



Making People Safer

Oxfam GB

Independent Safeguarding Review

Executive Summary & Recommendations

2018

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Ineqe Safeguarding Group LTD, 3A Heron Wharf, Belfast Northern Ireland BT3 9LE

Telephone: +44 (0) 2890 232 060

E-mail: enquiries@ineqe.com

Website: www.ineqe.com

Chair's Note

Under the ToR the Independent Reviewer has final editorial control of the final Phase 1 review report, rather than the Chair. Nevertheless, the Chair was tasked with ensuring three matters under the ToR, and her position on each of them is as follows.

First, the Chair was asked to “*ensure that the Independent Review is sufficiently robust and independent*”. I have no reason to doubt that the Independent Review was independent of OGB. There was robust challenge to the information with which the Review was provided by OGB, and to the individuals at OGB with whom the Review engaged.

Secondly, the Chair was asked to “*ensure that the final Phase 1 review report has been produced in compliance with the principles of natural justice and fairness; in particular any individual who may be subject to significant criticism in the report should be given an opportunity in advance to comment on the report's conclusions*”. I am satisfied that all individuals who may be subject to significant criticism in the report were given an opportunity in advance to comment on the report's conclusions.

Thirdly, the Chair was asked “*to ensure that the findings of fact and expressions of opinion in the final Phase 1 review report are justified on the available evidence, are reached taking into account all relevant matters into account and disregarding all irrelevant matters, are reasonable and are adequately reasoned*”. There is one aspect of the report, as set out in the Executive Summary, which in my opinion falls short of this requirement.

Insofar as the report makes findings in relation to OGB's safeguarding arrangements generally prior to 2017 (as distinct from its reporting to the Charity Commission and statutory funders in the UK, and its internal investigation and disciplinary processes), it exceeds the scope of the ToR.

Independent Reviewer's Response

With regards to exceeding the ToR as highlighted in the final paragraph of the Chair's Note, I must respectfully differ. In my opinion, this approach is covered by the scope of the ToR and was necessary to reflect on previous leadership, management and practice in order to benchmark, place in context and measure progress.

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Acknowledgement

The Independent Reviewer wishes to thank everyone at Oxfam GB for their constructive engagement and support during what has been a complex review. Nearly two thousand individuals from across the charity's geographic footprint participated in our online survey, with many current and former members of staff either e-mailing, writing or speaking to us directly after our staff briefings.

The team leading the review greatly appreciated the assistance of those in Oxfam GB who managed the coordination and supply of thousands of documents and to those who provided support to our fieldwork and site visits. These included over fifty interview and feedback sessions, as well as one to one interviews with key personnel in the UK, Rwanda and Tanzania.

The Independent Reviewer also wishes to put on record his thanks to the Charity Commission and in particular Kate Gallafent QC, the Independent Chair, whose insight, challenge and support has been invaluable.

Finally, it would be remiss not to acknowledge the critical insight provided by Helen Evans, a previous Global Head of Safeguarding and the former CEO Mark Goldring. Mark's humility, compassion and commitment to learn from what had happened was unquestionable.

The Independent Chair

Kate Gallafent QC was appointed as independent Chair by the Charity Commission in March 2018.

The Independent Reviewer

Jim Gamble QPM is a former Chief Police Officer and was the founding Chief Executive of the Child Exploitation and Online Protection (CEOP) Centre. He is currently the CEO of the INEQE Safeguarding Group and the Independent Chair of both the City and Hackney and the London Borough of Bromley Safeguarding Children Boards.

He was the UK ACPO¹ lead for child abuse investigation, internet safety and countering child trafficking. He was a co-author on the UK's first Domestic Homicide Review² and in 2010 was appointed by the then Home Secretary to lead the initial scoping review of the investigation into the disappearance of Madeleine McCann. More recently, in 2016 he led a wide-ranging safeguarding review of an NHS Trust and has commissioned and overseen a number of contemporary Serious Case Reviews.

Review Panel

Given the complex nature of this task, the Independent Reviewer has relied on a Review Team and Quality Assurance and Ethics Panel with over 250 years combined experience. Their multi-agency involvement spans safeguarding, charity, public sector and criminal justice practice from the front-line to senior leadership roles. (See Appendix C for details).

¹ Association of Chief Police Officers

² <https://aafda.org.uk/wp-content/uploads/2015/07/Pemberton-Homicide-Review-2008.pdf>

1. INTRODUCTION

1.1 On 12 February 2018 the Charity Commission (the independent regulator of charities in England and Wales) opened a statutory inquiry into Oxfam GB. This was initiated as a consequence of alleged misconduct by staff working in Haiti and the Commission's concerns that Oxfam GB '*...may not have fully and frankly disclosed material details about the allegations at the time in 2011, its handling of the incidents since, and the impact that these have both had on public trust and confidence*'.³

1.2 At this time, Oxfam GB also sought to engage an independent review of its current safeguarding provision (the Review). Following consultation with the Charity Commission, it was agreed that this work would be subject to the supervision of the statutory inquiry. The Review commenced on the 26th March 2018.

1.3 Set against an agreed methodology and focused Terms of Reference (ToR) (*Appendix A*), the Review was tasked to:

Review the sufficiency of Oxfam GB's current safeguarding arrangements (including leadership and culture) in meeting the charity's obligations both domestically and internationally to its beneficiaries, staff and other charity workers, with specific regard to:

- the charity's safeguarding strategy (including the sufficiency of the charity's prevention, deterrence, training and awareness measures);
- governance;
- HR policies and practice;
- organisation, management, resources;
- systems and processes; and
- the sufficiency of, and progress to date in implementing, the 2017 Action Plan and current safeguarding improvement plans.

Review the management of a sample of historic safeguarding incidents, complaints,

³ <https://www.gov.uk/government/news/charity-commission-opens-statutory-inquiry-into-oxfam-and-sets-out-steps-to-improve-safeguarding-in-the-charity-sector>

allegations, reports or cases (Safeguarding Cases) for the period 2011 to present - excluding the known cases arising in relation to Haiti in 2011 and the Philippines in 2013⁴ to:

- assess the integrity and sufficiency of Oxfam GB's internal investigation and disciplinary processes;
- assess the adequacy of Oxfam GB's provision of information in respect of safeguarding cases to other aid agencies, both on a proactive and reactive (such as when asked for a reference) basis.

Review all safeguarding incidents, allegations, complaints, reports or cases for the period 2011 to present – excluding the known Haiti 2011 and Philippines 2013 cases – providing assurance that:

- all relevant matters which meet the Commission's Serious Incident Report (SIR) criteria applicable at the time have been reported as SIRs to the Commission;
- matters involving conduct which may give rise to a criminal offence either domestically or internationally, have been reported to law enforcement or other respective agencies; and
- the circumstances of the notifiable incident have been fully disclosed to the Commission and
 - where required by law and subject to the consent of the victim where reasonably required, to other UK statutory agencies; and
 - in other countries, where the victim agrees and there are no reasonable human rights concerns, to the relevant statutory agencies.
- the charity has adequately and accurately disclosed information about these matters to statutory funders in the UK, to the level requested or required by them, and has also provided extensive information to other principal donors.

Each of the areas set out above will be benchmarked against the applicable law, good practice and Oxfam GB's obligations as a charity at the relevant time.

⁴ The "known cases" are (i) the Haiti cases subject to the Oxfam GB Investigation Report of approx. August 2011 which Oxfam GB published in March 2018 and (ii) the alleged Philippines incident reported in the Evening Standard on 15 February 2018.

Make recommendations where appropriate or necessary to the trustees and the Commission on relevant matters including but not limited to:

- any remedial actions required to address issues with the handling or reporting of past safeguarding incidents, allegations, reports or cases; and
- future safeguarding arrangements for the charity, to include an action/improvement plan with a recommended timeline for priority actions.

The Review's Definition of Safeguarding

1.4 The definition of safeguarding within the ToR is wide and extends beyond that explicitly covered by the statutory framework and guidance for children and vulnerable adults in the UK. It includes specific reference to Prevention of Sexual Exploitation and Abuse (PSEA) and preventing harm to beneficiaries, as well as staff and others who come into contact with the charity.

1.5 For the purposes of the Review, 'safeguarding' has the meaning set out in the Charity Commission's strategy for dealing with safeguarding issues in charities (December 2017), that is, '*the taking of reasonable steps to ensure that beneficiaries and other persons who have contact with Oxfam GB do not, as a result, come to harm.*'

The Review's Approach to Benchmarking

1.6 In line with the specific requirements of the ToR, each of the areas for consideration by the Review has been benchmarked against the applicable law, good practice and Oxfam GB's obligations as a charity at the relevant time (the benchmark).

1.7 The Review has sought to do this based, in particular, on guidance from the Charity Commission⁵ and pertinent statutory^{6 7} and non-statutory guidance^{8 9 10}, as well as the various underlying statutory regimes. Where appropriate, relevant evidence from within the Review's time period has also been used to contextualise and benchmark progress.¹¹

1.8 With regards to the Review's findings and recommendations, where it has been found that Oxfam GB has not met the benchmark, this has been made clear, with the associated narrative identifying what Oxfam GB *must* do in order to remedy the position.

1.9 The Review also makes a number of recommendations in relation to Oxfam GB where it already meets the benchmark, but in the Review's professional opinion further improvements *should* be made in order to meet best practice or even higher.

1.10 Ultimately, the issue for any charity is whether its trustees have fulfilled their duty to take reasonable steps to assess and manage risks to the charity's activities, beneficiaries, property, work or reputation. The Review hopes that its recommendations for further improvement will assist the trustees in demonstrating they have not merely taken reasonable steps to do so but have sought to make Oxfam GB's approach to safeguarding the very best that it can be.

⁵ [Charity Commission Reporting Serious Incidents Guidance, 2010](#), [Charity Commission Reporting Serious Incidents Guidance, 2012](#), [Charity Commission Reporting Serious Incidents Guidance, 2013](#), Charity Commission of England & Wales – Charities – How to Protect Children & Adults at Risk 2013 (updated March 2018)

⁶ [For Children & Young People: In England - Working Together to Safeguard Children 2018 / In Wales - All Wales Child Protection Procedures / In Scotland – National Guidance for Child Protection Scotland / In N Ireland – Co-operating to Safeguard Children & Young People in Northern Ireland.](#)

⁷ For example - [What to do if you're worried a child is being abused – advice for practitioners \(2015\)](#)

⁸ [Charity Governance Code](#)

⁹ Inter-Agency Standing Committee Minimum Operating Standards (IASC) for UN and non-UN personnel 2013 & 2016

¹⁰ CHS Alliance on humanitarian organisations receiving and investigating allegations of abuse, exploitation, fraud or corruption by their own staff

¹¹ ToR paragraphs 7 and 8 have also required a review of the management of a sample of casefiles and all safeguarding incidents, allegations, complaints, reports or cases for the period 2011 and 2018 (excluding the known Haiti 2011 and Philippines 2013 cases)

1.11 In terms of comparisons against other aid charities, the absence of any evidence base for performance across the sector makes this approach inherently difficult.

1.12 Despite this challenge, Oxfam GB's safeguarding arrangements have previously been considered as demonstrating 'best practice'. This acknowledgement was highlighted by Professor Dyan Mazurana and Affiliated Student Phoebe Donnelly of Tufts University in their research on sexual assaults against humanitarian and development aid workers.¹² The 'best practice' quote within this paper has been referenced many times by Oxfam GB during this Review. However, the statement, from what is an insightful paper needs to be considered in the context of the scope of the research undertaken and the ToR of this Review.

1.13 When interviewed, Professor Mazurana stated; "...when we were looking for any kind of best practice, we were asking...who do you think out there is doing a good job on this? Who do you think at least has got the right policies in place and you hear that there is some movement forward? And Oxfam GB came up repeatedly, now a couple [of] other agencies were named, big international agencies, and when we contacted them, they said oh absolutely not, do not put us as best practice, what we are doing is abysmal, we're so far behind".

1.14 Professor Mazurana acknowledged the fact that her work did not have the opportunities created by this Review to look at individual cases and how processes work in practice. It is exactly for this reason; the lack of any detailed evidence of safeguarding quality across the aid sector, that using other charities as a benchmark would be superficial and could not be considered useful.

1.15 The Review equally acknowledges that safeguarding in the context of Oxfam GB's overseas operations is a complex area and it is not always easy to identify what constitutes good practice in the aid sector at any particular time. It can also be argued that this complexity makes it unreasonable to expect the charity to work to UK standards everywhere.

¹² Mazurana, D. and Donnelly, P. (2017). Stop the Sexual Assault against Humanitarian and Development Aid Workers. Somerville USA: Feinstein International Centre. <http://fic.tufts.edu/publication-item/stop-sexual-assault-against-aid-workers/>

1.16 However, the Review believes that this is exactly what Oxfam GB should, whenever possible, *aspire* to do. Indeed, apart from practice that conflicts with local law, the charity should endeavour to apply UK standards for safeguarding people, regardless of the geography or context within which it operates. As a set of parameters against which to model good practice, the law and guidance in the UK provide a strong framework upon which to build.

2. EXECUTIVE SUMMARY & RECOMMENDATIONS

2.1 Given the level of detail contained within this report, the Executive Summary has been purposefully written to provide the reader with a brief synopsis of the key issues examined by the Review.

Review of Safeguarding Incidents, Allegations and Complaints

2.2 The Terms of Reference (ToR) required a review of all safeguarding incidents, allegations and complaints reported to Oxfam GB within a defined time period. To undertake this task, the Review was provided with a copy of Oxfam GB's '*Safeguarding Register*' (used to track incoming cases) and a number of case files. The Review found this register to be inadequate in respect of its data quality and management.

2.3 Furthermore, many of the historic case files submitted to the Review were bundles of paper and printed email trails, often including duplicates. They lacked meaningful structure and could not always be cross referenced or related to the register. Indeed, a significant number of entries in the register had no accompanying paperwork and 18 case files were not listed within it. The Review has been unable to establish if all cases have been dealt with effectively and whether potential victims have been appropriately protected and supported.

2.4 During the final drafting and fact checking period of the Review, additional files were located by Oxfam GB. These were dip sampled and found to reflect the same issues identified above.

2.5 Prior to the commencement of the Review Oxfam GB had recognised the aforementioned failings and invested in a new electronic management system. This positive step should help improve case recording and tracking in future.

Serious Incident Reports to the Charity Commission

2.6 It could be argued that Oxfam GB's first safeguarding Serious Incident Report (SIR) submission (relevant to the Review's ToR¹³) was made to the Charity Commission in 2015. This document was a copy of the then safeguarding register. It collated headline information concerning 122 safeguarding incidents covering the preceding four years. However, supposing the timing of this submission had been consistent with guidance, which it was not, the detail within it could not be described as sufficient as it did not always include even the most basic of information.¹⁴

2.7 In February 2018, Oxfam GB submitted a consolidated SIR submission to the Charity Commission. This report covered the year 2016/17. Two further safeguarding incidents were also notified by Oxfam GB's legal team. In total, these reports covered 36 safeguarding incidents. Whilst this represented a significant improvement in the quality of information provided, the reports fell outside the timeline expected for such notifications. Oxfam GB's most recent SIR submissions, in June and August 2018, provides further evidence of the charity's ongoing progress in this area. At the time of writing Oxfam GB have reported all known incidents assessed by the Review as requiring a Serious Incident Report to the Charity Commission.

Reporting to law enforcement or other relevant agencies

2.8 The Review also examined whether matters involving conduct which *may* give rise to a criminal offence had been reported to law enforcement or other relevant agencies. The Review assessed that 51 cases between 2011 and 2018 may give rise to a criminal offence in the UK, 28 of which were reported to the police or other appropriate statutory authority. In 12 cases it was clear from the case files that the victim either did not wish to pursue a case or make a report to police. In 11¹⁵ cases, the Review found no evidence that these had been reported to or advice sought from

¹³ The single SIR submitted in 2011 relating to the Haiti incident falls outside the Review's ToRs.

¹⁴ 10 cases have no date whatsoever and 49 reference a month but no year. (paragraph 3.62)

¹⁵ The 11 cases involving potential crimes relate to the following period of time; 2 incidents took place in 2013, 1 in 2014, 3 in 2015, 3 in 2016 and 2 in 2017.

relevant statutory agencies. Three of these cases¹⁶ involved children and arose in 2016 and 2017¹⁷. The Review has provided Oxfam GB with advice on how to respond to these unreported cases. At the time of writing, the charity has made good progress in identifying potential victims and ascertaining their wishes regarding reporting, as well as establishing further detail concerning the status of each incident. During this ongoing process, no additional evidence has been identified to confirm any of these 11 cases had previously been reported.

2.9 The Review also assessed that 46 cases may give rise to a criminal offence in Executing Affiliate (EA) countries, three of which were confirmed as being reported. In 12 cases, it was clear from the files that the victim did not wish to pursue the matter or make a report to the police.

2.10 There were 31¹⁸ cases where the files do not enable clear conclusions to be reached about whether there were potential crimes which should have been reported to statutory authorities.

2.11 It has not been possible to reach clear conclusions about reporting. This is because most of Oxfam GB's files do not record decision-making regarding whether or not to report to statutory authorities; as they should have done. Furthermore, in EA countries, the law, culture and traditional approaches to the administration of criminal justice can vary. It is therefore acknowledged that it can be more difficult to establish whether some acts are in fact crimes and whether it is safe for the victim (or the subject of complaint) to report them. Notwithstanding this potential ambiguity, except for those cases where exceptional circumstances¹⁹ applied, some of the allegations should have been reported to, or advice sought from an appropriate statutory agency at the time. In the opinion of the Review, it is not for Oxfam GB to judge whether or not a crime has been committed. The Review has therefore recommended that Oxfam GB immediately review and risk assess those cases and either report to, or seek advice from the police, statutory authorities or other agencies as appropriate. Written

¹⁶ Two cases involved inappropriate behaviour towards children and the third inappropriate behaviour by a child volunteer.

¹⁷ The former Head of Global Safeguarding employed between April 2012 and January 2015 assured the Review that she "reported (to the police) all UK cases involving allegations in respect of children".

¹⁸ Of the 31 EA cases, 3 took place in 2012, 2 in 2013, 6 in 2014, 7 in 2015, 4 in 2016, 6 in 2017 and 3 in 2018.

¹⁹ Exceptional circumstances relate to cases where there are human rights concerns for an individual or fears that the safety of the victim might be jeopardised by local reporting.

assurance should then be provided to the Charity Commission that this has been done.

2.12 Of the 33 case files tenuously linked to Oxfam GB and falling within the category of 'Other',²⁰ ten were assessed as involving conduct that may give rise to a criminal offence. Of these cases, two were reported to the appropriate authorities. One victim withdrew their complaint and seven²¹ potential crimes were unreported.

2.13 In some cases, and for very legitimate reasons, the victim may not wish to pursue or continue with a complaint and it is absolutely right that the victim's wishes are considered and ordinarily prioritised. However, there will be cases, especially relating to the young and vulnerable, where a decision not to report shouldn't be made in isolation of other agencies.

2.14 In the UK, support and advice is available from the Local Authority or police service. However, EA countries undoubtedly represent a more challenging environment. Whilst there is some evidence of consideration of the wider issues and legal advice being sought in a few cases, this approach needs to be further enhanced and uniformly applied.

Disclosure of information to statutory funders and other donors

2.15 The Review found there that there was no express or, in the opinion of the Review, implicit requirement in the DFID contracts examined to disclose safeguarding matters. The charity advised the Review that due to the nature of their legacy systems, it was unable to locate any records of the information previously disclosed to statutory funders in the UK, including DFID.

2.16 The Review examined four recent donor reports. Each of these were found to be comprehensive, focused and evidence based. In the opinion of the Review each met the needs expected for such reporting. Oxfam GB has now developed

²⁰ Other includes incidents that are not directly linked to Oxfam GB, including those arising at the private residences of employees/individuals and by SoCs that are not affiliated with Oxfam GB in any capacity known to the Review.

²¹ Of the 7 Other cases, 1 took place in 2012, 1 in 2015, 2 in 2016 and 3 in 2017.

comprehensive *Reporting Misconduct Standard Operating Procedures* (SOP) which the Review recognises as good practice.

Offending Profiles, Trends and Patterns

2.17 The Review analysed 245 incidents from 2011-2018. Of these, 146 incidents were assessed as needing SIRs. Of the 146, 107 incidents have been assessed as conduct which may give rise to a criminal offence.

2.18 Within the 146 cases assessed as requiring a SIR across the UK, TA, EA and 'Other' divisions, 27 related to incidents where the alleged victim was under 18 years old. 16 incidents related to victims that were beneficiaries and 11 related to vulnerable adults. In 51 cases, the alleged victim was a member of Oxfam GB staff, 10 victims were adult volunteers and 18 involved victims who were third parties.²² In a number of cases there was no identified victim.²³

2.19 The most common allegations contained a sexual element. Unsurprisingly, the vast majority of victims were female and the majority of subjects of concern (SoC) were male.

2.20 Whilst beneficiaries feature in the victim profile in EA countries, over half the victims were Oxfam GB staff members, as were the majority of SoCs. Of the 21 potential crimes involving child victims within the UK, TA and EA, 16 cases relate to Oxfam GB's TA division.

2.21 Whilst under-reporting of safeguarding concerns is an issue across Oxfam GB's footprint, it is most prevalent in EA countries where only 6.5% of the cases examined by the Review were confirmed as having been reported to the police or relevant statutory body. There was also a higher percentage of unreported incidents where the conduct disclosed may have given rise to a criminal offence and a greater proportion of victims not wanting to progress matters further (26.1%).

²² This relates to those incidents within UK, TA, EA and Other divisions. In this instance, "other" relates to incidents tenuously linked to Oxfam GB via PAs or incidents involving staff and volunteers that had no relationship to their employment with the charity.²²

²³ Some cases do not directly relate to individual victims but to instances that fall within the reporting criteria that should have initiated an SIR, for example cases involving suspected sex offenders working in shops.

Historic Safeguarding Incident Investigation

2.22 Four cases were subject to an in-depth audit by the Review. These ‘*deep dives*’ were selected by the Independent Reviewer and agreed with the Charity Commission. Whilst reflecting more recent improvement, a number of practice issues were seen to frequently repeat in both the deep dives and the general review of case files.

2.23 In terms of the investigative process, planning was weak and recorded management oversight was variable. Overall, the quality of case files and case recording was poor. Terms of Reference for investigations were erratic and it was often difficult to identify what policies were being considered or applied. The use of phone and Skype to conduct interviews was also noted as impinging on investigation sufficiency, as was the failure to engage relevant agencies. Despite these issues, the Review did see improvements in investigative practice, particularly in Oxfam GB’s Trading Arm.

2.24 In the context of Oxfam GB’s provision of information to other aid agencies, case files demonstrated little evidence of any systematic approach to this. Outcomes were inconsistently recorded and there was little evidence that the wider safeguarding implications of offending behaviour were being robustly pursued. Often, it appeared that decision making and operational interest by Oxfam GB ended at the point an employment contract or an offer to volunteer was terminated.

2.25 The Review recovered information relating to the identity of 123 Subjects of Concern.²⁴ Oxfam GB was able to identify 73 of these individuals as Oxfam GB employees or volunteers (27 in the UK, 44 in EA countries and two in Partner Affiliate (PA) countries).

2.26 Oxfam GB was able to confirm that it had sought a reference from 24 SoCs at the time of their recruitment. This should not be taken as an indication that no reference was sought by Oxfam GB in the other cases, but rather that the nature of its legacy information systems and devolved geographic footprint is such that historic

²⁴A person against whom an allegation was made was classified as a Subject of Concern (SoC). This classification should not be read as implying guilt.

records cannot be easily recovered. Indeed, feedback collected from the shop and staff surveys provides reassurance in this regard, demonstrating that Oxfam GB normally seeks and follows up on references at the time of recruitment.

2.27 Post-employment, there is little evidence of safeguarding concerns being shared with other aid agencies. However, the Review identifies challenges in this regard, including the possibility that Oxfam GB could be exposed to legal challenge were it to proactively share information without reasonable justification. The Review also acknowledges its ability to provide true, accurate and fair details following a legitimate request for a reference.

2.28 This is a complex cross-sector issue although better practice is clearly developing within Oxfam GB, reflected in the implementation of its new electronic management system and reporting misconduct procedures (specifying the completion of investigations even if a member of staff / volunteer leaves). Further progress is also evident in the new referencing system implemented by Oxfam GB in March 2018. This new framework has been put in place to centralise its referencing system. It now enables the charity to 'coordinate and track references globally'.

Current Safeguarding Arrangements

Leadership

2.29 Given the significant and competing demands that need to be prioritised in such a large organisation, it is critical that the senior leadership team and Council maintain a direct and frequent line of sight on safeguarding. They have the responsibility to create the conditions that both influence and impose the right safeguarding culture.

2.30 Oxfam GB is improving in this regard and it is clear that safeguarding now has a much sharper focus. However, the current management responsibility for safeguarding is spread too wide and too thin to deliver optimum practice.

2.31 To improve Oxfam GB's safeguarding capability, a new safeguarding operating model should be implemented. The proposed model is set out in Appendix D. It includes a range of recommendations that if agreed, will involve the creation of a number of new safeguarding posts and the reconfiguration and re-focusing of others.

Culture

2.32 Despite the difficulties recently faced, the Review sensed no shift in the commitment of staff and volunteers to their overall mission. However, the allegations emerging from the media and subsequent interventions by government and the Charity Commission have understandably undermined the confidence of some staff.

2.33 Oxfam GB need to adopt a stronger culture of compliance with its own safeguarding policies and procedures. Where wrong-doing is identified and where this warrants action, this needs to be fair, consistent and swift. The Review welcomes the fact that Oxfam GB are encouraging people to speak out and that the new 2018 misconduct procedure emphasises that any future investigations will carry on in absentia.

Governance

2.34 Whilst the Charity Commission maintains regulatory oversight it does not

provide the periodic style inspections experienced by many public sector organisations. As a consequence, trustees are entirely reliant on their own internal assurance mechanisms. Providing the appropriate level of training and support to trustees, and in particular the Chair and Lead Trustee, is therefore critical.

2.35 Oxfam GB has a clear vision as set out in its Strategic Plan 2013-19. Put simply, its aim is to end the injustice of poverty and this forms the bedrock of Oxfam GB's mission. Critically the organisational purpose must be set in and reflective of the context of safeguarding.

2.36 However, the Review formed the opinion that not everyone in Oxfam GB had fully understood the inherent relationship between safeguarding and the '*environment*' in which the charity operates. Some maintained that given Oxfam GB is an aid sector charity, safeguarding is somehow not a core feature within its organisational purpose. The Review fundamentally disagrees. Indeed, this misunderstanding fails to recognise that all of Oxfam GB's business involves safeguarding people. If the charity's purpose is to be achieved it should adopt a '*safeguarding first*' approach in all of its activities. This ethos needs to be reflected from the top down.

2.37 Leadership in the context of governance requires trustees to set the 'tone' for the charity. This positive and influential approach is unlikely to be achieved without trustees ensuring that they hear from the front-line. The Chair of the Council understands this and has held a range of events to facilitate candid exchanges.

2.38 Moving forward the challenge for trustees will be to ensure that they maintain line of sight on safeguarding. To do so, they must actively ensure that their directions, policies and systems are properly and consistently applied. This requires them to challenge the actions of staff, one another and the leadership team.

2.39 Whilst the Trustee Safeguarding Group (TSG) is applying more scrutiny of the SIR process, they need to ensure that their understanding of what is required for SIR notifications complies with the Charity Commission guidelines.

2.40 Within Oxfam GB, there are a number of mechanisms in place through which

trustees exercise oversight. Whilst the structures appear to be working well, the principle issue is the lack of quality safeguarding information being presented. Without any specific safeguarding expertise at either Council, TSG or the leadership team level, trustees may be unable to adequately interpret and challenge what they are being told.

2.41 Whilst the Review has identified evidence of some good practice, the failings identified indicate that the arrangements in place failed to ensure that the charity had sufficient grip on the oversight of safeguarding, including the recording and reporting of safeguarding incidents and SIR notifications. The Review recommends the creation of an independent Safeguarding Committee, that whilst sitting within Oxfam GB's overall governance structure will provide an enhanced and transparent level of professional scrutiny.

Safeguarding Strategy

2.42 Oxfam GB's most recent safeguarding strategy covers a three-year period from 2018 to 2021. It was approved by the TSG in May 2018 and has been fully endorsed by the Council. Oxfam GB has recognised that further updates are required.

2.43 Due to the short amount of time this strategy has been in existence, the analysis of its sufficiency has been somewhat restricted to content as opposed to the impact it has delivered. Notwithstanding this, the Review has already seen evidence of an improved focus in respect of its implementation. There is no drift and actions are progressing at pace. Eight of the 50 actions set out within the strategy were complete at the time of its approval.

2.44 Overall, the Review considers the structure of this strategy to be sufficient. However, there is scope for Oxfam GB to improve the methodology it uses to inform its strategy development.

The 2017 Action Plan

2.45 The plan set out activities designed to cover four key '*Desired Outcomes*' with

a target completion date of March 2018. Whilst the Review covers the progress made against each of the four 'desired outcomes' of the plan, this has been superseded with the development of Oxfam GB's new strategy.

Organisation, Management and Resources

2.46 The Global Safeguarding Team is the centrepiece of the charity's safeguarding arrangements and forms the hub through which all safeguarding activity is managed. The Review has been impressed by the dedication and effort of the staff within this team, including those more recently recruited to help manage the surge in demand.

2.47 Oxfam GB's investment in this dedicated resource is without doubt a positive step in the right direction. However, the Review considers there to be an issue with the breadth and depth of the team's current remit. Historically this has resulted in staff being unable to comprehensively deal with other safeguarding responsibilities that require prioritisation.

2.48 Oxfam GB has no role to investigate safeguarding concerns other than in the context of their duties as an employer and its responsibilities for volunteers. Whilst the review acknowledges the best intent of Oxfam GB in its desire to tackle safeguarding in its broadest sense, this has led to the team's capacity being limited. This in turn has impacted on their ability to effectively delivery what is arguably its key function; ensuring that a strong safeguarding focus is maintained across the organisation, at all times and in all places.

2.49 The Global Safeguarding Team should remain the single point of contact for all safeguarding concerns, but their capacity to hand-off cases to other skilled and trained professionals needs to increase.

2.50 Within EA countries, Safeguarding Focal Points (SFP) have been appointed as a local safeguarding resource. The recruitment process for these roles is inconsistent insofar as the Country Director or Leadership Team (CLT) can nominate someone or staff can be asked to elect their SFP.

2.51 SFPs are a good extension to the safeguarding network, although limited with what seems to be a rather arbitrary 5% of their time allocated to this issue. Having said that, the Review sees this as a very useful first step in developing the infrastructure to address safeguarding needs in a local context.

2.52 The Review recommends that the title of this role should be changed to Designated Safeguarding Lead (DSL) in line with the proposed safeguarding model. This naming convention aligns with similar roles in the UK and is a term that will be easily recognisable in statutory and non-statutory organisations including those operating internationally.

2.53 The DSL in EA countries will take lead responsibility for safeguarding children and vulnerable adults within their respective country teams/areas of responsibility. A Deputy DSL should also be appointed in each workplace. Both should be known by and be accessible to all staff and volunteers within their area of responsibility. The Review has formed the opinion that in order to improve future practice the DSL and Deputy DSL should receive Safeguarding Level 3 training.

2.54 To compensate for the scaling back of the investigation role of the Global Safeguarding Team and to ensure DSL arrangements are properly supported, the Review also recommends the creation of Regional Designated Officers (RDOs).

2.55 RDO accountability would feed through the EA Divisional Manager and the Director of Safeguarding. Decision making would by-pass in country staff with whom a conflict of interest could arise due to personal or professional relationships (such as Country Directors and/or HR Managers).

2.56 The RDO would coordinate and chair all initial management meetings in the aftermath of a safeguarding complaint against anyone connected with the delivery of Oxfam GB's program of work, including contracted staff. They may also undertake investigations.

2.57 The RDO would also be responsible for EA DSL and Deputy DSL training and support, whilst also developing specific courses for Country Directors and their senior

leadership teams.

2.58 Oxfam GB's Trading Arm (TA) is the most 'recognisable' in the sense that its safeguarding functions mirror what would be seen in many other UK based operations. The eight regional Business Partners (HR trained professionals) provide a good framework to support the many staff and volunteers working in Oxfam GB's shops across the UK. Whilst this team needs to strengthen its engagement with UK wide LADO arrangements, it is delivering responsive and valued support.

2.59 The Review recommends that DSLs and Deputy DSL roles are introduced into each shop. This will strengthen both accountability and the in-house skill-set of TA staff and volunteers. The DSL would have a direct line to support and advice from the TA Divisional Safeguarding Manager.

Policy

2.60 The Review examined a range of different policies, analysing them in the context of their credibility and relevance to Oxfam GB's safeguarding responsibilities and practice. Oxfam GB had already undertaken work to update its policies prior to the commencement of this Review.

2.61 Oxfam GB has improved its Safeguarding Children Policy, which is now in line with the expectations set out by the Charity Commission. In the Review's opinion, this should be further strengthened to reflect contemporary best practice, covering the overarching accountability for safeguarding, expectations of staff or volunteers who have concerns, and by including references to legislation and statutory guidance (both national and international). It should also provide clear contact details through which further advice can be sought including children's services, police, health, the LADO, the Child Exploitation and Online Protection (CEOP) Centre for e-Safety concerns and NSPCC helplines.

2.62 The Protection from Sexual Exploitation and Abuse (PSEA) Policy is clear in defining and accepting the '*inherent risk*' that can arise from some staff and volunteers exploiting their positions of power for personal gain and sets out a range of

expectations and the actions that will be taken in consequence of a breach. Addressing issues similar to those highlighted in the Safeguarding Children Policy would further strengthen this policy.

2.63 The Safeguarding Adults Policy follows a similar structure to the children's policy. This helpfully illustrates a consistency in approach by Oxfam GB, without compromising the need to explain the clear differences in how this policy should be applied.

2.64 The Review has identified a number of strengths in the policy. Areas for improvement are also identified, including the need for clearer emphasis on the description of appropriate legislation, links to the Oxfordshire Safeguarding Adults Board²⁵ and more detail explaining the context of engaging adults at risk for volunteers.

2.65 Oxfam GB's most recent Code of Conduct for Employees is structured against the six core standards and values that Oxfam GB seeks to promote and makes appropriate references to a range of expectations about employee behaviour.

2.66 In the opinion of the Review, the code should be further strengthened through emphasis being placed on a duty to report and how and where to access advice. However, the key area to be addressed in this policy relates to the following paragraph; *'Whilst observing the requirements of the Code of Conduct, I will also be sensitive to, and respectful of, local customs and culture, even if the norms and values in that cultural context differ from the Code of Conduct'*.

2.67 Local customs and culture in some jurisdictions can present safeguarding risks to both children and adults. This can include abuse facilitated by faith, belief and traditional practices, for example Female Genital Mutilation (FGM), so-called Honour Based Violence or Forced Marriage. Such behaviours clearly differ from the intent set out in the code and yet, the manner in which this paragraph is constructed, unintentionally suggests that Oxfam GB employees merely need to be sensitive and

²⁵ Oxfam GB's HQ is based in Oxford

respectful to such abuse. This position should be clarified by Oxfam GB and amendments made as part of the next policy revision.

2.68 The Code of Conduct for non-Oxfam GB Employees is structured against the same six core standards and values described in the Code of Conduct for Employees and as such, the comments set out above apply.

2.69 The Disclosure of Malpractice in the Workplace (Whistleblowing) Policy is clear in describing the types of malpractice for which it should be initiated and includes appropriate references to examples of safeguarding children, vulnerable adults and beneficiaries.

2.70 The Anti-Bullying and Harassment Policy sets out appropriate principles and provides relevant guidelines and procedures. Whilst deemed broadly sufficient, the Review considers that there are two areas of the policy that should be strengthened.

2.71 Firstly, a clear reference to the legal position relating to harassment in the UK, ensuring staff and volunteers understand the potential legal consequences (outside of any actions by Oxfam GB).

2.72 Secondly, whilst referencing the use of Information Technology, this aspect should be strengthened within the policy. This is particularly relevant in the context of the growth in cyberbullying and the increased opportunities for perpetrators to access, control and harass their victims.

2.73 The Recruitment Policy provides some good advice regarding interviews and stresses the need for criminal record checks (in the UK) and the use of local checking services (i.e. police checks) overseas. However, the policy and more importantly practice could be supported by the development and acceptance of a range of minimum standards for safer recruitment.

2.74 Whilst there is evidence of revised policies being developed by Oxfam GB, there is little evidence of supporting procedure to guide practice. The current safeguarding procedure 'flowchart' is written to cover events arising both in the UK and EA countries and whilst it is simple to understand, it appears to have been

constructed on the basis of Oxfam GB's requirements as opposed to any lessons derived from best or good practice.

2.75 Neither at the point a complaint is received, nor at the point a case conference is held is there any reference to Oxfam GB referring to statutory authorities. This omission in procedures is significant and seriously undermines their effectiveness. Oxfam GB should not make a decision about their investigative role (except in exceptional circumstances outside the UK) until statutory agencies have confirmed their intentions.

2.76 In the Review's opinion, Oxfam GB's interpretation of the requirements for reporting to statutory authorities should also be refined. Whilst accepting there will be scenarios where responsibility needs to be taken by the charity for reporting concerns (even in the absence of consent from the victim/survivor to do so) Oxfam GB defines such circumstances as: *'If someone's life is in danger or the matter relates in any way to a child or adult at risk'*. Given the case work the Review has examined, this should be broadened to include circumstances that *'indicate a potential risk of harm to an individual or others in the future'*.

Practice

2.77 In December 2017, The Charity Commission published a review it had undertaken into Oxfam GB's safeguarding arrangements.²⁶ Broadly, this Review concurs with the Charity Commission's findings, although whilst identifying elements of good practice (particularly in more recent cases from 2016 onwards), concerns about overall quality and effectiveness remain. The following analysis of the key elements of safeguarding practice should be read in the context of the Global Safeguarding Team's capacity at the relevant time. In 2012, Oxfam GB's first Global Head of Safeguarding was a 0.6 Full Time Equivalent (FTE). By 2017, capacity had increased with the team expanding to 3 FTE posts. At the commencement of the Review in 2018, this number had more than doubled (including temporary staff brought in to manage the surge in demand).

²⁶ Oxfam – case report – The Charity Commission Dec 2017

Identifying & Reporting

2.78 The fallout from the media coverage of Haiti may have further damaged confidence levels in Oxfam GB beneficiaries. Low levels of reporting are not a new phenomenon and this has been a recognised feature in the aid sector for many years. The Review acknowledges some of the factors seen during the examination of case files, which exacerbate under reporting.

2.79 From the 245 cases examined by the Review only 14 related to the abuse of beneficiaries.²⁷ Oxfam GB needs to focus its efforts to rebuild trust and enhance levels of awareness. In order to do so it should maximise its existing capacity, particularly with those staff working in the Global Humanitarian Teams and staff involved in Safe Programming and Protection Programming activities.

2.80 It is fair to say that there is evidence that Oxfam GB's ability to identify exploitation and abuse is improving. This can be seen in the increased reporting since 2011, alongside the Review's specific testing of knowledge during surveys and the field visits undertaken to Tanzania and Rwanda. The use of an Independent Confidential Hotline recently introduced by Oxfam GB should also make it easier for staff and volunteers to report their concerns. Callers can remain anonymous and the system provides multi-lingual reporting.

Thresholds

2.81 The Global Safeguarding Team has not operated with the benefit of a defined set of criteria or 'thresholds' to help determine what cases they should be involved with and what cases need to be re-directed to other services (either internal or external). The impact of this is that the team deal with a range of different enquiries and have no consistent guidance to help them make decisions and provide a rationale for how their workload is prioritised. In the opinion of the Review this has contributed to the significant pressure that this team has experienced.

²⁷ This relates to the UK, TA and EA divisions only.

Investigation

2.82 Oxfam GB is neither the police nor a lead agency in the context of adult and child protection. So, whilst Oxfam GB has a dedicated resource that undertakes 'safeguarding investigations', it is important to understand that the basis for this practice is fundamentally aligned to its disciplinary procedure and its responsibilities as an employer. Investigations by statutory authorities will always take primacy and the activity by Oxfam GB should always be closely coordinated so as not to compromise these in any way.

2.83 This does not diminish the importance of Oxfam GB's role. Indeed, where burdens of proof are too high to result in criminal action, employer led investigations can often be the last line of defence in protecting people from those who pose a risk of harm to others.

2.84 Regardless of the status of any particular investigation, relevant staff need to have appropriate skillsets and training. In 25 EA and seven UK case files, interviews undertaken as part of the investigation process were noted as being led by the Global Safeguarding Team and conducted on the phone, via Skype or by e-mail. Whilst acknowledging the geographic challenges that might exist in reaching some people in EA countries, the use of such 'virtual interviewing', in the opinion of the Review, should be avoided, particularly when dealing with vulnerable witnesses or those suspected of wrong-doing. Oxfam GB is aware of and agrees this position.

2.85 From the case files it is difficult to assess how many interviews required an interpreter. In one case,²⁸ there was no indication of a translator being present when a victim (whose first language was not English) was interviewed concerning allegations of indecent assault and sexual misconduct.

2.86 Furthermore, during the Review's visits to Tanzania and Rwanda, despite the Global Safeguarding Team being held in high regard, there was a view expressed by some that matters could and should be dealt with more locally. The Review agrees.

²⁸ INE242

Alongside the practical challenges of investigations being led from another country, having investigators on the ground was felt to be a sensible way forward. Except for the most basic of enquiries or for meetings that do not involve vulnerable witnesses or SoCs, the Global Safeguarding Team's role should be to facilitate and provide specialist support and safeguarding advice to the investigative process as opposed to 'virtually' leading it.

Allegations against staff and volunteers in the UK

2.87 Referral and engagement with UK statutory agencies should form a key part of Oxfam GB's safeguarding response when concerns arise about a professional or volunteer working with children or young people.²⁹

2.88 This is particularly relevant for Oxfam GB's TA and UK operations. In such circumstances contact should always be made with a Local Authority's Designated Officer (ordinarily known as a LADO).

2.89 Within email trails in relevant files there is occasional reference to the possibility of a case being forwarded to the LADO. The Review's screening process of UK based cases assessed that 76 out of 129 met the criteria for a LADO referral. Only one of these can be confirmed as having been referred.

The Disciplinary Processes

2.90 Cases examined by the Review revealed a mixed approach to discipline, ranging from very prompt investigations and expeditious disciplinary action to less structured investigations that failed to hold potential wrongdoers to account. Whilst many of the case files provide little information on outcomes, the Review was able to establish that in 11 of the 245 historic files investigations were halted because the SoC had left their post, resigned or their contract had come to an end.

2.91 Many of the files lacked clarity and consistency in recording the outcome of disciplinary hearings or even a note that a recommendation for disciplinary action had

²⁹ In the case of Adults at Risk a referral should be made to the Local Authority Safeguarding Adults team.

been followed. New guidance has been incorporated into Oxfam GB policy to ensure this does not happen in future.

2.92 Moving forward Oxfam GB will face other challenges, not least of which will be the transition into 'One Oxfam'. In order to build on the progress it has made, the charity should retain jurisdiction over its employees and volunteers irrespective of where they are deployed.

Case Recording & Case Files

2.93 Historic practice in respect of case recording and the maintenance of coherent case files is an area of significant weakness. Oxfam GB has responded to this recognised deficit and is implementing a case tracking and management system. The Review has had sight of this system and is reassured that focus is being applied and action is being taken to improve the way in which Oxfam GB collects and stores relevant information.

Quality Assurance

2.94 In the context of Oxfam GB's current processes, the Review identified no firm evidence of any coherent monitoring of key performance indicators, case auditing activity or systematic safeguarding surveys. Whilst acknowledging Oxfam GB is developing its performance data in line with its 2018-21 strategy and that there are elements of auditing and reviews in place (i.e. via the MEAL process³⁰), a more sophisticated approach should be developed. This will help Oxfam GB gain sufficient line of sight on the quality of practice.

Engagement – Local Arrangements

2.95 In terms of practice, there is no evidence that Oxfam GB has consistently engaged with local arrangements that support multi-agency practice in respect of safeguarding adults and children. The adoption of the new safeguarding model will see specialist advice from agencies such as the police, Adult Services and Children's

³⁰ Monitoring, Evaluation, Accountability and Learning

Social Care embedded within the proposed Independent Safeguarding Committee.

Safer Recruitment

2.96 The Review focused on how Oxfam GB attract, select and verify new staff and volunteers in the context of its approach to safer recruitment.

2.97 With regards to attracting people to the charity, its commitment to safeguarding is evident within recent on-line job adverts. Where present, this ordinarily features as a clear policy statement. However, across a number of advertised roles, wording varied and in some, the commitment and responsibilities for safeguarding were not explicitly defined or appeared to be in draft.

2.98 With regards to selection, Oxfam GB's recruitment policy provides good guidance on the interviewing process. It includes a number of key questions and techniques to use when seeking to appoint someone who will work with children, young people and vulnerable adults. Whilst the Review did not observe any interviews, safe recruitment is likely to be strengthened if elements of this specific guidance are used in the interview process for all candidates.

2.99 For the verification stage of recruitment, the Review examined Oxfam GB's practice in respect of seeking references and vetting.

References

2.100 Oxfam GB's current policy and guidance sets out a range of minimum standards for the reference process that are considered by the Review to be broadly sufficient. However, the guidance for internal candidates states that only one reference is required from their current line manager. Safeguarding extends beyond the initial phase of someone joining an organisation and given the range of cases involving people in positions of trust abusing that position and managers failing to act, the referencing process should not be diluted from the process applied to new recruits.

Criminal Record Checks

2.101 The authorities providing criminal record checks for Oxfam GB in the UK are the Disclosure and Barring Service (DBS), covering England and Wales, Disclosure Scotland (DS) and Access NI (Northern Ireland). Outside the UK, whilst Oxfam GB advises that local checking services should be used, the charity should also prescribe use of the International Child Protection Certificate (ICPC).

2.102 In Oxfam GB's shops, enhanced checks are prescribed for shop managers, deputy shop managers and volunteers in supervisory roles. Until checks are completed, Oxfam GB expects supervision by an experienced staff member at all times when children and/or vulnerable adults are present. Evidence was seen by the Review where the absence of vetted staff resulted in children being prohibited from volunteering at such times.

2.103 The Review identified the significant challenge that Oxfam GB faces in terms of maximising its capability to safeguard people within the existing legal constraints on criminal record checks.

2.104 The Review fully supports calls to change the legislation in this area, as it believes this could be helpful to Oxfam GB for two reasons. Firstly, from 65 safeguarding incidents recorded in the Trading Arm, 80% (52) of the SoCs were volunteers. From a safeguarding perspective, the absence of checks meant that Oxfam GB appointed these individuals without being fully sighted on their history.

2.105 Secondly, the examination of case files revealed nine cases, involving volunteers identified in Oxfam GB's safeguarding records as Registered Sex Offenders (RSO). The status/suspected status of these individuals was not identified pre-employment and only became apparent during their tenure, with the exception of a volunteer for the festival team who was rejected prior to deployment.

2.106 For the vast majority of volunteering roles, Oxfam GB is unable to lawfully seek the type of criminal record check that would reveal such offences. This hinders its

ability to prevent such individuals working for the charity and by the nature of its work, to be in contact with vulnerable people. This is a matter for government.

Registered Sex Offenders volunteering in shops

2.107 In reference to the nine suspected RSOs,³¹ none were known to be involved in offending in any of Oxfam GB's premises. They were not subject to any form of DBS check. Furthermore, if they were sex offenders who were only subject to standard notification requirements³² they would not have had to declare their status when applying for the role.

2.108 When the status/suspected status was discovered, they generally had their offer to volunteer withdrawn. However, on occasions, shop managers/staff appeared to have known about the previous offending and had allowed the risk to continue.

2.109 Some of the practice involving these cases demonstrates a clear lack of understanding of safeguarding and it is reasonable to have expected Oxfam GB to have engaged with the police or other appropriate statutory agency.

2.110 The case files made available to the Review covered a period of seven years, although six of the cases refer to 2017 and one to 2016. In three cases, information about the individual of concern was shared with the police³³ or another appropriate agency. In the six cases where information had not been shared, five were found to be volunteering in Oxfam GB TA shops and one was a prospective volunteer in the Oxfam Festival Team.

2.111 In the experience of the Review, most organisations engaging a large unvetted workforce will encounter the same or similar problems in terms of people who are unsuitable to work with the vulnerable. The key issue is not that such people and the risks they represent exist, it is how the risk is identified and mitigated by appropriate recruitment, vetting and aftercare.

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³² <https://www.legislation.gov.uk/ukpga/2003/42/part/2/crossheading/notification-requirements>

³³ In one case the police contacted the Oxfam GB shop to inform them of their concern.

Supporting Community Service (Sentences) Volunteers in Oxfam GB Shops

2.112 Having a conviction should not automatically bar someone from working with Oxfam GB and credit should be given to the charity for the work they do supporting people with previous convictions on their rehabilitation and reintegration back into employment. Oxfam GB recognise the potential for risk and it has a policy that a risk assessment is carried out before a CSO is allowed to volunteer. This policy must be consistently applied.

Safeguarding Induction & Training

2.113 Induction is an essential part of 'on-boarding' for any new recruits to familiarise them with an organisation's policies and procedures. For Oxfam GB, delivering a consistent induction process that sets the right 'tone' is fundamental to creating the right culture in which safeguarding practice can thrive. Feedback from the Review's staff survey indicates that such consistency has yet to be achieved.

2.114 Moving forward Oxfam GB's intention is to develop a mandatory e-learning module for all staff. This is a positive and important step forward. However, bespoke induction at the most senior levels of the organisation is also of critical importance. The new approach to induction should be implemented at pace.

2.115 The delivery of safeguarding training across Oxfam GB has been inadequate to meet the needs of the organisation. High quality safeguarding training is essential for any organisation that works with vulnerable people and is the foundation of strong safeguarding practice. For Oxfam GB, a training offer that comprehensively covers the needs of both children and adults will help ensure its staff and volunteers are appropriately skilled, competent and confident in carrying out their safeguarding responsibilities. Course content needs to be flexible enough to maintain a clear focus on the local context in which Oxfam GB operates as this will ultimately help make everyone safer.

2.116 Whilst acknowledging that Oxfam GB has recently applied more focus to its

training offer (with the development of a draft ‘training plan’ dated June 2018), there has been no overarching strategy, no training needs analysis and no organisational safeguarding training priorities. When considering that Oxfam GB’s most important asset is a highly skilled and knowledgeable workforce, this is a significant gap.

2.117 Furthermore, whilst recognising the need for a tailored approach to the different divisions, there is an urgent need for Oxfam GB to consolidate and agree core training content that will be applicable across the entire organisation. Within Oxfam GB’s TA division, proposals have already been developed to construct a framework for training content that can be applied to different levels of staff and volunteers. This structure should be built upon three levels focused on the context of the role and needs of the workforce.

2.118 Oxfam GB has not provided safeguarding training as part of a defined programme. Training delivered by the Global Safeguarding Team has been ad-hoc. Oxfam GB has recognised this variability is unsustainable and is planning to introduce more robust requirements for staff. As an example of early progress in response to the Review’s interim suggestions, trustees and the leadership team have been receiving safeguarding training from the new Head of Global Safeguarding. Whilst a positive start, trustees and the leadership team should be required to attend the same appropriately accredited ‘day session’ safeguarding training that they are planning for all managers.

2.119 Oxfam GB also need to develop a much stronger approach to the evaluation of training going forward. This will be essential if they are to sustain improvement.

Conclusion

2.120 Throughout the Review’s engagement, it has been mindful of the need to avoid hindsight bias and in line with this approach, it has kept its focus on learning and improvement. The Review has not been undertaken to apportion blame, especially with regards to those well-intentioned individuals in the front-line, many of whom did the best they could, with the resources they had, in the circumstances they faced.

2.121 That said, as evidenced in the charity's case files, the Review is clear that Oxfam GB's safeguarding arrangements have historically been inadequate. While elements of good practice were seen in some case files, there has not been consistent delivery of basic standards and the management of some cases may have exposed people to an unnecessary risk of harm. There has been poor compliance with relevant guidance, including statutory guidance, and insufficient investment.

2.122 Moving forward, the Review has seen a real appetite to improve. There is emerging evidence of better practice, casework management, policy development, timely SIR submissions and investment in personnel. However, to ensure long term improvement Oxfam GB needs to sustain and deliver the systematic change that it has begun. The charity should continue to welcome the challenge that a new approach can bring, demonstrate a better grip at the top and drive forward identified areas of improvement. It can use this opportunity to move beyond rhetoric and paper action plans. Beneficiaries, volunteers, staff and donors all need to see and feel the difference.

2.123 There has been no evidence of an organisational attempt to cover up past failings.

Recommendations

R1: Standard Operating Procedures (SOPs) should be developed to ensure appropriate management and oversight of information relating to the tracking of safeguarding cases and the monitoring of actions. This should include required fields, formal review periods and approval requirements as well as minimum requirements for Terms of Reference within any safeguarding investigation.

R2: That Oxfam GB revisit each of the entries on the register for which no paperwork or file was made available to the Review. Where no clear outcome is recorded or where concerns are evident that cases have not been thoroughly dealt with, Oxfam GB should initiate contact with referrers and/or alleged victims to establish whether any ongoing risk exists or not.

R3: If further information comes to light that indicates one or more of the registered incidents (where no file was provided) meet appropriate Charity Commission SIR criteria, the case must be reported to the Charity Commission without delay.

R4: Oxfam GB should implement a defined process to strengthen its compliance with safeguarding SIR reporting to the Charity Commission. This process should provide;

- clarity about how and when cases should be escalated to senior managers in Oxfam GB for immediate decisions to be taken on SIR reporting.
- direction that Oxfam GB should undertake to report particularly serious or significant incidents immediately, with quarterly reporting for other cases.
- a defined frequency of reporting of SIR activity to Oxfam GB trustees (including an analysis of trends, themes and patterns) to strengthen their oversight on these highly significant cases.

R5: After assessment and appropriate consideration of the wishes of any victims, Oxfam GB must refer all remaining unreported cases to the appropriate police service and relevant UK statutory agencies and thereafter notify the Charity Commission of the outcome.

R6: In the context of EA countries, if there are credible concerns that reporting a case to local authorities might impact upon the safety of a victim, advice should be sought from the Head of Global Safeguarding, and a balanced, evidence-based judgement made and recorded. The procedural guidance and accompanying flow-chart highlighted in recommendations R56 and R57 should include guidance in this respect.

R7: After appropriate consideration of the wishes of any victims, and except in cases whereby reporting might jeopardise the safety of a victim, all previously unreported suspected crimes must be referred to the local police service and or other relevant agencies as appropriate. Once such reporting is complete Oxfam GB should notify the Charity Commission of the outcome.

R8: In respect of relevant unreported cases and future cases where the safety of the victim or other issues linked to potential Human Rights violations are considered to exist, a full risk assessment should be completed. As a minimum it should address the following:

- Synopsis of case. (including a timeline).
- Evidence base for concerns.
- Consultation feedback from appropriate police service representative or other appropriate agency (to include minutes of meetings).
- Relevant legal framework (and legal opinion where sought).
- Risk Assessment re the victim/s, potential future victims, beneficiaries, staff, volunteers and the organisation.
- Recommendations.
- Detailed approval. (Whilst the recommendation may be made by the Country Director, the final decision should be agreed and authorised by the Director of Safeguarding (or equivalent) and reported to the Chair of Safeguarding Committee.
- Such reports should be shared with the Charity Commission.

R9: Oxfam GB should engage with the appropriate Oxfam Affiliate or Partner to ascertain whether the known cases identified and shared with the Review, have been reported to the police or other relevant agencies within their territorial areas of responsibility.

R10: Oxfam GB should support its decision making by developing a template (checklist) and contemporaneous record of their decision-making process. At a minimum this should include:

- Synopsis of case (timeline).
- Evidence base for concerns.
- Consultation feedback from police service representative or other appropriate agency.
- Relevant legal framework (and legal opinion where sought).
- Risk Assessment re the victim/s, potential future victims, beneficiaries, staff, volunteers and the organisation.
- Recommendations.
- Detailed approval. Whilst the recommendation may be made by the Country Director, the final decision should be agreed and authorised by the Director of Safeguarding (or equivalent) and reported to the Chair of Safeguarding Committee.
- Such reports should be shared with the Charity Commission if requested.

R11: Oxfam GB should actively recruit both women and men to positions of power and influence within Oxfam GB where their past performance evidences a clear commitment and ability to promote the rights of women, children (given the Oxfam GB victim profile), and other minority groups.

R12: Consistent with the Minimum Operating Standards for PSEA reflected in the IASC guidance in 2013 and 2016, appraisal targets for senior staff and heads of security should be set to include performance measures on their ability to foster safe, respectful working environments where sexual discrimination and harassment are not tolerated.

R13 In order to achieve consistency in the formulation of ToR for safeguarding cases, Oxfam GB should include guidance and examples in the Consolidated Procedural Guidance document recommended in this review (see Recommendation 56 and 57).

The guidance should be included in the Safeguarding Training Strategy and should be delivered as part of the safeguarding training for DSL's, RDO's and relevant decision makers.

R14: For case INE015, Oxfam GB should establish what information/reference (if any) was shared with the two charities named in the reference request, clarify the basis for the SoC's resignation/termination and the reason for conflicting records. The outcome should be shared with the Head of Global Safeguarding and the Lead Trustee who should consider what further actions may be appropriate, including notifying the Charity Commission.

R15: In all cases, the wider safeguarding issues that could potentially arise in the context of an individual's future employment should be considered at the earliest possible stage and included for consideration in all investigation ToR.

R16: All partial and complete SoC identities relating to potential crimes that have been unreported in the UK and EA must be provided to the police in the area where the alleged crime was committed (considering relevant Human Rights issues as necessary). This should be done as part of compliance with Recommendations R5, R6, R7 and R8.

R17: That Trustees, the Oxfam GB leadership team and all senior managers (as appropriate) should, as a priority, where possible, receive accredited safeguarding training that ensures clarity on the following:

- Oxfam GB's responsibilities to children and vulnerable adults in the context of its operations in the UK.
- Oxfam GB's responsibilities in the context of its safeguarding functions to overseas beneficiaries. It is acknowledged that accredited training in this regard may be harder to access. The National Crime Agency (NCA) may be able to facilitate such. In the absence of accredited training for overseas responsibilities Oxfam GB should consider commissioning the development of such training based on its own training needs analysis.

R18: To ensure the sufficiency of distributed leadership in respect of safeguarding within Oxfam GB, there should be a continued investment in greater capacity and staff with the necessary experience, skills and abilities.

R19: Oxfam GB should agree to work in collaboration to develop the new proposed safeguarding operations model outlined in Appendix D.

R20: In order to strengthen its safeguarding capability, Oxfam GB should establish the following roles:

- A Director of Safeguarding role to oversee and maintain accountability for the delivery of effective safeguarding responses across all Oxfam GB divisions.
- Three Divisional Safeguarding Managers to oversee and maintain accountability for the delivery of effective safeguarding responses within their respective divisions.
- A Safeguarding Operations manager role to oversee and maintain accountability for the Global Safeguarding Team and its (revised) functions.

Create Designated Safeguarding Leads (DSLs). A DSL and Deputy DSL should be appointed in each Oxfam GB TA shop, other facility, project or programme, including those in EA countries. (DSLs should replace the role of existing Focal Points in each project across the 27 Oxfam GB EA countries).

R21: Oxfam GB should amend its policy to facilitate the appointment of independent investigators for cases involving individuals in positions of power, influence and authority (where their influence in Oxfam GB might compromise an objective and fair investigation).

R22: The TSG or new Safeguarding Committee (Appendix D) should bi-annually review the findings of safeguarding audits. The auditing process should have clear terms of reference and identify trends, themes and patterns relating to SoC and victim profiles, allegation types and investigation outcomes. Critically, all incomplete investigations should be considered and noted by the TSG or new Safeguarding Committee and presented to the Council as part of the annual safeguarding report.

R23: To support trustees to develop the skills, abilities and experience required to be effective in their role, Oxfam GB should:

- Explore shadowing opportunities with relevant in-sector and/or external bodies with inspection / peer review experience in safeguarding.
- Design and implement a safeguarding personal development portfolio for each trustee aimed at identifying areas relevant to their role in Oxfam GB.
- Introduce a routine briefing cycle on related safeguarding trends, themes and patterns in Oxfam GB. The suggested time frame is quarterly to the TSG / Safeguarding Committee and annually to the Council.

R24: The current trustees should engage with the Charity Commission to ensure that their understanding of Serious Incident Reporting (SIR) requirements are accurate and that Oxfam GB's systems are sufficient to meet those needs.

R25: In relation to future SIR notifications, the responsible trustee(s) should seek feedback from the Charity Commission and ask that it confirms all incidents forwarded have been received. The feedback should also prompt the Charity Commission to inform Oxfam GB if further information or clarification is required.

R26: The trustees should ensure that the information they receive is sufficiently detailed to enable them to:

- Make accurate decisions as to whether the incidents have been properly investigated
- Report to the Charity Commission and
- Discharge their other duties and responsibilities.

R27: Oxfam GB should align the action for reviewing the Safeguarding Risk Management approach with the proposals for a Learning & Improvement Framework so that there is one process to assist strategy development, quality assurance and improvement.

R28: That the 2018-21 safeguarding strategy should be amended to include the following:

- The development of a safeguarding training strategy.
- The development of consistent course content adapted to country context.
- The development of a comprehensive training programme.
- The development of an evaluation framework to determine impact.

R29: Building on the recently agreed Safeguarding Strategy 2018-21, Oxfam GB should produce one single safeguarding business plan to consolidate all areas of safeguarding work:

- The Plan should be SMART with all actions being Specific, Measurable, Achievable, Realistic and Timely.
- This plan will be monitored by the Trustee Safeguarding Group (TSG)/Safeguarding Committee. Progress will be reported to the Council bi-annually.

R30: In respect of the 2017 Action Plan, the wording of desired outcome 1 should change to the following:

Oxfam's values, code of conduct and expected behaviours have been embedded within our senior programme leadership.

R31: Oxfam GB should review and revise the operational parameters for the Global Safeguarding Team to ensure its functions are focused, manageable and include the following:

- Leadership of Oxfam GB's engagement with relevant safeguarding structures locally, nationally and/or internationally as required.
- Acting as a single point of contact to provide specialist advice on specific safeguarding issues and direct investigation support to Regional Designated Officers (RDOs), for whom the manager of the Global Safeguarding Team will be responsible.
- Acting as the conduit through which referrals to statutory bodies are made in a timely way.
- Providing and delivering safeguarding training.
- Raising awareness through regular communications.
- Quality assuring the effectiveness of Oxfam GB's safeguarding response through a defined learning and improvement framework that includes: performance information, auditing, reviews, staff and public engagement.
- Reporting on progress to internal and external bodies as relevant.
- Taking responsibility for identifying escalating relevant risks to the leadership team / governing bodies.

R32: That Oxfam GB should ensure a blended skill-set is maintained within the Global Safeguarding Team and that this includes staff with enhanced safeguarding training and experience. This is important to ensure the team maintains flexibility to provide advice and guidance (and or deploy on complex investigations).

R33: That Oxfam GB should identify relevant support to reduce the requirement on the Global Safeguarding Team to lead on investigations. This should include implementing Oxfam GB's stated intent of building capacity across the globe (through the training of an additional 119 investigators) and reviewing the support available from within HR.

R34: Oxfam GB should:

- Consider renaming Safeguarding Focal Points (SFP) as Designated Safeguarding Leads (DSL).
- Review and amend the DSL (SFP) job description – removing the prescription of a percentage of time being allocated to safeguarding and setting out the expected deliverables in respect of training, casework, advice and guidance.
- Appoint Deputy DSLs that can provide appropriate expertise and cover in the absence of the DSL.
- Ensure all DSL's receive mandatory safeguarding training (Level 3) to enable them to effectively discharge their duties.

R35: The Review recommends that Oxfam GB should rapidly engage other cross-agency forums to explore opportunities to develop the role of the RDO on a cross-NGO basis. Developing in-country capacity across a range of NGOs is likely to increase the capacity, stability and sustainability of this role, alongside providing opportunities for NGOs to access peer support and 'off-line' investigations by qualified individuals with no employment relationship.

R36: Oxfam GB should update its policies as set out in these recommendations and the main body of the report. The Charity will need to develop a clear plan to ensure their development and implementation.

R37: Oxfam GB should revise its Safeguarding Children Policy as follows:

For all staff:

- The narrative in respect of what staff or volunteers should do if they are worried about a child or concerned about a professional or volunteer working with children should be strengthened, with these sections being brought closer to the start of the document.
- Ensure clear contact details are included, through which further advice can be sought.

Additional changes for staff based in the UK:

- More explicit reference should be made to the CEO and Chair of Trustees retaining the overarching accountability for child safeguarding in Oxfam GB.
- Strengthen relevant reference to legislation and statutory guidance.

R38: Oxfam GB should strengthen its Safeguarding Adults policy to realise their aim to achieve a globally applicable policy, which is relevant to the confederation.

For all staff:

- Definitions should be strengthened with references to extremism, modern day slavery and abuse as a result of faith, belief and harmful practices.
- Guidance on how to raise a complaint or concern should be strengthened in terms of more detail to guide staff and volunteers about what they should do if they are worried about either abuse or a professional or volunteer working with a vulnerable adult.
- In the section relating to adults at risk as volunteers, further detail should be set out explaining the context of such volunteering e.g., where this might take place and in what context, would be helpful.

Additional changes for staff based in the UK:

- More explicit reference should be made to the CEO and Chair of Trustees retaining the overarching accountability for adult safeguarding in Oxfam GB.
- Ensure appropriate links to the Local Government Association and the Association of Directors of Adults Services guidance on dealing with adult safeguarding and domestic abuse.
- Highlighting the legislation and guidance relevant to the safeguarding of vulnerable adults using information readily available via Oxfordshire's Safeguarding Adults Board website.

R39: That Oxfam GB’s Code of Conduct be revised as follows:

- The code should state that the listed examples of behaviour are not exhaustive but aim to help employees understand the ground-rules that they are expected to observed.
- The code should include an explicit reference about the behavior expected of employees in identifying and reporting any safeguarding concerns in line with the relevant Oxfam GB policy and procedure.
- The code should be strengthened to describe where employees can access advice if at any time they are unsure about the ‘right thing to do’. This should include the following as a minimum;
 - refer to the Code of Conduct itself and/or any policies, procedures, guidance or local rules and requirements that apply to their job,
 - discuss the situation with their manager,
 - contact Human Resources, Audit & Anti-Fraud or Legal Services for assistance.
- In the section listing those policies that support the code’s standards, the Adult Safeguarding Policy should also be included.

R40: Whilst recognising that the various legal jurisdictions in which Oxfam GB operates might limit their ability to intervene effectively, the Code of Conduct should be rewritten to ensure that local customs and cultural practices that present safeguarding risks to both children and adults (e.g. FGM) are not perceived to be endorsed or tolerated by Oxfam GB.

R41: Oxfam GB should revise the definition on bullying to include more detail in respect of cyberbullying.

R42: Oxfam GB should strengthen the Anti-Bullying and Harassment Policy to include reference to the potential criminal and civil consequences of harassment. The procedure set out within this policy should be amended to include specific consideration as to the engagement of relevant authorities where a criminal offence may have been committed.

R43: Oxfam GB should revise its recruitment policy to include more explicit reference to its function in respect of safeguarding children, vulnerable adults and beneficiaries. This should emphasise safer recruitment in the policy statement and principles sections of the document.

R44: Oxfam GB should develop and insert within its recruitment and selection policy a set of minimum standards applicable to safer recruitment. As a minimum, these should include:

- A generic statement within every job description involving contact or work with children, vulnerable adults or beneficiaries outlining the organisational expectation of the post-holder regarding safeguarding. For example:

“All staff have a responsibility to safeguard and promote the welfare of children, vulnerable adults and beneficiaries with whom Oxfam GB engages. The post holder will undertake the appropriate level of training and is responsible for ensuring that they understand and work within the safeguarding policies of the organisation”

- A definition within each job description of the nature of supervision a post-holder will receive.
- The requirement for a new DBS check at enhanced level for every new member of staff who works directly with, or has regular contact with, children or vulnerable adults in the UK (consistent with DBS guidance and / or relevant law).
- The requirement for local checks for every new member of staff who works directly with, or has regular contact with beneficiaries (both children and adults) in overseas operations.
- 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.
- The requirement to take up a minimum of 2 references, one of which should be from the most recent employer.
- A requirement to ensure that every employer/manager involved in the interviewing process receives and can evidence that they have received appropriate training that addresses safer recruitment and refreshes this whenever the law in this context changes.

R45: The procedure for handling safeguarding concerns should, wherever possible be amended to align with the expectations set out in statutory and non-statutory guidance in the UK, adopting a 'best practice' approach regardless of the country of operation.

R46: Oxfam GB's interpretation of the requirements for reporting safeguarding cases to statutory authorities as set out in its PSEA Policy, currently includes the following definition of those circumstances where such reporting should take place:

'If someone's life is in danger or the matter relates in any way to a child or adult at risk.'

This should be broadened to include circumstances that *'indicate a potential risk of harm to an individual or others in the future'*.

R47: That Oxfam GB should build further on the work of its Protection Advisors in enhancing the awareness of beneficiaries in the context of their understanding of safeguarding and their rights to protection from abuse and exploitation. This work should be led by the Global Safeguarding Team, with support from the proposed 'Designated Safeguarding Leads' (Safeguarding Focal Points), Regional Designated Officers and Protection Teams where they are in operation.

R48: Given staff turnover, Oxfam GB should develop appropriate succession planning measures for new Designated Safeguarding Leads (Safeguarding Focal Points).

R49: Procedures should prescribe that in safeguarding cases, investigators and decision makers should seek early advice from the Global Safeguarding Team.

R50: In all cases where a SoC or witness is being interviewed in a language other than their native tongue or a language in which they are judged to be fluent, procedures should prescribe the use of an interpreter. Such interpreters should be independent from the investigation, save in those cases where the SoC or witness is fluent in the language of the investigator.

In some cases (for example in remote locations) where the only resource for interpretation is the Safeguarding Focal Point (DSL), their use should be risk assessed before any interview takes place. The rationale for their use by the person who authorises the interview, as well as the risk assessment should be recorded.

R51: The preferred method of conducting interviews, particularly with SoCs or vulnerable witnesses should be face-to-face. If this is not possible, the decision to use phone or Skype should be recorded in the case file. (See R53 re practicality).

R52: Operational protocols should be adapted to include a specific prompt and question regarding the use of interpreters for victims, witnesses and SoCs.

For interviewees whose first language is different to that of the interviewer, interpreters should always be made available, save in those cases where the interviewee is fluent in the language of the investigator.

Exceptions can include when information is being urgently sought to help safeguard someone or prevent a crime, or if the investigator has established an adequate level of fluency by the interviewee. All exceptions should be authorised by the Head of Global Safeguarding, Head of HR or equivalent.

R53: Relevant operational protocols should be adapted to include authorisation for interviews intended to be carried out by any means other than face to face.

Protocols should not inhibit such an approach, but require evidence of the rationale for the decision and authority to proceed. As a minimum, the following should be included:

- The nature of the interview / inquiry.
- The status of the interviewee. Victim / Witness / SoC.
- An assessment of whether the virtual engagement will achieve best evidence.
- Authorisation from the Head of Global Safeguarding or if a misconduct case, the relevant HR line manager.
- SoCs should not be interviewed via email, skype or phone unless explicit permission has been obtained from the Head of Global Safeguarding, HR or equivalent.

R54: Immediate training should be provided to key personnel in both the Global Safeguarding Team and Trading Arm (Business Partners and Shop Managers) on the process relating to LADO and the management of allegations against staff and volunteers.

R55: In all safeguarding cases, procedures should prescribe explicit justification and sign off as to why a case is not considered suitable for referral to the police or appropriate relevant agencies.

R56: A consolidated procedure document should be produced to assist all staff, across all divisions to understand the step-by-step approach to dealing with safeguarding allegations, similar to those contained in the Safeguarding Children Procedures – Trading (July 2016).

R57: The consolidated procedures document referred to in recommendation 56, to provide guidance to all staff in case recording/investigation of safeguarding allegations, should include a defined flowchart as developed in the Safeguarding Children Procedures - Trading (2016) (amended as per relevant recommendations within this report).

R58: Procedures in respect of safeguarding investigations should prescribe that in cases where there is a police investigation, irrespective of the outcome, the Head of Global Safeguarding should review the case and determine if there are any residual safeguarding issues that need to be addressed (either by way of disciplinary action or through engagement with other agencies and information sharing).

R59: The issue of jurisdiction and who is responsible for the conduct of investigations is something that Oxfam GB should clarify as they move towards their aim of 'One Oxfam'.

R60: In order to ensure consistency of approach to disciplinary decision making, all disciplinary files dealing with safeguarding cases should be reviewed on completion/disposal by the Head of Global Safeguarding.

In addition, Oxfam GB may wish to consider sharing outcomes, trends and patterns in respect of safeguarding cases with relevant decision makers, senior management and Trustees. This could include an anonymous synopsis of all cases and their outcomes.

R61: Oxfam GB should develop a case file structure within the new system to improve the handling and storing of safeguarding recording, alongside developing key templates on which Oxfam GB staff and managers can record their activity / decisions in a coherent manner.

R62: Key Oxfam GB safeguarding personnel should receive bespoke training on case recording in the context of safeguarding concerns.

R63: Effectiveness Reviews should be developed to include safeguarding, either as a stand-alone discipline or as a defined element requiring consideration within each of the defined themes.

R64: Oxfam GB should develop a Learning & Improvement Framework that includes mechanisms for safeguarding self-assessment, case auditing, performance data monitoring, stakeholder feedback and external learning.

R65: As they move forward, part of Oxfam GBs safeguarding strategy / action plan should ensure there is a dedicated focus on developing links with key safeguarding structures in the UK to support Oxfam GB staff and volunteers.

R66: As part of their recruitment process, an agreed statement should be used in all advertising to ensure absolute clarity to all prospective candidates about the importance of safeguarding and their responsibilities in this regard if appointed.

R67: In order to reinforce the priority that Oxfam GB places on safeguarding, as part of their recruitment process they should introduce a mandatory safeguarding question for all roles as part of Oxfam GB's interview stage and define this within relevant policy / guidance issued by the Recruitment Team.

R68: Oxfam GB should consider applying the requirement for job applicants to supply two references to internal candidates, as they do for other candidates.

R69: Oxfam GB should include the regular use of the International Child Protection Certificate (ICPC) as part of its recruitment process overseas.

R70: Oxfam GB should ensure that they have a non-negotiable rule in all shops that no-one under 18 can work in the shop unless there is a DBS vetted adult supervisor on duty. If for any reason this is not possible the child must be sent home even if it means a shop has to be closed.

R71: Oxfam GB should strengthen their policy regarding suspected Registered Sex Offenders (RSO) volunteering in stores which facilitate work experience for children and vulnerable adults.

Such policy should include advice and information about appropriate pathways for reporting.

This should not prohibit them, if they so wish from supporting other employment and rehabilitation opportunities in other areas of their business.

Training for TA managers and lead volunteers should be considered to reinforce the application of this policy.

R72: Volunteers in the Trading Arm should undergo DBS/PVG checking to the highest level that is lawful, according to their role within the Trading Arm and that Oxfam GB is entitled to seek. For those in qualifying roles a standard or enhanced DBS check must be sought.

R73: Oxfam GB should ensure the consistent application of its policy to risk assess volunteers who are engaged via Community Service Orders.

R74: Oxfam GB should ensure that safeguarding induction materials within its proposed e-learning package are standardised across all its divisions (allowing for variation in certain content depending on the context of operations).

To provide reassurance that the safeguarding components of induction have been fully understood, Oxfam GB should build in tests as part of the e-learning induction and prescribe a mandatory pass rate.

R75: Oxfam GB should develop a Training Strategy that delivers consistency in respect of the identification of safeguarding training priorities, training content, methods of delivery and the monitoring and evaluation of quality and impact.

R76: That Oxfam GB should develop a single course structure that will be applicable for use across all of Oxfam GB divisions, both in the UK and in EA countries. Core content will provide consistency in message but should also remain flexible enough to deal with the local safeguarding context.

R77: Oxfam GB should develop a defined programme of safeguarding training that is scheduled for each year. This will support those professionals involved in the delivery of training and ensure that training is planned for in a systematic way that maximises attendance. This programme should be published in advance on an annual basis with other learning opportunities included as they arise.

Trustees and the leadership team should attend the accredited day session safeguarding training mandated for other managers within Oxfam GB.

R78: In order to maintain clear oversight on training delivery across its international and UK workforce, Oxfam GB's learning management system should be developed to provide specific prompts for refresher training.

R79: In order to maintain a robust overview of safeguarding training, Oxfam GB should develop and implement a training evaluation framework that captures information and involves analysis in the following related areas:

- Detailed quantitative data on training sessions delivered and number of attendees.
- The relevance, currency and accuracy of course content.
- The quality of training delivery.
- The impact of training on safeguarding practice and outcomes for vulnerable people.

To oversee and coordinate safeguarding training delivery, Oxfam GB should consider creating a dedicated resource to manage this activity.

8. APPENDICES

Appendix A - Terms of Reference

Oxfam GB Independent Safeguarding Review: Terms of Reference

Background

1. Oxfam GB (registered charity number 202918) is concerned to ensure that its current safeguarding practices are sufficient and comply with best practice and that it has appropriately responded to safeguarding incidents/allegations which have taken place since 2010. Where there have been failings, it is committed to identifying these, taking full responsibility and commensurate remedial action.
2. To these ends, Oxfam GB has decided to commission a detailed safeguarding review which is independent and provides full disclosure and accountability to the Charity Commission of England and Wales (“the Commission”), its regulator, who will supervise the progress, process and content of the review, in accordance with terms and principles set out below.
3. The Commission has opened a statutory inquiry into Oxfam GB, in particular its approach to safeguarding following media coverage of a safeguarding case in 2010 and cases involving senior members of staff, including its handling at the time and subsequently of allegations in Haiti in 2011. As part of Oxfam GB’s response to this inquiry the Trustees have commissioned an independent external review with the agreement of, and to provide assurance to, the Commission. The review terms have been approved by the Commission. The Commission will be undertaking careful scrutiny of Phase 1 of the review on a regular basis as one strand within its statutory inquiry work. Further, the Commission will have absolute discretion to decide whether to undertake such scrutiny in relation to Phases 2 and/or 3 within the framework of a statutory inquiry, or under an alternative form of regulatory engagement.
4. The purpose of the Independent Review is as described in paragraph 1 above and also to ensure that Oxfam GB is in a meaningful position to assist the Commission in its statutory inquiry with an assurance of independence. Oxfam GB is also committed to maintaining its accountability to the public.
5. Any amendment to the terms of reference must be approved in writing by the Commission.

6. Review the sufficiency of Oxfam GB's current safeguarding arrangements (including leadership and culture) in meeting the charity's obligations both domestically and internationally to its beneficiaries, staff and other charity workers, with specific regard to:
 - (a) the charity's safeguarding strategy (including the sufficiency of the charity's prevention, deterrence, training and awareness measures);
 - (b) governance;
 - (c) HR policies and practice;
 - (d) organisation, management, resources;
 - (e) systems and processes; and
 - (f) the sufficiency of, and progress to date in implementing, the 2017 Action Plan (**Appendix A**) and current safeguarding improvement plans.

7. Review the management of a sample of historic safeguarding incidents, complaints, allegations, reports or cases ("Safeguarding Cases") for the period 2011 to present - excluding the known cases arising in relation to Haiti in 2011 and the Philippines in 2013³⁴ - to:
 - (a) Assess the integrity and sufficiency of the Oxfam GB's internal investigation and disciplinary processes;
 - (b) Assess the adequacy of Oxfam GB's provision of information in respect of Safeguarding Cases to other aid agencies, both on a proactive and reactive (such as when asked for a reference) basis.
 - (c) The sample shall be decided by the Independent Reviewer on a risk assessment basis, having undertaken the review of all cases etc referred to in para 8 below, save that the assessment at paragraph 7.2 above in respect of the reactive provision of information shall be undertaken in respect of every Safeguarding Case where an inquiry or request for information has been received by Oxfam GB in respect of the relevant member of Oxfam GB staff (eg by way of request for reference)ie, and shall be subject to the approval of the Commission).

8. Review all safeguarding incidents, allegations, complaints, reports or cases for the period 2011 to present – excluding the known Haiti 2011 and Philippines 2013 cases – providing assurance that:

³⁴ The "known cases" are (i) the Haiti cases subject to the Oxfam GB Investigation Report of approx. August 2011 which Oxfam GB published in March 2018 and (ii) the alleged Philippines incident reported in the Evening Standard on 15 February 2018.

- (a) all relevant matters which meet the Commission's SIR criteria applicable at the time have been reported as SIRs to the Commission;
 - (b) matters involving conduct which may give rise to a criminal offence either domestically or internationally, have been reported to law enforcement or other respective agencies; and
 - (c) the circumstances of the notifiable incident have been fully disclosed to the Commission and
 - i. where required by law and subject to the consent of the victim where reasonably required, to other UK statutory agencies; and
 - ii. in other countries, where the victim agrees and there are no reasonable human rights concerns, to the relevant statutory agencies.
 - (d) the charity has adequately and accurately disclosed information about these matters to statutory funders in the UK, to the level requested or required by them, and has also provided extensive information to other principal donors.
9. Each of the areas set out at paragraphs 6 to 8 above will be benchmarked against the applicable law, good practice and Oxfam GB's obligations as a charity at the relevant time.
10. Make recommendations where appropriate or necessary to the trustees and the Commission on relevant matters including but not limited to:
- a) any remedial actions required to address issues with the handling or reporting of past safeguarding incidents, allegations, reports or cases; and
 - b) future safeguarding arrangements for the charity, to include an action/improvement plan with a recommended timeline for priority actions.

Definitions

- *Safeguarding*: for the purposes of this Independent Review “safeguarding” has the meaning set out in the Commission’s Strategy for dealing with safeguarding issues in charities (December 2017), that is, the taking of reasonable steps to ensure that beneficiaries and other persons who have contact with Oxfam GB do not, as a result, come to harm. This definition of “safeguarding” for the purposes of this Independent Review is wider than that used in the context of statutory guidance and domestic legislation, which applies to children and young people under 18 years of age and vulnerable adults (aged 18 and over). If deemed relevant and appropriate, the Independent Review will identify safeguarding incidents which concern children and/or vulnerable adults and those which do not. “Safeguarding” includes, but is not limited to, responsibilities within PSEA, prevention of, and responding to, misconduct by Oxfam GB’s staff and Safe Programming. The historic internal use by Oxfam GB of the term “safeguarding” is not determinative of whether an incident or issue falls within the scope of “safeguarding’ for the purposes of this Independent Review.
- *Protection from Sexual Exploitation and Abuse (PSEA)*: the prevention of sexual exploitation and abuse (as defined in the UN Secretary General’s Bulletin ST/SGB/2003/13), including sexual exploitation and abuse by Oxfam GB staff of beneficiaries or other persons who come into contact and with Oxfam GB, as well as sexual abuse and exploitation towards Oxfam GB staff.
- *Misconduct*: unacceptable or improper behaviour which is likely to cause harm to a reasonable person’s physical or mental well-being.
- *Safe Programming*: All Oxfam humanitarian programmes aim to be Safe Programmes that take proactive measures to, amongst other things, avoid causing inadvertent harm.
- *Staff*: Includes employees, contractors and volunteers.

Appendix B – Review Process and Principles

Methodology and Approach

11. Subject to approval by the Commission, the Independent Review will be undertaken by Jim Gamble of Ineqe Group as an external safeguarding consultant and independent reviewer (the **Independent Reviewer**), with support from a team, appointed by him.
12. The Independent Review will be overseen by an independent Queen’s Counsel (the **Chair**), who will have overall oversight of the review and will work closely with the Independent Reviewer to ensure that the Independent Review is sufficiently robust and independent. The appointment of the Chair will be subject to the approval of the Commission.
13. The Independent Review team will develop a clear and detailed methodology for the Independent Review, based on the outline in **Appendix B**, to the satisfaction of the Chair. Oxfam GB and the Commission will be consulted on the proposed methodology, and the Commission will have final approval. The Independent Reviewer will invite feedback from the Commission, Chair and/or Oxfam GB on the proposed content of the Phase 1 review report and any interim report requested under paragraph 25 and will give consideration to such feedback but, for the avoidance of doubt, final editorial control on the content shall be a matter solely for the Independent Reviewer.
14. Oxfam GB will make available the necessary resources for the Independent Review. The Independent Reviewer will have full and timely access to all the information that they need, unless there is a legal impediment (e.g. where the transfer would not be in accordance with the Data Protection Act / GDPR). Oxfam GB will where appropriate facilitate the Independent Reviewer and/or his team speaking to any relevant employees or trustees (current or former) upon his request.
15. The Independent Reviewer will promptly inform the Commission of any and all information identified as part of the Independent Review that is or may be relevant to the Statutory Inquiry insofar as it concerns the known cases in Haiti 2011 and the Philippines 2013.
16. The Commission will promptly inform the Independent Reviewer of any and all information identified as part of the Statutory Inquiry that is or may be relevant to the Independent Review.
17. Where the Independent Reviewer or Commission receives information in relation to a safeguarding allegation that has not previously been reported, whether at line-manager or headquarters level, then the substance of that allegation will be dealt with in accordance with Oxfam GB’s existing policy and procedures in respect of such allegations, but the Independent Reviewer will inform the Commission of the facts of such allegation. As part of

the Independent Review the Independent Reviewer will consider the reasons why the allegation was not previously reported, and in particular consider whether there were, and/or are, any inhibitions on reporting as a result of the culture, practice or policies of Oxfam GB with a view to making recommendations as to how as such inhibitions could be removed for the future.

Accountability

18. The Chair will provide confidential interim updates on progress, at least every month, to Caroline Thomson (Oxfam Chair of Trustees) and the Trustee Safeguarding Group (a sub-committee of the Board of Trustees) and the Commission simultaneously and will give all parties the opportunity to respond to such updates and will as appropriate discuss with the Independent Reviewer how any responses should be appropriately taken into account, but this will be subject always to the Independent Reviewer's final editorial control on the content of the final Phase 1 review report (and any interim report).
19. The Chair will ensure that the final Phase 1 review report has been produced in compliance with the principles of natural justice and fairness; in particular any individual who may be subject to significant criticism in the report should be given an opportunity in advance to comment on the report's conclusions.
20. The Chair will ensure that the findings of fact and expressions of opinion in the final Phase 1 review report are justified on the available evidence, are reached taking all relevant matters into account and disregarding all irrelevant matters, are reasonable and are adequately reasoned.
21. The Independent Reviewer and / or Chair will liaise with the Commission on a regular basis as to the process being followed and progress being made and are under no obligation to disclose to Oxfam GB any discussions between her/him and the Commission. The frequency and form of the liaison will be determined by the Commission in consultation with the Chair and Independent Reviewer.
22. In the event that the review process identifies information which, in the view of the Independent Reviewer and/or Chair, should be reported to the Commission, law enforcement, other regulatory agencies, or UK statutory funders that information will be promptly reported by the Independent Reviewer and/or Chair to Oxfam GB. Oxfam GB will immediately refer it on to the relevant organisation(s) and report to the Independent Reviewer and Chair regarding the action which has been taken. Nonetheless, the Independent Reviewer expressly reserves to himself the right if he so decides to report directly to the appropriate authorities any matters relating to any alleged serious crime. If the Chair disagrees with any decision taken by Oxfam GB as a consequence of the matter that has been reported, he or

she shall refer that further matter to the Commission no later than 5 working days after becoming aware that the decision has been taken.

23. The Independent Review team and all relevant Oxfam GB staff will work cooperatively with the Oxfam International Commission and will agree how to avoid unnecessary duplication, while ensuring professional standards are adhered to by the review.
24. The review process will be undertaken in three phases, as stated below. The Independent Reviewer will complete Phase 1 by 15 June 2018 and Phase 2 by the end of September 2018, unless this timetable is revised by agreement with the Commission.
- Phase 1: key output: a review report sufficiently robust to restore public confidence, donor commitment and staff morale. The report will contain findings and conclusions of the Independent Review team in respect of items 1,2, and 4 of the terms of reference listed above and provide the recommendations in the areas outlined in paragraph 10 of the terms of reference listed above. This report would provide the platform for Oxfam GB to build an improved safeguarding system. If requested by the Commission the Independent Reviewer will provide an interim report prior to the conclusion of Phase 1.
 - Phase 2: key output: delivery of a new safeguarding framework. This would involve a collective safer by design approach that minimised opportunity for criminal, abusive, corrupt and inappropriate conduct. The new framework would mirror contemporary best practice found in other safeguarding environments, including but not limited to; the management of complaints against professionals; enhanced disclosure; aftercare and credible investigative strategies. The necessary policy development, training and support would be developed in line with this approach. This phase would run alongside phase one and aspects of it (if successful) would be included as evidence of improvement in the Phase 1 Report. Other parts of this work would continue after Phase 1 and up to the completion of Phase 3.
 - Phase Three: key output a post Review Evaluation.
25. During the course of the review, the Commission reserves the right to require additional explanation, information or assurance to be provided on any matter relevant to the review. Failure to provide a timely response to the Commission which satisfactorily addresses the matter in question, may lead to the Commission giving consideration as to whether the review can continue to be progressed or whether regulatory action may be required.

Reporting and Disclosure

26. The draft Phase 1 review report will be submitted at the same time to Oxfam GB and the Commission. Both will have an opportunity to comment, sharing these with each other. The Commission may require the Independent Reviewer and Chair to review and where necessary amend the report if it considers that the report does not adequately address significant matters relevant to the review. The Independent Reviewer and Chair (consistent with her role at paragraphs 19 and 20 above) will have absolute independence and final say on any findings and the content of the final report. For the avoidance of doubt (and as stated in paragraph 18 above), the Independent Reviewer will have final editorial control over the content of the final Phase 1 review report but shall ensure that the report acknowledges that the independent review has been overseen by the Chair. The Commission may publish a separate report at the conclusion of the inquiry as part of its own regulatory functions which may or may not address or comment on matters in the final report produced by the independent review.
27. Once finalised, the Phase 1 review report of the Independent Review will be submitted at the same time to the Commission and Oxfam GB.
28. All communications, drafts and reports relevant to this process will remain confidential unless disclosure is required by law. However, the Commission can use the whole or any part of the Phase 1 review report as part of its formal findings in relation to the statutory inquiry and Oxfam GB may apply to the Commission for consent to publish the whole or any part of the review report or any interim report

Appointment and Tenure

29. The appointment of the Chair and Independent Reviewer is subject to the approval of the Commission.
30. The Independent Reviewer will remain in post until the work under the Terms of Reference has been completed, and the Chair will remain in post until the delivery of the final Phase 1 review report (unless the Commission determines that the Chair should continue in post for Phase 2 and/or 3), in each case subject to:
 - (a) resignation of either the Independent Reviewer or the Chair;
 - (b) early termination of the appointment by Oxfam GB, in consultation with the Commission, on account of ill health or other reason for failure to or inability to complete the work.

Appendix C – About the Review Team

INDEPENDENT REVIEWER



JIM GAMBLE QPM
INDEPENDENT REVIEWER

Jim is the CEO of the Ineqe Group of Specialist Safeguarding Companies and Independent Chair of several London based Safeguarding Children's Boards. He is widely recognised as a global authority on safeguarding children and was the founding chair of the Virtual Global Taskforce; a former national policing lead for child protection and the architect and CEO of the UK Child Exploitation and Online Protection (CEOP) Centre.

REVIEW TEAM



RORY MCCALLUM
SENIOR PROFESSIONAL ADVISOR

Rory is a qualified social worker with over 25 years experience. He co-designed the first Multi-Agency Safeguarding Hub (MASH) and is the Senior Professional Advisor to the City & Hackney Safeguarding Board, the first LSCB in the UK to be awarded an 'Outstanding' grade by Ofsted in 2016. He has recently authored a number of contemporary learning reviews.

HANNAH PAUL
DIRECTOR OF OPERATIONS

Through working with children in the UK and abroad, Hannah has developed a strong practical insight regarding the context of the risks they face. This is accompanied by the academic studies and research associated with her LLM from Queens University Belfast and M.Phil from Trinity College Dublin.



BILL WOODSIDE
CHIEF OPERATING OFFICER

Bill is currently a director at Ineqe Group. He is a former Senior Police Officer with extensive global experience conducting thematic inspections. He holds an Honours Degree in Law and a Masters in Criminal Justice Management and is a Fellow of the Chartered Management Institute.



NOEL MULLAN QPM

SENIOR INVESTIGATOR

Noel is a former senior detective. Previously the PSNI lead on Human Trafficking, he worked with multi agency partners to support the victims of this exploitation and to increase the overall prevention, detection and awareness. He was awarded the Queens Police Medal for his contribution to policing.



RESEARCH TEAM



BIANCA VISSER

HEAD OF RESEARCH

Bianca is the Lead Researcher at Ineqe Group. She holds two degrees in psychology and a Masters in Applied Psychology with advanced research methods. Her thesis compared collective vs. Western parenting styles and attachment. Her academic achievements are enhanced through her work with children at risk.

LAURA MILNER

RESEARCH ANALYST

Laura is currently completing her PhD in Sociology. Her research areas centre on the construction of childhood, the construction of gender and sexuality and how this impacts girls and young women as well as the impact of the digital age on the expression of gender and sexuality.



HANNAH BLAKLEY

RESEARCH ANALYST

Hannah holds a degree in Sociology with Criminology, together with a Masters of Research degree from Queens University. Her research topics included approaches to social research, sources and construction of quantitative data, quantitative data analysis, sources and construction of qualitative data, qualitative data analysis and advanced qualitative research methods.

QUALITY ASSURANCE AND ETHICS PANEL



MAURINE LEWIN

HEAD OF LEGAL

Maurine is the former Head of Legal at CEOP and has 24 years of experience across Magistrates court services specialising in Child Protection, Family Law, Policing procedure, Senior management and government.



ADE ADETOSOYE OBE

CHAIR OF QUALITY ASSURANCE & ETHICS

Ade is the Chief Executive and Executive Director of Education, Care & Health, Bromley Council and helped the City and Hackney Safeguarding Board to achieve Ofsted's first 'Outstanding' rating.



SOPHIE HUMPHREYS

OBE

QUALITY ASSURANCE NGO SOCIAL CARE

Sophie is the Founder and Chair of Pause; a charity working for women with complex needs. She is a member of the Ministerial Female Offenders Advisory Board, Children's Commissioner's Advisory Board and is a non exec board member of CAF/CASS.



TREVOR PEARCE CBE

QUALITY ASSURANCE TRANS-NATIONAL LAW ENFORCEMENT

Trevor is the former Director General of both the National Crime Squad and the Serious Organised Crime Agency and was appointed a Board member of UK Anti-Doping in 2016.

Appendix D – A New Safeguarding Model

1. Oxfam GB is a large charitable organisation that delivers a diverse range of services across a geographic footprint that is both broad and complex. From its UK based operations to the twenty seven countries in which the charity is Executing Affiliate, Oxfam GB has significant experience of effecting positive change. This is no more apparent than through its work with some of the most vulnerable communities on our planet - communities where families, women and children who have been displaced by disaster or conflict are in need of protection and support.

2. In these circumstances, the need to safeguard people from external threats is obvious. However, effective safeguarding practice extends well beyond the most clear and present danger. It includes a range of measures that mitigate risk, both externally and internally, in all the contexts within which Oxfam GB is engaging people.

3. In this sense, it is the position of the Review that the charity should adopt a simple principle of taking a ***safeguarding first*** approach in all of its activities. This means:

- working in a way that routinely prioritises safeguarding and ensures that the mitigation of risk is the first aspect considered whatever the focus of operations.
- building and maintaining a competent safeguarding workforce with the skills and capacity to effectively manage the complex challenges they face.
- making sure that leadership, governance and organisational arrangements result in the effective delivery and critical oversight of safeguarding practice.

4. In respect of leadership, strong leaders at all levels welcome challenge. In fact, they seek it out. Indeed, one of the most courageous things an organisation can do is open itself up to independent scrutiny. Scrutiny that is sufficiently credible and informed so as to provide the professional curiosity and challenge that ensures focused reflection. Oxfam GB has done this. It now need to translate such reflection into tangible improvements

5. The following model is constructed to ensure that the governance and leadership team have a clear and frequent line of sight on safeguarding issues and

that they benefit from exposure to the critical professional challenge that external safeguarding professionals can bring. It is neither designed to replace or undermine the authority of the Council nor dilute their ultimate accountability for the matters with which they are currently charged.

6. The model is not something that can or should be imposed. If it is to work Oxfam GB must embrace the potential it holds. They need to own it. Therefore, whilst the component elements and recommendations are set out in the body of the Review, the model will require a collaborative process to ensure it fits. Ultimately, its implementation will test Oxfam GB's appetite for real change.

Independent Safeguarding Committee

7. The current trustees, without doubt, bring a wide spectrum of benefits to the Council. However, safeguarding is a specialism that requires a specific set of skills and experience. To be effective in this regard, trustees must be backed by a robust and distinct safeguarding structure, with the capacity to effectively support them with their safeguarding responsibilities.

8. Enhancing Oxfam GB's current arrangements, the Review recommends the creation of an independent Safeguarding Committee. Whilst sitting within Oxfam GB's overall governance structure, this committee will provide an additional level of scrutiny of the organisation's policy development and safeguarding practice. By virtue of this structure Oxfam GB can routinely expose itself to independent expert advice, professional curiosity and informed challenge.

9. The Safeguarding Committee will provide additional reassurance to the Council that internal tensions are not restricting transparency, whether intentional or not. Put simply, Oxfam GB won't be solely reliant on '*marking its own homework*' when considering its overall safeguarding performance and effectiveness.

10. The Safeguarding Committee will be led by an Independent Chair. Trustees will not be appointed to this role. It will be held by someone with significant safeguarding experience with no connection to Oxfam GB.

11. Independent Chairs (as seen in those chairing safeguarding adults and children boards in the UK) have no operational responsibility but use their influence to ensure that safeguarding partners are collaborating and effectively discharging their duties. This sits comfortably with the fact that the organisations hold operational responsibility and retain full accountability for their actions. The role of the Chair and Board is driven by influence, not direct authority.

12. Membership of the Safeguarding Committee will comprise:

- The Director of Safeguarding
- The Divisional Managers (x3)
- The Lead Trustee

13. Membership will also include safeguarding professionals from outside of Oxfam GB. The following roles should ideally be represented:

- Representative from LA Children's Services (LADO) – specialist in the management of allegations against staff
- Representative from LA Adult Services.
- Representatives from Local Safeguarding Children Arrangements / Boards and Safeguarding Adult Boards.
- A Senior Police Officer with significant safeguarding experience.
- External lead advisor on Violence against Women and Girls and abuse linked to faith belief and harmful practices.
- A minimum of two Lay Members (members of the public).

14. The Safeguarding Committee will be responsible for independently overseeing the effectiveness of Oxfam GB's safeguarding strategy, policy and practice. This will involve insight via the implementation of a robust learning and improvement framework to include auditing, self-assessment, case reviews, staff and user engagement and comprehensive performance monitoring.

15. The Safeguarding Committee's work schedule will be driven by a fixed agenda and forward plan to ensure focus and timely consideration of key issues.

16. The Chair of the Safeguarding Committee will report to Council in line with its quarterly cycle.

Director of Safeguarding

17. A new leadership team position should be created and designated as the Director of Safeguarding. Critically, as a member of the Senior Leadership Team, the Director of Safeguarding will be accountable for safeguarding activity across all territorial areas of responsibility covered by Oxfam GB.

18. This role will routinely provide informed oversight and challenge at the most senior level of the organisation. It will also improve focus and accountability for strategy, without impacting on day to day practice requirements.

19. The creation of this role provides a strategic opportunity to bring together those functions focused on making people safer. The Director of Safeguarding's responsibilities should include safeguarding children and at-risk adults, beneficiary protection and PSEA.

Divisional Safeguarding Managers

20. Each of the divisions within Oxfam GB should have a designated safeguarding manager. These three roles will report to the Director of Safeguarding. They will maintain overall accountability for newly defined 'Designated Safeguarding Leads' (DSLs) operating within Oxfam GB UK, Oxfam GB TA and Oxfam GB EA. It is suggested that DSLs replace the role of existing Focal Points in each project across the 27 Oxfam GB EA countries.

21. Divisional Safeguarding Managers will be responsible for the oversight, training, development and support of DSLs. For Oxfam GB EA, an additional role of Regional Designated Officer (RDO) should be created. RDOs will be managed directly by the EA Divisional Safeguarding Manager.

22. This involves the creation of one new post; the EA Divisional Manager. The

UK division post would subsume the operational responsibilities of the current Head of Global Safeguarding, with the TA Divisional Managers role being undertaken by the current Deputy Director HR Trading.

Safeguarding Operations Manager

23. A Safeguarding Operations Manager will be responsible for oversight, training, development and support of the Global Safeguarding Team. Subject to scoping, this could be incorporated into the responsibilities of the UK divisional safeguarding manager.

Designated Safeguarding Leads (DSL)

24. A Designated Safeguarding Lead (DSL) role should be created. A DSL and Deputy DSL should be appointed in each OXFAM GB TA shop, other facility, project or programme.

25. In the case of shops there is nothing to inhibit the role being carried out by a volunteer, in fact such practice will serve to strengthen awareness and accountability.

26. In EA countries DSLs should replace the role of existing Focal Points. This naming convention aligns with similar roles in the UK and is a term that will be easily recognisable in statutory and non-statutory organisations including those operating internationally.

27. A DSL will take lead responsibility for safeguarding within their respective country teams / areas of responsibility. A Deputy DSL should also be appointed in each workplace, project or team.

28. Both the DSL and Deputy DSL should be known by, and accessible to all staff and volunteers within their area of responsibility.

29. The DSL and Deputy DSL must receive specialist training to help them know what to look for and what to do if they identify a potential safeguarding issue, or one

is brought to their attention. To be clear, the DSL will not undertake investigations of any type.

30. Their training should be updated every other year or as and when necessary if new law, regulations, guidance, policy or practice is developed and adopted. As a minimum DSLs will complete Safeguarding Level 3 training (including country context training where appropriate).

31. The DSL can be a member of the workplace team. The DSL role will supplement but not replace their other duties. That is not to say the DSL role should be diminished or minimised. It should in fact take precedence over any other task. Their training and frequent liaison with the Global Safeguarding Team should be mandated. Responsibilities will include:

- Working with the Global Safeguarding Team to ensure the work place environment is safe and that good safeguarding practice is promoted and supported.
- Unless in exceptional circumstances, be the single point of contact on safeguarding matters for the Global Safeguarding Team.
- Support the Global Safeguarding Team when engaging and or maintaining communication and support with the LADO (for Oxfam GB UK and Oxfam GB TA) or RDO (for Oxfam GB EA).
- Provide support, advice and safeguarding awareness training for other staff in their workplace. This should include mandatory safeguarding induction training.

Regional Designated Officers

32. Regional Designated Officers (RDOs) operate along similar lines to Local Authority Designated Officers (LADOs), with the added responsibility of undertaking investigations.

33. LADOs operate within the UK, are defined within statutory guidance and are dedicated roles employed by Local Authorities. The primary responsibility of a LADO is to coordinate the safeguarding response when allegations are made, or concerns

raised about people working or volunteering with children. In this instance their focus would be broader and align with the definition of safeguarding as used by Oxfam GB.

34. This model will strengthen Oxfam GB's safeguarding arrangements, with a fundamentally independent person coordinating and undertaking any subsequent investigation.

35. Their number will be based on the local intelligence in respect of concerns, demographics and geography. Critically they will be separate from the line management of the Country Director and Local HR Teams.

36. The EA Divisional Manager will be responsible for RDOs and provide direct support to them regarding referrals that relate to safeguarding issues and any associated investigation activity. This will provide an independent chain of command that is distinct from the operational staff on the ground.

RDOs Managing Allegations in EA Countries

37. The RDO will coordinate and chair all initial management meetings in the aftermath of a safeguarding complaint against anyone connected with the delivery of Oxfam GB's programme of work, including contracted staff.

38. The RDO will consider the nature of the allegation and invite the appropriate professionals to participate in the management meeting.

39. At the meeting related intelligence will be shared and a recommendation made regarding 'next steps'. The focus will be maintained on ensuring the alleged victim/survivors' safety, alongside the wider safeguarding implications of the potential threat. This will include:

- Distinguishing between a safeguarding incident, a crime and or misconduct issues.
- Classification of allegations (safeguarding incident/crime/misconduct) and agreeing primacy regarding investigation response.

- In liaison with the EA Divisional Safeguarding Manager agreeing how specialist support could best be provided to the victim/survivor, the investigation team or any other specialist involved in the case.

RDO Training Role

40. The RDO will also be responsible for EA DSL and Deputy DSL training and support. It will be the role of the RDO, working with the EA Divisional Safeguarding Manager and the Director of Safeguarding to ensure:

- Contextually appropriate safeguarding induction and routine training is delivered. This to include an understanding of PSEA and wider safeguarding issues.
- At a minimum the training should include credible scenario-based examples and ensure that the workforce is alert to signs and indicators of abuse. It should also cover reporting pathways to the RDO and whistle blowing facility 'independent' of the in-country management.
- Specialist training should be developed for Country Directors and their senior leadership teams to ensure they fully understand the roles and responsibilities of the RDO. Their knowledge should be tested against scenario-based case studies.

Conclusion

41. Improvement will require investment and a willingness to reflect on the lessons learnt over the last few years. The model outlined above is a template. It provides a foundation upon which work can begin in order to test and develop each aspect of its structure and the applicability of the suggested roles.

42. Moving forward it is important that whatever Oxfam GB does next, it works, and that it does so within the wider Oxfam OI vision and the 'One Oxfam' framework.

Appendix E – Glossary of Terms

CD – Country Director

CEO – Chief Executive Officer

CLT – Country Director or Leadership Team

CMT – Corporate Management Team

CPD – Continuous Professional Development

CPI – Corruption Perception Index

CQC - Care Quality Commission

CRA – Collective Resource Allocation

CSO – Civil Society Organisations

DBS – Disclosure and Barring Service

DFAT – Department of Foreign Affairs and Trade (Australia)

DFID – Department for International Development

EA – Executing Affiliate

FTE – Full-Time Equivalent

GDPR – General Data Protection Regulations

GHT - Global Humanitarian Team

GTI – Grail Trust India

HECA – Horn, East and Central Africa

HMICFRS - Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

HO – Honorary Officer

HR – Human Resources

HSP - Humanitarian Support Personnel

IDP – Internally Displaced Person

INGO – International Non-Governmental Organisation

IT - Information Technology

ISA - Independent Safeguarding Authority

KPI – Key Performance Indicator

LADO – Local Authority Designated Officer

LA - Local Authority

LGBTQ - Lesbian, Gay, Bisexual, Transgender, Queer

LT – Leadership Team

MENA – Middle East and North Africa
MPI – Multidimensional Poverty Index
NGO – Non-Governmental Organisation
OXFAM GB – Oxfam Great Britain
OI – Oxfam International
OSCR – Scottish Charity Regulator
PA – Partner Affiliate
PNC - Police National Computer
PSEA – Protection Against Sexual Exploitation and Abuse
PVG – Protecting Vulnerable Groups (operated by Disclosure Scotland for employees in Scotland)
RADG - Recruitment and Development Group
RSO –Registered Sex Offender
SHPO - Sexual Harm Prevention Order
SIR – Serious Incident Report
SMART - Specific, Measurable, Attainable, Relevant and Timely.
SOC – Subject of Concern
SOPO - Sex Offender Prevention Order
SSG - Safeguarding Steering Group
SOP - Standard Operating Procedure
TA – Trading Arm
TAFG – Trustee Audit and Finance Group
TSG – Trustee Safeguarding Group

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Ineqe Group Ltd, 3a Heron Wharf, BT3 9LE, Northern Ireland.

Telephone: +44 (0) 2890 232 060

E-mail: enquiries@ineqe.com

Website www.ineqe.com



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www.ineqe.com