

A photograph showing a group of women sitting in a row, likely in a community meeting or training session. They are wearing traditional Indian clothing, including colorful saris and bangles. The woman in the foreground is writing in a notebook with a pen. The background is slightly blurred, showing more women and a bright light source.

# WWF ENVIRONMENTAL AND SOCIAL SAFEGUARDS FRAMEWORK

Overview document



# TABLE OF CONTENTS

## **Part I: Background—4**

WWF's Existing Social Policy Framework

## **Part II: Environmental and Social Safeguards Framework—6**

Comprehensive Environmental and Social Safeguards Framework  
Maintaining the Highest Standards  
Safeguards and WWF's Project Guide

## **Part III: Institutional Arrangements—10**

WWF International Safeguards Unit  
WWF Office Responsibility and Accountability  
Office of the Ombudsperson  
Independent Monitoring and Review Function

## **Part IV: Standards—14**

The Environmental and Social Management Standards of WWF's Safeguard Framework  
Excluded Activities

## **Part V: Getting Started—16**

Safeguards Screening Tool  
Risk Categorization  
Sign-Off of Screening and Categorization

## **Part VI: Mitigation and Implementation—21**

Mitigation Planning  
Stakeholder Consultation  
Finalizing Mitigation Frameworks  
Sign-Off of Mitigation Frameworks  
Financing  
Implementation  
Monitoring and Reporting

## **Part VII: Responding to Grievances—25**

WWF Policy on Accountability and Grievance Mechanism  
Country- and Project-Level Grievance Redress Mechanisms

## **Part VIII: Ombudsperson's Office - Independent Monitoring and Review Function—27**

Independent Monitoring and Review Function  
Response Protocol on Human Rights

## **Part IX: Documentation and Disclosure—29**

Documentation  
Disclosure

## **Conclusion—30**



# Part I: Background

## WWF's Existing Social Policy Framework

WWF adopted its first social policy in 1996 and they now comprise a suite of commitments on human rights, poverty, livelihoods, equity, gender and the rights of Indigenous Peoples. Together with the environmental and social safeguards, including this framework document, the social policies have been updated and will be subject to a public consultation in 2021.

WWF is a founding member and one of the first signatories of the 2009 [Conservation Initiative on Human Rights](#), committing itself to respecting internationally recognized human rights and ensuring that WWF activities do not result in human rights violations.

[WWF's Human Rights Policy Statement](#) details the seven principles through which the network implements its human rights commitments, namely to:

1. **Respect human rights.**
2. **Advocate for governments, as duty-bearers, to fulfil their obligations**
3. **Promote human rights within our work**
4. **Identify and mitigate negative human rights impacts**
5. **Help protect the vulnerable**
6. **Encourage good governance**
7. **Support for rights holders**



© Emmanuel Rondeau / WWF-US



© Jürgen Freund / WWF

Complementing this commitment to human rights, WWF has further adopted the following social policies.

The [WWF Policy Statement on Indigenous Peoples and Conservation](#) (1996, 2008 and updated in 2021). This Policy ensures that the rights of indigenous peoples are respected in WWF's work, that indigenous peoples do not suffer adverse impacts from WWF activities, and that they receive culturally appropriate benefits from conservation.

The WWF Policy Statement on Gender Equality (2021) signifies WWF's ongoing commitment to equity and integrating a gender perspective in its policies, programmes, and projects, as well as in its own institutional structure. It speaks beyond gender binary, recognizing that there are multiple terms and definitions that relate to gender, which will evolve over time.

WWF's social policies apply to all activities that we undertake including policy advocacy, research, partnerships and communications. For place-based work that WWF undertakes within landscapes and seascapes (hereafter 'landscapes') implementation is through the Environmental and Social Safeguards Framework (ESSF, or framework).

## PART II: Environmental and Social Safeguards Framework

### A Comprehensive Environmental and Social Safeguards Framework

The board of WWF International and the WWF Network Executive Team (NET) agreed to adopt the Environmental and Social Safeguards Framework in June 2019 to ensure consistent, comprehensive application of safeguards across the entire WWF network<sup>1</sup>. The framework will continue to be reviewed and updated periodically in consultation with stakeholders across the WWF network and with outside practitioners and civil society organizations (CSOs).

Safeguards were designed as a risk mitigation management system to be applied to WWF activities, development and implementation that may potentially generate negative social or environmental impacts. They have been progressively adopted by bilateral development agencies (e.g. KFW - the German development bank, and United States Millennium Challenge Corporation (MCC)), international development organizations (e.g. World Bank, InterAmerican Development Bank, and other multilateral banks), United Nations development agencies, and environmental funds (e.g. Global Environment Facility). They are also being adopted by conservation-focused nongovernmental organizations (NGOs), including the International Union for Conservation of Nature (IUCN).

**What are safeguards?** A set of standards, policies, planning and implementation mechanisms, and compliance systems that govern how activities are carried out to safeguard people from harm.

**Why are safeguards necessary?** To help ensure that conservation efforts do not have adverse social and environmental impacts, and most important, to help ensure the protection of human rights.

**Where are safeguards implemented?** In the landscapes where WWF has activities, whether those be direct, co-managed or managed through a third party (or parties).

**When are they implemented?** When environmental or social risks have been identified in a landscape (or activity within a landscape) and when those activities are being carried out with financial resources that flow directly through WWF accounts.

**Who is responsible?** Everyone at WWF has a role to play in implementing safeguards, to varying degrees.

---

<sup>1</sup> WWF's highest executive body chaired by the Director General of WWF International and comprising CEOs of a representative sample of WWF offices



## The seven core elements that underpin WWF's ESSF



WWF often pursues long-term, rolling projects that comprise a set of actions to pursue sustainable development and secure nature in landscapes. The safeguards framework is applied to the entire set of actions and interventions undertaken in these landscapes, rather than considering each activity separately. As such, in this document, ‘activities’ capture the entire scope of WWF work where resources are provided in the form of technical assistance, physical investments (infrastructure, technology, or equipment), or financing to bring about changes in skills, knowledge, attitudes, behaviors, and/or practices of institutions or individuals within a defined geographical area - the operational landscape.

### Operational Landscapes

Operational Landscapes are normally smaller and more homogeneous than ‘umbrella landscapes’ which are often referred to for spatial conservation planning. As such, operational landscapes are of a size and scale suitable for safeguards implementation and have the following characteristics:

- Are the geographical areas where the strategic intent for conservation is operationalized and executed.



© Karine Aigner/WWF-US

- Are the geographical areas where the ESSF is implemented.
- Are the geographical areas where WWF offices provide physical (e.g. small infrastructure, equipment) and/or other (e.g. staff time, financial support to partners).
- Are as homogeneous as possible from a contextual point of view - i.e. areas identified within a national context (not transboundary).
- Have a WWF Operational Landscape leader/owner or a Programme Manager in charge of the strategy execution and ESSF implementation and one WWF office that takes full ownership and responsibility (including legal) for the operational landscape and ensures that adequate capacity and resources are allocated to execute the strategic intent for conservation.

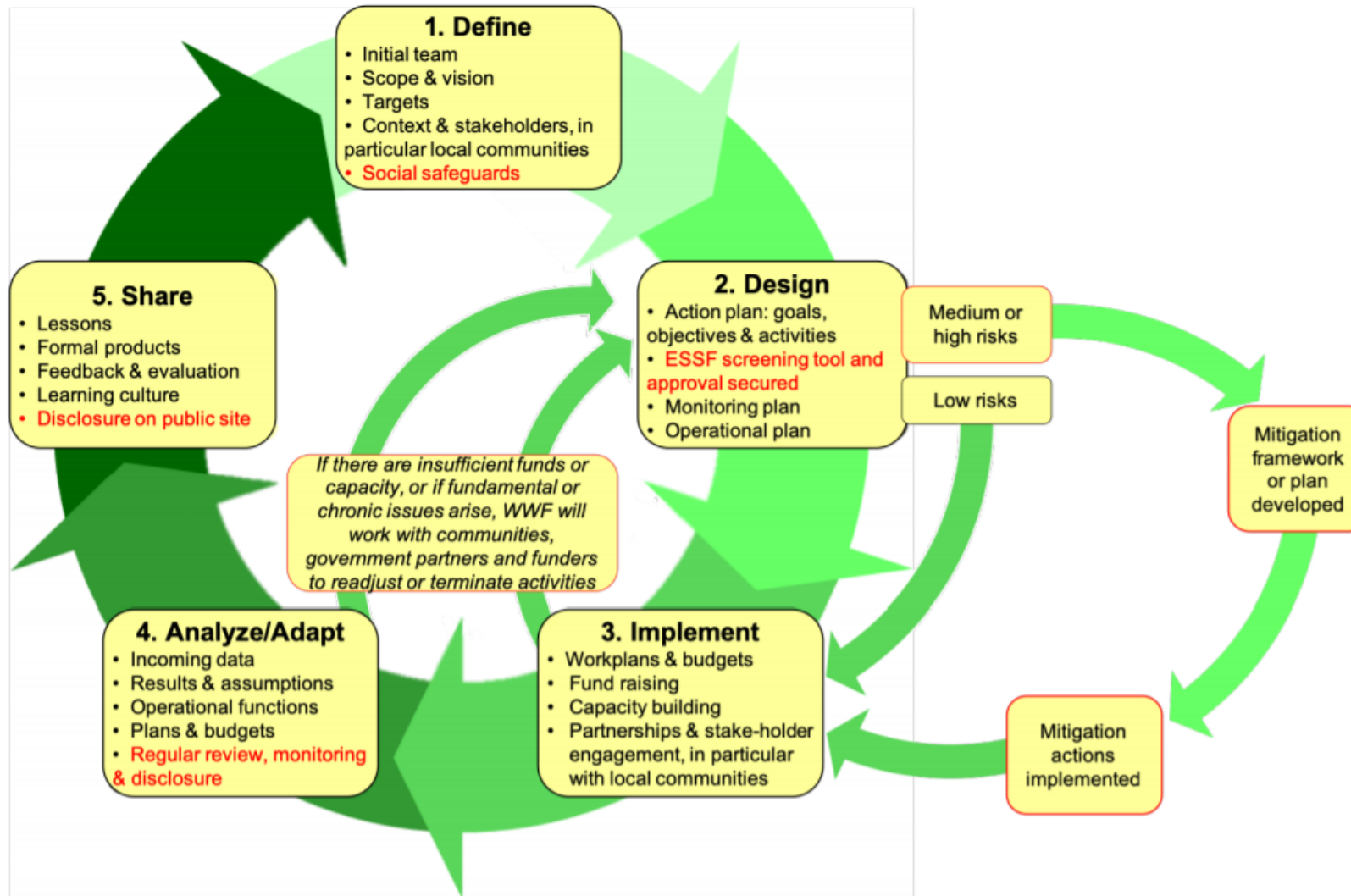
### **Maintaining the Highest Standards**

The purpose of the framework is to set a minimum “floor” globally for WWF’s work and ensure that at least these standards are met. We will follow the highest social safeguards expected by government funding agencies and other donors (e.g., USAID has specific policies and requirements around trafficking in persons and working with children), as well as national laws and safeguards standards where funding originates or is ultimately invested.



## Safeguards and WWF Project and Program Cycle

The safeguards framework has been designed to be implemented within WWF's project and programme management system, which will be progressively strengthened to implement this framework.



## PART III: Institutional Arrangements

The institutional arrangement to implement the framework is summarized below.

**1**

### **WWF International Safeguards**

Unit staffed by a dedicated team that provides the foundational support and cohesion for the implementation of safeguards across the Network. This includes managing the screening tools, overseeing training and accreditation, managing the internal and external safeguard databases, and ensuring quality assurance.

**2**

**WWF Offices** in countries where activities take place are responsible for applying safeguards as per the safeguards framework. WWF offices may recruit safeguard experts to provide guidance and quality assurance, and to ensure consistency across the Network. These experts will need to be accredited through the International Safeguards Unit to perform this function.

**3**

**Independent Monitoring & Review Function** led by an ombudsperson that includes dispute resolution, compliance assessment and advisory functions.



© Staffan Widstrand / WWF

## WWF International Safeguards Unit

The WWF International Safeguards Unit maintains and oversees the safeguards framework and underlying standards. It comprises the Director of Safeguards and Human Rights, Regional Heads for Africa, Asia and Europe, the Social Policies manager, a Communications Officer and a Team Coordinator. The Unit is also supported by a safeguards team in WWF-US (which plays a regional oversight role for the Americas) and a 'practitioners network' of safeguard staff across national offices.

On behalf of the WWF network, the International Safeguards Unit provides the following functions:

*Safeguards Framework Management.* The Unit serves as the repository of safeguard standards and policies. The team maintains and strengthens risk screening tools, and updates the safeguards framework as needed to align with international best practices.

*Capacity Building.* The Unit provides guidance and mentoring support on landscape screening and the development of mitigation frameworks. It also coordinates a community of practice (the safeguards practitioners group) and oversees the design and rollout of training for all WWF staff.

*Capacity Building.* The Unit provides guidance and mentoring support on landscape screening and the development of mitigation frameworks. It also coordinates a community of practice (the safeguards practitioners group) and oversees the design and rollout of training for all WWF staff.

*Safeguards Quality Assurance.* The review and sign off on all safeguard screening results and mitigation frameworks, including decisions to escalate higher risk landscapes (or activities within them) to the network level Conservation Quality Committee for further review and approval. Safeguards quality assurance is part of a wider risk and quality assurance process within WWF.





*Accreditation.* WWF’s safeguards framework depends on experts to provide quality assurance across the global pipeline and portfolio of place-based work, ensuring that environmental and social issues are adequately addressed within landscapes and to provide relevant safeguards approvals. While the International Safeguards Unit has employed safeguards experts, the system is designed to be supported by a network of technical experts who are able to provide help and quality assurance and any WWF office may employ someone to perform these functions. To ensure consistency and ensure the highest standard of safeguards are applied systematically across the WWF network, staff serving these functions need to be accredited by the WWF International Safeguards Unit. It will be the responsibility of the Director Safeguards and Human Rights to develop and maintain the accreditation system for such staff, and to report to the WWF NET on the accreditation programme and any measures needed to strengthen its performance.

**Database.** The International Safeguards Unit also maintains the database where all risk screenings, mitigation frameworks and supporting plans are inventoried and provides for public disclosure of safeguards actions.



© Day's Edge Productions



© Sonja Ritter / WWF

## **WWF Office Responsibility and Accountability**

WWF offices where implementation takes place are responsible for applying safeguards in the landscapes where WWF investments are made and for maintaining a documented record of such.

The CEO or equivalent of each legal WWF entity, along with their Board, is fully accountable for country programmes and initiatives under their legal jurisdiction and must ensure their overall portfolio is managed in accordance with the safeguards framework. The CEO may delegate responsibilities for different safeguards functions while maintaining overall accountability.

The landscape lead is a named individual who has ultimate responsibility for the activities in a landscape. Within the safeguards framework, the landscape lead is responsible for ensuring safeguards procedures (including screening and the development and subsequent implementation of mitigation measures/frameworks) takes place.

WWF offices will be required to set up grievance mechanisms for stakeholders to lodge concerns regarding implementation of WWF's safeguards policies and securing satisfactory resolution. Further information on grievance mechanisms can be found in Part VII of this document.

## **Office of the Ombudsperson - Independent Monitoring and Review Function (IMRF)**

In 2019, when establishing the Safeguards department WWF committed to establishing an Independent Monitoring & Review Function (IMRF), which is also known (and hereafter referred to) as the Ombudsperson.

The role of this office is described in more detail in Part VIII of this document.

## Part IV: Standards



© Sonja Ritter / WWF

### The WWF Environmental and Social Safeguard Standards

WWF's global network of offices will use a common set of safeguard standards to identify and manage the environmental and social risks where WWF field-based activities could have adverse impacts as well as opportunities for improving social and environmental outcomes. The safeguards framework has 9 standards that fall into two categories.

*Process Standards:* applied in all landscapes where safeguards are applicable.

[Environmental and Social Risk Management](#). This standard describes WWF's process for identifying potential environmental and social risks and benefits.

[Stakeholder Engagement](#). This standard ensures that WWF is committed to meaningful, effective, and informed stakeholder engagement with potentially impacted communities in the design and implementation of activities within landscapes.

[Grievance Mechanisms](#). This standard prescribes how affected peoples can raise concerns about how they are being impacted by WWF activities and seek their resolution.



*Substantive Standards:* standards that apply to specific risks that can arise in WWF landscapes.

[Access Restriction and Resettlement.](#) This standard helps WWF identify and respond to restriction of access, proposed resettlement and economic displacement or other economic impacts related to WWF activities.

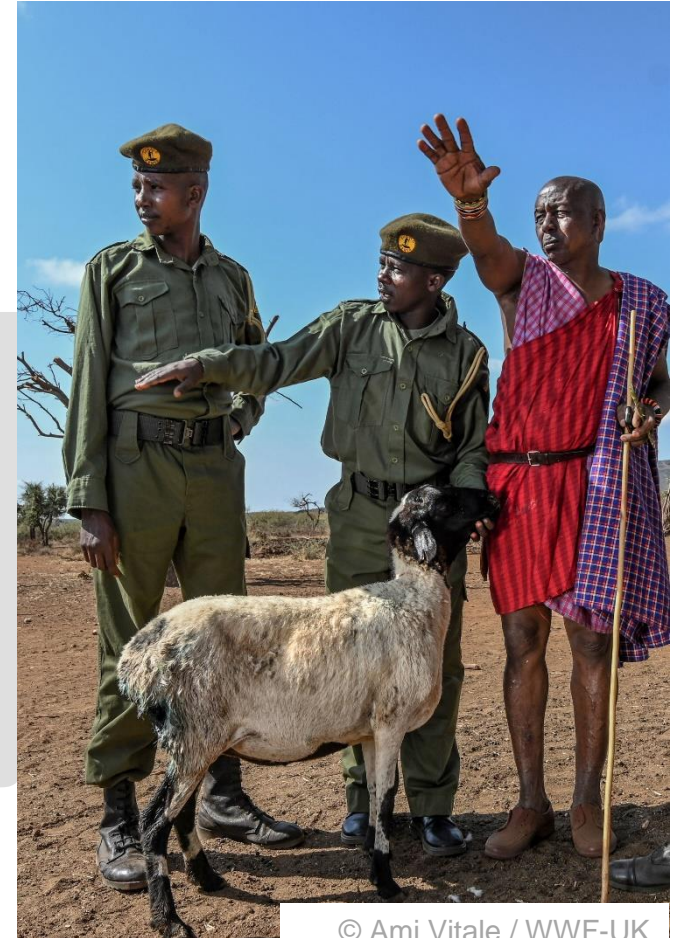
[Indigenous Peoples.](#) This standard ensures that all due consideration is taken in WWF activities projects that could potentially affect Indigenous Peoples' rights, including free, prior, and informed consent.

[Community Health, Safety and Security.](#) This standard makes sure a review of potential consequences to communities' health and safety are adequately addressed, including consequences of engagement with rangers.

[Cultural Resources.](#) This standard ensures that cultural resources - tangible, natural and intangible - are appropriately preserved and their destruction or damage is avoided.

[Protection of Natural Habitats.](#) This standard ensures mitigation of any potential negative impact on natural habitats.

[Pest Management.](#) This standard ensures review and proper use of pesticides and fertilizers in order to mitigate impacts on communities and natural habitats.



© Ami Vitale / WWF-UK

## Excluded Activities

WWF considers a number of activities as ineligible for WWF managed and WWF supported work. [This list of excluded activities can be found here.](#) If any proposed work seeks to finance an activity listed on the exclusion list, including through partners, it must be redesigned to exclude such activity in order to proceed.

## Part V: Getting Started

### Safeguards Screening



© Luis Barreto / WWF-UK

The process of safeguard screening is described in the [Standard on Environmental and Social Risk Management](#) from which the text below is taken.

The safeguards risk screening is the first step in WWF's safeguards process. All landscapes in which WWF works must be screened to (1) identify potential negative social or environmental impacts and (2) identify opportunities to strengthen design or implementation. The screening also determines the overall risk category of the landscape (see Categorization below).

The landscape lead (i.e. the person appointed by the implementing office to oversee activities) leads the screening process, working with their team. Beyond the proposed activities themselves, screening (i.e. due diligence) is also undertaken on partners and context i.e. socio-political and other 'enabling environment' factors that influence implementation. Once completed, the screening is submitted to a WWF accredited Environment and Social Safeguards Reviewer ("safeguards reviewer"), who will analyse the document, ensure the screening is comprehensive, take account of all likely risks, assign the risk category to the landscape and when satisfied, approve.

While the landscape teams will lead the screening effort for their landscapes and seascapes, interaction with technical and operational staff will be essential. In particular, the process should be done in consultation with relevant safeguards staff or other staff accredited for quality assurance to ensure that the analysis it provides considers all possible impacts and associated risks and meets WWF's Standards.

**Adaptive management of landscape screens.** While the screening and mitigation actions described herein are meant to be applied at a landscape level, it is clear that new activities may from time to time be added into the same landscape. In these cases, the landscape lead is responsible for reviewing existing screening results against proposed new activities, and adapting the mitigation framework to address any new or increased risks found. In these cases, a safeguards expert should also review and sign off on these adapted measures.

## Risk Categorization

The safeguards reviewer will categorize the landscape into one of the following risk categories and record the outcome in the categorization memo. The memo shall clarify whether any additional assessment (e.g. an environmental and social impact assessment) is required, and if so, the scope and content of such.

- **Low-risk landscapes** are likely to have minimal to no social and environmental impacts. Examples of such activities include:
  - convening other organizations;
  - developing standards;
  - advocacy campaigns and multi-stakeholder platform work;
  - natural resource assessments and monitoring;
  - environmental and sustainable development analysis;
  - monitoring and evaluation exercises;
  - desk studies, workshops, meetings, scientific research, and field surveys (however, the nature of the research may require reclassification as medium risk);
  - research and extension in agriculture, forestry, fisheries, natural resource management, remote sensing, and geospatial analysis;
  - capacity development, communications, and outreach programmes, including training.



© Andy Isaacson / WWF-US



- **Medium-risk landscapes** have potential adverse social and/or environmental impacts. This includes funds from or related to WWF for field-based activities that support:
  - creation and management of government or private protected areas;
  - creation and management of indigenous and community conservation areas;
  - community-based natural resource management;
  - sustainable development activities for local communities, such as investment in livelihoods, community health and education;
  - construction of small-scale infrastructure, such as visitor amenities, ranger outposts and community facilities;
  - direct expenditures on measures to reduce negative environmental impacts in the field, including from forestry, fisheries and agriculture.

The above are medium-risk only if they occur in places that are not considered high-risk in the context of human rights abuses (see below).

- **High-risk landscapes** have the potential for significant adverse social or environmental impacts at scale or have compound, multiple risks including the potential for human rights abuses. These include activities that:
  - trigger multiple safeguards standards with no pre-existing mitigation;
  - activities that are proposed in [fragile or conflict- or violence-affected states](#); or
  - regions of states that have a history of systemic human rights abuses.

### **Impact Assessments and Environmental and Social Mitigation Frameworks**

The safeguards reviewer will use the results of the safeguards risk screening phase to determine:

- If any further impact assessments are required at the landscape level and what areas should be further assessed. Such impact assessments (e.g. social and environmental impact assessment, socio-economic impact assessment) are carried out to fill gaps in information and explore the potential impacts identified in the screening in more depth;

- If it is necessary to develop an environmental and social mitigation framework (at landscape level) or an environmental and social management plan (at activity level) and its scope. An environmental and social mitigation framework (ESMF), for example, can include measures to address access restrictions or impacts on Indigenous Peoples or if warranted, such issues can be addressed via dedicated plans.

The determination will be captured in the categorization memo.

If a landscape is categorised as high-risk, independent environmental and social safeguards expertise must be engaged by the implementing office to lead further assessments and develop the mitigation framework or management plan. These will be reviewed by a safeguards reviewer and escalated to the WWF Conservation Quality Committee for final approval.

If a landscape is categorised as medium risk, the implementing office will carry out the impact assessment and develop the mitigation framework or management plan with internal resources, however under certain conditions (e.g. planning for complex FPIC processes) an external expert may be contracted to support the development of specialized components of the assessment and mitigation measures. These will be reviewed and approved by the safeguards reviewer.

If a landscape is categorized as low risk, there is no requirement to undertake any further impact assessment or develop a mitigation framework, - unless new activities with a different risk profile are proposed for the landscape. After the categorization memo has been signed and disclosed, no further action is required for low risk landscapes.

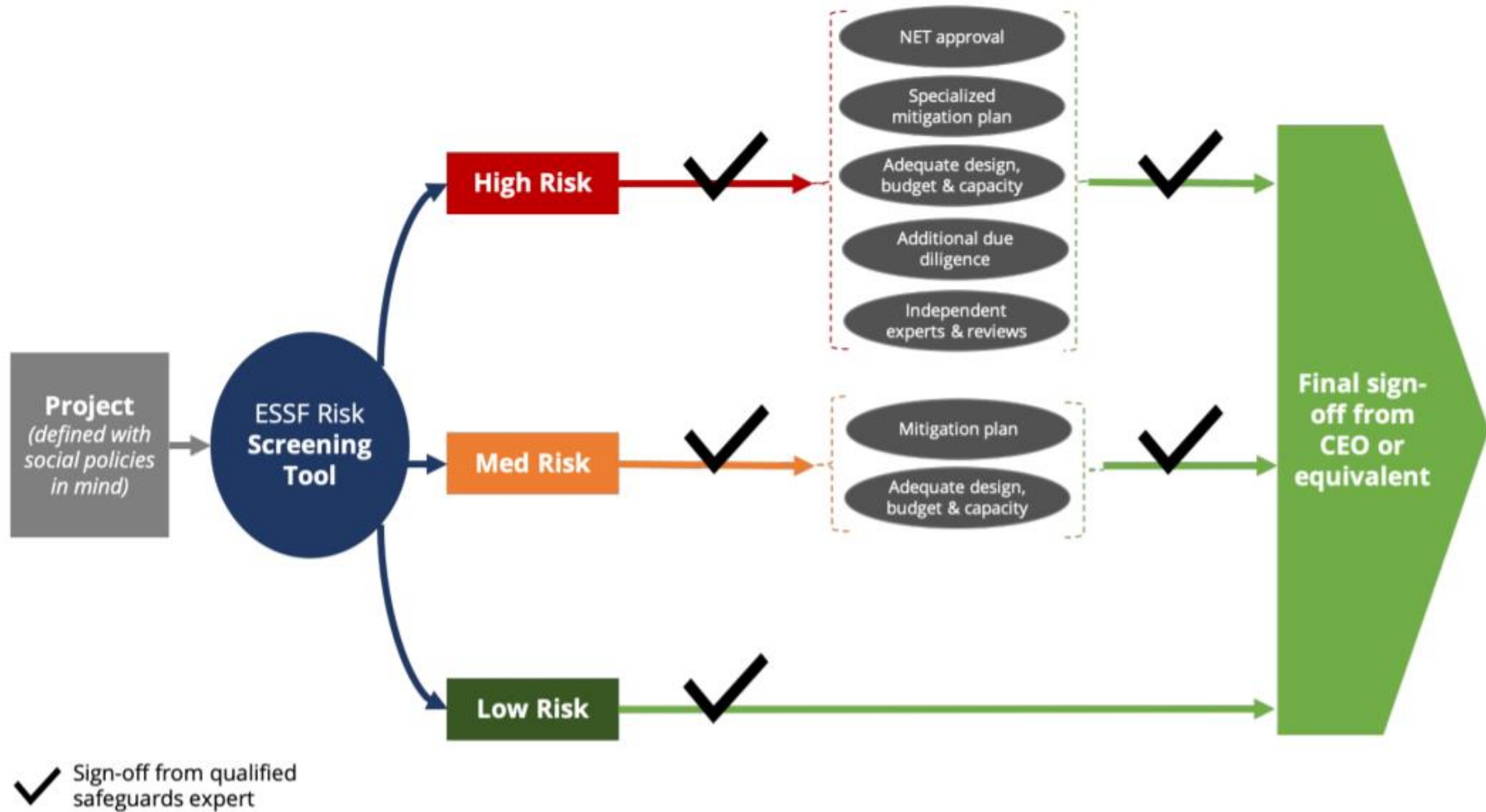
### **Approval: the Categorization Memo**

The safeguards reviewer captures the screening review, categorization and requirements for further assessment and mitigation planning via a categorisation memo, which will be publicly disclosed on the official WWF website (panda.org) - see Disclosure below.

The safeguards screening and planning requirements of specific donors, such as GEF and GCF, must be satisfied.

The landscape screenings and categorisation memos will be reviewed periodically (differing time frame depending on risk category) but also when new activities in the landscape are being proposed. Any updates to the categorisation memo will be disclosed on the official WWF website.

# The Screening Process





## Part VI: Mitigation and Implementation



© Simon Rawles / WWF

### Mitigation Planning

If the screening determines that safeguards are required, the next step is identifying and addressing mitigation measures. This begins with a consultative process with stakeholders and, in particular, potentially affected local communities to explain the possible impacts and discuss ways the project can address these risks. The representation of the stakeholders consulted should be truly inclusive (see below). With the input from these groups, the landscape team should then be able to develop a mitigation framework.

### Stakeholder Consultation

For all high or medium risk landscapes, the landscape lead is required to conduct meaningful consultations with relevant stakeholders, including affected groups, indigenous peoples, CSOs, and local authorities. Consultations should include the environmental and social impacts (positive and negative) and ensure the stakeholders' views are taken into account. For further details, see the [Standard on Stakeholder Engagement](#).

## Finalizing Mitigation Frameworks

Before they are finalized and disclosed, an accredited safeguards expert must review and approve the proposed mitigation framework. The landscape team must also disclose to affected parties the final frameworks prior to implementation and any subsequent action plans prepared during project implementation. In all cases, disclosure should occur in a manner that is meaningful and understandable to the affected people for their consent.

Prior to moving to disclosure and implementation, the implementing office's CEO/country director (or delegate) must also formally approve the assessments and mitigation frameworks.

## Sign-Off of Mitigation Frameworks

The final step of mitigation planning is securing sign-off from an accredited safeguards expert, who will assess the following:

- compliance with the safeguards framework
- adequacy and feasibility of the proposed safeguards mitigation measures and monitoring
- adequacy of consultations and communications with potentially impacted communities
- technical and financial capacity available and required to implement the project
- technical and financial capacity required for safeguards-related measures during the preparation and implementation of the project (e.g., having a qualified safeguards expertize as part of the implementing team)
- disclosure ready versions of all final safeguards documents (see below).



© James Morgan / WWF-US

## Disclosure

The landscape lead will disclose information relevant to stakeholders and reveal not only general information about WWF funded activities (e.g. duration, scale, proposed activities), but also potential risks for communities and planned mitigation measures. The disclosure of information must occur in a reasonable timeframe to allow stakeholders to process this information and – if applicable – raise concerns. The form of disclosure must be targeted to the audience in the appropriate language and channels of communication and in a culturally appropriate, non-discriminatory and gender-sensitive manner, free of external manipulation, intimidation or coercion.

Below is the minimum list of safeguards documents that require disclosing:

- the Safeguards Categorization Memo
- the Environmental and Social Mitigation Framework (at landscape level), which includes related safeguards assessments and where necessary, mitigation plans (at activity level)
- the Stakeholder Engagement Plan (where stand-alone: see [Standard on Stakeholder Engagement](#) for more detail)
- the Safeguards Compliance Memo.

The above documents will be disclosed for at least 30 days prior to a new activity's proposal being finalized –and if Indigenous People exist in the activity area, then for 45 days.

## Financing

The cost of safeguarding actions must be incorporated into project budgets. This includes all associated costs, including pre-implementation work (such as screening and consultations), mitigation actions, monitoring and reporting, as well as any actions taken to address negative impacts identified during implementation and therefore requiring adaptive management.

## Implementation

Actions identified in the risk mitigation framework must be incorporated into project activities and overseen along with other project activities. Responsibility for implementation of these actions lies fully with the implementing office, through the landscape lead under the accountability of the head of the office.

Mitigation measures may also need to adapt to changing project circumstances, including when new activities trigger additional safeguards actions.



If the proposed mitigation activities are not adequate, or if conditions within or outside of the project make it impossible to fulfil the safeguards, then WWF will work with funding and other partners to take appropriate action. This could include holding disbursements of funds until risks are fully addressed, or terminating activities where circumstances become untenable.

## Monitoring and Reporting

During project implementation, safeguards compliance and performance against mitigation measures will be tracked along with other programmatic activities. At each performance-reporting stage, the landscape team will revisit and report on the safeguards issues to assess their status and address any further issues that may arise. The qualified safeguards expert will review and approve reports including any additional or adapted action plans developed during project implementation. The qualified safeguards expert will maintain contact with the landscape/seascape team to obtain clarification on information provided, including where deemed necessary, participating in due diligence trips to the sites.

When activities and landscapes have been classified as high-risk, annual safeguards supervision is mandatory and must involve suitably qualified staff (or third party expertise) from outside the implementing team/office.



© Luis Barreto / WWF-UK

## Part VII: Responding to Grievances

WWF has multiple mechanisms through which those affected by WWF's activities can raise their grievances and seek resolution. These are described in the [Standard on Grievance Mechanisms](#), from which the text below is taken.

WWF interventions in landscapes/seascapes (hereafter 'landscapes') are expected to yield positive environmental and social outcomes. However, the implementation of some conservation activities have the potential to result in unintended negative impacts. When these occur, affected individuals or groups need a trusted way to voice and resolve [their concerns and complaints](#). WWF is committed to strengthen its accountability and improve transparency during the implementation of its conservation interventions and ensures that transparent, legitimate and trustworthy mechanisms are established at the different relevant levels to enable any affected stakeholders including local communities and Indigenous Peoples to raise their complaints or grievances and get them addressed in a timely and consistent manner.

Since grievance mechanisms are a fundamental pillar of stakeholder engagement, they should be designed through effective consultation with, and strong participation of stakeholders and their final form shared with stakeholders during the design phase or at other appropriate interactions.

### **Country and landscape-level Grievance Mechanisms**

Each WWF office is responsible to develop and maintain procedures to enable individuals or groups impacted by WWF supported activities to raise and seek resolution to concerns and grievances about activities implemented or supported by WWF in that country. These procedures should be customized to respect the local context, for example, by considering localized cultural and linguistic needs and logistical constraints, as well as where possible, support or supplement existing community complaints mechanisms. They must be communicated as needed to ensure that individuals and groups can easily find information about, understand, and be able to make use of the procedures.

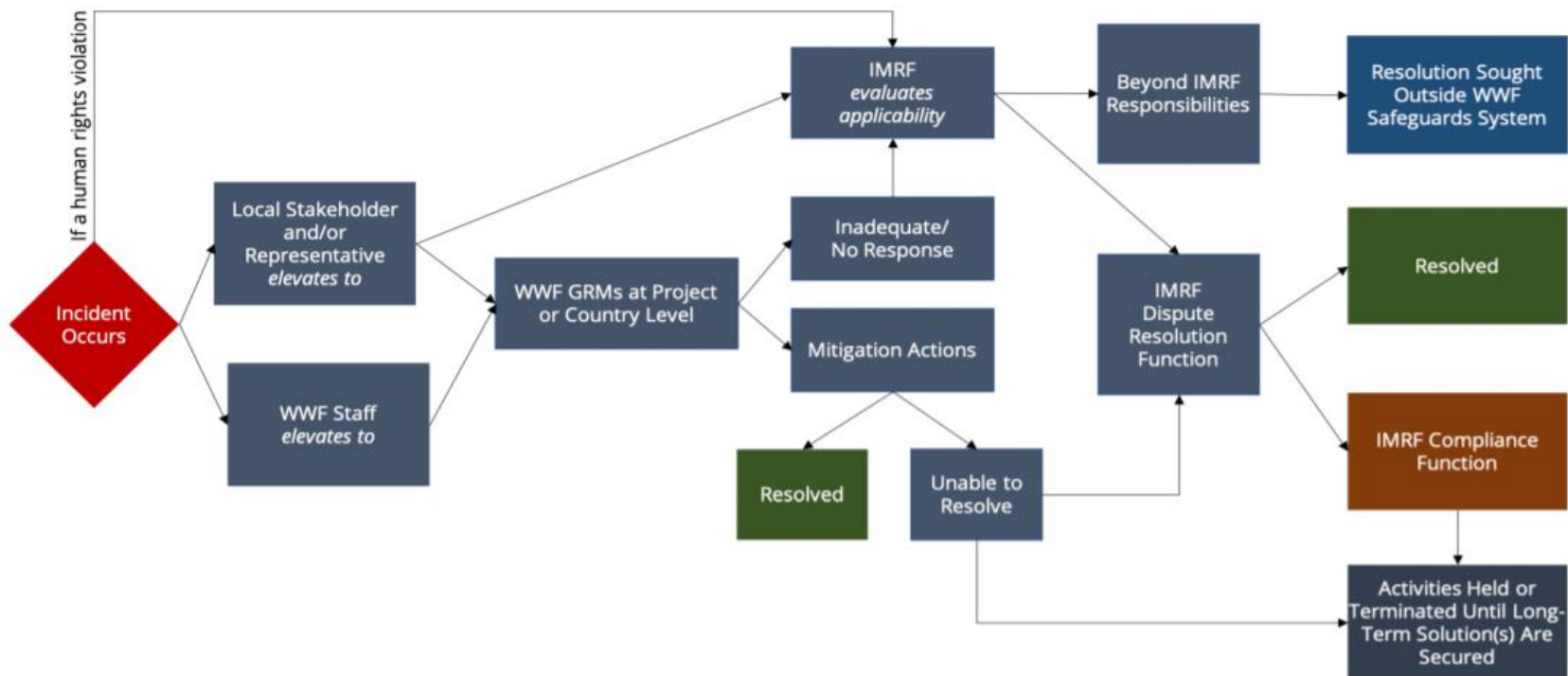
The need for additional landscape-level grievance mechanisms will be established during the design phase of activities, and will be designed to best address risks identified and the particular social context. For high-risk landscapes, a dedicated grievance mechanism should be established. Complaints received at this level must be escalated to the country level grievance mechanism. Escalation protocols for complaints are outlined in a complaints management framework.

All cases received by the office will be logged transparently in a case-management system. A case file will be opened, and stakeholders will be informed about the progress of their case. The office will review the complaint and assess whether it is eligible for their

consideration and, if so, determine the most appropriate method to deal with the complaint.

All complaints logged into the local case-management systems must be uploaded in a timely manner to the global complaints repository through the respective reporting channels to ensure all local systems are linked to WWF's global repository of complaints. The reporting channel for WWF International managed offices is [Whistle B](#), while WWF US and its managed offices use [EthicsPoint](#).

Grievances that cannot be fully addressed or resolved at landscape or country levels must be escalated to the Independent Monitoring & Review Function (IMRF), which is also known as the Ombudsperson.





## Part VIII: Ombudsperson's Office - Independent Monitoring and Review Function

**Note:** for the purposes of this consultation, this section of the framework is being retained but once the operating procedures of the Ombudsperson's Office have been established, it will be revised to ensure full alignment. WWF announced [the appointment of the Ombudsperson in early 2021](#).

WWF is establishing the office of the Ombudsperson, which will perform the independent monitoring and review function. This office will be independent from WWF International line management and will report directly to the WWF International Board.

The independent monitoring and review function has three parts:

- *High-level dispute resolution.* The Ombudsperson is intended to supplement localized grievance redress mechanisms. It provides an impartial mechanism for parties to resolve disputes through mediation. The grievance can be lodged by an affected party, WWF management, and/or WWF staff. All parties must agree to engaging in dispute resolution.

All cases received by the office will be logged transparently in a case-management system. A case file will be opened, and stakeholders will be informed about the progress of their case. The office will review the complaint and assess whether it is eligible for their consideration and, if so, determine the most appropriate method to deal with the complaint.

- *Compliance assessment.* The Ombudsperson may also assess WWF's compliance with the safeguards framework. Assessments focus on compliance with relevant policies, standards, and procedures within the framework, and are independent of, but complementary to, WWF's routine internal assurance efforts. Where a compliance assessment determines that a project is not in compliance with WWF's safeguards framework, the concerned WWF offices will need to develop and implement a response plan to bring the project into compliance. The Ombudsperson will monitor and keep track of actions taken.
- *Advisory.* The Ombudsperson provides an advisory function to the WWF NET and WWF International Board. The office will provide periodic assessments, based on lessons learned and evolving international best practices, of how WWF might improve its safeguards processes.

## Response Protocol for Human Rights Abuses

WWF takes alleged breaches of human rights extremely seriously. In the case where allegations are raised through any of the above mechanisms related to loss of life, loss of liberty, attacks on persons, torture, degrading treatment, or other forms of discrimination associated with WWF or partner activities and/or financing, including those by third parties that receive funds from WWF, a swift and thorough response by WWF is required. The response protocol for human rights abuses is an annex to the [Standard on Grievance Mechanisms](#).



© Brent Stirton / Getty Images / WWF



## Part IX: Documentation and Disclosure

### Documentation

Each step in the safeguards framework requires documented assurance of its completion and, where applicable, WWF International Safeguards Unit or management sign-off. These documents, including but not limited to risk screenings, stakeholder engagement plans, mitigation frameworks, compliance reports, complaints, and mediation results, must be completed and held in the relevant project files. They also must be uploaded into an internal WWF global depository.

### Disclosure

To strengthen accountability, the safeguards framework commits WWF to public disclosure of safeguarding actions. The WWF network has developed an external site managed by the WWF International Safeguards Unit, which will upload and maintain updated safeguards summary reports for all landscapes. This can be found on [panda.org](https://panda.org). WWF-US already has [an external site](#) for Global Environment Facility and Green Climate Fund projects.



