



**ENVIRONMENTAL & SOCIAL SAFEGUARDS
RESPONSE PROTOCOL FOR
HUMAN RIGHTS ABUSES**

V2.0 revision for consultation - May 2021

WWF takes alleged breaches of human rights extremely seriously.

Where there are allegations 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 allegations may come to light through various means – from complaints to a project or office level grievance redress mechanism, as a result of allegations in the media or directly to the Independent Monitoring & Review Function (IMRF), which is also known (and hereafter referred to) as the Ombudsperson¹.

The following response protocol sets out the actions that WWF offices must follow:

- Under all circumstances a case file must be opened by the implementing office where the activity is being undertaken;
- The implementing office management must:
 - Alert and inform: their Board; Head of Compliance WWF International; Enterprise Risk Director (for WWF-US managed offices); The Network Executive Team (a body of CEOs appointed by their peers to support Network cohesion, strategic alignment and performance); The Board of WWF International; The Board and Senior Management of any WWF office funding the project against which there are allegations;
 - Undertake an internal assessment of WWF's role, if any, and ensure compliance to and cooperation with government investigations;
 - Determine whether or not to suspend activities and remedial safeguarding of people and assets;
 - Handle internal and external communications in coordination with the network;
 - Ensure that the recommended actions of the investigation are followed up;
 - Advocate to local and national authorities that justice is served where egregious or other criminal actions are found.
- A copy of the case file will also be sent to the Ombudsperson. The case file will be routinely updated and include the proposed management actions. The Ombudsperson will keep a track log of the compliance with the management actions through to resolution;
- Donor office management or their Boards may also choose to suspend financing of activities until additional information is found as a result of the investigation. **All donors to the project must be informed;**
- Implementing or other relevant office Boards can direct management to take additional steps;

¹ [See here](#). For the purposes of this consultation, this section of the standard is being retained but once the operating procedures of the Ombudsperson's Office have been established, it will be revised to ensure full alignment.

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- Through the dispute resolution mechanism under the Ombudsperson, a mediated settlement between the parties requiring actions by WWF may be reached. The Ombudsperson would monitor compliance with the remedial actions and keep relevant Boards, the NET, and relevant WWF management updated;
- Through the compliance function under the Ombudsperson, a compliance monitoring plan may be put in place for management to bring breaches of the ESSF back into compliance. As part of this the Ombudsperson may require the implementing office to fulfil its obligations in financing and undertaking a full investigation of the issues if not already doing so.
- If there are repeated failures or an unwillingness of a WWF office to meet the requirements under a compliance monitoring plan, the Ombudsperson may recommend to that office's Board additional measures such as terminating a project. It would be for the office Board to act upon any such recommendations.

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