The Credibility of International Non-Governmental Organizations (INGOs) and the Oxfam Scandal of 2018*

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Abstract

In 2018, one of the largest international development non-governmental organizations (NGOs) in the world, Oxfam GB, became engulfed in a scandal which quickly spread to other international NGOs (INGOs). The crisis arose from the sexual exploitation, abuse and harassment (SEAH) of the beneficiaries and staff of leading INGOs and caused significant reputational harm to these organizations amid declining public trust and intense political and media scrutiny. The crisis raises significant questions about the credibility of INGOs and the policies necessary to restore public trust. This paper reviews the background to the crisis and the responses to it from Oxfam GB & Oxfam International, by other INGOs and by the funders and regulators tasked with overseeing them, focusing on the United Kingdom. It then analyses these actions in the context of an analytical framework proposed in Gourevitch, Lake & Stein (Eds)(2012). It argues that the Oxfam scandal of 2018 marks a fundamental shift in the manner in which INGOs must promote accountability and transparency, based on high-quality, culturally-inclusive, learning-based management.

Key words: International Non-Governmental Organizations (INGOs); aid chains; regulation; management; policies; Oxfam GB; Oxfam Worldwide.

1. Introduction

The *World Development Report 2012: Gender Equality and Development* (World Bank 2012) explored the enduring and systemic nature of gender inequality and ill-being in the contemporary world, including a demographic imbalance arising from the

disproportionate mortality of women and girls.[1] Until recently, however, few observers appreciated the extent to which such inequality and ill-being was embedded and institutionalised within the international non-governmental organizations (INGOs) charged with fighting it. Reports of the sexual exploitation, abuse and harassment (SEAH) of the beneficiaries of international aid programmes first emerged in 2002 (UN & SCF 2002) and follow-up reports from inter-governmental and non-governmental organizations (including SCF 2008, IRC 2014, UNFPA 2015, & UNPFA 2017) confirmed the predatory behaviour of aid agency or local contractor staff towards vulnerable beneficiaries in particular instances. Media reports contributed further to this emerging picture. Between 2015 and 2017, for instance, *Guardian* newspaper features on SEAH within the aid industry, based on whistle-blower reports and its own investigations, covered a survey into sexual violence in the humanitarian aid sector by the International Women's Rights Project, the activities of a dedicated NGO, Report the Abuse, and the work of the Safety and Security Community of Practice run by the ACT Alliance.[2] In addition, pioneering research by Danielle Spencer explored systemic gender-based violence within the aid industry, sustained in part, she argues, by INGO indifference, a culture of cover-ups and 'diversionary action' (Spencer 2016).

In 2018, however, the direct culpability of leading INGOs became more evident when Oxfam Great Britain (Oxfam GB), the UK's principal humanitarian and development NGO,[3] and one of the world's leading INGOs, was engulfed by a scandal arising from the alleged abuse of beneficiaries and staff. The scandal occurred at a difficult time, when INGOs such as Oxfam GB were focusing on the worst humanitarian landscape since the end of World War II, with concurrent emergencies in Syria, Yemen, Nigeria and South Sudan and separate Mediterranean and US-Mexico border refugee crises, and amid a media-fuelled backlash in

[1] According to the report, 'Females are more likely to die, relative to males, in many low and middle-income countries than their counterparts in richer countries. These deaths are estimated at about 3.9 million women each year. About two-thirds of them are never born, one sixth die in early childbirth and over one third die in their reproductive years.' (World Bank 2012: xxi).
[2] See Norbert (2015); Mwesiga (2016); Associated Press (2016); and Kelly (2017).
[3] In 2014-15, Oxfam GB was the largest development and humanitarian NGO in the UK, based on annual income and staff size, followed by Save the Children UK, Marie Stopes International and the British Red Cross (based on annual reports filed with the Charity Commission).

Western countries such as the UK against putatively high levels of aid, migration and refugee movements. The scandal caused significant reputational harm to Oxfam GB amid intense political and media scrutiny and resulted in declining public trust and financial support.[4] The most significant to hit British civil society in more than 50 years,[5] the Oxfam scandal quickly embraced other INGOs in the UK and elsewhere, including Save the Children UK, the Catholic Fund for Overseas Development (CAFOD), World Vision, Caritas International, the International Committee of the Red Cross (ICRC), Plan International, Mercy Corps, the Mines Advisory Group and ONE.[6] This primarily reflected on the behaviour of individual INGO staff (including managers), the organizational cultures in which it occurred and, in some cases, the deficient organizational responses.

Against this background, this paper explores the Oxfam scandal of 2018 to answer three salient questions which arise. First, and building on factors noted above, what failings on the part of Oxfam GB and others led to the Oxfam scandal? Second, what was the response to the Oxfam scandal on the part of Oxfam GB, Oxfam International, and other relevant organizations. Third, in light of answers to the first two questions, and relevant academic debate, to what extent are INGOs credible development actors? To answer these questions, the article draws on a number of sources. First, it draws on documents and reports produced by organizations directly involved in the response to the scandal, including Oxfam GB, Oxfam International, the Charity Commission for England and Wales (CCEW), the Department for International Development (DFID), and the House of Commons International Development Committee (IDC). Second, it draws on data from the Charities Aid Foundation and other sources that help to quantify the effects of the scandal on Oxfam GB and other UK charities. Third, it draws on the voluble reporting of the scandal in the print, broadcast and online media, including interviews with key individuals at the heart of the scandal. Finally, it draw on contextual documents from organizations including BOND, the Independent Commission for Aid Impact and other INGOs and inter-governmental organizations.

[4] See further below.
[5] The Statutory Inquiry by Oxfam GB's main regulator, the Charity Commission for England and Wales (CCEW), was the largest ever undertaken by the CCEW (Ratcliffe 2019).
[6] The scandal also engulfed a number of inter-governmental or multilateral organizations, including UNICEF and UNAIDS, although the scope of this paper is limited to INGOs.

The questions considered here are important for a number of reasons. INGOs work transnationally, challenging national-centric systems of management and regulation and they work in partnership with other organizations, giving rise to complex aid chains which are difficult to manage coherently and transparently. Most importantly, however, INGOs work with some of the poorest communities in the world, where beneficiaries are often powerless and vulnerable to exploitation, enhancing the responsibility (or 'duty of care') that falls on the INGOs that assist them.

The answers to the questions above are set out in the sections below, as follows. In section 2, an analytical framework applicable to the case here is set out, based primarily on Gourevitch, Lake & Stein (Eds)(2012). Section 3 provides an account of the factors behind the Oxfam scandal and its impact on both Oxfam GB and other INGOs. Section 4 assesses responses to the scandal by the affected INGOs and by regulators, focusing on the case of the United Kingdom. Section 5, the conclusion, explores lessons in the context of the credibility of INGOs, including the governance and regulation of their activities, arguing that the Oxfam scandal illustrates a fundamental shift in the way in which INGOs must promote accountability and transparency.

2. International NGOs as Development Alternatives

In the late 1980s, when they first became the subject of academic scrutiny, non-government organizations (NGOs) involved in transnational development and humanitarian activities were viewed as 'development alternatives'.[7] Two main reasons, of totemic significance, were usually advanced, one normative, the other institutional: first, they offered a credible discursive alternative to the economic neo-liberalism of the mainstream development enterprise; and second, they offered a positive, pro-poor alternative to the state and market in the delivery of pubic goods and services and the facilitation of social inclusion and political participation. Subsequent literature pointed to the real challenges of delivering on these expectations, including that of developing innovative approaches to accountability and legitimacy and of working in partnership with donors and other actors (See Edwards & Hulme (Eds)(1995); Hulme & Edwards (Eds)(1997)).

[7] See 'Development NGOs: The Challenge of Alternatives', a special supplement to *World Development*, 15:1, 1987, especially Drabek (1987).

By the late 2000s, evidence suggested that NGOs had largely failed to live up to these expectations, that they had failed, for instance, to develop or identify a credible discourse of transformative change to rival neoliberalism and that they had become too close to the state and market alike, compromised by their dependence on official aid, their ensnarement in the bureaucratic culture of targets and indicators, their involvement in the new security agenda of the early 2000s, and by their distance from the social movements that seek systemic change (Bebbington, Hickey & Mitlin 2008). Commentators felt that NGOs retained both a degree of separation from the state and market and a still-latent capacity to mount a radical and transformative project (Mitlin, Hickey & Bebbington 2005). The challenges they faced, however, remained significant and politically-salient: 'NGOs are only NGOs in any politically meaningful sense of the term', it was argued, 'if they are offering alternatives to dominant models of development' (Bebbington, Hickey & Mitlin 2008: 3). Implicit here was the argument that political saliency required that they implement these approaches in ways which distinguished them favourably from the state and private sector.

This latter point is developed in literature from the early 2010s. According to Gourevitch, Lake & Stein (Eds)(2012), transnational NGOs (TNGOs) remain both credible and virtuous in the eyes of the public and distinctive from both the state and market:

> They pursue laudable goals, attract dedicated individuals who labour for little renumeration, and - in general - do good work. We find them credible, in turn, precisely because of their virtue. Recent surveys show that NGOs are trusted to address pressing social problems more than governments or business (Gourevitch & Lake 2012a: 3-4).

Yet, virtue, they argue, is not enough. TNGOs are now large, complex organizations, subject to the same pathologies of power that characterise most large bureaucracies. To remain, credible, they argue, NGOs cannot rely on their virtue alone, and must instead focus on four distinct challenges:

> NGOs are credible not only when they are virtuous, but when they share common interests with an audience, send costly signals, incur penalties for misrepresentation, and are subject to third-party verification (Ibid: 4-5).

As this suggests, NGOs must espouse causes with which the public (and other actors) can identify and on terms to which they can relate. They must invest in evidently costly effort,

which other types of organization would not be prepared to incur, to prove that they are genuinely committed to social change. They must pay a penalty where they engage in misrepresentation, for instance, in lying or hiding pertinent facts. And finally, since most are not membership-based, nor subject to democratic control, they must open themselves to external scrutiny and verification that goes beyond accountability to donors (Ibid: 14-18).

Likewise, they argue, when their virtue is challenged, NGOs can respond in different ways. First, they can proactively nurture common bonds around shared values, complementing exogenous ones; Second, they can support and defend autonomous governance structures which promote strict ethical standards; Third, they can increase transparency by publishing important information that helps the public to understand and relate to them, including their sources of funds. Fourth, they can professionalise by investing in internal policies and procedures, including those pertaining to staff. Fifth, they can cooperate with other NGOs and integrate into the wider NGO community, as well as competing on agreed terms (for instance, for limited funding). Sixth (and finally), they can invest in costly fields unrelated to their main activities to produce multiplier effects (for instance, in advocacy campaigns arising from core operational activity)(Ibid: 18-23).

This proposed basis for the credibility of NGOs, and proposed responses to any challenges to that credibility, is captured in Figure 1, below. Implementing these strategies, the authors argue, is complex, for instance, in the context of the delegated chains of authority that characterise TNGOs with far-flung regional and national offices which are difficult to manage and multiple programmes and donors. It also potentially gives rise to distinct costs or down-sides where 'need for credibility:

1. leads to an emphasis on procedure at the expense of substance;
2. favours numerical and other tangible criteria of success, especially financial accounting, over programme evaluation;
3. places a priority on short-term responses rather than long term programmes;
4. leads to excessive bureaucratization and the loss of flexibility;
5. prioritises the donors of the organisation over local populations they are designed to help or the other entities they are intended to monitor; and
6. diverts attention to ancillary programmes.' (Ibid: 33-34).

The management of these potential downsides, they argue, needs careful balancing with the activities in Figure 1 (Ibid).

Figure 1: The Sources of NGO Credibility

Internal	External	
		Strategies for increasing credibility
Virtue Rests on the internal or personal qualities of NGOs as perceived by audience[s]	*Common Interests* NGO claims more credible when an audience perceives that it possesses common interests with the NGO	- Promoting bonds around shared values - Adopting autonomous governance structures
	Costly effort NGOs are more credible when their claims are backed by observable costly effort	- Adopting autonomous governance structures - Professionalizing - Expending costly effort in other fields
	Penalties for misrepresentation NGOs are more credible if they suffer penalties for lying or otherwise misrepresenting information	- Increasing transparency
	External verification NGOs are more credible if claims are subject to external verification	- Increasing transparency - Integrating into the NGO community

Source: Gourevitch, Lake & Stein (Eds) 2012a: 11, drawing on Lupia & McCubbins (1998).

Gourevich, Lake & Stein (Eds)(2012) provide a valuable analytical framework against which the credibility of transnational or international NGOs (TNGOs/INGOs) can be assessed. Of the cases which they consider, none is of the magnitude of the Oxfam scandal of 2018; in the egregious behaviour of staff, the deficient response from managers and trustees, and in the harm to its credibility in the eyes of the public and other actors. This makes the Oxfam scandal a useful case with which to test the framework and to suggest possible refinements. The analysis below suggests that the Oxfam GB scandal is far from a singular or exceptional case but rather an exemplar of the challenges captured in the framework. The scandal, however, also sheds valuable light on areas where the framework needs calibration or where NGOs face particular challenges in fulfilling the criteria in full.

3. The Oxfam Scandal of 2018

The Oxfam scandal of 2018 dates to the Haitian earthquake of January 2010, in which an estimated 300,000 people died, with hundreds of thousands more displaced. A large-scale humanitarian response followed, and international NGOs arrived in force or expanded their operations. Of the INGO responders, Oxfam GB was one of the largest and most influential, both as an independent INGO and as the leading member of the Oxfam

International confederation.[8] Oxfam GB employs 5,000 staff (or half the 10,000 employed by Oxfam International affiliates) and has 23,000 volunteers, mostly in the UK. It has an annual income of roughly UK£427m (US$555m),[9] operates in 27 countries,[10] and has played an important role in articulating the contemporary mission of INGOs committed to relief and development, for instance, their commitment to international human rights standards.[11]

Oxfam GB coordinated Oxfam International's response to the Haiti earthquake and by late 2010, its Haiti programme employed more than 550 staff, mostly Haitians (CCEW 2019b: 4). The scale of its humanitarian operation and the rapid expansion and turnover of its Haiti staff, however, stretched its capacity and, amid weak leadership, poor and abusive behaviour was allowed to take root. In 2011, Oxfam GB sent a team to investigate reports of staff impropriety. As a result, the Country Director and two other members of staff resigned, four were dismissed for gross misconduct and two were disciplined, amid a range of misconduct charges including the 'use of prostitutes on [Oxfam GB] property' and the 'sexual exploitation and abuse of employees' (Oxfam 2011). Oxfam GB submitted a report of a serious incident (RSI) to its principal regulator, the Charity Commission for England and Wales (CCEW, hereafter, the Charity Commission), copied to its main UK funder, the Department for International Development (DFID), noting 'inappropriate sexual behaviour' (and other misconduct) on the part of staff, but it failed to report that beneficiaries, including minors, may have been involved.[12] Although Oxfam GB was required by the Charities Act 2011 to submit the RSI, the precise information to be disclosed was less clear. Neither the Charity Commission nor DFID, however, requested further clarification or action by Oxfam GB and the matter lay dormant for six years.

[8] Oxfam International is a coalition of 19 member organizations, with headquarters in Nairobi and representative offices in seven countries ('Our history', https://www.oxfam.org/en/our-history). In 2018-19, its members had aggregate income of just over one billion Euros (or US$1.1 bn.)('Our finances…', https://www.oxfam.org/en/what-we-do/about/our-finances-and-accountability, (both sites accessed 31 January 2020).
[9] CCEW 2019c: 4. Based on an exchange rates of £1=$1.3, as on 29 January 2020.
[10] CCEW 2019c: 5.
[11] See, for instance, Green (2012), a valuable account of Oxfam's philosophy.
[12] For the text of the RSI, see CCEW (2019C: 138). Oxfam GB also issued a press release, 'Internal Investigation confirms staff misconduct in Haiti', 5 September 2011.

In the interim, Oxfam GB launched a new Global Safeguarding Team, planting the seeds for the 2018 scandal. First established in 2012, the Team initially consisted of a Head of Safeguarding, working 4 days week, supported by an administrator working 3 days a week, between them responsible for 5,000 staff in 23 countries and for 23,000 volunteers working in hundreds of Oxfam GB shops in the UK (Evans 2018). In 2015, the Head resigned, frustrated at the perceived lack of investment in the team (Ibid). Two replacements resigned in 2018 and 2019 respectively, again over the perceived lack of investment in the team and, in the case of the final of these resignations, the creation of a more strategic role reporting directly to the (new) Chief Executive (O'Neill 2019).

Interviewed on TV in 2018, its first Head of Global Safeguarding argued that Oxfam GB should have provided more resources when the need was clear (Evans 2018).[13] While this was undoubtedly true, however, Oxfam GB faced external constraints. INGOs are invariably under pressure from donors to keep non-programme or overhead costs to the minimum through 'value for money' and similar tests yet, at the same time, to invest in governance and compliance initiatives that enhance transparency and accountability (BOND 2016, ICAI 2019). From its expenditure, for instance, Oxfam GB devotes 81% to humanitarian and development programming and an additional 2% to advocacy and campaigning, but it devotes 7% to fundraising costs and 10% to support, control, compliance and other costs (Oxfam 2018b: 10). As such, 17% of its costs go to overheads. Oxfam receives just under half of its income from official sources (government and multilateral)(ibid: 12), so roughly half of its overhead costs should, in theory, be supported by official funders. Yet, on average, donors fund INGOs on the basis that overheads amount to 6.85% of their costs, a significant underestimate in most cases (BOND 2016: 9).

Since 1997, Oxfam had benefitted from unrestricted funding from DFID through multi-year Programme Partnership Agreements (PPAs) which provided flexible funding which supported strategic non-programme activities such as compliance costs but in 2016, Oxfam GB's five-year General PPA, covering core operations and worth £9.6m ($12.48) a year,[14] was not renewed at its conclusion. This was due to a DFID decision in 2016 to overhaul its civil

[13] In the interview, she also noted that she had raised her concerns with the Home Office and with the Charity Commission.
[14] For a copy of the G-PPA, see https://policy-practice.oxfam.org.uk/our-approach/strategic-funding-partnerships/dfid-programme-partnership-agreement.

society funding mechanisms and to divert more money from large to small INGOs. Money was diverted, however, without evidence that the policy shift was justified on objective grounds (ICAI 2019: 16). DFID's outrage at the Oxfam scandal of 2018, including the public demands by the Secretary of State for International Development on 11 February 2018 for the resignation of Oxfam GB's Chief Executive and its decision to temporarily bar Oxfam GB from applying for further DFID funding (Booth 2018), therefore smacked of double-standards since its termination of the PPA funding mechanism deprived Oxfam GB, and other prominent INGOs, of the vital unrestricted funding needed to develop governance and compliance initiatives in the light of government and public expectations.[15]

The Oxfam scandal of 2018 began months earlier in an initial flurry of media reports. In a front-page story on 28 October 2017, *The Times* reported that Oxfam GB was dealing with unprecedented allegations of sexual harassment of staff and beneficiaries. Seven senior Oxfam officials, it alleged, had been investigated in the last year, and Oxfam GB had received 87 complaints of sexual harassment in 2016-17, compared to 26 complaints two years previously (O'Neill 2017). Other newspapers followed suit, prompting intervention by the regulator and on 19 December 2017, the Charity Commission issued a Decision requiring Oxfam GB to prepare an action plan by the end of March 2018 (CCEW 2017). Otherwise, the regulator largely exonerated Oxfam GB. 'Many allegations', it argued, 'were not substantiated' and '[w]e established that the charity had a strong policy framework around protecting staff and beneficiaries from sexual exploitation and abuse' (Ibid). Addressing the media furore, Oxfam GB reported that it had sacked 22 members of staff in the last year over allegations of sexual impropriety and had reported 53 complaints to the police (Watt 2017).

In February 2018, however, Oxfam GB faced new allegations, and these rapidly gained political traction, fuelling a media storm and a significant political and regulatory response. In a front-page story on 9 February, *The Times* reported that Oxfam GB staff in Haiti had paid 'prostitutes' for sex in Oxfam GB properties, that Oxfam GB had investigated the allegations, and that it had subsequently 'covered up' the scandal (O'Neill 2018). In subsequent days, new allegations emerged: that the Haiti Country Director had been

[15] On the negative consequences for DFID-funded INGOs of the termination of general, unrestricted funding in 2016, see ICAI (2019).

allowed to resign and that he had been recruited from Merlin, another INGO, despite similar allegations against him there; that Oxfam GB had hidden crucial details from the Charity Commission and from DFID; and that offences may have been committed against minors. A media furore raged intensely for the next six weeks and more sporadically over the following 15 months, until June 2019, when a series of investigations into the scandal concluded. Focused on Oxfam GB, the scandal spread to Save the Children UK and to other INGOs (see above) and it ran in parallel with concurrent investigations into SEAH in the UK, including the Independent Inquiry into Child Sexual Abuse (IICSA) and 'Operation Hydrant', a police investigation into historic child sexual abuse, amplifying the resonance of the Oxfam GB case.

Beyond the investigations and inquiries launched, the consequences of the scandal for Oxfam GB were significant. Over the year from February 2018, Oxfam GB lost £14m of income as supporters terminated or reduced their contributions, and it temporarily lost access to DFID funding, worth £22m a year prior to the scandal (Gordon 2019), forcing it to shed 220 jobs by March 2019 (Oxfam 2019d:36). It's annual income grew between 2016 and 2019, including a modest 1.6% increase between 2018 and 2019 (from £408.6m in 2016-17 to £427m in 2017-18, and £434.1m in 2018-19) (Oxfam 2018b:12 & 2019d: 11).[16] Nevertheless, Oxfam GB's institutional funding took a substantial hit, with a 30% drop in the value of multi-year contracts agreed with institutional funders in 2018-19, compared to the previous year (Oxfam 2019d: 11 & 36).

Beyond Oxfam GB, evidence suggests that other charities were also affected. The biennial Sport Relief fundraising telethon in March 2018, for instance, raised £38m on the night for charitable causes in the UK and overseas, compared to £55m in 2016 (BBC 2018), suggesting a backlash from the public against UK charities supporting overseas causes. Furthermore, Charities Aid Foundation (CAF) data reveals that UK charities raised £10.1 bn. from charitable giving in 2019, compared to £10.3 bn. in 2018 (CAF 2018: 5; CAF 2019: 3), suggesting that the Oxfam scandal, and wider fatigue with charitable giving, may have cost UK charities approximately £200m over one year.

Beyond the financial hit, Oxfam GB's reputation was damaged significantly by the attacks from the media. From the right, for instance, the *Daily Mail* newspaper and website

[16] The Oxfam financial year runs to 31 March.

launched a multi-pronged attack, claiming that Oxfam GB was irredeemably tainted; linking charges of SEAH to allegations of paedophilia; and criticising Oxfam GB in the round, for instance, its putative links to the Labour Party, its alleged pro-European Union (EU) views (in the context of Britain's 2016 EU membership referendum), its alleged links to historical controversies, and the salaries of its senior staff. The Oxfam GB scandal and the wider scandal of SEAH in the aid industry was also used by the *Mail* to attack the 'greedy, incompetent, patronising and predatory aid industry' (Birrell 2018), a comprehensive list of indictments. Oxfam GB and other INGOs were also attacked from the left, in critiques that used the Haiti scandal to graft concerns about race in the context of international aid on to those about gender. In the *Guardian*, for instance, author and columnist Afua Hirsch linked the Oxfam scandal to 'the aid industry's white saviour mentality' and its related 'toxic and exploitative mentality' (Hirsch 2018). Hirsch was supported by the Green Party, which asked the UK government to give money to women through direct cash payments, rather than channelling it through INGOs in an evident 'colonial construct of givers and takers' (Kentish 2018), and by David Lammy, a Labour MP. 'I'm afraid its complacent to suggest', he argued on Twitter, 'that colonial attitudes are dead. The scandal involving women exploited by aid workers at Oxfam in Haiti can testify to that'.[17] Analysis of social media suggests that critical media coverage found traction with the public; Oxfam GB's credibility was damaged, and had still to recover six months after the events of February 2018 (Scurlock, Dolsak & Prakash 2018). Oxfam GB, this suggests, had been dragged into the frontline of Britain's febrile culture wars, criticized from the right and the left, exacerbating the challenges of rebuilding the trust of its staff, supporters and beneficiaries.

4. **Responses to the Oxfam Scandal**

In March 2018, in response to the scandal, Oxfam GB announced new safeguarding measures, including new policies on the uptake of references, the launch of an independent whistle-blowing helpline and a tripling of its annual safeguarding budget to £720,000 (Weakley 2018). But these were relatively minor measures in the context of unprecedented scandal. As an immediate response, Oxfam GB was barred from Haiti and temporarily

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[17] David Lammy, Twitter, 23 February 2018, https://twitter.com/davidlammy/status/966964026805772288?lang=en

prohibited by both DFID and the European Commission from applying for funding. Other responses unfurled more slowly, with four separate lines of investigation and two significant institutional initiatives, an unprecedented multi-institutional response to misconduct within a UK-based INGO (See Figure 2, below). Oxfam International launched an investigation into Oxfam GB and the cultural context to misconduct by its staff, as well as a confederation-wide review of safeguarding policies; the Charity Commission launched a Statutory Inquiry, covering the governance of Oxfam GB, and an independent review of its safeguarding policies (alongside a Statutory Inquiry into SCF UK, and a sector-wide investigation into safeguarding within UK charities); the House of Commons International Development Committee launched an investigation into SEAH in the aid industry, leading to two reports (July 2018 & October 2019) and related correspondence with successive Secretaries of State for International Development; and the National Crime Agency investigated allegations of criminal behaviour reported to it by Oxfam GB, following discussions with the Charity Commission. In addition, DFID convened an International Safeguarding Conference in London in October 2018, leading to subsequent actions, while Interpol and the UK Association of Chief Police Officers (ACPO) Criminal Records Office (ACRO) launched Project Soteria, a trial database to record the criminal records of aid workers, with DFID funding.

Figure 2: Formal investigations and inquiries into Oxfam GB and into wider sexual exploitation, abuse and harassment in the aid industry

Oxfam International Investigation and Report of the Independent Commission on Sexual Misconduct, Accountability and Cultural Change June 2019	**UK Charity Commission** Statutory Inquiry and Regulatory Actions *vis* Oxfam GB (June 2019) Statutory Inquiry and Regulatory Actions *vis* SCF UK (March 2020) Charity Commission sector-wide safeguarding investigation and report (October 2018)	**UK House of Commons International Development Committee** Investigation into sexual abuse & exploitation in the aid industry: Hearings, reports and correspondence 2018-19
UK Department for International Development International Safeguarding Conference 2018 (and follow-up measures, inc. organizational assessments of funded NGOs	**Interpol & ACPO Criminal Records Office (ACRO)** Five-year trial of new criminal records and background checks for aid workers (Project Soteria) and proposed new 'humanitarian passport'	**UK National Crime Agency** Criminal investigations into incidents reported by Oxfam GB with the support of the Charity Commission

In addition to the initiatives in Figure 2, above, NGOs such as Safe Space, the Code Blue campaign, Hear Their Cries, and the End Violence Against Women (EVAW) Coalition, demanded transformative action to protect the female beneficiaries and staff of

international aid organizations, through campaigning and militant actions.[18] INGOs which administer coordinating mechanisms such as the Core Humanitarian Standard Alliance (CHS Alliance), the Humanitarian Quality Assurance Initiative (HQAI), and the Steering Committee for Humanitarian Response (SCHR) worked to upgrade the Core Humanitarian Standard and the Misconduct Disclosure Scheme respectively, to address SEAH by INGO and local partner staff.[19] In the UK, BOND (formerly British Overseas NGOs for Development) worked to upgrade safeguarding policy and practice among its member organizations and their in-country partners to help them be more effective actors.

Of the institutional responses captured in Figure 2, above, the most important and consequential was the Charity Commission's Statutory Inquiry under the terms of the Charities Act 2011, its largest ever investigation. On 7 June 2019, the Commission issued an Official Warning under the terms of the Act, identifying four areas of failure on the part of Oxfam GB's senior staff:

- To take appropriate decisions during 2015-17 in relation to safeguarding such that there was ongoing inadequate resourcing and capability of the charity to match the level of risk;
- To ensure prior to improvements in 2018 adequate assurance of safeguarding risks;
- To properly handle events involving staff misconduct in Haiti in 2011;
- To properly manage the risks connected to, and not reporting onwards to local law enforcement authorities in Haiti, to the Commission or other authorities of, concerns that two girls under the age of 14 might be at risk of sexual exploitation (CCEW 2019a);[20]

Four days later, the Commission released its final report, explaining the context to its Official Warning. Exploring Oxfam GB's handling of the 2011 allegations about its Haiti programme and its safeguarding policies, both historic and current, the report attributed blame to

[18] NGO Safe Space: https://ngosafespace.org/; Code Blue Campaign: http://www.codebluecampaign.com/; Hear Their Cries: http://www.heartheircries.org/; and the EVAW Coalition: https://www.endviolenceagainstwomen.org.uk/.

[19] On the CHS, see https://corehumanitarianstandard.org/the-standard. On the SCHR scheme, see https://www.schr.info/the-misconduct-disclosure-scheme.

[20] Oxfam's 2011 investigation explored allegations that two girls under the age of 14 had been abused by Oxfam GB staff. The Charity Commission concluded that these investigations were insufficient. Subsequent investigations have shed no further light on the matter.

operational staff, managers and trustees alike, noting ‘systemic weaknesses’ in ‘safeguarding matters’ (CCEW 2019b: 15). It criticised ‘weakness in the corporate oversight of safeguarding arrangements at Oxfam GB’ and a ‘gap between its strategy, the strategic intent behind it and its implementation’ (Ibid). Central to such failures, the report argues, was the under-resourcing of the Global Safeguarding Team between 2015 and 2017 when ‘resourcing and capabilities did not adequately match the level of risk faced by the charity, its global reach and the nature of the activities carried out’ (Ibid: 18 & 32). The wider lessons, it argued, were clear:

> Operating internationally across multiple jurisdictions and cultural contexts and in the midst of humanitarian crisis is a profoundly complex and difficult endeavour and lives depend on the work of UK charities and the thousands of charity workers and volunteers across the world…But failure to take reasonable steps cannot be excused by the difficult context in which a charity works’ (Ibid: 33).

In this context, it concluded, ‘an effective culture of keeping people safe identities, deters and tackles behaviours which minimise or ignore harm to people and cover or downplay failures’ (Ibid).

The interim and final reports of Oxfam International’s Independent Commission on Sexual Misconduct and Cultural Change in January and June 2019 recognised the gravity of Oxfam GB failings, set against its mission and principles. ‘Oxfam’, the final report argued, ‘prides itself on being a rights-based organization that prioritizes gender justice campaigns and women’s empowerment and asserts that the right to gender justice underpins all its work’ (Oxfam 2019c: 2). This, it noted, made all the more concerning the ‘…systematic failures in safeguarding… – at Oxfam and across the aid sector [which] have contributed to impunity for perpetrators, weakened accountability to survivors and eroded trust within the organization and between Oxfam and its stakeholders’ (Oxfam 2019c: 2), linking Oxfam GB’s evident failings to wider dynamics within the aid sector.

Both the interim and final report noted staff concern that sexual impropriety was symptomatic of deeper and more systemic problems arising from power asymmetries within both Oxfam GB and the wider aid industry, including sexism, racism, elitism and differentials between national and international staff, leading, staff felt, to bullying and an often toxic work environment (Oxfam 2019a:13-14; 2019d: 10). According to the final report, ‘…power abuses – coupled with an absence of a systematic application of a

protections lens and [accompanying] procedures to all programming – are at the root of Oxfam's safeguarding crisis and that of the wider aid community' (Oxfam 2019c: 10), suggesting that sexual impropriety can only be tackled as part of wider reforms within the aid sector that address structurally-based power asymmetries.

The final report promised a radically new and confederation-wide safeguarding system, including an 'ombuds' system (allowing for independent investigation and arbitration), a new values-based leadership model, new support mechanisms for victims and survivors, and support for the development of the Core Humanitarian Standard.[21] The report, however, also pointed to significant challenges, including that of implementing standardised safeguarding procedures in different national settings. 'One of the thorniest issues with which Oxfam and the sector as a whole must contend', it noted, 'is how structural violence and cultural norms differ in each country setting and inform behaviours regarding safeguarding and a system to detect and address abuses' (Ibid: 21). In the report, for instance, Oxfam announced a 'zero tolerance' approach to staff abuse, including a prohibition on all forms of transactional sex, but implicit in the proposal was a recognition of the challenge in converting the principle into enforceable rules, and navigating the murky boundaries between consensual and coercive relationships, and between acceptable or unacceptable behaviour in personal interactions with others. Similarly, it wrestled with the difficulty of extending its safeguarding protocols to local partners (over 3,600 of them) in diverse settings, and amid the pressure from donors to localise aid activities, leading to premature partnerships with organizations lacking in relevant capacity (Oxfam 2019d: 20-22).

Compared to the Charity Commission and Oxfam International reports, the International Development Committee (IDC) reports had a wider remit. Prompted by the Oxfam scandal, but directed at the wider aid sector, including INGOs, UN agencies, bilateral donors, and the private sector, its findings were directed primarily to DFID and its ministerial team, but also to the BOND network, the main coalition of UK-based INGOs, of which Oxfam GB is the leading member. The IDC reports were outspoken in their condemnation. SEAH in the aid industry, they argued, was both 'longstanding and endemic' (IDC 2018a: 19),

[21] The latter after Oxfam International commissioned a HQAI audit of Oxfam programmes in Ethiopia, Uganda and Bangladesh which found systemic weaknesses in Oxfam's accountability systems (Oxfam 2019c: 19).

although the scale of the problem remains unclear, with research to date hinting at that scale rather than offering a comprehensive account. ‘The international aid sector’s response to tackling SEA has been reactive, patchy and sluggish’, it argued, and the Oxfam scandal ‘did not reveal to aid organisations that SEA was a problem’, but rather ‘the impact of a media exposé’ (Ibid).

The IDC’s first report (in July 2018) recommended a series of measures including the establishment of an international ombudsman and a global register of aid workers to facilitate employment checks; the development of victim-centred approaches and of whistle-blowing and investigation mechanisms; and the provision of DFID or government funding to the Charity Commission, to UK INGOs and to other safeguarding-based institutional responses (IDC 2018a). DFID and BOND took action to respond to the recommendations (and to those from DFID’s 2018 Safeguarding Conference). DFID, for instance, set up an online Research and Support hub for DFID staff and for funded partners, costing £10m, a Safeguarding Investigations Team with four specialist safeguarding investigators, and committed £10m to Project Soteria over five years (see Figure 1) (IDC 2019), while also establishing a Cross-Sector Safeguarding Steering Group which brings together INGOs, UN agencies and the private sector (DFID 2019). BOND began work on a reporting and complaints toolkit for members and their local partners.

In a follow-up report in December 2019, however, the IDC argued that DFID and BOND responses ‘seem to place significant weight on developing the theory and substantially less on ensuring changes in practice’ (IDC 2019:3). The criticism revealed a sharp divide between DFID, BOND and the parliamentarians over the practicality of the IDC’s recommendations and the complexity of the challenges facing DFID and BOND. DFID, for instance, rejected the establishment of a standalone register of international aid workers as impractical, but recommended alternatives (IDC 2018b: 5-6). It rejected the recommendation for comprehensive funding to INGOs to boost their safeguarding efforts, noting that it expected bigger INGOs to fund safeguarding measures from within their budgets, but that smaller organisations might be supported (IDC 2018b: 5; IDC 2019: 9). BOND, a representative organization, rejected demands that it become a quasi-regulator, duplicating functions of the Charity Commissions, for instance by requiring, as expected by

the IDC, that members publish annual data on SEAH incidents, arguing that it's engagement with members should be supportive rather than punitive.[22]

Of the organisations discussed here, Oxfam GB was the most significantly and the most adversely affected. Yet the failings here were not of Oxfam GB's alone. The Charity Commission, for instance, failed to seek clarification when Oxfam reported staff misconduct in 2011. Its June 2019 report contradicted its December 2017 actions, when the allegations were first reported. In December 2017, for instance, as already noted, it reported its belief 'that [Oxfam GB] had a strong policy framework around protecting staff and beneficiaries from sexual exploitation and abuse' (see above) but eighteen months later, in June 2019, it declared that 'Ultimately, Oxfam's GB's culture and response on safeguarding matters… from 2011 to 2017 fell short of the expectations and the commitments that it made' (CCEW 2019b), a dissonance which reflects badly on its regulatory oversight. Thirdly, in its 2019 report, that Commission recommended that INGOs report allegations of SEAH involving minors to local authorities in countries in which they operate (CCEW 2019a & 2019:32), but failed to balance this with concern for the right of defendants to due process.[23]

Similar charges can be levelled at the Department for International Development (DFID). Like the Charity Commission, it failed to seek clarification when Oxfam GB reported staff misconduct to it in 2011. In terminating Oxfam GB's General Programme Partnership Agreement in 2016, it cut Oxfam's access to unrestricted funding yet expected it to continue investing in non-programme governance and compliance initiatives, while also maximising investment in humanitarian and development interventions and localising its aid delivery. And in February 2018, it rushed to judgement, condemning Oxfam GB in the light of allegations that remained to be tested or proven, and when its own safeguarding record was inherently flawed.

Likewise, the House of Commons International Development Committee emerges from the scandal with questions about its actions. It charged Oxfam GB with being more reactive to the media exposé than to the reality of SEAH in the aid industry (see above), yet

[22] IDC 2019, Annexes 1 (SAS0003) and 2 (SAS0008).
[23] Potentially exposing INGO expatriate staff to risk and transgressing the human rights principle that you don't protect the human rights of one person by violating those of another.

the IDC was itself guilty of political grandstanding and of moral panic.[24] It made unrealistic demands of INGOs and their funders, such as the establishment of a register of international aid workers. It made unwarranted efforts to persuade BOND, the representative organization of British humanitarian and development INGOs, to assume regulatory functions, conflicting with its role as a representative association. The lesson here is that while INGOs must work hard to improve their safeguarding policies and practices, effective safeguarding requires a multi-institutional approach, involving INGOs, regulators and funders (among others).

5. Conclusion

The Oxfam scandal of 2018 can be viewed as a perfect storm, as a unique concatenation of events that led to a uniquely negative and disproportionate furore.[25] It represents, for instance, the greatest political scandal in the UK based on allegations against a charitable or civil society organization and the greatest international scandal to affect an individual humanitarian or development INGO. By mid-2019, the media and political storm had largely abetted, and regulatory proceedings completed, with Official Warnings issued to both Oxfam GB and Save the Children UK by the UK Charity Commission for safeguarding failures. No charges resulted from the investigations of the UK National Crime Agency arising from Oxfam UK reports (see Figure 2), pointing to the difficulty of investigating sexual exploitation, abuse and harassment (SEAH) transnationally.[26]

In other respects, however, the scandal can be viewed as both a bellwether, drawing attention to evident pathologies of power inherent in INGOs, and a harbinger, heralding lessons for the sector, and potentially far-reaching change. Analysing the Oxfam scandal of 2018 through the lens of Gourevitch, Lake & Stein (Eds)(2012) serves primarily to vindicate its analytical framework. This both predicts the factors that may lead to the erosion of the

[24] While arguing that DFID should contribute to the safeguarding costs of unfunded INGOs, large and small, for instance, the IDC also described as ‘galling’ the arguments of INGOs that funding constraints constitute the single largest impediment to better safeguarding (IDC 2018, Summary).
[25] Uniquely negative in being the largest scandal to affect a UK-based INGO and disproportionate in that many of the false allegations levelled against Oxfam GB accentuated the crisis and its consequences for Oxfam GB and its beneficiaries.
[26] Although the investigation involved a UK INGO operating in Haiti, none of the alleged perpetrators was British or UK resident, hindering inquiries and the filing of charges.

credibility of large INGOs and suggests strategies to restore that credibility once it has been harmed, with each relevant here.

First, the framework helps to diagnose the organizational failings that precipitated the scandal, and the damage to Oxfam GB's credibility to which it led. The Oxfam scandal of 2018 largely resulted from organizational failings on the part of Oxfam GB. It failed, for instance, to make adequate checks when it recruited the country director for its Haiti programme in 2010. It failed to report the precise nature of the staff misconduct to the Charity Commission and to DFID in 2011. It failed to invest adequately in its Global Safeguarding Team (GST) between 2015 and 2017, despite the advice of GST staff. Most importantly, it put its reputation ahead of addressing evident injustice, resorting to the traditional reflex of powerful institutions when confronted with evidence of failings. The scandal also reflects badly on Oxfam International, which failed to properly oversee the management of Oxfam GB ahead of the scandal, possibly out of undue deference to its largest member. These represent distinct failings when viewed through the analytical framework here (see Figure 1), including deficiencies in the level of professionalization within the organization, in the adoption of autonomous governance procedures and in the organization's willingness to make costly efforts to improve its operations. In this sense, Oxfam GB's failings seem all the more egregious, since managers and trustees in both Oxfam GB and in Oxfam International knew from available social science what needed to be done to retain the credibility of the organization. Oxfam's failings also point to areas where the analytical framework might be sharpened. To the extent that the Oxfam scandal resulted primarily from deficient internal processes and procedures, the quality of internal organizational governance deserves a more central place in the analytical framework here (in the 'internal' column, covering 'virtue'). Equally, in pointing to the role of external verification, the framework implicitly recognises that the credibility of INGOs depends partially on external organizations and their credibility, including regulators and donors. The framework thus needs to include the provision that external verification itself must be credible (changing the fourth criterion in the middle column of Figure 1 from 'external verification' and the 'possibility' to 'credible external verification' which is 'actual' or 'evident').

Second, the analytical framework here directs attention to the strategies to be employed to improve credibility where it has been damaged. Here again, the Oxfam scandal

represents a neat fit with the framework. Once the scandal broke, Oxfam GB and Oxfam International took a number of steps as recommended by it. They have worked to promote bonds around shared values, for instance, through the use of social media to promote campaign messages (as explored in Scurlock, Dolsak & Prakash 2020). They have also both professionalized the organization and expended costly effort in other fields by introducing new policies on the uptake of references, by launching a new whistle-blowing helpline, tripling the budget for safeguarding, replacing members of the senior management team, and by ensuring that the head of global safeguarding now reports directly to the Chief Executive, increasing the importance of the role. By supporting Oxfam International's investigation, and accepting the report of its Independent Commission, Oxfam GB has supported autonomous governance structures, including the report's recommendation of a new, confederation-wide safeguarding system, including a Joint Code of Conduct and an 'ombuds' system, allowing for independent investigation and arbitration.[27] Oxfam GB and Oxfam International have also integrated further into the NGO community (by supporting the efforts of BOND to develop new safeguarding policies and of HQAI and CHS Alliance to develop the Core Humanitarian Standard) and worked to increase transparency (as members of the International Aid Transparency Initiative (IATA), and of Accountable Now (which oversees the INGO Accountability Charter), complying with the reporting requirements of both). As in the case of other INGOs, however, Oxfam GB and other confederation members are still reluctant to openly share certain information, especially regarding aspects of their finances. They must compete with other INGOs for limited donor funding and hence hold back key information which they feel might help their competitors. Through organizations such as IATI and Accountable Now, INGOs are working to improve protocols for the open sharing of information, a task that will remain on-going, however, as public preferences for the type of information to be shared, and as compliance criteria set by regulators and donors, change and evolve.

The multiple range of external organizations to which NGOs are now accountable, and to which they may soon be accountable, however, creates significant challenges for INGOs, and distinct costs as recognised in Gourevitch, Lake & Stein (Eds)(2012). In addition

[27] On Oxfam International's current safeguarding policies, see https://www.oxfam.org/en/what-we-do/about/safeguarding.

to their accountability to national regulators, donors and parliamentarians, to their federation (where relevant), and to accountability, transparency and quality assurance initiatives such as IATI, the CHS Alliance, HQAI and Accountable Now, and engagement with other initiatives such as the Misconduct Disclosure Scheme, Oxfam GB and other INGOs may soon have to engage with independent regulatory mechanisms overseen by intergovernmental agencies such as Interpol (the International Criminal Police Organization) and the Organization for Economic Cooperation and Development (OECD). Some may be coordinating fora or standard-setting exercises. The OECD's Development Assistance Committee, for instance, has agreed a *Recommendation on Ending Sexual Exploitation, Abuse and Harassment in Development Cooperation and Humanitarian Assistance*, a legal instrument (albeit non-binding) that sets standards for member governments, bilateral donors and their 'implementing partners' (including international and local NGOs) (OECD 2020). But some, such as Interpol's Project Soteria, may give rise to regimes with greater reach and bite than self-regulation or standard-setting mechanisms. This will be welcomed in many quarters, but it will also give rise to questions about the duplication of mechanisms (including possible new layers of bureaucracy, new tick-box regimes and new unfunded costs) and about regulatory reach stretching into countries in which INGOs work, and to local partners, with the risk of inappropriate cultural intrusion and competition between conflicting national standards.[28] Hence, the potential costs of efforts to maintain and improve INGO credibility as presented in Gourevitch, Lake & Stein (Eds)(2012) are tangible here. The authors are clear about the risks and potential costs here:

> …the need for credibility may also lead to the bureaucratization. To produce numbers and reports, NGOs need staff who can gather and analyse data and translate it into forms easily understood by others. The effect is to create greater bureaucratization, necessary perhaps, but with further consequences. It reduces political sensitivity or acuity and the ability to respond to changing circumstances on the ground. In keeping with the Weberian standards of organization, the NGO becomes less flexible and less responsive to experience (Gourevitch & Lake 2012b:202).

All six 'costs' which they propose (see Section 2, above) arise here, and may increase as accountability mechanisms proliferate and become more demanding, increasing the

[28] For instance, the dispute between the Swedish International Development Agency (SIDA) and Rwandan NGOs over conflicting national standards with respects to the rights of women, explored in Clarke (2016).

compliance costs borne by, and the bureaucratic nature of, INGOs and eating into funding for core activities where donors refuse to co-finance them.

Nevertheless, to maintain their credibility, INGOs must embrace a brave new world which both protects staff and beneficiaries from pernicious forms of harm yet balances competing compliance demands in multinational and multicultural terms. They must promote novel forms of accountability and transparency which enhances safeguarding and the duty of care, based on high-quality, culturally-inclusive, learning-based management. In particular, the governance and regulation of INGOs must increasingly ensure that both staff and beneficiaries are treated with respect and on the basis of equality, taking account of a myriad of ascriptive criteria including, but by no means limited to, gender, sexual identity, race, religion, ethnicity, nationality, age and health status. This obliges INGOs to address complex power asymmetries (or intersectionality) and means that policies and procedures must be transparent and provide for variable value systems in the context of complex aid chains involving delegated authority. Success in this endeavour will be vital if INGOs are to maintain their credibility as politically-salient 'development alternatives' in the years to come.

Bibliography

Associated Press (2016), 'UN Peacekeepers in South Sudan 'ignored rape and assault of aid workers'', *The Guardian*, 15 August 2016.

BBC (2018), 'Sport Relief raises more than £38 for charities', 24 March. https://www.bbc.co.uk/news/entertainment-arts-43518433

Bebbington, A., Hickey, S. and Mitlin, D.C. (2008), 'Introduction', in Anthony Bebbington, Samuel Hickey and Diana C. Mitlin, *Can NGOs Make A Difference? The Challenge of Development Alternatives*, London: Zed Books.

Birrell, I. (2018), 'The aid industry and gullible governments have abused our generosity…', *The Mail on Sunday*, 18 February.

BOND (2016), *Cost Recovery: What Does it Mean for CSOs?* London: BOND.

Booth, R. (2018), 'Oxfam warned it could lose…', *The Guardian*, 12 February.

CAF (2018), *CAF UK Giving 2018*, London: Charities Aid Foundation.

CAF (2019), *CAF UK Giving 2019*, London: Charities Aid Foundation.

CCEW (2017), 'Decision – Oxfam: Case Report', Charity Commission for England and Wales, 19 December.

CCEW (2018), 'Final Report of the Charity Commission Safeguarding Taskforce', London: Charity Commission for England and Wales, 17 October. https://www.gov.uk/government/publications/final-report-of-charity-commission-safeguarding-taskforce/final-report-of-charity-commission-safeguarding-taskforce

CCEW (2019a). 'Official Warning…to Oxfam, dated 7 June 2019', Charity Commission for England and Wales.

CCEW (2019b), 'Inquiry Report: Summary Findings and Conclusion – Oxfam', Charity Commission for England and Wales, 11 June.

CCEW (2019c), 'Statement of the Results of an Inquiry – Oxfam', Charity Commission for England and Wales, 11 June 2019.

Clarke, G. (2013), 'Religion and Development: Challenges for Donors and for Faith Groups', in H. Moknes & M. Melin (Eds.), *Faith in Civil Society: Religious Actors as Drivers of Change*, Uppsala: University of Uppsala & Dag Hammarskjöld Foundation.

DFID (2019), *Putting People First: Tackling Sexual Exploitation, Abuse and Harassment in the Aid Sector*, London: Department for International Development.

Drabek, A.G. (1987), ‘Development Alternatives: The Challenge for NGOs – an overview of the issues’, *World Development*, 15:1, 1-11.

Duffield, M. (2007), *Development, Security and Unending War: Governing the World of Peoples,* Cambridge: Polity Press.

Edwards, M. & Hulme, D. (1995), *Non-Governmental Organizations: Performance and Accountability - Beyond the Magic Bullet*, London: Earthscan.

Evans, H. (2018), Head of Global Safeguarding, Oxfam GB, interviewed on Channel 4 News, 12 February. Available on youtube.com.

Green, D. (2012), *From Poverty to Power: How Active Citizens and Effective States Can Change the World*, Rugby: Practical Publishing & Oxford: Oxfam International.

Gordon, S. (2019), ‘Saving Oxfam: new chief’s quest to rebuild trust in the charity’, *Financial Times*, 17 March.

Gouveritch, P.A., Lake, D.A. & Stein, J.G. (Eds)(2012), *The Credibility of Transnational NGOs: When Virtue is Not Enough*, Cambridge: Cambridge University Press.

Gouveritch, P.A. & Lake, D.A. (2012a), ‘Beyond virtue: evaluating and enhancing the credibility of non-governmental organizations’, in P.A. Gourevitch, D.A. Lake & J.G. Stein (Eds), *The Credibility of Transnational NGOs: When Virtue is Not Enough*, Cambridge: Cambridge University Press.

Gouveritch, P.A. & Lake, D.A. (2012b), ‘Conclusion: Credibility and Compromise’, in P.A. Gourevitch, D.A. Lake & J.G. Stein (Eds), *The Credibility of Transnational NGOs: When Virtue is Not Enough*, Cambridge: Cambridge University Press.

Hirsch, A. (2018), ‘Oxfam abuse scandal is built on the aid industry’s white saviour mentality’, *The Guardian*, 20 February.

Hulme, D. & Edwards, M. (1997), *NGOs, States and Donors: Too Close for Comfort?* Basingstoke: Macmillan.

ICAI (2019), ‘DFID’s partnerships with civil society organizations: A performance review’, London: Independent Commission for Aid Impact, April.

IDC (2018a), ‘Sexual exploitation and abuse in the aid sector inquiry report’, London: International Development Committee, Houses of Parliament, 18 July.

IDC (2018b), ‘Sexual exploitation and abuse in the aid sector: Government Response…’, International Development Committee, Houses of Parliament, 6 December.

IDC (2019), ‘Follow-Up: sexual exploitation and abuse in the aid sector’, House of Commons International Development Committee, 17 October.

IRC (2014), 'Are we Listening? Acting on Our Commitments to Women and Girls Affected by the Syrian Conflict', New York: International Rescue Committee, September.

Kelly, N. (2017), 'Aid workers and sexual violence: survivors speak out', *The Guardian*, 2017.

Kentish, B. (2018), 'Give aid directly to women…Green Party says', *The Independent*, 4 March.

Lupia A. & McCubbins, M.D. (1998), *The Democratic Dilemma: Can Citizens Learn from What They Need to Know?* Cambridge: Cambridge University Press.

Mitlin, D, Hickey, S. & Bebbington, A. (2005), 'Reclaiming development? NGOs and the Challenge of Alternatives', *World Development*, 35:10, 1699-1720.

Mwesigwa, A. (2016), 'World Bank Cancels funding for Uganda road amid sexual assault claims', *The Guardian*, 12 January.

Norbert, M. (2015), 'Aid worker: I was drugged and raped by another humanitarian in South Sudan', *The Guardian*, 29 July.

OECD (2020), *DAC Recommendation in Ending Sexual Exploitation, Abuse and Harassment in Development Cooperation and Humanitarian Assistance: Key Pillars of Prevention and Response*, OECD/Legal/5020, Paris: Organization for Economic Cooperation and Development.

O'Neill, S. (2017), 'Oxfam workers claimed bosses harassed them', *The Times*, 28 October.

O'Neill, S. (2018), 'Minister Orders Oxfam To Hand Over File On Haiti Prostitutes Scandal', *The Times*, 9 February.

O'Neill, S. (2019), 'Oxfam loses second child protection expert in a year', *The Times*, 18 January.

Oxfam (2011), 'Investigation Report, FRN5 Haiti', Oxford: Oxfam GB. [Released in 2018].

Oxfam (2018a), 'Oxfam's safeguarding and related policies', Oxford: Oxfam GB, January. https://www.oxfam.org.uk/safeguarding-at-oxfam/safeguarding-related-policies

Oxfam (2018b), *Oxfam GB: Annual Report and Accounts 2017-18*, Oxford.

Oxfam (2019a), 'Listening to People – Rebuilding Trust', Interim Report, Independent Commission on Sexual Misconduct, Accountability and Culture Change, Oxford: Oxfam GB, January.

Oxfam (2019b), 'Committing to Change – Executive Summary', Independent Commission on Sexual Misconduct, Accountability and Culture Change, Oxford: Oxfam GB, June.

Oxfam (2019c), 'Committing to Change, Protecting People: Final Report', Independent Commission on Sexual Misconduct, Accountability and Culture Change, Oxford: Oxfam GB, June.

Oxfam (2019d), *Oxfam GB: Annual Report and Accounts 2018-19*, Oxford.

Ratcliffe, R. (2019), 'Oxfam failed to report child sex abuse claims in Haiti, reports finds', *The Guardian*, 11 June.

SCF (2008), 'No One to Turn To: The under-reporting of child sexual exploitation and abuse by aid workers and peacekeepers', London: Save the Children UK.

Scurlock, R., Dolsak, N. & Prakash, A. (2020), 'Recovery from Scandals: Twitter Coverage of the Oxfam and Save the Children Scandals', *Voluntas*, 31:1, 94-110

Spencer, D. (2016), *Cowboys and Conquering Kings: Sexual Harassment, Abuse and Exploitation in the Aid Sector*, London: ChangingAid, https://www.changingaid.org/.

UNFPA (2015), *Women and Girls in the Syria Crisis: UNFPA Response*, New York: United Nations Population Fund.

UNFPA (2017), *Voices from Syria: Assessment Findings of the Humanitarian Needs Overview*, New York: United Nations Development Programme.

UNHCR & SCF (2002), *Sexual Violence and Exploitation: The Experience of Refugee Children in Liberia, Guinea and Sierra Leone*, United Nations High Commissioner for Refugees and Save the Children UK.

Watt, H. (2017), 'Oxfam says it has sacked 22 staff in a year over sexual abuse allegations', *The Guardian*, 31 October.

Weakley, K. (2018), 'Oxfam appoints independent commission to review its safeguarding', www.civilsociety.co.uk, 16 March.

World Bank (2012), *The World Development Report 2012: Gender Equality and Development*, Washington DC: The World Bank Group.