



Private Sector Policy Oxfam Sweden

INTRODUCTION

There is evidence that the power of companies can be harnessed to benefit poor and excluded people. However, there is also much evidence of the negative impact of companies on poor and excluded people. Although Oxfam Sweden does not have a mandate for any advocacy related activities in Sweden, it will engage with Swedish companies to benefit poor and excluded people by creating partnerships with companies for fundraising and communication. Also, Oxfam Sweden uses companies as suppliers of various products and services.

Private sector engagement – as customers, as recipients of gifts, or as beneficiaries of co-branding publicity – can be high profile. The underlying policy is meant to reduce the risk that engagement with the Swedish private sector harms the reputation of Oxfam. It is aligned with the *OI ethical screening standards* but is slightly more specific for Oxfam Sweden in certain cases (e.g. process; financial limitations). The *OI ethical screening standards* do however stay valid and must be adhered to as well.

This document is produced for staff to engage appropriately and be proactive in their relations with companies, while avoiding:

- potential conflict between commercial and advocacy interests within the Oxfam confederation;
- damage from being associated with an inappropriate partner;
- a bottleneck of bureaucratic approval procedures on any venture.

The document consists of the following chapters:

- General principles
- Corporate Fundraising Policy and Procedures
- Purchasing Policy and guidelines

Management of the policies and procedures is the responsibility of the Secretary General, who is accountable to the Board of Oxfam Sweden.



1. General principles

The following principles govern all individual rules for Oxfam Sweden's engagement with the private sector.

1.1 The object of Oxfam Sweden

Oxfam Sweden's object is: *'to raise awareness of people living in poverty and facing injustice; to foster active citizenship by connecting and mobilizing people via campaigns and to raise funds for projects and programs of Oxfam and Oxfam Novib aimed at empowering poor and marginalized people, in particular women and achieving a just world without poverty'*.

Work with the private sector must therefore have the reasonable expectation of furthering Oxfam Sweden's objectives.

1.2 Ethics

Oxfam Sweden's mandate is based on an ethical position that poverty and injustice is wrong. Ethics also inform Oxfam Sweden's ways of working. To meet this ethical stance, staff will have access to appropriate tools and knowledge in order to make sound judgments about engagement.

1.3 Fairness

Companies are sensitive to both the commercial and reputation impacts of Oxfam's and Oxfam Sweden's work. Oxfam Sweden will demonstrate fairness and even-handedness in dealings with the private sector.

1.4 Risk management

Oxfam's and Oxfam Sweden's reputation and brand are among its most valuable assets and are based on the integrity with which it promotes the interests of poor and excluded people. All our activities should seek to enhance that reputation. Oxfam Sweden will consider the interests of poor and excluded people against risks of being (or seen as) unduly influenced by a corporate engagement and risks to Oxfam Sweden and others of getting it wrong.

1.5 Precautionary Principle

Since engagement with the private sector may have high profile, Oxfam Sweden should reduce risks to its reputation. Where there is doubt about the balance of risk against benefit to poor and excluded people, Oxfam Sweden will avoid public association.

1.6 Due Diligence

Oxfam Sweden will demonstrate due diligence in its risk management procedures into all relations with the private sector. Information will be gathered about a company's impact, before decision-making. This particularly applies to public association with or endorsement of companies. A calculation of net benefit to poor and excluded people should be a demonstrable outcome of engagement.



1.7 Strategic

When there is conflict between the mobilization of skills, resources and funds from companies and campaigning, the primary driver of Oxfam's corporate engagement will be to influence the policies and behaviours of companies in order to maximize concrete gains for poor and excluded people. All Oxfam offices – including Oxfam in Sweden - will take this into account in their decision making process.



2. Corporate Fundraising Policy and Procedures

2.1 Application of Policy

The underlying fundraising policies and procedures are applied on the basis of a series of guidelines, which may be modified from time to time by the Board of Oxfam Sweden. These guidelines cover the scope of the policy, procedures that are to be followed (including screening), authority to apply policy and the main criterion for rejecting donations. The interpretation of these guidelines is the responsibility of the Secretary General. The policy is in line with the Oxfam Novib Corporate Sector Policy and the *OI ethical screening standards*.

2.2 Rules

1. The policy applies to all donations to Oxfam Sweden, of any type (including money, gifts in kind, time or publicity) and from any source, whether directly solicited or not.
2. Scrutiny of donations is generally applied only to the first donation from any source, except when there is reason to believe that there is a change in the status of the donor.
3. Donations of any size are accepted where Oxfam Sweden cannot identify their source, but only after serious attempts to identify the donor. Anonymous donations of > SEK 100.000 must be reported to the Board of Oxfam Sweden.
4. Donations of below SEK 100.000 are accepted without scrutiny unless a) there is an obvious reputational or other risk to Oxfam Sweden in accepting it or b) we are or become aware of a problem with the source (eg a link to terrorism or money laundering).
5. No donations of SEK 100.000 or more will be accepted if it does not pass the following procedure.
6. The fact that an organisation is a supplier to Oxfam Sweden does not exempt them from the Corporate Fundraising Policy and Procedure, but staff should in following these procedures ascertain what checks have been carried out under the Purchasing Policy and Procedures.

2.3 Emergency response

During an emergency, especially when resources are required to enable us to respond rapidly, the “humanitarian imperative” may be called into play. Under these circumstances we may agree to accept tactical, one off donations that we would not normally accept on the grounds that lives are at risk and we need to respond swiftly.

Acceptance of such donations does not in any way imply endorsement or support for organizations making these donations and Oxfam International, Oxfam affiliates and partners retain the right to lobby or campaign against these organizations at any time. However, staff cannot assume that ALL support is accepted at this time. Screening procedures still need to be followed, and donations may still be rejected.



2.4 Procedure for gifts from organizations

The following procedure applies in a non-emergency situation.

- Step 1. Is the donation anonymous?
If YES, accept but only after serious attempt to find out the identity of the donor.
If NO, go to Step 2.
- Step 2. Is the donation from a donor of which we know nothing and below SEK 100.000?
If YES, go to Step 3
If NO, go to Step 4
- Step 3. Is the donation from a source where there is an obvious reputational or other risk to Oxfam (Sweden) in accepting it, or where we are aware of a problem with the source?
If YES, reject the donation
If NO, go to Step 7
- Step 4. Is the donation from an individual or organization in a prohibited industry (see 2.7)?
If YES, reject the donation.
If NO, go to Step 5.
- Step 5. Is the donation from an organization that is an Oxfam affiliate campaign target?
If YES reject the donation.
If NO go to Step 6
- Step 6. Is the donation from a multinational corporation?
If YES the donation must be consulted with the Private Sector Management Team of Oxfam Novib and – afterwards – approved by the OPST and Oxfam Sweden Board.
If NO, go to step 7.
- Step 7. Does the donation involve public association* between Oxfam Sweden and the donor?
If YES, go to step 8.
If NO, accept the donation, if it is under SEK 100,000, otherwise refer to the Private Sector Management Team of Oxfam Novib and – afterwards – the OPST and the Oxfam Sweden Board.
- Step 8. Does the donor pass the screening below?
If YES, the donation can be accepted.
If NO, reject the donation.

** Public Association is defined as being when an organization promotes its association with Oxfam to the general public. If publicity is limited to internal/staff communications this is not public association.*



2.5 Screening

Screening is applied in any case where a donation worth over SEK 100,000 is involved, or where Oxfam Sweden's name is linked publicly with another brand, individual or organization. Where screening is required by the procedures above, all the following questions must be answered YES about the candidate before proceeding. All answers must be supported by evidence.

1. Will public association have a positive impact on poverty, distress and suffering?
2. Does the candidate have a reasonable ethical policy and record?
3. Is risk acceptable? See under Criterion below.
4. Does the candidate's image build on one or more of Oxfam Sweden's brand values? If not, is there a strong case for accepting the donation in view of its value to Oxfam Sweden? Otherwise refer to the Private Sector Management Team of Oxfam Novib and – afterwards – the OPST and Oxfam Sweden Board.

2.6 Authority

1. All employees of Oxfam Sweden are accountable for policy adherence and following procedures.
2. If there is any doubt (particularly if the company has international operations) the issue is referred to the Private Sector Management Team of Oxfam Novib and – afterwards – the OPST and Oxfam Sweden Board.
3. The Secretary General of Oxfam Sweden is responsible for reviewing policy and procedures from time to time.
4. Adjustments in the policy must be approved by the Board of Oxfam Sweden.

2.7 Criterion

Donations are rejected if the risk to Oxfam (Sweden) from public association with the donor exceeds the impact of the gift on poverty and injustice. This will arise when, should the donation become public knowledge, it could lead to public criticism; or when public knowledge of the donation could undermine campaigning. The following list covers prohibited industries. It may be amended from time to time.

Prohibited industries

- Arms manufacture or sale.
- Oil and mining industry.
- Baby milks sales outside the WHO Code of Conduct.
- Pesticide sales outside the FAO guidelines.
- Pornography.
- Tobacco production and sale.
- Alcohol



Providers of services to these industries are not automatically prohibited. If the service is to provide a critical part of the components of the industry (e.g. chemicals to a pesticide company) the case should be referred to the Private Sector Management Team of Oxfam Novib and – afterwards – the OPST and Oxfam Sweden Board.

In the event of a company being owned by or being under common ownership with another company which breaches this criterion or being acquired by a company that has interests that breach the criterion, the case should be treated as a marginal decision and referred to the Private Sector Management Team of Oxfam Novib and – afterwards – the OPST and Oxfam Sweden Board.



3. Ethical Purchasing Policy

3.1 General

Oxfam Sweden's policy is to seek to purchase goods and services which:

- are produced and delivered under conditions that do not involve the abuse or exploitation of any persons;
- have the least negative impact on the environment;
- are most cost-efficient.

Such considerations will form part of the evaluation and selection criteria for all goods and services purchased by Oxfam Sweden.

In addition, Oxfam Sweden will seek alternative sources where the conduct of suppliers demonstrably violates the basic rights of Oxfam Sweden's intended beneficiaries, and there is no willingness to address the situation within a reasonable time period, or where companies in the supply chain are involved in the manufacture or sale of arm in ways which are unacceptable to Oxfam Sweden.

3.2 Purpose

The purpose of the policy is to:

- promote good labour and environmental standards in the supply chains of Oxfam Sweden;
- to protect Oxfam Sweden's reputation.

Suppliers should commit to continuous improvement towards compliance with the labour and environmental standards specified, both in their own companies and those of their suppliers.