

Oxfam GB

STATEMENT ON MODERN SLAVERY

FINANCIAL YEAR 2023/24

This is Oxfam GB’s ninth annual statement under the UK Modern Slavery Act (MSA) 2015,¹ covering the reporting period April 2023 to March 2024. The Act requires organizations with a turnover of more than £36m to make an annual public statement on steps being taken to identify and prevent modern slavery and human trafficking, covering direct operations, supply chains and business relationships. Our statements are approved by the Board and signed by the CEO and can be accessed via our home page and downloaded from: <https://www.oxfam.org.uk/about-us/plans-reports-and-policies/modern-slavery-act-statement/>

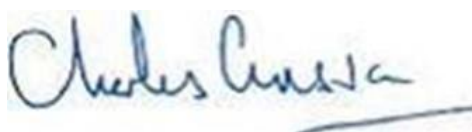
For decades, Oxfam GB has actively campaigned and supported efforts to ensure that organizations identify the human and environmental impacts of their business and supply chains, provide effective redress when harm is done and integrate that learning into core business decisions to prevent harm. Under the MSA 2015, companies have the opportunity to be transparent about how they tackle the challenges of identifying the hidden abuses of modern slavery and human trafficking and to share the steps they have taken to integrate mitigation and prevention measures into how they do business.

Oxfam GB aims to be transparent as one way of playing our part in enabling organizations to learn from each other about what works and what doesn’t, recognizing that collective efforts are needed to end modern slavery and human trafficking. We also strive to continuously learn from others about how we can improve the ways we identify, redress, mitigate and prevent harm so that we can contribute to locally embedded good practice.²

SIGNED



Halima Begum, CEO, Oxfam GB



Charles Gurassa, Chair of Trustees, Oxfam GB

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FOREWORD

Oxfam understands modern slavery as a profound abuse of power and that those who experience discrimination, or have been forcibly displaced from their homes, perhaps as a result of climate change or war, are more vulnerable to being exploited. That's why last year we highlighted our alarm at global predictions that the number of forcibly displaced people could reach one billion by 2050. Our experience indicates that the people who are least responsible for the climate crisis are likely to be amongst the most exploited.

Across the world in places such as Gaza, Ukraine and Yemen, we continue to see burgeoning numbers of people whose lives and livelihoods are under increasing threat and who as a consequence are now more vulnerable to further harm. This year, our research into humanitarian responses for refugees from the war in Ukraine found that although local and national organizations have been responding to human trafficking, international agencies have not identified trafficking amongst those refugee populations. This reflects how easy it is for some of the most vulnerable people to fall through the gaps. International systems need to respond to the ever-increasing numbers of forcibly displaced people, for example by changing who is heard and how we listen.

'The impact of weather-related events on economic activities [has] led to high levels of poverty. This has increased vulnerabilities of women and children to human trafficking, child labour, and early marriages.'

Florence Bore, Cabinet Secretary, Kenyan Ministry of Labour and Social Protection

Wherever people are, the International Organization for Migration (IOM) states that if they can access paid work, they are less at risk of being trafficked.³ In the UK, people who have been trafficked or held in modern slavery first need to obtain an official confirmation of that abuse before they are allowed to access paid work. In 2023, data showed that women were waiting twice as long as men or children to receive an official decision.⁴ Certain nationalities are not allowed to access paid work in the UK, without a work visa, or an official decision that they have been trafficked. It is therefore women who cannot access paid work who are being left most vulnerable to being re-trafficked while they wait.

This is the context in which Oxfam operates. We understand that it matters not only what we do, but also how we work and with whom. We believe that acting together is more powerful than standing apart. Therefore, we continue to prioritize developing partnerships which centre the needs of the people who are most negatively affected, and to work in solidarity with them.

In this reporting period we found no cases of modern slavery or human trafficking in Oxfam GB operations, supply chains or business relationships. We recognize that these abuses are often hidden and that we do not know beyond doubt that no such harm was done. Two concerns about possible child labour were reported through Oxfam's misconduct reporting system and were investigated by our safeguarding team. In one of those cases, a child was identified as engaging in work for Oxfam and we took immediate, safe and appropriate action. This was an example of our 'zero tolerance to inaction' approach, which means we do not walk away as soon as we find a problem, but instead take action to raise standards and mitigate harm. In this case, measures were put in place to prevent further incidents and the labour provider has committed to changing behaviours. Furthermore, the external audit of our case management system found no concerns, noting that standards remain high and significant improvements had been made.

This year we are reporting against the three-year objectives outlined in last year's statement. We continue to make steady progress on steps that enable us to work effectively across the Oxfam confederation and towards integrating ethical and environmental considerations into our everyday procurement decisions. We observed how our first loss and damage-funded work could inform future options for addressing the horrors of human trafficking and modern slavery. We believe that these steps, and those taken to deepen our understanding and to better articulate how racial and climate injustices are linked and reinforce each other, are helping us to become more effective at tackling modern slavery and human trafficking.

Halima Begum, CEO
Oxfam GB

Charles Gurassa, Chair of Trustees
Oxfam GB

1. ORGANIZATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

Oxfam GB is one of 21 independent affiliates that, together with the international secretariat Oxfam International (OI), make up the Oxfam confederation. The descriptions of our organizational structure, business and supply chains and our intention to transform Oxfam GB to become part of a single global network comprising equitable and interdependent organizations have not significantly altered since previous statements.⁵ Relevant updates are outlined in our Annual Report and Accounts.⁶ Our supply chain information remains similar to last year and an up-to-date list of our retail suppliers can be found in the same place online [here](#).

Oxfam GB is developing its understanding of its role within the new structure, alongside our shift to becoming a feminist and anti-racist organization that seeks to keep people safe by mitigating and preventing harm that could (unintentionally) be done through our work. In the meantime, we continue to prioritize becoming a more respectful and trustworthy partner of choice – both across the Oxfam confederation and with external partner organizations. This includes improving the ways in which we transfer power and control within our funding processes and growing the number of Oxfam affiliates rooted in the Global South. One example of that is a newly formed Strategic Oversight Group (SOG) with a remit to ensure that safe programming is included in confederation-wide strategic planning. This group is guided by the foundational human rights principle of ‘do no harm’. It provides leadership and organizational support to a Safe Programming Working Group (SPWG), which focuses on the practical implementation of safe programming across the confederation.

2. HUMAN RIGHTS DUE DILIGENCE

This year we have focused on delivering the three-year objectives which we set ourselves last year (see section 3 below).

GLOBAL CONTEXT

The 2023 Global Slavery Index (GSI) reported that US\$468bn worth of G20 imports are goods at risk of modern slavery,⁷ while four years of research by Save the Children found that child labour existed in half of the company supply chains that claimed a zero-tolerance approach to it.⁸ This highlights the need to go beyond compliance and audit-based approaches to centre people and planet, adopting a more open and collaborative approach to taking the action needed to genuinely tackle the serious harm that the international community knows is happening across so many global supply chains, including in the UK.

**US\$468bn of
G20 imports are
goods at risk of
modern slavery.**
Global Slavery Index
2023

As Oxfam GB delivers against the commitments we set last year, we have been building an evidence base and articulating how racial and climate injustices are linked and reinforce each other. We noted with interest that the topic of addressing the root causes of environmental racism had risen up the agenda and was discussed at the annual meeting of the UN Working Group on Business and Human Rights in November 2023.⁹

EUROPEAN LEGISLATION

At European level, the Corporate Sustainability Due Diligence Directive (CSDDD) was provisionally agreed in December 2023 and adopted in May 2024. There was disappointment at delays and missed opportunities, such as restricting the size and sectors of companies in scope, leaving out smaller businesses and enabling exceptions in company supply chain accountability for children as young as 12 years old.¹⁰ The impact of the Directive now hinges on its adequate transposition, implementation and enforcement by EU Member States and on guidance for companies to be developed by the European Commission.¹¹

We will also be watching with interest the proposed creation of an EU Network against Forced Labour Products and a single portal on forced labour to provide tools and access to relevant information, including decisions taken.¹² We also welcome the European Parliament's approval of a Forced Labour Regulation which requires investigation, and where forced labour is identified products must be withdrawn from the market.¹³

Oxfam acknowledges that due diligence is increasingly important in its own business decisions, both to identify and redress harm and also to mitigate or prevent potential harm (including but not limited to modern slavery and human trafficking). Global figures suggest that:

- Being discriminated against is more of a risk factor for being trafficked or held in modern slavery than had previously been assumed – even for people who are not living in poverty.¹⁴
- 86% of forced labour is imposed by private actors, including companies and, contrary to dominant assumptions, more than half of all this forced labour happens in wealthier countries.¹⁵
- The International Organization for Migration (IOM) states that securing migration status, so that people can work in the place where they end up and access the support they need, decreases their vulnerability to being trafficked.¹⁶

UK CONTEXT

In the UK, only certain nationalities have the right to access paid work or to apply for a UK work visa.¹⁷ If a person has been trafficked into the UK, they must first receive official confirmation before they can take any further steps to access paid work.

The National Referral Mechanism (NRM) is the UK's official system through which survivors of modern slavery are identified and supported. Over the last year, there was a drastic increase in the number of rejected applications for that official confirmation. In 2022, 89% of these claims had been accepted, but in 2023 this fell to 66%.¹⁸ In 2023, NRM data was analysed and showed that the Nationality and Borders Act 2022 and Illegal Migration Act 2023 had resulted in **women waiting twice as long to receive an official decision, compared with men, boys and girls**.¹⁹ In the first nine months of 2023, the median waiting time for women was 1,038 days, which was nearly twice as long as the 524 days for men.²⁰ Since certain nationalities are not allowed to access paid work in the UK without either a work visa or confirmation of their status, those people will be more vulnerable to being re-trafficked while they await this official decision. It is women of nationalities not allowed to access paid work in the UK who are left most vulnerable. For example, they may be tempted to take work they would not otherwise have accepted and take a gamble that someone will help them get a work visa or provide accommodation and/or work (a common tactic of traffickers). Or the state may prosecute them for working illegally, or deport them, perhaps to the place from which they were originally trafficked.²¹

3. SUMMARY OF PROGRESS AGAINST ACTIONS PLANNED FOR OCTOBER 2023–MARCH 2026

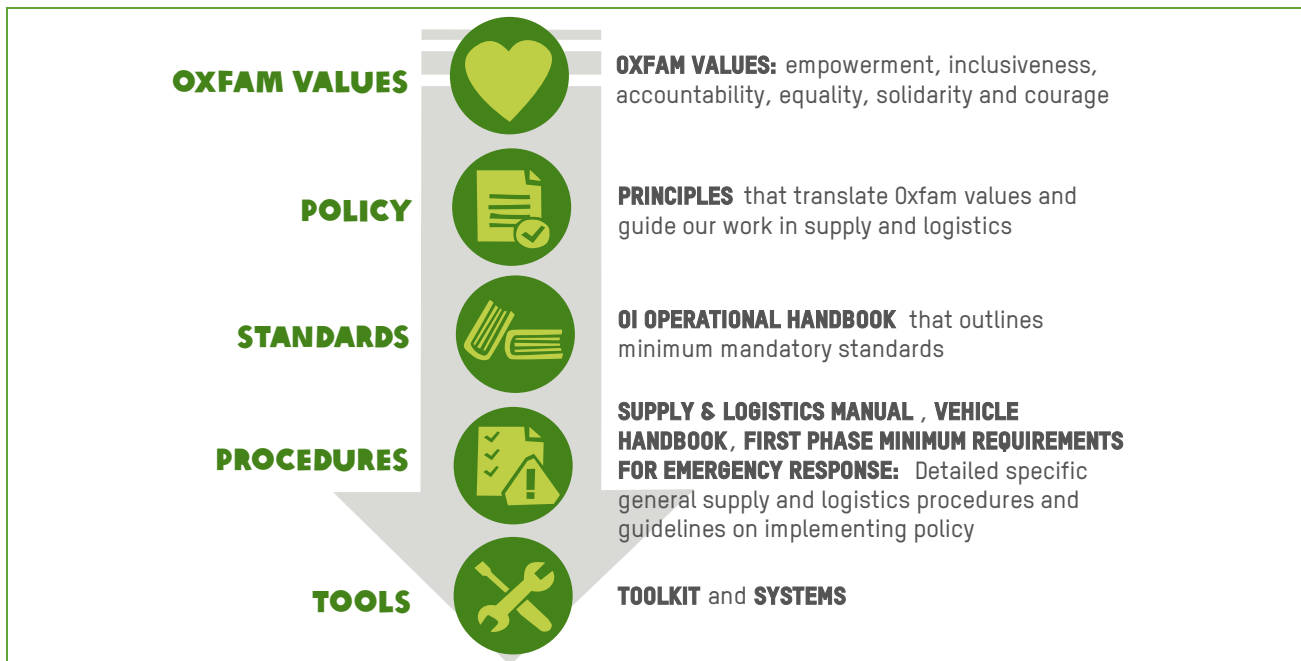
This section outlines the progress made from 1 April 2023 to 31 March 2024 against our priority three-year objectives. We acknowledge that tackling modern slavery and human trafficking requires continuing work to ensure that our systems routinely prompt each individual delivering Oxfam's work to recognize that it is possible for harm to be caused, even by actions taken by someone who intended to do good. We also know that proactive steps are required to seek out harm done, to report concerns and to apply learning from across the organization, so that we integrate organizational learning about what works to mitigate and prevent harm throughout our everyday decision-making.

Oxfam GB acknowledges that these processes require continuous learning, especially where any harm done through our operations, supply chains or business relationships affects people who have previously been overlooked, for example due to discrimination.²² We recognize that some of the worst abuses are the most hidden and that they require skilled and proactive action to be identified and addressed.

Table 1 outlines the main risks we have identified, our objectives, planned actions to address those risks and the progress we have made towards this over the past year. Our statements focus on sharing stories about our impact. We recognize that a compliance approach to risk could quantify some of our impacts and that quantifiable indicators would more neatly justify our actions. However, we have not yet identified meaningful quantitative performance indicators for the main objectives we have set, based on our due diligence. Therefore, we remain focused on outlining and sharing examples which explain what we have done to find out what our impact is and according to whom. Our intention is to learn across different parts of Oxfam and with external stakeholders so that we can listen and learn from those who are likely to have been made most vulnerable to harm. The example of learning from frontline responders on pages 13–14 highlights why this is important.

Table 1: Summary of progress against planned actions, October 2023–March 2026

Supply chain	
Risk 1	<p>The increase in global numbers of people held in modern slavery, added to an increase in numbers of people on the move, indicates an increased risk of forced labour or other forms of harm in our international operations supply chain.</p> <p>An example of how this risk could happen:</p> <ul style="list-style-type: none"> • Staff sourcing the goods and services required to carry out Oxfam’s programme work might not identify this risk or might not report their concerns about potential harm done in the supply chain. • Under-reporting hampers clear oversight and increases risks that vulnerable people might fall through the gaps.
Objective	People sourcing the goods and services required to carry out Oxfam’s work have clear guidance regarding best practice in working responsibly with suppliers to manage and mitigate risk of harm in our supply chains and in how to raise concerns about potential harm done.
Planned action	<p>The Operations Improvement and Delivery (OID) Team and Ethics Team will work alongside other affiliates and country teams on the three actions below:</p> <p>1.1 Update the Supply and Logistics Manual that is used by most Oxfam affiliates,²³ aiming to update alignment with Oxfam GB’s latest decolonial, anti-racist, ethical and environmental aims.</p>
<p>Update</p> <p>In this reporting period Oxfam focused on finalizing a confederation-wide Sustainable Supply Policy, which translates Oxfam’s values of empowerment, accountability and inclusiveness into principles to guide our work in supply and logistics. We expect that policy to be signed off in the next reporting period and have already moved on to start drafting the minimum mandatory standards that will align supply and logistics work across the confederation with this new policy. These standards, once agreed, will be outlined within our confederation-wide Operational Handbook.</p> <p>The diagram below gives an overview of Oxfam’s operating framework for supply and logistics. Once the policy has been finalized, the standards and then the procedures and tools will be updated.</p> <p>Figure 1: Oxfam’s Operating Framework for Supply and Logistics</p>	



Regular reporting also enables us to notice changes and to make any necessary updates in response to what we are learning. There is also a Supply & Logistics Advisory Team who are in regular contact with teams across Oxfam and Regional Logistical Managers. This facilitates learning and sharing across teams and also helps shape regional workshops and the annual global logistics conference. The systems used by logistical teams are also set up to encourage the exchange of information.

Although working together across affiliates can take longer to deliver outputs, we envisage that investing in confederation-wide agreements will achieve a better-quality alignment with our values and more sustainable and better-targeted impacts than anything Oxfam GB could achieve alone.

Planned action	1.2 Produce guidance on renting vehicles to contribute to improving how we address the risks to drivers employed by agencies (recruitment, terms and conditions of employment).
Update	<p>Work in this period has focused on updating how we use the Tracpoint logistics system, including outlining options for tracking:</p> <ul style="list-style-type: none"> a) our use of rental vehicles to more accurately reflect usage; b) whether the driver was made aware of and contracted to follow Oxfam’s Code of Conduct. <p>The aim has been to deliver a more comprehensive and better-quality implementation of current standards.</p>
Planned action	1.3 Produce guidance outlining potential risks to agency workers , including information about the ‘employer pays’ principle. ²⁴
Update	<p>Progress on the guidance itself has been slow, since it first required a wider discussion to define how such work should happen in a decolonized way. However, we can now say that this guidance will be developed with feedback from teams outside the UK and that the aim is for it to be integrated into the confederation-wide toolkit (mentioned in Figure 1 above).</p>

Risk 2	<p>Oxfam GB sources new products to sell in its shops and online. The business strategy of its Sourced by Oxfam (SbO) Team is based on an ethical and environmental framework.²⁵ If we do not fully integrate ethical and environmental concerns into our everyday business decisions, we will not have the transformative impact we aspire to. One core risk is that dominant commercial norms mean that we might rush through decisions which require a new approach. Undertaking due diligence maps the potential impacts we may have and informs the action plans we define together with our suppliers. But this takes time, which is needed if we are to develop our understanding of our impacts on the environment and on people working in our supply chain – and to design improvements over time.</p>
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Objectives	<ol style="list-style-type: none"> 1. Ensure ongoing training, reflection and support for Sb0 retail staff to integrate ethical and environmental considerations into their everyday business decisions, in collaboration with suppliers. 2. Continuously improve and consolidate the design and implementation of commercially appropriate systems and track changes in impact over time.
Planned action	2.1 Recruit additional staff capacity to support the Supply Chain and Sustainability Manager, Buying Manager and wider Sb0 team to integrate ethical and environmental considerations into their everyday decisions, systems and incentives.
<p>Update</p> <p>This year, the new Supply Chain Executive and the Supply Chain and Sustainability Manager have delivered a training session every other month for the buying and merchandising team. The training has covered various subjects including the impact that purchasing decisions might have on rights-holders, green claims²⁶ and engaging with stakeholders using Oxfam’s Ethical and Environmental Supplier Framework²⁷ (explained in previous statements).</p> <p>Having an additional dedicated person in the team has allowed us to do more to assess each manufacturing site and work towards fairer outcomes for the people behind the products we sell. More rigorous and regular checks have resulted in more robust integration of ethical and environmental standards into our everyday business decisions.</p> <p>For example, the sourcing teams for each product category are now more engaged and better informed about the progress made at each manufacturing site. We are also better assured that we are working with the right suppliers and are working more closely with them to raise standards and monitor progress in working conditions over time.</p> <p>Since the new role-holder has kept Oxfam buyers updated and applied their expertise to manage supplier relationships, this has significantly reduced the pressure and workload for the rest of the team. As one member of the team reported: ‘The new role has made it easier for us to improve the ethical and environmental impact of our business, which is so important.’</p> <p>The additional capacity has also enabled us to improve and standardize our tracking systems, so we now have a more efficient and systematic approach for assessing the ethical and environmental impacts of our supply chain.</p>	
Planned action	2.2 Develop senior-level championing of this commitment to integration.
<p>Update</p> <p>This year, our senior retail managers have developed internal procedures so that Oxfam’s ethical and environmental standards are more integrated across our core business decisions. There are several examples where product development processes have delved deeper to ensure there is adequate understanding of ethical and environmental implications before taking final decisions.</p> <p>We have also commissioned a pilot project to understand the impacts that our sourcing practices have in one of our highest-risk and highest-spend supply chains, which is Christmas cards sourced in China. This demonstrates our senior management commitment to delivering the UN Guiding Principles on Business and Human Rights in our own retail supply chain. It reflects support for moving towards a human rights due diligence approach to doing no harm to people and planet, i.e. going beyond traditional compliance and audit-based approaches which have focused on minimizing risks to the sourcing company.</p>	
Planned action	2.3 We will continue to use the Ethical and Environmental Framework and in particular its human rights roadmap ²⁸ to work with retail suppliers and create joint action plans of mutual accountability with the aim of improving our ethical and environmental impacts. We will report on key areas of change and learning.
<p>Update</p> <p>Although we did not reach our target to source 80% of products from suppliers ranked at level 3 or higher on our Ethical and Environmental Framework, we did increase from 69% to 71% in this past year. Although this small increase may not seem like a cause for celebration, we are particularly proud of the team’s performance and ability to let go of the mindset that prioritizes hitting quantity targets that do not adequately reflect the changes we seek. Their focus has shifted to learning what is required to reach the quality of transformation intended (i.e. moving away from audit-based risk management to a genuinely human-centred approach across our sourcing</p>	

decisions). This has been a particularly uncomfortable lesson to learn for a team that often exceeds its commercial targets. But we understand that willingness to feel the discomfort is a key indicator that we are attaining that quality of mindset transformation we seek.

We have also seen significant changes across our supplier base, with many now much more aware of the differences in these approaches and the details of Oxfam’s ethical and environmental expectations. This has been apparent through a better-quality and more open dialogue with our suppliers which has resulted in us better understanding and resolving challenges that suppliers may have previously decided not to raise. Although aligning the aspiration of producers with Oxfam’s commercial buying needs is not an easy task, more open dialogue is delivering different outcomes.

For example, our Fair Trade producer groups requested that we make more predictable orders and offer a longer-term commitment to sourcing their products. We responded by improving consistency and increasing the volume of our orders to one of our Fair Trade suppliers in Bangladesh, which meant that, from February 2024, 35 artisans on temporary contracts were given permanent ones.

Planned action

2.4 We will share learning on similar attempts at integration across other Oxfam teams.

Update

We have shared how we integrate ethical and environmental considerations into our product sourcing decisions and our sign-off processes with different parts of Oxfam GB. For example, retail teams are now more aware of the steps taken to ensure that new products sold in our shops and online meet Oxfam's ethical and environmental standards. This enables retail staff to explain to our customers and volunteers how we do this.

Programmes

Risk 3	The impacts of the climate crisis will fuel further displacement. That displacement makes people more vulnerable to harm and is compounded by racism and other forms of discrimination, which make people more vulnerable to modern slavery and human trafficking. There is a risk that Oxfam does not adequately understand these increased threats and vulnerabilities.
Objective	<ol style="list-style-type: none">1. Recognize and address internal as well as external values and systems that contribute to racial and climate injustice.2. Underpin all climate justice efforts with an understanding of how displacement, discrimination and responses interact. This understanding can then be used by the Ethics and Procurement Teams to improve our impact.3. Promote and prioritize a reparative approach to addressing climate harms.
Planned action	<ol style="list-style-type: none">3.1 Oxfam GB's Climate Justice Workstream will work in conjunction with the Research and Evidence and Racial Justice Teams and other partners to understand, build an evidence base and articulate how racial and climate injustices are linked and reinforce each other. This analysis and narrative will explore and inform external engagement and internal systems, approaches and practices and will help map a way forward for Oxfam GB to address areas where climate and racial injustice may be embedded across our supply chains.

Update

Oxfam GB's Board approved a new Climate Justice Strategy 2023–2030 which stated our long-term commitment to climate justice and set out the aim of deepening our understanding of the underlying drivers of the climate crisis and current responses to them.

Our strategy states that the crisis of climate injustice is driven by intersecting structural inequalities, which are embedded in historical and current patterns of violence, racism, colonialism, patriarchy and extractive capitalism. These intersecting structural injustices create a self-reinforcing system of climate injustices. We recognize that the UK is a key player in both global finance and climate finance and therefore Oxfam GB's focus is on public and private funding streams and the wider climate finance system. Over the last year we have:

1. Funded and provided technical support for the [Climate Equality Report](#),²⁹ which calls for a radical reduction in inequality as a pathway to achieving transformative climate action and fundamentally shifting economic goals to restore our planet while ensuring wellbeing for all.
2. As part of Oxfam GB's overall programme of work to ensure that loss and damage finance is accessible to the communities who are most marginalized and at risk of displacement and trafficking, we have supported research with partners in Asia. The findings have been published in a briefing paper,³⁰ which calls for the Loss and Damage Fund to prioritize women and marginalized communities who are at the frontline of the climate crisis.

We have also provided technical and financial support to research on locally led responses to loss and damage in Uganda and Latin America. The research from [Colombia and Honduras](#)³¹ highlights how historical and current colonial structures contribute to climate vulnerability and displacement and how empowered communities are reclaiming their shared narratives of solidarity and community action.

3. We also began an assessment of how we are communicating the story of climate justice and identifying next steps to co-creating a more nuanced story that captures the intersections of violence, racism, colonialism, patriarchy and extractive capitalism (inequality) and whose voices are communicating our story. This will inform our work to shift the climate change narrative in the UK so that the impacts of the climate crisis on marginalized groups are fully recognized. We will call for this to be addressed through policies which take a

reparatory approach and transform systems to stop generating and sustaining inequalities. This work is aligned with related work led by the Oxfam confederation.

Planned action

3.2 The Climate Justice Workstream on climate finance for both adaptation and loss and damage will integrate an aim to shift the narrative from climate finance being labelled as official development assistance to it being understood as compensation and eventually as reparations. The Racial Justice Team will support this aim, especially on reparative approaches, both internal to Oxfam and also externally.

Over the last year we have spoken out about making climate finance fairer. And learning from our first ever loss and damage-funded project indicates that addressing the impacts of climate change and providing gender-responsive support for people to stay in their communities with improved access to water and livelihoods and effective conflict resolution may indirectly contribute to reducing vulnerability to modern slavery and human trafficking.

As part of our loss and damage climate finance campaigning, we launched our report [Payment Overdue: Fair ways to make polluters pay for climate justice](#).³² It outlined four ways that new public finance for loss and damage across the UK could be raised in ways which would tackle inequality by making polluters pay.

To date, Oxfam GB has received funding for humanitarian relief or longer-term development projects. More recent funding has had the specific aim of supporting people to adapt to the effects of climate change. This year was the first time that Oxfam channelled funding that aims to address loss and damage – i.e. where it is either too late to adapt, since the damage has been done and now needs repair, or the loss is irreversible and requires compensation. For example:

- A humanitarian response might provide water during a crisis.
- A development response might support a community to build a safe, accessible and reliable water supply.
- An adaptation response might support a community to diversify its water sources and identify new ways of accessing water which would increase resilience during droughts/floods.
- A loss and damage response might restore water sources that have been damaged or compensate for water resources that no longer exist and can no longer be rebuilt.

However, since some areas of loss and damage, such as deaths caused by a lack of water, flooding or pollution are much harder to meaningfully repair or compensate, there are ongoing discussions about reparations.

Kenya Loss and Damage Project

Oxfam GB delivered its first loss and damage-funded project through Oxfam Kenya partner organizations Strategies for Northern Development ([SND](#)) and Merti Integrated Development Programme ([MIDP](#)). The implementation phase ran from January to March 2024. The project was gender-responsive and focused on:

- restoring critical water systems that had been damaged by drought and overuse;
- community cash transfers to support people whose livelihoods are affected by the impacts of climate change. Women-led households and survivors of gender-based violence (GBV) were prioritized;
- strengthening peace committees – since the increased difficulty in accessing water and pasture has also increased conflict. Steps were taken towards ensuring that women are influential in decision-making and that the project informs national, regional and global advocacy on loss and damage.

This project was not explicitly designed to address modern slavery or human trafficking. However, research has found that discrimination acts as a high-risk factor for people to be trafficked or held in modern slavery,³³ and that ‘climate change acts as a stress multiplier to factors driving modern slavery’.³⁴

The latest international figures indicate that more than 1.9 million Kenyans are experiencing crisis or emergency due to the impacts of climate change.³⁵ In this context, children are at an increased risk of being separated from families, dropping out of school and being married off for dowry as a survival tactic.³⁶ Dowry practices are exacerbated in times of crisis, such as drought, and contribute to increased rates of child marriage.³⁷

International standards recognize child marriage as a form of modern slavery.³⁸ There is evidence that girls living in low-income households are more likely to marry under the age of eighteen. Although Kenya's Children Act (2022) prohibits child marriage, it is not well enforced and traditional practices continue.³⁹ Activists for the rights of Maasai girls highlight that prolonged droughts prompt many families to give away young girls as brides in exchange for cattle. Long walks in search of water also expose young girls to sexual abuse and unwanted pregnancies, which may in turn initiate early marriages.⁴⁰ And in February 2024, Kenya was hosting 744,747 refugees and asylum seekers, most of whom had arrived from Somalia and South Sudan and other countries with a high prevalence of child marriage.⁴¹

'The impact of weather-related events on economic activities [has] led to high levels of poverty. This has increased vulnerabilities of women and children to human trafficking, child labour, and early marriages.'

Florence Bore, the Cabinet Secretary,
Ministry of Labour and Social Protection

IDENTIFICATION, REMEDY AND MITIGATION

In addition to previously reported Oxfam GB standard practices and the three priority areas outlined above which cover our supply chains, below we outline key updates on Oxfam GB's work to identify, remedy and mitigate modern slavery and human trafficking across our operations. Since Oxfam GB is committed to a survivor-centred approach,⁴² some of these details are deliberately topline, so that we can protect anonymity. However, the relevant Oxfam staff are in possession of much more detail and the annual external audit of our case management system found no concerns, noting that standards remain high and significant improvements have been made.

IDENTIFICATION

- **Identification: company-level complaints mechanism**

Oxfam's Code of Conduct stipulates that all Oxfam employees, volunteers, trustees and contractors have a duty to report through 'Speak Up' reporting channels if they suspect misconduct. However, victim-survivors are not obliged to report their own abuse. All reports are triaged by the Speak Up Team and then directed to the appropriate integrity or wider organizational team to respond. Decisions are taken on a case-by-case basis and align with our Survivor Policy.⁴³ Summary data on the Speak Up Team's work is routinely reported through our Annual Report and Accounts⁴⁴ and also in a more detailed internal newsletter called Integrity Insights.

In this section we outline any modern slavery or human trafficking-specific concerns that were investigated. Our aim is to be as transparent as possible while centring the need for anonymity and protection of any survivors.

In the last year our central Safeguarding Team investigated two allegations of child labour in two of Oxfam's partner organizations/suppliers. Although not all forms of child labour are modern slavery, Oxfam stipulates that child labour must not be used in our programmes or by partners or contractors. The most extreme forms of child labour may separate children from their families and expose them to serious hazards, illnesses and/or slavery. Child labour may also mean work that is mentally, physically, socially or morally dangerous or harmful to children and can interfere with their recreation and schooling.

One of the allegations was upheld. A warning letter was sent to the relevant labour provider, outlining the breach of Oxfam’s contract clause, which states that ‘child labour shall not be used’. The decision to not immediately cease working with the labour provider was made so that we maintained leverage over behaviours, in a location where child labour is a significant protection concern. Because of management interventions and advice from the Safeguarding Team, the labour provider is now adhering to Oxfam’s standards and code of practice. This is an example of the zero tolerance to inaction approach which is outlined in Oxfam GB’s Anti-Slavery and Human Trafficking Policy⁴⁵ and is intended to open dialogue, so that we can improve identification of harm and drive up standards to prevent future harm. As we strengthen our relationships with a range of partners, we are improving our understanding of the contextual risks of child labour and also what it looks like to safely mitigate harm in each context.

The second allegation referred to an incident that had happened two years earlier in a partner organization. Although this could no longer be directly followed up, we investigated, and a full review was conducted of current and historic programming with a focus on mitigating the risks to children, including the labour and safeguarding practices within Oxfam partner organizations. This review identified an opportunity to strengthen processes and we have now added prompts to include child labour risks in our standard risk assessment form, so that country teams are routinely prompted to consider and address those risks in their own contexts.

Zero tolerance to inaction

The decision to not immediately cease working with the labour provider was made so that we maintained leverage over behaviours, in a location where child labour is a significant protection concern. As a result, the labour provider is now adhering to minimum standards.

This is an example of the zero tolerance to inaction approach which is outlined in [Oxfam GB’s Anti-Slavery and Human Trafficking Policy](#). It is intended to open dialogue, so that we can improve identification of harm and drive up standards to prevent future harm. As we strengthen our relationships with a range of partners, we are improving our understanding of the contextual risks of child labour and also what it looks like to safely mitigate harm in each context.

REMEDY

Safeguarding at Oxfam has been focused on preventing sexual exploitation, abuse and harassment, on child protection and on misconduct. While committed to maintaining our focus on these issues, our confederation is also shifting towards a more holistic approach, which recognizes all power dynamics and imbalances which can give rise to harm.

In addition to a central Safeguarding Team, full-time safeguarding roles are now embedded directly into seven country teams, in the Democratic Republic of Congo, South Sudan, Yemen, Ethiopia, Bangladesh, Syria and Myanmar. This not only strengthens our ability to identify and mitigate risks in each context, but also supports our ability to ensure that we deliver survivor-centred and context-appropriate remedies.

In this reporting period we have continued to develop our safeguarding case management standards. This year’s focus has been on embedding mutual accountability between country and programme decision-makers and the central technical safeguarding team, which supports their safeguarding decisions. Investigations are reviewed regularly by a case manager, and progress is monitored. Decisions and actions are documented. Reporters and survivors are given regular updates, and consent to investigate is obtained in every case.

We believe that this has been achieved since Oxfam GB has significantly strengthened the ‘do no harm’ approach across our operations, in ways of working and in shifts in our culture. We continue to move beyond a traditional compliance-based approach and have been shifting mindsets by deepening our understanding of the intersectional barriers that individuals face and embedding a recognition of our own privilege and power (negative and positive) in how we operate and with whom.

MITIGATION

Alongside the mitigation steps outlined against the three prioritized risks above, this section explains some additional key areas of work to make our programmes safer.

- **Safeguarding**

Oxfam has 10 confederation-wide Safeguarding Core Standards which summarize all the commitments and requirements outlined across our safeguarding policies and strategies. Teams apply these standards to establish an effective safeguarding system for their own context, which fulfils our internal and external obligations, for example towards communities, staff, donors and supporters.

Oxfam's Safeguarding Core Standards

1. Safeguarding plan is established.
2. Trained Safeguarding focal points are present in all Oxfam offices.
3. The Oxfam Code of Conduct is signed by all employees and related personnel.
4. Safe recruitment and screening processes are in place.
5. Regular and appropriate training is provided to all employees and related personnel.
6. Safeguarding reporting and responding procedures are in place in all offices.
7. Community-based feedback mechanisms are established.
8. Partners adhere to One Oxfam safeguarding policies and Safeguarding Core Standards.
9. Safeguarding risk assessment and management practices are established.
10. Procedures for handling personal information are established.

In this reporting period, Oxfam GB developed, piloted and introduced a new Tracker Dashboard for these Safeguarding Core Standards. We expect the first data to become available next year.

The aim is that this will provide a clearer understanding of where each country team is in relation to implementing each of these core standards. It will also strengthen our ability to identify safeguarding particularities across all countries in which Oxfam GB operates and to share those insights so that all teams can learn from each other.

The dashboard is grounded in decolonial ways of working together, recognizing and celebrating the work and innovations of colleagues based in different countries and improving our understanding of the role of Oxfam's central Safeguarding Team and how to tailor support so that it is most appropriate for supporting survivors in the place where they live.

Our Regional Advisors were first introduced in 2019 and continue to support any of Oxfam's work in their geographical region. They have been instrumental in implementing the Safeguarding Core Standards, especially through their support to Safeguarding focal points. There are also Safeguarding Communities of Practice in each region, which support the sharing of learning, reflecting and sharing safeguarding best practices from a regional perspective.

This work, together with the work of the seven safeguarding roles now embedded in country teams, all feeds into confederation-level analysis and developments. We continue to have a core safeguarding group which analyses the strategic issues arising through Oxfam's humanitarian responses and longer-term development work as the foundation for developing safeguarding policy for the whole confederation. The quality of this work is improving as we increase resources embedded in country teams and we are reviewing ways of working at confederation level to make sure that we get the right voices in the room when taking decisions.

- **Learning from frontline responders: Ukraine response**

Oxfam is seeking to build truly equitable partnerships with local actors who are best placed to understand the needs of their communities and adapt quickly as needs change. In February 2024 Oxfam published its findings⁴⁶ from speaking with a number of people leading work for local and national women-led organizations (WLOs), women's rights organizations (WROs), LGBTQIA+-led organizations and other local non-governmental organizations (NGOs) addressing the needs of women, girls and gender minorities in Poland and Ukraine. We wanted to understand how the humanitarian crisis has impacted them, both personally and as organizations, and their needs and priorities for the future.

Our research found that official international agencies had not been identifying the human trafficking and GBV to which local organizations had been responding. Yet funding those frontline responses, accessing remedy and meaningful prevention can all be far more challenging without the acknowledgement of these official agencies.

One organization in Poland told Oxfam that the IOM had recently reported that it had not seen the increase in human trafficking that it had expected. But that assertion did not reflect the experience of the WLO in assisting trafficking survivors on the ground. 'We've seen the rise in cases. But this isn't always visible – women don't even always conceptualize that they have been a survivor of trafficking,' the organization stated.

'This isn't always visible – women don't even conceptualize that they have been a survivor of human trafficking.'
Polish organization

Another organization in Ukraine told us that it had not been consulted and did not agree with the UN's assessment of the areas it worked in as low risk: 'Now this money has been cut and we're trying to find the funding for these activities.'⁴⁷

Since this is the context in which Oxfam operates, we continue to push policymakers to make sure that the humanitarian response in Ukraine is driven by organizations which are embedded in their communities and understand the impacts on marginalized groups. We are calling for not only increased investment but for funding that is more flexible and less bureaucratic to access. Oxfam is also working to try to improve the way that the humanitarian system works with local organizations, including by supporting networks and forums where these organizations can raise their voices and lobby policymakers to provide more funding directly to local organizations. We believe that this will deliver better outcomes for those who most need support.

'It was a big surprise when we saw this report that there was low GBV risk in these areas. Now this money has been cut and we're trying to find the funding for these activities.'
Ukrainian organization

3. POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

We have not updated any relevant internal policies in this reporting period.

However, for Oxfam to meet its charitable objectives of preventing and relieving poverty, we need to address the systems of power that keep people in poverty. Oxfam GB's Racial Justice Team has contributed to a sector-wide toolkit aimed at supporting international development organizations to become more locally led as an anti-racist practice.⁴⁸

We have also published a framework for business⁴⁹ which outlines how companies can value all the work that women do – paid and unpaid – and how transformative engagement on gender equality is not about 'fixing' women, but about removing the structures and norms which disempower women in the first place.

4. TRAINING

In addition to the procurement teams' training mentioned in the updates against our main objectives above, this section outlines other key areas of training.

- **Oxfam’s mandatory training**

As noted in previous statements, Oxfam provides ongoing staff training on its Code of Conduct, safeguarding, anti-fraud and corruption and data management. In this reporting period, Oxfam GB developed the design and monitoring of its mandatory training programmes, i.e. those which:

- are outlined in Oxfam’s Code of Conduct;
- cover aspects of employees’ physical safety;
- cover our legal duties (such as safeguarding, health and safety, managing data, tackling bullying, discrimination, fraud and corruption, etc.).

Following external consultation, Oxfam produced a new Code of Conduct training course. For the first time, all staff across the confederation will be offered the same course, which aims to:

- focus learning away from knowledge towards behaviours;
- provide realistic case studies, which are filtered according to location and the role of staff receiving the training;
- address concerns and misgivings about reporting or resolving misconduct.

Through Oxfam’s confederation-wide process, in May 2024 this newly developed course was offered to all Oxfam staff globally. Therefore, our first completion data will be available in the next reporting period.

Oxfam GB also brought together data from several platforms, so that now we have one clear oversight of who has completed which mandatory course. This has enabled us to drive compliance with historic mandatory training courses, by clearly communicating which course(s) need to be taken, by whom, and sharing the relevant course access information.

In addition, Oxfam GB has continued to ensure that new starters complete mandatory training as part of their induction programme. And we have continued work to provide alternatives, such as our animation (reported in the 2022 statement), for colleagues who cannot use the standard e-learning tools. Valid reasons for this can range from neurotype or speaking a language that is not included in the e-learning offer to a lack of access to electricity or information technology where staff are working.

- **Safeguarding training**

Safeguarding training is one of the mandatory trainings for all Oxfam staff and must be completed within their first 30 days.

Oxfam GB’s safeguarding training is tailored for the local context of each country where we operate and also aligned with confederation-wide Oxfam safeguarding policies and reporting mechanisms. We have noticed how the additional capacity from having seven safeguarding leads embedded into country programmes is strengthening how this training is being tailored.

Oxfam GB staff embedded in the country programmes are supported by a central Safeguarding Team to deliver training to staff and also to partner organizations. This is tailored to the specific risks and environmental factors that impact each community and the safety of programme participants locally. Specific risks such as child marriage, human trafficking and child labour are also discussed with communities to improve understanding, mitigation and how Oxfam supports survivor needs.

Additionally, Safeguarding focal points (i.e. individuals whose primary role is not safeguarding but who champion safeguarding issues), attend an annual focal point workshop in every region. This enables the sharing of experiences and learning from each context. Focal points also receive contextualized support and training from the Safeguarding staff embedded into their country team.

Through learning from specific cases, Oxfam has identified gaps in management team knowledge about safeguarding, survivor-centred approaches and confidentiality. In responses, we designed and delivered workshops based on two-way dialogue. This supports technical leads to deepen their understanding of the contexts in which each country team works, and it also enables country decision-makers to deepen their understanding of the technical team’s experience of what works to keep people safe. These workshops then become safe spaces in which teams can collaborate to identify what works to deliver survivor-centred solutions.

This shift to two-way learning is now more embedded across all our investigations teams. This means that when we investigate wider human resources, corruption issues or any other concerns that are raised, we believe we are now better placed to understand and rectify the concern.

- **Safe Programming training**

Oxfam's approach to safe programming recognizes the risk that Oxfam and its delivery partners might do harm during the delivery of our work, even when that may be unintentional. We focus on the risk to the vulnerable individuals and communities our work aims to support, but also on the partner organizations with whom Oxfam works and other risks which might in some way undermine Oxfam's values. Our safe programming work does not focus on the risks to Oxfam, unless such risks may cause harm to the communities or partners with whom we work.

A central Safe Programming Team has been training trainers on this confederation-wide commitment to safe programming. There is now a pool of over 50 trainers across the regions in which Oxfam works, who can train staff across the confederation, most often through an initial half-day training course. This role is voluntary, with staff providing this training alongside their main roles.

In this reporting period, 126 participants received training from this voluntary pool of trainers. Online training is offered in English, Arabic and French. Written training materials are available in Russian, Ukrainian, Spanish, French, Arabic and English. Materials may also be made available in additional languages during an emergency response.

Each trainer uses a standard Oxfam Safe Programming Toolkit, but each training session is tailored to the contexts and roles of participants. During the training, participants are asked to complete Oxfam's standard Safe Programming Risk Assessment form. This is a simple, flexible tool to facilitate how staff identify risks to communities or individuals or any risks which may undermine Oxfam's values. The results of the training exercise vary depending on the risks that participants are facing locally and their specific roles. For example, in one context, a participant noted that the biggest risk to communities was of elephant attacks against women mining for precious stones. That training session then used that example to demonstrate how the tool can be used to support the risk assessment.

Oxfam GB employs a central Safe Programming Team, who apply learning to periodically update the content of Oxfam's training and toolkits. This learning happens in different ways: for example, tools might be developed together with country teams and thematic leads across the organization, or we may instigate a specific review. For instance, based on feedback, we are developing guidelines on childcare provision for programme participants during in-person training. When completed, these guidelines will be included in trainer notes for future safe programming training.

Oxfam GB's team also works closely with colleagues from Oxfam's international secretariat (as a Safe Programming Working Group) to host trainer briefings, most often offered as webinars. Technical experts from across the confederation or beyond are asked to demonstrate how they would identify particular types of risk, such as racial justice, conflict sensitivity, data rights or safeguarding specific risks. These briefings aim to facilitate the exchange of learning from practices across the confederation and increase opportunities for that learning to inform future risk assessments.

In the last year an external review of Oxfam GB's safe programming approach was carried out. Findings included the following:

- Participants reported that they found the training helpful.

- There was a positive correlation between receiving Safe Programming training and the maturity of our approach to risk management.
- A post-training increase in conversation about safe programming risks was noted.
- One example of the impact came from our training in a camp context in a humanitarian setting. Oxfam staff had wanted to ensure that the locations of new water taps would be both physically safe and also sensitive to local contexts. Before taking final decisions, staff consulted communities extensively, to find out whether they were comfortable with sharing tap stands and how to avoid exacerbating local tensions. In response, the programme was modified to provide more tap stands than staff had assumed would be needed prior to asking the community.

Safe, conflict-sensitive programme design

'If there are families that have historic conflict, and we are making them share a tap stand, that would create all sorts of issues. So, we ask them who they are willing to share water with and build a stand accordingly [...] While that's meant that we've added a few more tap stands than we would have hoped, it's allowed us to make sure we're doing things in a way that will not exacerbate any existing conflicts in the community and ensure the sustainability of the engineering work that we're doing.'

Oxfam Programme staff member

NOTES

¹ See: **Legislation:** Section 54 of the UK Modern Slavery Act 2015. Part 6. Transparency in supply chains etc.

<https://www.legislation.gov.uk/ukpga/2015/30/part/6>

Government guidance: UK Government. (2015). Transparency in Supply Chains etc. A Practical Guide.

https://assets.publishing.service.gov.uk/media/61b7401d8fa8f5037778c389/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

² Other useful good practice guidance includes:

- Corporate Justice Coalition. (2016). Beyond Compliance: Effective Reporting Under the Modern Slavery Act: a civil society guide for commercial organisations on the transparency in supply chains clause. https://corporatejusticecoalition.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf
- Corporate Justice Coalition. (2016). Short Guides on Modern Slavery Reporting. <https://respect.international/cores-short-guides-on-modern-slavery-reporting/>
- CORE, Anti-Slavery, UNICEF, Business and Human Rights Resource Centre. (2017). Modern Slavery Reporting: weak and notable practice. https://corporatejusticecoalition.org/wp-content/uploads/2017/06/Core_ExamplesFINAL.pdf
- Business and Human Rights Resource Centre. (2021). Modern Slavery Act: Five years of reporting. Conclusions from monitoring corporate disclosures. https://media.business-humanrights.org/media/documents/Modern_Slavery_Act_2021.pdf. Oxfam GB was a member of the Modern Slavery Registry Board, in support of the original central registry of all UK company modern slavery statements. This was created and managed by the Business and Human Rights Resource Centre until the UK government agreed to host an official registry in 2021, which is now available here: <https://modern-slavery-statement-registry.service.gov.uk/>
- BOND. (2022). Becoming locally led as an anti-racist practice: a guide to support INGOs. <https://www.bond.org.uk/resources/becoming-locally-led-as-an-anti-racist-practice-a-guide/>

³ See, for example, International Organization for Migration (IOM). (2021). World Migration Report 2022, Chapter 10, p.5.

<https://publications.iom.int/books/world-migration-report-2022-chapter-10#:~:text=to%20reading%20list-,World%20Migration%20Report%202022%3A%20Chapter%2010%20%2D%20Human%20trafficking%20in%20migration,and%20new%20forms%20of%20cooperation&text=This%20chapter%20provides%20an%20overview,of%20human%20trafficking%20and%20traffickers>

See also United Nations Human Rights Office of the High Commissioner (OHCHR). (2014). Human Rights and Human Trafficking: Fact Sheet No. 36, p.16. https://www.ohchr.org/sites/default/files/Documents/Publications/FS36_en.pdf

⁴ P. Burland, IOM in the UK. Modern slavery: what the numbers tell us about how survivors are identified.

<https://events.teams.microsoft.com/event/7ac26c09-5757-4b10-b019-43bb23dd5afc@3223ec3f-c044-42bd-9eb2-381049e596cf>

⁵ See previous Oxfam GB statements on modern slavery at: <https://www.oxfam.org.uk/what-we-do/about-us/plans-reports-and-policies/modern-slavery-act-transparency-statement>

⁶ For example, see Oxfam GB Annual Report 2022/23. A summary of our plans is presented on p.103.

<https://www.oxfam.org.uk/about-us/plans-reports-and-policies/annual-report-and-accounts/>

⁷ Walk Free, Minderoo Foundation. (2023). The Global Slavery Index 2023.

<https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

⁸ Save the Children International. (2023). Child Labour Risks Found Widespread in Global Supply Chains from Cell Phones to Coffee. <https://www.savethechildren.net/news/child-labour-risks-found-widespread-global-supply-chains-cellphones-coffee-new-study>

⁹ UN Forum on Business and Human Rights. (2023). Addressing the root causes of environmental racism: leveraging the UNGPs as a tool for transformative change. <https://forumbhr2023.sched.com/event/10rgF>

¹⁰ M.-O. Herman. (2023). New EU business rules spare fossil fuel financiers and sectors rife with labour exploitation. Oxfam International. <https://www.oxfam.org/en/press-releases/new-eu-business-rules-spare-fossil-fuel-financiers-and-sectors-rife-labour>. Annex I, item 9 of the directive outlines the material scope of the due diligence obligations of companies regarding child labour: 'The prohibition of the employment of a child under the age at which compulsory schooling is completed and, in any case, is not less than 15 years, except where the law of the place of employment so provides in line with Article 2(4) of the International Labour Organization Minimum Age Convention, 1973 (No 138), interpreted in line with Articles 4 to 8 of the International Labour Organization Minimum Age Convention, 1973 (No 138).' European Union. (2024). Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1760&qid=1720543639416>

¹¹ Ibid.; and M.-O. Herman. (2024). EU's heavyweights slash supply chain rules to appease big business. Oxfam International. <https://www.oxfam.org/en/press-releases/eus-heavyweights-slash-supply-chain-rules-appease-big-business>

¹² Consilium (europa.eu). (2024). Forced labour: Council adopts position to ban products made with forced labour on the EU market. https://www.consilium.europa.eu/en/press/press-releases/2024/01/26/forced-labour-council-adopts-position-to-ban-products-made-with-forced-labour-on-the-eu-market/?utm_source=dsms-auto&utm_medium=email&utm_campaign=Forced+labour%3a+Council+adopts+position+to+ban+products+made+with+forced+labour+on+the+EU+market

¹³ The proposed Regulation:

- would investigate suspected use of forced labour and, if proven, products would be withdrawn from the market;
- would scrutinize products coming from areas with a high risk of state-imposed forced labour;
- may allow products back on the market after forced labour has been eliminated from the supply chain.

European Parliament. (2024). Products made with forced labour to be banned from EU single market. <https://www.europarl.europa.eu/news/en/press-room/20240419IPR20551/products-made-with-forced-labour-to-be-banned-from-eu-single-market>

¹⁴ International Labour Organization, Walk Free, International Organization for Migration. (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>

¹⁵ Ibid.

¹⁶ See, for example, IOM. (2021). World Migration Report 2022, Chapter 10, op. cit., p.5. 'The decision of the Colombian Government in February 2021 to regularize Venezuelan migrants who were irregularly in the country with a 10-year temporary protection status constitutes a major step forward in improving their protection and safety and decreasing their vulnerability to human trafficking.'

See also OHCHR. (2014). Human Rights and Human Trafficking: Fact Sheet No. 36, p.16. op. cit.

¹⁷ See GOV.UK. Work in the UK. <https://www.gov.uk/browse/visas-immigration/work-visas>

¹⁸ Anti-Slavery International. (7 March 2024). X post. https://twitter.com/Anti_Slavery/status/176580052042008580?s=20 [accessed 19 July 2024].

¹⁹ P. Burland, IOM in the UK. Modern slavery: what the numbers tell us about how survivors are identified, op. cit.

²⁰ IOM. (2024). Updated analysis of the National Referral Mechanism data. <https://unitedkingdom.iom.int/news/updated-analysis-national-referral-mechanism-data#:-:text=%20Women%20referred%20to%20the,the%20524%20days%20for%20men>

²¹ There is growing international agreement that 'trafficked persons [should not be] prosecuted for violations of immigration laws or for the activities they are involved in as a direct consequence of their situation as trafficked persons' (p.18). 'States can support trafficked persons by waiving prosecution against any trafficked person working illegally in their country' (p.50). See, for example: p.4, 'Right to work' and p.16, 'Risk of further exploitation'. OHCHR. (2014). Human Rights and Human Trafficking: Fact Sheet No. 36, op. cit. See also P. Burland, IOM in the UK. Modern slavery: what the numbers tell us about how survivors are identified, op. cit.; and Council of Europe Convention on Action against Trafficking in Human Beings, Article 26, p.17. <https://assets.publishing.service.gov.uk/media/5a75ae20e5274a545822d636/8414.pdf>

²² The UK's Equality Act 2010 defines nine **protected characteristics**: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. Available at: <https://www.equalityhumanrights.com/en/advice-and-guidance/your-rights-under-equality-act-2010>

The International Labour Organization (ILO) defines the **prohibited bases of discrimination in employment** as: race, colour, sex, religion, political opinion, national extraction, social origin, age, HIV status, disability, sexual orientation, workers with family responsibilities, trade union members or activities, or any 'distinction, exclusion or preference... which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation'.

²³ Oxfam. (2016). Supply and Logistics Manual. From Programme Design to Beneficiary: A guide to delivering effective and accountable programmes. <https://oxfam.app.box.com/v/SupplyAndLogistics-Manual-EN>

²⁴ Oxfam GB's Anti-Slavery and Human Trafficking Policy (https://www.oxfam.org.uk/documents/271/Anti-Slavery-Policy-and-Human-Trafficking-Policy-Sep-21_wGfVpGm.pdf) commits us to implementing the 'employer pays' principle. See Institute for Human Rights and Business. (2023). The Employer Pays Principle. https://www.ihrb.org/employer-pays-principle?_gl=1*4vh3hp*_ga*MTQ30TUxNzgwOS4xNjg0NDIwOTg2*_ga_CSPNK4BXVZ*MTY4NDQyMDk4NS4xJEUxMTY4NDQyMTAyMS4yNC4wLjA.S_ga=2.109640578.669459613.1684420986-1479517809.1684420986

²⁵ Oxfam. A Supplier's Guide to the Sourced by Oxfam Ethical and Environmental Supplier Framework. https://www.oxfam.org.uk/documents/313/Sb0_Ethical_Environmental_Supplier_Framework.pdf

²⁶ UK Government. (2021). Green claims code: making environmental claims.

<https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>

²⁷ Oxfam. A Supplier's Guide to the Sourced by Oxfam Ethical and Environmental Supplier Framework, op. cit.

²⁸ Oxfam. (2021). Human Rights Roadmap, Sourced by Oxfam Ethical and Environmental Supplier Framework. <https://oxfam.app.box.com/s/s16b3g8a1f92lv81d655qvqqcqhptpplb>

²⁹ A. Kalfan et al. (2023). Climate Equality: A planet for the 99%. Oxfam International. <https://policy-practice.oxfam.org/resources/climate-equality-a-planet-for-the-99-621551/>

³⁰ N. Tewari et al. (2023). Gendered Dimensions of Loss and Damage in Asia. Oxfam International. <https://policy-practice.oxfam.org/resources/gendered-dimensions-of-loss-and-damage-in-asia-621556/>

³¹ C. Fernández, A.M. Rodríguez et al. (2024), Climate Change Loss and Damage in Rural Communities in Honduras and Colombia. La Ruta del Clima and Oxfam. https://larutadelclima.org/wp-content/uploads/2024/06/LRDC_OUTPUT-3.-Narrative-Case-Study-Reports-Honduras-and-Colombia.pdf

³² E. Blom and L. Walsh. (2023). Payment Overdue: Fair ways to make polluters across the UK pay for climate justice. Oxfam GB. <https://policy-practice.oxfam.org/resources/payment-overdue-fair-ways-to-make-polluters-across-the-uk-pay-for-climate-justi-621539/>

³³ ILO, Walk Free, IOM. (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, op. cit.

³⁴ R. Bharadwaj, D. Chakravarti, N. Karthikeyan, S. Hazra, U. Daniel, J. Topno, R. Abhilashi. (2022). Climate change, migration and vulnerability to trafficking. International Institute for Environment and Development (IIED). <https://www.iied.org/20936iiied>

³⁵ Relief Web. (2024). Kenya: Drought – 2014–2024. <https://reliefweb.int/disaster/dr-2014-000131-ken>

³⁶ N. Wadekar. (2020). Kenya Is Trying to End Child Marriage. But Climate Change Is Putting More Young Girls At Risk. Time. <https://time.com/5878719/climate-change-kenya-child-marriage/>

³⁷ Minority Rights Group International (2019). Minority and Indigenous Trends 2019: Focus on climate justice, p.84. <https://minorityrights.org/resources/minority-and-indigenous-trends-2019-focus-on-climate-justice/>

³⁸ As discussed in: Oxfam GB Statement on Modern Slavery, Financial Year 2022/23.

https://www.oxfam.org.uk/documents/713/Modern_Slavery_Statement_2023_EMt2hcJ.pdf, p.10 and Oxfam GB Statement on Modern Slavery, Financial Year 2020/21.

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ACKNOWLEDGEMENTS

This statement was written by Beck Wallace, Corporate Responsibility Adviser. We acknowledge comments provided by Rosie Woollcott, Helen Jeans, Rhaea Russell-Cartwright, Sophie Brill, Blandina Bobson, Matthew Cousins, Chris Pritchard, Andrea Gerwer, Marco Herman, Elissa Alayache, Ania Gaboune, Magnus Corfixen, Awssan Kamal, Tim Moyles, Anita Kasza and Carol Brady.

Photo (front cover): Fabeha Monir / Oxfam

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Published by Oxfam GB. The information in this publication is correct at the time of going to press.

Oxfam GB, Oxfam House, John Smith Drive, Cowley, Oxford, OX4 2JY, UK.

Oxfam GB is a member of Oxfam International.