

United Nations Global Compact Communication on Progress

For the period from 30th March, 2020 to 29th March, 2021

1. Statement of Continued Support by the Chief Executive

Oxford Policy Management Limited (OPM) committed to the United Nations Global Compact (UNGC) on 25th January, 2018. I am pleased to confirm that OPM reaffirms its support of the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption. In accordance with UNGC's subsidiary policy, this commitment applies to (i) Oxford Policy Management Limited, our parent company, (ii) OPM's UK and foreign subsidiaries and branch offices.

It remains OPM's mission to help low- and middle-income countries to achieve growth and reduce poverty and disadvantage through public policy reform. We enable low and middle-income governments to bring about lasting positive change using analytical and practical policy expertise.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations.

Yours sincerely



Mark Henstridge
Chief Executive Officer

2. Executive Summary

In a year that has put immense strain on many organisations around the world, OPM has worked hard to limit undue stress on our staff and supply chain. We have endeavoured to put the health, safety and well-being of our staff at the centre of what we do, and to accommodate and adapt to new ways of working during the global pandemic. We have strengthened our wellbeing offer to our staff and given managers discretion to allow their staff to fit their work life around their own circumstantial needs.

COVID-19 and the restrictions it has forced upon everyday life globally has made us examine our standard ways of working and accelerated change in many areas, particularly home and flexible working. We are planning a future which moves us away from the 'fly-in-fly-out' model which is common in so many professional services organisations. Instead we are seeking local and virtual solutions for our global business.

As we remain committed to the UN Global Compact, the ten principles are integrated into our business and strategy planning. We continue to operate an enterprise risk management framework, mitigating risks which prevent us from upholding our values in the work that we do. The Policy Management Framework has been successfully embedded following its introduction last year, and it supports transparent and effective policy governance across the OPM group. We are currently undertaking a corporate governance review which aims to simplify, clarify and strengthen responsibilities and accountabilities from the board-level down.

We have provided more detailed information below on the steps taken by OPM during the period under review around Human Rights, Labour Standards, the Environment and Anti-Corruption.

In delivering services to our clients we seek positive impacts in wider spheres, and are keen to add to the global debate by delivering thought leadership and contributing to the evidence base around the UN's goals. See Section 5 'Contributing to UN Goals' for examples of our publications.

3. Description of Actions

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Safeguarding

- We have established an internal audit framework to assess safeguarding process compliance by Project Managers, and have undertaken at least one per quarter in our first year of roll-out.
- OPM continues to be a member of the Keeping Children Safe network (KCS) and the Safeguarding Leads Network (SLN), so that we are kept informed of developments in the field.
- General safeguarding training continues to be mandatory for all new OPM staff, and they receive an automated reminder annually for refresher training.

- We have secured free safeguarding risk assessment mentoring for project managers and are in the process of rolling out to all staff in a leadership position on any projects with a safeguarding element.
- We have piloted free online training for external consultants and will be offering this to all those that work on projects with a safeguarding element during 2021.
- We are in the process of procuring refresher training for senior executives accountable for safeguarding within the OPM Group, with an aim to deliver in Q2 2021.
- Although safeguarding remains important to our ways of working we have paused the recruitment into the specialist Safeguarding Officer post we were planning due to headcount restrictions as part of our COVID-19 response plan.

Data protection and security

- Our Data Protection framework remains in use and is being adapted to international jurisdictions as OPM grows its global footprint, with particular emphasis on Australia, the European Union, and the USA.
- Data processing registers are regularly updated to ensure continued oversight of our data processing.
- Our IT Team has undertaken a review of existing data security measures. Planned developments include an increased use of the MS365 Data Compliance Centre, to ensure that we have enhanced control over individual documents even once they have been shared externally. Local storage is in the process of being removed with encrypted cloud based storage replacing it.
- OPM is always respectful of the rights of the participants in its research projects and ensure complete adherence to research ethics.

Modern Slavery

- We have completed our Annual Modern Slavery Statement as required under UK Modern Slavery Act 2015 and our risk remains “low”. It has been strengthened through the inclusion of a suite of anti-slavery KPIs.
- Following our detailed Modern Slavery audit by the UK Government Cabinet Office, we have identified further actions we can undertake to improve our approach to anti-slavery.

Ethical training

- All staff have been offered ethical training across seven modules. We review and update all training courses before posting the refresher requirements.
- We run quarterly reports to verify staff compliance with our training suite.

Labour Standards

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in employment and occupation.

Labour Standards – general

- OPM supports staff's right to freedom of association and we have an active and representative Staff Consultative Committee with whom the Board and Senior Management Team work closely on matters concerning staff terms and conditions.
- OPM upholds or exceeds local labour standards in all countries in which we work. We recognize the UN definition of a child (anyone under the age of 18) and do not employ anyone under this age irrespective of local legislation.
- OPM does not believe it has any forced or compulsory labour within its supply chain: see information provided under the sub-heading 'Modern Slavery' above.

Staff Health and Safety: COVID-19 response

- Given OPM's global footprint and general travel requirements we were very concerned about the potential impact of COVID-19 on our staff. OPM's Global Security Manager attended COVID-19 response conferences before there were confirmed cases in the UK, and we closed our offices globally prior to mandatory lockdown to protect our staff. We set up a COVID-19 committee to manage risk to our staff and they meet weekly to review health and safety risk to our staff globally.
- At the start of the pandemic OPM repatriated all staff that requested a relocation.
- Prior to office closure OPM offered all staff the opportunity to take home office resources such as their chairs and monitors to assist with comfortable homeworking.
- Where 'furlough' type schemes have been made available globally and OPM has made use of them, we have topped up the pay of affected staff to ensure that they did not suffer financially. We also offered reduced hours to those staff with caring or other responsibilities that would benefit from a shorter working week.
- Some of our offices have been reopened globally – the process for doing so has been health and safety-led with the decision to do so only taken following a comprehensive risk assessment.
- OPM usually has a very mobile workforce, but throughout the global pandemic staff have been restricted from travelling for work unless the need can be evidenced and the travel must be signed off by both our Senior Management Team and Spearfish (our external security advisers).
- OPM's Staff Consultative Committee (**SCC**) remains active and has been a crucial tool for staff to express their preferences and any concerns over the past year when our ways of working have been so significantly affected by COVID-19. The Committee has recently undergone a nominations process and democratic elections for new members.
- Following last year's Mental Health First Aid training to 17 staff members, the Wellbeing Champions network continues to support and signpost staff on wellbeing issues. They have supported staff through the period of enforced homeworking required as a result of COVID-19.
- OPM continues to offer an 'Employee Assistance Programme' which includes an externally-hosted hotline for staff to receive mental health or debt counselling amongst other support services.

Diversity and Inclusion

- The OPM Diversity and Inclusion Committee (D&IC), has representation globally from staff across our organisation and includes the Global HR Director. It continues to meet regularly to review and discuss new initiatives. In the past they have completed research into legally protected characteristics across the jurisdictions in which OPM has permanent offices. The D&IC support the organisation in working to incorporate Diversity and Inclusion principles and jurisdiction specific elements into our ways of working.

- OPM has published its gender pay gap report, and we continue to review our processes to ensure that they are inclusive and fair.
- We have provided unconscious bias and harassment in the workplace training for senior management. Exploration of delivering similarly themed e-learning training to the global workforce is underway with a focus on making sure it is appropriate to all of the locations in which OPM works.
- OPM continues to have a flexible working policy, which was updated and strengthened in response to the increased need for home- and flexible working as a result of COVID-19. Our policy allows staff flexibility in their working hours, and this combined with a positive suite of family-friendly policies, benefit those with caring responsibilities.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally-friendly technologies.

Environmental Responsibility

- OPM demonstrates its commitment to reducing its environmental impact by continuously monitoring all environmental aspects of our business, proactively setting environmental objectives and engaging with staff through regular communications and sustainability initiatives. As a global organisation, we are particularly careful to proactively consider the potential environmental impact of opening a new office and in recent years we have tried to make use of shared office spaces wherever possible.
- We have recently conducted a review to the energy mix usage in the countries where OPM operates. The intention is that this will inform the decision-making process both with regards to the opening of new offices and on implementing environmentally-sustainable practices going forwards.
- OPM has an Environmental Management System which follows the guidelines set by ISO14001 2015.
- In the last year we have improved our leadership commitment and staff engagement through our Environmental Sustainability Committee (ESC). The ESC's plans for 2020 were refocused in light of the global pandemic, and we are considering how in 2021 we can become more outward- and community-focused. We will be seeking to take learning from our global colleagues to help all our offices achieve the same standard. For example, our Pakistan Office have invested in solar panels for energy generation.
- As an international development consultancy OPM's carbon footprint is heavily affected by our frequent flying. Over the past year our staff have travelled much less as a result of global travel restrictions. This has forced us to invest in better processes and systems which can work remotely. OPM expects to increasingly move away from the "fly-in-fly-out" model through a combination of increasing local representation on the ground and using remote working where appropriate.

Anti-corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Anti-Bribery, Fraud and Corruption

- OPM has undertaken its annual anti-bribery risk assessment at a group-level in March 2020. We are currently in the process of updating the risk assessment on an entity level to give us a more granular approach. We are aware that we continue to work in high risk jurisdictions, and have comprehensive mitigations in place.
- The Gifts and Hospitality Register and corporate Conflicts of Interest Register remain live and additions to both are reported to OPM's Board on a quarterly basis.
- Our Conflicts of Interest Policy has been refreshed, and an online register has been created.
- OPM continues to subscribe to the Expolink service, providing external and anonymous channel for whistleblowing. Issues raised through this process are reviewed by senior management and a clearly established process followed to make sure all matters are promptly, fairly and appropriately managed.

Due Diligence

- OPM's Due Diligence process has screened well over 3000 individuals in the last two years via an online portal which checks against 700 global watch lists and media databases across 240 countries. We have started screening staff as well as suppliers, beginning with our Board and senior executives. We are also rolling out our Due Diligence processes to corporate suppliers (we have previously focussed on project / sub-contracted suppliers).
- We are in the process of updating our Due Diligence Policy and pulling together all our existing guidance and tools into a single Due Diligence Handbook to facilitate compliance amongst staff.

4. Measurement of Outcomes

We have not identified any instances of organisations within the OPM Group causing or contributing to any adverse human rights incidents.

We have had no reported incidents relating to modern slavery and human trafficking.

Over the past year we have not had to make a report to, or been informed by the UK information Commissioner's Office (or any other data protection supervisory authority), of any personal data breaches.

We have responded appropriately to any concerns reported to us. The reporting of concerns through our established reporting procedures evidences OPM's evolving risk and compliance culture, the effectiveness of our whistleblowing and reporting procedures generally, and the existence of an environment which encourages and is conducive to raising and reporting concerns.

We have undergone a number of successful external safeguarding audits and enhanced due diligence checks as required by our clients, and each has found that our processes are fit for purpose.

5. Contributing to UN Goals

Our Work

In delivering services to our clients, we also seek to create positive impact in wider, global spheres. We offer policy design, delivery, and evaluation services to policy makers and businesses in line with the ten principals of the UN Global Compact. We have highlighted below the teams working within each goal, and a selection of the recent work being done in these focal areas.

Global human rights

- [Conflict Security and Violence](#)
- [Education](#)
- [Health](#)
- [Nutrition](#)
- [Poverty and Social Protection](#)
- [Public Sector Governance](#)

Anti-corruption

- [Natural Resources and Energy Team](#)
- [Public Financial Management Team](#)
- [Public Sector Governance Team](#)

Environmental Sustainability

- [Climate Change and Disaster Risk](#)
- [Natural Resources and Energy](#)
- [Water, Sanitation and Hygiene](#)

Thought Leadership

OPM has an active blog, publishing contemporary thought pieces around a broad spectrum of development topics within the UN Global Compact, alongside consistently producing new papers and other publications on our work. A selection is listed below:

- [How can global health systems be strengthened to respond to shocks like Covid-19? | Oxford Policy Management \(opml.co.uk\)](#) January 2021
- [Covid-19 decision support tool for low-and middle-income countries | Oxford Policy Management \(opml.co.uk\)](#) December 2020
- [Reimagining technical assistance: what role should technical advisers have in supporting government reform? | Oxford Policy Management \(opml.co.uk\)](#) December 2020
- [Women's empowerment, the gangs of Medellin, and child marriage: New essays on the impact of covid-19 | Oxford Policy Management \(opml.co.uk\)](#) October 2020
- [Labour Reforms hold no meaning if they take away labourers' rights | Oxford Policy Management \(opml.co.uk\)](#) June 2020
- [Keeping Indonesia's low-income households protected and informed amid the COVID-19 crisis | Oxford Policy Management \(opml.co.uk\)](#) April 2020