 2021.

Safeguarding case management

The 26 actions in this thematic area relate broadly to ensuring the Charity’s safeguarding case management procedures are strengthened and following up on historic casework.

Of the 26 actions in this thematic area, GCPS found that the Charity had fully attained 17, with 9 actions requiring additional work.

The additional work required for full completion, in summary, includes:

- the creation of a decision-making template to aid effective decision making
- further strengthening the Charity’s consolidated case management procedures and training key staff on the guidance
- strengthening of policies to facilitate the use of independent investigators in cases involving senior staff
- ensuring specific historic cases were further reviewed for additional work or recording

In particular, the Action Plan required the Charity to revisit and risk assess a significant number of historic entries on its safeguarding register (the safeguarding register was the means by which Oxfam used to record incidents reported to it until it was replaced in 2018 by case management software) for which papers had not been made available to the Ineqe Review during the inquiry. The Charity was also required to conduct a risk assessment on 31 international cases relating to potential crimes for which there were full files but which had not been reported to the relevant law enforcement agencies. GCPS found that serious and sustained efforts had been made to address these two actions, including by seeking advice from a law enforcement agency which advised that no reports to police were needed. However, GCPS found that both actions needed more work to ensure the cases were properly assessed for ongoing risks.

As a result, the Charity conducted further work on both sets of cases. No new information emerged which required further action by the Charity or referral to statutory agencies. The Commission sought further assurance in respect of this remedial work resulting in the Charity engaging an external safeguarding specialist to dip sample the remedial work. This was concluded in October 2020. The

safeguarding specialist identified no outstanding safeguarding risks, confirmed that none of the cases required reporting to the police and found that no further work was needed beyond, on a number of cases, administrative tasks such as adding data, documents or linking reports. The Charity has confirmed these actions have been completed. In relation to the entries for which papers were not made available to the Ineqe Review, the Commission is satisfied that the Charity has exhausted reasonable efforts to locate missing information.

The Action Plan also required the creation of a template in support of consistent decision making. GCPS told the Commission its view was that a decision-making template (checklist) was required notwithstanding the Charity's use of a case management system. The Commission therefore engaged both GCPS and the Charity to seek assurance on this matter. As a result, this matter was addressed by the Charity producing a new template and clear policy mandating its use.

The Charity's workplan outlines the range of measures it has taken or will take to address the other areas falling short of full completion. These include:

- rolling out new training to key staff on the consolidated guidance. This was completed in December 2020
- amending its case management procedures to include explicit references to the need to consider the use of external investigators in cases involving senior staff, to consider in every case whether a referral to the police or other agencies is required, and to strive to adhere to UK "best practice" approaches in handling safeguarding concerns, balanced against the survivor's views and the country context. This was completed in December 2020

The Commission has engaged with the Charity on individual safeguarding cases via the serious incident reporting regime. The Commission has seen evidence of improvements that have been made by the Charity in victim support, case handling, holding subjects of concern/complaint to account, and employment references for former employees who have been the subject of misconduct allegations or concerns.

Serious incident reporting

The actions here relate broadly to strengthening of the Charity's processes in relation to serious incident reports (SIR), enhancing trustee understanding of the SIR regime, and ensuring historic cases are assessed and promptly reported. The latter includes the historic entries on the Charity's safeguarding register and the unreported international cases referred to above, under "Safeguarding case management".

Of the 7 actions in this area, the Charity achieved 4 in full.

GCPS found that 3 actions required work for full completion, of which serious and sustained efforts have been made in relation to 2.

On the matter of historic casework, as outlined above, under "Safeguarding case management", GCPS asked for more work around the Charity's review of these cases. The Charity undertook a further review, identifying a number of cases as meeting the threshold for reporting as SIRs. The Commission engaged with the Charity on these cases and is satisfied that it has taken reasonable steps to locate missing information and to mitigate ongoing risks.

GCPS also found that 3 more recent cases, dating between June 2019 and March 2020, meeting the threshold for SIR had not been reported to the Commission. In response, the Charity reviewed its current casework and found no further errors. The necessary reports have now been made to the Commission. The failure to report was as a result of human errors during the transition to their current

procedures. The Commission has accepted this explanation and the Charity has committed to annual external audits of its SIR processes in order that its trustees and the Commission have the necessary assurance.

Governance and accountability

The Action Plan required the Charity to strengthen its arrangements for reporting to the trustee board and its Safeguarding Committee, work collaboratively to implement its safeguarding operations model, and engage other non-governmental organisations to convene a sector wide discussion around the Independent Commission report.

Of the 7 actions in this area, the Charity fully achieved 6, confirming that governance and accountability within the Charity in respect of safeguarding has been considerably strengthened since 2017.

GCPS found that serious and sustained efforts have been made in relation to the requirement for a formal safeguarding report to be delivered to The Safeguarding Group (TSG) that identifies ‘trends, themes and patterns’ but advised further work was required in order fully to meet the action. The Charity has since confirmed to the Commission that there will be biannual reporting to its Safeguarding and Ethics Committee [\[footnote 8\]](#), informed by external audits and internal casework reviews, and these reports will include the recommended analysis.

Conclusion

Overall progress

GCPS concluded that the Charity “has satisfactorily attained the overwhelming majority of the 100 recommendations and commitments in the Ineqe Review and the Action Plan, with only four areas of exceptions to be addressed and some strengthening still required in areas not fully met. Nevertheless, these should be put into perspective and into the context of the enormous collective efforts that have resulted in substantial changes to the way Oxfam approaches safeguarding...it appears Oxfam has made many significant strides over the past two years or so on its safeguarding journey and the small number of gaps highlighted by GCPS...should be seen as positively contributing to the continued development of safeguarding in Oxfam, rather than any signs of fundamental weakness in current arrangements.”

The Commission fully agrees with the statement made by GCPS in its assessment report that “There is no ultimate end point for safeguarding whereby an organisation can say the work is complete, rather an acknowledgement there is always a need to learn, adapt and develop to better meet existing and new challenges and continue to address ongoing and emerging risks and issues. It is evident to the review team that Oxfam is now much better placed to continue on this journey.”

Alongside GCPS’ findings, the Commission has also seen evidence through its casework of improvements in the Charity’s approach to safeguarding since it engaged with the Charity on these matters in November 2017. The Charity has invested significant resources and energy into implementing the Action Plan and strengthening its oversight and approach to safeguarding.

These efforts have resulted in improvements in the Charity’s:

- prevention measures including safer recruitment and working culture
- safeguarding resources and capabilities
- oversight and supervision of safeguarding

- understanding of barriers to beneficiaries reporting of sexual exploitation abuse and harassment, which is being used to further develop the Charity's approach to safeguarding
- support for survivors of exploitation, harm and abuse and its case management and intervention when things do go wrong

Progress on improving the Charity's culture

In particular, the Commission notes the progress the Charity has made in implementing the various drivers of culture change, including:

- recognising the important role of leadership in safeguarding; GCPS reported to the Commission that it has seen evidence showing that staff, including senior leaders, have measurable performance and professional development appraisal targets and are held accountable against them. The Charity's senior leaders also took part in a comprehensive and anonymous 360° assessment, and key leadership practices which should help foster safe and respectful working environment where SEAH and discrimination are not tolerated have also been set out in a guidance document aimed at the Charity's leaders
- addressing gender imbalances at the top of the organisation; in 2016, women represented 25% of the leadership team and as of 2020, this had increased to 50%
- investing in safeguarding capability and capacity; a Director of Safeguarding was recruited in 2019, reporting to the Chief Operating Officer with a direct line to the Chief Executive Officer, the Chair of Trustees and the newly recruited Lead Safeguarding Trustee, alongside recruiting staff into various key safeguarding roles, and funding for the Charity's safeguarding function has been tripled. GCPS notes that the Charity has made the necessary investment to ensure the Charity's safeguarding team is sufficiently resourced and equipped
- mandatory Code of Conduct training for new starters and existing staff including biannual refresher training
- updating the Charity's various safeguarding policies and practices, including making efforts to embed safer programming, such as developing a Safe Programmes Framework and delivering a safe programming pilot in Burkina Faso and Mozambique to monitor the application of the safe programming approach
- developing cultural workshops which enable staff to explore different aspects of power and culture

The Charity has also reported to the Commission that it has taken action outside the Action Plan on safeguarding, safer recruitment and wider culture change, including:

- recruitment processes and interviews that include mandatory questions on values, safeguarding and attitudes towards gender equality
- developing active bystander training, seeking to apply the active bystander model to the workplace to challenge negative behaviours and misconduct
- conducted a staff culture survey worldwide to inform changes within the Charity
- ensuring performance management processes now have a greater focus on how employees work as well as what they deliver

The Commission has seen evidence through its casework with the Charity of how this cultural shift has led to a more robust approach in dealing with subjects of complaint/concern and a more survivor centred approach when addressing safeguarding concerns and allegations.

The Commission notes and agrees with GCPS' observation that the Charity is "striving to create a culture where its organisational values are embedded in the day to day actions and behaviours of staff and associates from the top down."

However, this is an ongoing process and effective safeguarding is a task that is never completed, something the Charity recognises. It requires ongoing commitment and vigilance from leaders, senior managers and staff to place the highest priority on keeping people safe from harm, consistent with peoples' expectations of a charity. This is about having the right systems and processes in place but it is also about ensuring that the organisation's living culture – the spoken and unspoken expectations placed on all staff and all volunteers – promotes an environment that keeps people safe. There is no room for complacency at any charity in this regard. The Commission recognises that, as with any organisation of the Charity's size and reach operating in challenging and difficult environments, there may be safeguarding matters arising in the future. What matters is that the Charity's culture and processes make them much less likely to occur, and that if they do, they are identified and rapidly and properly addressed.

While this report ends a period of intense regulatory oversight for the Charity, the Charity's leaders recognise that they have further work ahead of them to continue to rebuild trust and confidence, not just of the general public and the Charity's supporters and donors, but crucially of the many people around the world who are the Charity's beneficiaries.

Next Steps and transition to standard regulatory oversight

Following further work undertaken by the Charity since GCPS reported its findings, there are some limited areas in which the Charity needs to do more in order to fully comply with the original recommendations and actions. The Charity's work since the GCPS report was produced, its next steps and workplan to achieve full completion and address GCPS's advice is set out in Appendix 2 to this report. The Charity has undertaken to keep the Commission updated on its safeguarding development work, in addition to formal reporting through the usual regular mechanisms. The Commission welcomes this commitment from the Charity.

However, the Commission is satisfied that the Charity has made significant progress in delivering the Action Plan which is sufficient for the period of statutory supervision to now conclude. With the publication of this report, the Charity has now reverted to the Commission's standard regulatory oversight.

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1. By this time the Charity had reported to the Commission that it had completed a number of the recommendations made by the Ineqe Review.
 2. The Independent Commission on Sexual Misconduct, Accountability and Culture Change was established in February 2018 at the behest of Oxfam International following the Haiti revelations.
 3. [Factors Influencing Misconduct Reporting in Saladin and Nineveh, Iraq, Oxfam GB, January 2020 \(https://oxfamlibrary.openrepository.com/bitstream/handle/10546/620929/cs-factors-influencing-misconduct-reporting-iraq-060120-en.pdf?sequence=1&isAllowed=y\)](https://oxfamlibrary.openrepository.com/bitstream/handle/10546/620929/cs-factors-influencing-misconduct-reporting-iraq-060120-en.pdf?sequence=1&isAllowed=y)
 4. [Factors Influencing Misconduct Reporting in Kachin, Myanmar, Oxfam GB, November 2019 \(https://oxfamlibrary.openrepository.com/bitstream/handle/10546/620893/cs-misconduct-reporting-kachin-myanmar-121119-en.pdf?sequence=1\)](https://oxfamlibrary.openrepository.com/bitstream/handle/10546/620893/cs-misconduct-reporting-kachin-myanmar-121119-en.pdf?sequence=1)

5. [Factors Influencing Misconduct Reporting in Sawla and Tarkwa, Ghana, Oxfam GB, February 2020](https://oxfamilibrary.openrepository.com/bitstream/handle/10546/620946/cs-factors-influencing-misconduct-reporting-ghana-100220-en.pdf?sequence=1) (<https://oxfamilibrary.openrepository.com/bitstream/handle/10546/620946/cs-factors-influencing-misconduct-reporting-ghana-100220-en.pdf?sequence=1>)
 6. [Factors Influencing Misconduct Reporting: A meta-analysis, Oxfam GB, July 2020](https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621022/cs-misconduct-reporting-meta-analysis-070720-en.pdf?sequence=1) (<https://oxfamilibrary.openrepository.com/bitstream/handle/10546/621022/cs-misconduct-reporting-meta-analysis-070720-en.pdf?sequence=1>)
 7. See [Appendix 1: Executive summary of report by GCPS Consulting dated 10 December 2020](https://gov.uk/government/publications/charity-inquiry-follow-up-oxfam-gb-progress-on-safeguarding/appendix-1-executive-summary-of-report-by-gcps-consulting-dated-10-december-2020) (<https://gov.uk/government/publications/charity-inquiry-follow-up-oxfam-gb-progress-on-safeguarding/appendix-1-executive-summary-of-report-by-gcps-consulting-dated-10-december-2020>) for a detailed explanation of these attainment scores
 8. The Safeguarding and Ethics Committee replaced TSG in 2020
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