

United Nations Global Compact Communication on Progress

For the period from 30th March, 2021 to 29th March, 2022

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) OPM, our parent company; and (ii) OPM's 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

2021 was a year in which COVID-19 continued to affect many organisations, including OPM. The safety and well-being of OPM's staff remains a priority across the organisation. We continue to refine the new 'ways of working' across all of our offices and have retained flexibility to adapt our policies in light of ever-changing local guidance. The impact of COVID-19 has varied greatly across our offices with each office having its own unique set of challenges based on the local COVID-19 situation.

Traditionally, we have used a fly-in-fly-out model to deliver our projects in various locations all over the world however, we have started to move away from this model and instead are focusing on strengthening our in-country presence. The ongoing pandemic has also given us an opportunity to consider longer-term virtual or hybrid ways of working.

2021 has also presented other unexpected situations for our current and former colleagues. Following the withdrawal of the US forces from Afghanistan and subsequent Taliban coup, our CEO helped to lobby the UK government regarding the evacuation of people formerly associated with OPM. OPM has assisted those associated with OPM to apply for a UK government resettlement scheme.

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 now been in place for two years and is successfully embedded in the organisation. In 2021, we undertook a corporate governance review which has resulted in a clarification of the roles and responsibilities of the Board and Senior Management Team. A new delegation of authority framework has been implemented and training is being delivered to all staff.

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 continued to roll out our internal safeguarding audit framework to assess safeguarding process compliance by Project Managers. We regularly liaise with the Director of Consulting and / or the Consultants Programme Manager to identify projects with a safeguarding element which may benefit from this process.

- OPM continues its membership with 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 safeguarding risk assessment mentoring for project managers which is run through our external advisors, KCS.
- We have identified safeguarding focal points in our international offices. The relevant individuals have subsequently received tailored training from KCS as have the Senior Management Team and project managers involved in projects with a safeguarding element.

Data protection and security

- Our Data Protection framework remains in use and we continue to hold personal data to its standards, including when it is stricter than that required by local legislation.
- Our Data Protection framework is being adapted to ensure it complies with further international jurisdictions as OPM grows its global footprint, with particular emphasis on Australia, the European Union, and the USA.
- Data processing registers are in place and required for all projects to ensure continued oversight of our data processing.
- Our IT Team has recently undertaken a review of existing data security measures and systems. Sophos Intercept X has been fully deployed and monitors all client access and activity, enhancing edge protection. The Microsoft 365 DLP system is now used to monitor and alert on data movement. Local data storage has mostly been phased out with encrypted cloud-based storage replacing it.
- OPM is always respectful of the rights of the participants in its research projects and ensures 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 which we are reporting for on, for the first time, this year.
- 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 and have been discussing possible synergies / training initiatives with dedicated charities with a focus on modern 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.
- In 2020, in response to financial pressures of the pandemic, OPM made the difficult decision to reduce employer pension contributions to the statutory minimum. Following a successful all-staff consultation in 2021, OPM is pleased to be returning to an above-market employer pension contribution which will be implemented in three stages in March 2022, March 2023 and March 2024.

Staff Health and Safety: COVID-19 response

- Given OPM's global footprint, the COVID-19 pandemic has impacted our standard ways of working. We set up a COVID-19 committee to manage risk to our staff and in the early stages of the pandemic, the committee met weekly to review health and safety risk to our staff globally. The committee now meets as required and continues to monitor the latest government guidance across our office locations. We aim to balance the risk presented by COVID-19 against staff needs for suitable working environments (access to equipment and/or documents) and a desire to return to the office by implementing booking systems and safety guidelines. Offices are beginning to re-open and social distancing at in-person events continues. OPM keeps a close watch on local government guidance in all office locations and ensures applicable guidance is adhered to.
- At the start of the pandemic OPM repatriated all staff that requested a relocation. OPM continues to repatriate staff when relocation is requested.
- OPM made use of the 'furlough' type schemes when they were initially introduced in 2020, topping up the pay of affected staff to minimise financial implications. No claims were made under the UK furlough scheme in 2021.
- 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. A representative from the SCC

attends the quarterly Board meetings providing a direct communication line between the SCC and the OPM board of directors. The SCC representative and Board chair circulate a joint statement summarising topics raised and the Board's response to staff following each quarterly meeting.

- OPM has 7 Wellbeing Champions who have received Mental Health first Aid training. The Wellbeing Champions have supported staff through various initiatives such as virtual wellbeing breakfast sessions and sharing mental health support resources on Microsoft Teams.
- Recognising the impact of isolation and broader well-being challenges our global team are facing we have also engaged the Unmind platform and app providing a suite of tools and support to improve mental health as well as signposting our staff towards local information and organisations that can help. The tool also provides the ability for team members to monitor their wellbeing over time and spot trends as they work towards personal goals and general wellbeing. In addition, 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 and has recently refreshed its terms of reference to further enhance its organisational impact.
- OPM has published its gender pay gap report which shows a small reduction in the Gender Pay Gap for the reporting year. HR processes have been developed to support a further reduction of the Gender Pay Gap (for example, broadening the recruitment sites used to extend OPM's reach and reducing the use of psychometric testing to further reduce unconscious bias).
- 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

- Our Environmental Policy was refreshed in 2020 and will be reviewed by quarter two of this year.

- OPM has an Environmental Management System which follows the guidelines set by ISO14001 2015.
- In 2021, the ESC considered how OPM 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 two years our staff have travelled much less as a result of global travel restrictions and remote working has become part of the 'new normal'. OPM is moving away from the traditional fly-in-fly-out model of project delivery and is actively strengthening local, in-country presence.
- In compliance with the UK's Energy Savings Opportunity Scheme 2014, OPM UK undertook an audit of its premises to identify opportunities for further energy savings. This audit was concluded 10 November 2021 and no significant areas for reduction were identified.
- OPM UK has created a Carbon Reduction Plan as part of its requirements for tendering with FCDO and will publish this plan in Q1 2022.

Anti-corruption

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

Anti-Bribery, Fraud and Corruption

- OPM now conducts anti-bribery and corruption risk assessments on an entity level to give us a more granular approach and to highlight any issues that individual country offices may face. These will be updated annually. 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.
- OPM subscribes to EthicsPoint, which provides an 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 approximately 3,000 individuals in the last two years via an online portal which checks against 700 global watch lists and 3 billion media sources 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 recently updated our Due Diligence Policy and have finalised OPM's Due Diligence Handbook which pulls together all our existing guidance and tools into a single resource to facilitate compliance amongst staff.

- Our new online Due Diligence Questionnaire for companies has been rolled out. It is designed to improve the due diligence process for companies and provides a more user-friendly interface.

Oxford Policy Fellowship

- Oxford Policy Fellowship (OPF) is a development programme that places high calibre lawyers in low- and middle-income ministries to work as civil servants and build local capacity. In March 2021, OPF had 11 Fellows posted in eight sub-Saharan African governments as embedded technical advisors in a wide range of ministries (finance, education, environment, climate change, trade and health). The purpose of the Fellows' work was to provide legal expertise to these governments to help strengthen their governance, legal and public policy capacity as well as supporting processes that improve the rule of law.

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 principles 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](#)

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:

- [Does climate change drive poverty: a Big Data approach](#) | Oxford Policy Management (opml.co.uk) December 2021
- [India's transition to electric vehicles – the road ahead](#) | Oxford Policy Management (opml.co.uk) November 2021
- [Crisis funding – how much do we really know?](#) | Oxford Policy Management (opml.co.uk) August 2021
- [Ways to measure managerial performance in health: Lessons from India](#) | Oxford Policy Management (opml.co.uk) June 2021
- [Financing for COVID-19 and climate action? The best use of the IMF SDR allocation](#) | Podcast hosted by European Political Economy Project May 2021
- [Towards a fairer, healthier world: How can we build resilience in the frontlines of health systems](#) | Oxford Policy Management (opml.co.uk) April 2021