

# OXFAM NOVIB SPEAK UP PROTOCOL

RAISING CONCERNS OF MISCONDUCT



OXFAM  
Novib

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# 01. INTRODUCTION

Integrity is at the heart of Oxfam Novib’s work. At Oxfam Novib, we recognize that our staff hold a privileged position of power and trust in relation to our partners and the communities that we come from and serve. We are committed to creating and maintaining a safe organizational culture for all those who work for and with us, as well as the communities we serve. This means treating all people with respect and dignity and challenging any form of harassment, discrimination, intimidation, exploitation or abuse of power.

Oxfam Novib will not tolerate our employees or anyone associated with the delivery of our work carrying out any form of sexual exploitation, abuse or harassment, child abuse, nor any form of fraud or corruption. We encourage anyone who suspects that misconduct has occurred or is occurring to communicate their suspicions confidentially in accordance with this Speak Up Protocol. This will ensure that Oxfam Novib can support victims/survivors and act upon the concerns raised.

# 02. PURPOSE AND SCOPE

This Speak up Protocol explains how to report any form of misconduct committed by an Oxfam Novib employee or anyone associated with the delivery of our work.

This Protocol is not aimed at grievances or complaints related to labour disputes or any disagreement that staff may have with their manager on performance, nor about disagreements relating to organization or prioritization of work. Oxfam Novib takes such complaints seriously, but different processes and procedures apply.

Any person working for or with Oxfam Novib can speak up within our organization if they have witnessed or experienced misconduct in any form (see full definitions and examples in Annex 1). This includes:

- **safeguarding misconduct**, such as sexual exploitation abuse, sexual harassment or child abuse,
- **corruption misconduct**, such as fraud, theft, bribery, money laundering, financing or aid diversion or nepotism,
- **interpersonal misconduct**, such as bullying, intimidation, harassment or discrimination.

Reports can also be made by any other person who has a concern about misconduct happening within the scope of Oxfam Novib's work, including program participants, volunteers, suppliers, partners and members of the public.

Different speak up channels have been implemented to facilitate multiple reporting methods so that reporters can choose the one they are most comfortable with.

# 03. SPEAK UP CHANNELS

If you are concerned about misconduct, it is important not to investigate or gather evidence yourself, but rather to report your suspicions to Oxfam Novib's Integrity Unit as soon as possible using one of the channels outlined below.

All reports received by the Integrity Unit will be treated confidentially, with the privacy and safety of all those concerned honoured as a guiding principle. Any information concerning complaints is shared only on a limited and 'need-to-know' basis. This means that it will only be shared with those who need to know it for the management or implementation of an appropriate response, to comply with legal or contractual donor reporting requirements, or to protect others from further harm. Those who need to know will only be given as little information as reasonably necessary and no more.



## **A CHANNELS REACHING THE INTEGRITY UNIT DIRECTLY AND CONFIDENTIALLY**

- **E-mail to [integrity@oxfamnovib.nl](mailto:integrity@oxfamnovib.nl):** this e-mail address is confidential and accessible only to members of the Oxfam Novib Integrity Unit.
- **The Oxfam Reporting Misconduct Webform:** this webform feeds directly into the confidential environment of Oxfam’s Global Case Management System. Complaints relating to Oxfam Novib will only be accessible to the Oxfam Novib Integrity Unit. The form is available in several languages.

NOTE: it is possible to report concerns anonymously through the webform. However, if insufficient information is provided, this may affect our capacity to respond as anonymous complaints do not allow us to follow up with the reporter.

## **B CHANNELS REPORTING TO THE INTEGRITY UNIT CONFIDENTIALLY**

- **Safeguarding Focal Points in Country Offices:** Country office staff can report safeguarding concerns through their Safeguarding Focal Points (SGFPs). SGFPs are trained to facilitate in-person reporting. SGFPs liaise directly and confidentially with the Oxfam Novib Integrity Unit.
- **Members of the Safeguarding Shared Service:** Members of Oxfam’s Safeguarding Shared Service, such as Regional Safeguarding Advisors, are also available to receive reports of safeguarding concerns. They liaise directly and confidentially with the Oxfam Novib Integrity Unit. To reach out to a member of the Safeguarding Shared Service in your region, consult the list of key contacts on COMPASS.
- **Oxfam Novib Management and Country Management:** Managers receiving a misconduct report must report these concerns immediately, directly and confidentially to the Oxfam Novib Integrity Unit, in person, via e-mail or by using the webform. When other types of concerns are reported to managers, managers can contact the Integrity Unit to discuss whether the matter falls within the mandate of the Integrity Unit or if other avenues are mandated.

## **C CHANNELS NOT AUTOMATICALLY REPORTING TO THE INTEGRITY UNIT**

- **Confidential Counsellors:** Confidential Counsellors are a confidential, independent support resource for all Oxfam staff members who experience unwanted behavior in the workplace. A confidential counsellor does not deal with formal complaints. Instead, they can provide advice and support on either jointly exploring informal solutions for the unwanted behavior or formalizing a complaint through the appropriate Oxfam channels.

As consultations with a confidential counsellor are strictly confidential, the counsellor will take no action without the staff member’s explicit consent unless they are legally obliged to do so.

# 04. ROLES AND RESPONSIBILITIES

## A INSTITUTIONAL RESPONSIBILITIES

All staff are required to be informed of the Speak Up Protocol, Integrity-related policies and aware of their own responsibility regarding Integrity and the Oxfam Code of Conduct. Each staff member must assess specific integrity risks and challenges within their scope of work and tailor their actions accordingly. A description of institutional responsibilities and mandates related to integrity in our organisation can be found below.

- **Oxfam Novib Board of Directors** owns the Oxfam Novib Speak up Protocol. It leads the work of fostering a culture of ethics and accountability. The Board of Directors delegates the responsibility for managing misconduct reports to the Integrity Unit. The Board of Directors is ultimately accountable for misconduct happening in

Oxfam Novib and the Country Offices for which Oxfam Novib is Executing Affiliate.

- **Oxfam Novib Integrity Unit** works to prevent, respond to and address misconduct within Oxfam Novib and the Country Offices for which Oxfam Novib is the Executing Affiliate.
- **Oxfam Novib Board of Supervisor Integrity Focal Point** support the Board of Supervisors in discharging its governance responsibilities concerning integrity. It provides the Integrity Unit Manager with a direct link to the Board of Supervisors to help solidify the independence of the Unit. In cases of misconduct reported against a member of the Board of Directors, the Oxfam Novib Board of Supervisor Integrity Focal Point will serve as an advisor to the Integrity Unit Manager in the case management.
- **Oxfam Novib Management and Country Management** are responsible for fostering a safe and brave culture. Managers may receive reports of misconduct which they must escalate to the Integrity Unit. Additionally,

senior managers might be involved in managing or implementing the response to concerns raised, in coordination with the Integrity Unit. However, details of the concerns raised will only be shared with senior managers on a confidential and strict need-to-know basis.

- **Oxfam Novib Human Resources, People and Culture Unit, Human Resources colleagues in Country and from the EA Global Business Support Unit** champions a safe and brave culture within the organization. Also, HR colleagues might be informed of concerns raised where it is necessary to manage or implement the response. However, details of the concerns raised will only be shared with HR colleagues on a confidential and strict need-to-know basis.
- **Oxfam International** is responsible for managing complaints of misconduct involving staff and associated personnel within the OI Secretariat. OI representatives may be involved in managing or implementing the response to the concerns raised.

# B REPORTING RESPONSIBILITIES

- **All Oxfam Novib employees and those working for or affiliated with Oxfam Novib** are required, as stipulated in Oxfam's Code of Conduct, to report any misconduct, experience or observed, occurring in the workplace as soon as possible, using one of the channels outlined above.
- **Managers** who have received a complaint or have been informed on concerns on misconduct are required to report these complaints and concerns without delay to the Oxfam Novib Integrity Unit. All managers are urged not to take any investigative or disciplinary action before informing the Integrity Unit. In case the initial reporter does not want their identity to be disclosed, it is possible to report the concerns to the Integrity Unit without disclosing the personal information.
- **Safeguarding Focal Points** who have received a complaint or have been informed on concerns on misconduct must report these complaints and concerns immediately to the Oxfam Novib Integrity

Unit without reporting to line management. When in doubt, it is important to still report any concerns around safeguarding or corruption misconduct. In case the initial reporter does not want their identity to be disclosed, it is possible to report the misconduct to the Integrity Unit without disclosing the personal information.

- Confidential counsellors are obligated to maintain confidentiality in all consultations and are not required to report misconduct unless the employee seeking help explicitly consents to it. However, when there is potential for further harm or escalation leading to inflicting serious harm to others or the organization, the confidential counsellor must break confidentiality and report their concerns to Oxfam Novib Integrity Unit. This decision is only made after discussing it with the employee seeking help and encouraging them to report the misconduct themselves.

**Information relating to misconduct must be treated with care so as not to cause distress or harm to the people involved, nor put the integrity of an investigation or response at risk. As such, sensitive and personal information should only be shared with those who need to know it, through one of the channels outlined above.**

**Retaliation against anyone reporting a genuine misconduct concern or cooperating with the Integrity Unit during the response is prohibited. Individuals who engage in retaliation may be subject to disciplinary action. If you believe you are or have been subjected to retaliation as a result of speaking up, you should raise this through one of the channels outlined above.**

**No disciplinary measures will be taken against staff reporting a genuine concern, even when the concern later proves to be mistaken or misguided. However, an unfounded complaint made with malicious intent will be independently investigated and may result in disciplinary measures.**

# 05. INTEGRITY CASE MANAGEMENT PROCESS

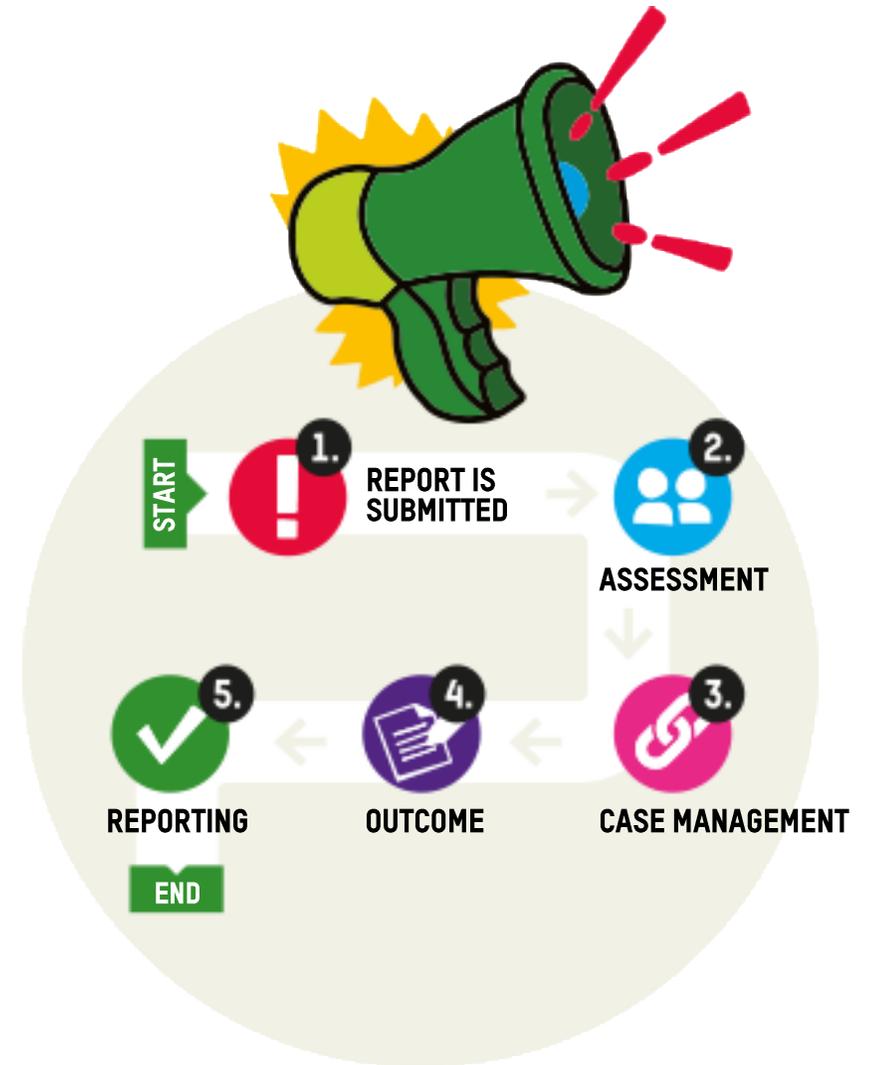
When responding to a reported misconduct concern, Oxfam Novib's Integrity Unit is committed to acting swiftly and responding appropriately to all reports, following due process and providing procedural fairness to all involved. Accordingly, a One Oxfam Standard Operating Procedure has been adopted for safeguarding and interpersonal misconduct, and a similar one for fraud and corruption responses. However, the timeline of the process followed for all responses to misconduct reports, as set out in the diagram below, may vary depending on the nature and complexity of the concerns raised.

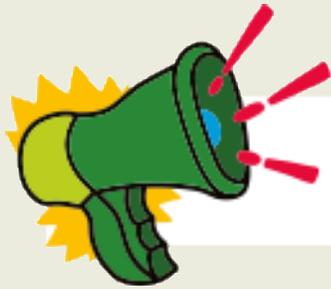
Any complaints or concerns about the management of a specific case outside of the normal appeals process should be addressed to a member of the Board of Directors. If the report concerns a member of the Board of Directors,

the complaint should be addressed to the Integrity Focal Point within the Supervisory Board of Oxfam Novib.

If, following the exhaustion of internal measures, the complainant still believes that the report was not handled appropriately or when alternative external advice is needed, the following reporting option in the Netherlands is also available:

Investigation Department of the Huis voor Klokkenluiders (House of Whistleblowers): <https://www.huisvoorklokkenluiders.nl/english>



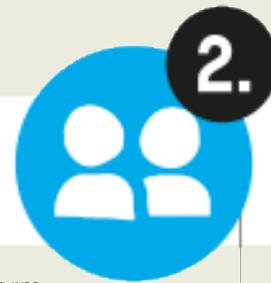


**START**



## REPORT IS SUBMITTED

Reports submitted through the Webform are received by the Integrity Unit. Where insufficient information has been provided to complete an initial assessment, the Unit may contact you confidentially to obtain further details.



## ASSESSMENT

The report is assessed by the Integrity Unit to determine if there should be an investigation and who should be responsible for follow-up. Support and protection measures are offered to survivors and witnesses where needed.



## REPORTING

For reasons of transparency, Oxfam Novib shares anonymized data on the outcome of cases in our annual reports and our reports to donors.

**END**



## OUTCOME

Where sufficient evidence can be gathered to make findings, investigators will prepare a report setting out their conclusions and recommendations. In cases where misconduct has been identified, further action will be taken.



## CASE MANAGEMENT

Depending on the nature of the allegations, the case may be referred to a specialist within the Integrity Team for investigation or to another department for follow-up. In cases involving SEAH,\* we prioritize the rights, needs and wishes of survivors.

\*Sexual exploitation, abuse or harassment

# 06. ENFORCEMENT, DEROGATIONS, TRANSITION PERIOD AND REVISION

No derogations are applicable concerning this Protocol.

The Speak up Protocol enters into force from 15/06/2023, replacing the Speak up Protocol approved by the PEO on 24/09/2018. This Protocol is reviewed on 15/06/2025 and will be reviewed and updated no later than two years after this date.

## 1. ADMINISTRATIVE INFORMATION

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<b>Editor</b>	Integrity Unit, Oxfam Novib
<b>Notes</b>	This revision supersedes earlier versions of the Speak up Protocol. Please note that this Protocol has a complementary character: any applicable national legislation remains valid. Where the terms of this Protocol are stricter than applicable legislation or provide additional safeguards, rights or remedies, the terms of this Protocol will prevail.

# ANNEX 1

## DEFINITIONS OF MISCONDUCT AND EXAMPLES

### SEXUAL ABUSE, SEXUAL EXPLOITATION AND SEXUAL HARASSMENT (SEAH)

DEFINITION	EXAMPLES IN PRACTICE
<b>SEXUAL ABUSE</b>	
The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.	<p>A driver employed by Oxfam rapes another Oxfam staff member during travel to a remote field location.</p> <p>An Oxfam staff member inappropriately touches intimate parts of the body of the cook in the Oxfam guesthouse.</p>
<b>SEXUAL EXPLOITATION</b>	
Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.	<p>An employee suggests to a community member that they can be bumped up on the list of distributions if they are willing to enter into a romantic relationship.</p> <p>An Oxfam staff member pays for sex with someone living in the refugee camp where Oxfam is distributing food.</p>
<b>SEXUAL HARASSMENT</b>	
Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. When such conduct interferes with work; is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work.	<p>An employee repeatedly makes crude jokes and shares vulgar pictures with colleagues in public and private settings.</p> <p>A senior manager makes gestures with sexual undertones towards participants of a workshop.</p> <p>A manager insinuates that the renewal of the contract of a subordinate staff member is contingent upon engaging in sexual activities.</p>

## CHILD ABUSE

Child abuse involves the abuse of children’s rights and includes all forms of violence against children: physical, emotional and sexual abuse, neglect, family violence, sexual exploitation, abduction and trafficking, including for sexual purposes, involvement of a child in online child sexual exploitation and child labour as defined in the One Oxfam Child Safeguarding Policy

FORMS OF CHILD ABUSE	DEFINITION AND EXAMPLES
<b>CHILD SEXUAL ABUSE AND EXPLOITATION</b>	When a child is used by another child, adolescent or adult for his or her own sexual stimulation or gratification. Sexual abuse involves all forms of sexual activity involving children. Sexual activity with children that constitutes sexual abuse/ exploitation can include both contact and non-contact activities. For example, exposing a child to online child sexual exploitation material, or taking sexually exploitative images of children.
<b>NON-SEXUAL EXPLOITATION</b>	The exploitation of children for non-sexual purposes, such as child labour and child trafficking.
<b>PHYSICAL ABUSE</b>	When a person purposefully injures, or threatens to injure, a child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. It also includes cultural practices which can alter physicality in ways that cause distress, harm and/or cause lasting health ramifications such as Female Genital Mutilation.
<b>EMOTIONAL ABUSE</b>	A persistent attack on a child’s self-esteem. Examples include, but are not limited to – name-calling, threatening, ridiculing, shaming, intimidating or isolating the child.
<b>CHILD NEGLECT</b>	The persistent failure, where there are means, or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child’s health and development is placed at risk.
<b>CHILD MARRIAGE</b>	Child marriage is a formal marriage or informal union before age 18.

## CORRUPTION

### DEFINITION

### EXAMPLES IN PRACTICE

#### FRAUD

Fraud is any act or omission that intentionally misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation. It can also involve the abuse of one's position. Fraud may be perpetrated internally or by external parties.

An employee creates a false invoice, which they then use to settle a cash float; keeping money that they are not entitled to.

A partner organisation provides false financial records so that they can charge the same project costs to Oxfam and another donor.

Members of a programme team falsify entries in cash distribution record so that they can keep some of the money for themselves.

#### THEFT

Theft is the taking of another's property without their consent, and with the intent to permanently deprive them of it. Theft may be perpetrated internally or by external parties.

An employee dishonestly takes cash from the office safe knowing that they are not entitled to do so.

An employee takes WASH kits from the warehouse in order to sell them privately.

An employee fails to return their Oxfam laptop after leaving the organisation.

#### BRIBERY

Bribery is the offering, giving or promising (or requesting, agreeing to receive or accepting) any financial or other advantage to influence another person to improperly perform a function or activity, or to obtain an undue advantage.

A logistics officer agrees to manipulate a procurement process in order to award a contract to a supplier, in exchange for a kickback payment from that supplier.

An employee offers to pay an illegitimate fee to a customs official in order to release goods imported from abroad quickly.

An employee is caught speeding in an Oxfam vehicle by the local traffic police. The employee agrees to pay some cash to the officers to avoid receiving a formal ticket and larger fine.

<b>NEPOTISM</b>	
Nepotism is favouritism granted to associates regardless of merit.	<p>A senior manager influences a recruitment process to ensure that one of their family members is offered a position.</p> <p>An employee influences a partnership selection process to award a partner contract to an organisation owned by their spouse.</p>
<b>MONEY LAUNDERING</b>	
Money laundering is the process of turning the proceeds of crime into property or money that can be accessed legitimately without arousing suspicion.	<p>A private donor uses their donation to Oxfam to transfer money earned through criminal activity from one country to another. The donor requests that a portion of the donated funds are transferred to a bogus NGO in the destination country.</p>
<b>AID DIVERSION AND TERROR FINANCING</b>	
Aid (including funds, economic goods and material support) is knowingly or recklessly diverted from its intended purpose and made available to any entity or individual designated as terrorist by the international community or affiliate domestic governments; or individuals or entities subject to financial sanctions by the United Nations, a relevant state or the European Union.	<p>Oxfam procures items from a supplier who features on an international terror list.</p> <p>An Oxfam office is raided overnight by members of a proscribed terror group, who steal assets.</p> <p>Oxfam pays a grant to a partner organisation that is affiliated with a proscribed terror group.</p>

## INTERPERSONAL MISCONDUCT

### DEFINITION

### EXAMPLES IN PRACTICE

#### ABUSE OF POWER

Abuse of power takes place when someone in a position of authority, actual or perceived, misuses their power to oppress, control or make excessive demands from others.

#### BULLYING

Bullying is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment undermining the confidence and self-esteem of the recipient(s). It could be an abuse or misuse of power that humiliates or injures the recipient(s), and can be physical or psychological behaviour or conduct.

Note: Management actions for managing performance and conduct are not in themselves harassment or bullying.

Aggressive behaviour towards others, including unreasonable anger or shouting, threatening gestures, language, insults or actual violence.

Criticism that focuses on a personal characteristic rather than work performance, or criticising someone in front of others which undermines their confidence.

Persistently setting objectives with impossible deadlines or unachievable tasks; unnecessary pressure.

Using unnecessary levels of excessive supervision and interfering with the small detail of work.

Deliberately withholding work information or unreasonably blocking promotion or training opportunities.

Conduct designed to belittle a person's reputation in the organisation or wider community.

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## DISCRIMINATION

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Discrimination is any unfair treatment or arbitrary distinction based on a person's race, sex, gender, sexual orientation, gender identity, gender expression, religion, nationality, ethnic origin, disability, age, language, social origin or other similar shared characteristic or trait. Discrimination may be an isolated event affecting one person or a group of persons similarly situated, or may manifest itself through harassment or abuse of authority. It may also occur through systems which create barriers or exclude people or groups of people due to these characteristics.

Excluding people because of personal characteristics.

Any "jokes", banter, insults, taunts or gibes which focus on personal or physical characteristics as defined above.

Display or circulation of any offensive material, graffiti, racist or otherwise discriminatory literature; pictures, objects or written materials.

The general use of racist language; racist terminology; homophobic language or otherwise discriminatory or provocative language.

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## HARASSMENT

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Harassment is defined as any disagreeable or offensive act. Although it may sometimes be just one action, in general it is identified as repeated and unreasonable actions that target an individual or group of individuals and may cause difficulties in the execution of assigned tasks or mean that the employee feels that the workplace environment is hostile, intimidating or humiliating.

This situation may entail risks to the individual's health, safety and welfare. Harassment frequently involves the abuse of power, which means that the person attacked feels the situation is unwanted and finds it hard to defend themselves.

Insulting or ridiculing the way someone dresses, speaks or behaves.

Persistent or unwanted attention or physical contact or similar.

The exercise of undue influence, e.g. insinuating or stating that another person's employment opportunities could be adversely affected by a refusal to submit to requirements or demands, that cannot be reasonable expected from that person's job.

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**INSTITUTIONAL HARM**

Criminalization of the victim or re-victimization in the institution responsible for ensuring victim protection; a victim’s version of events is questioned or they are blamed for causing the aggression, or an attempt is made to convince them to solve the problem privately instead of reporting it.

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**RETALIATION**

Retaliation occurs when an employee is subjected to threatening or less favourable treatment because they have made or supported a complaint or grievance in good faith, or because they are suspected of doing so, or are about to do so.