



**ENVIRONMENTAL & SOCIAL SAFEGUARDS
STANDARD ON GRIEVANCE
MECHANISM**

Introduction

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. This Standard 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.

This Standard fully replaces the WWF Network Project Complaints Resolution Process established in 2016.

Requirements

1. 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

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WWF International managed offices is [Whistle B](#), while WWF US and its managed offices use [EthicsPoint](#).

All complaints related to human rights abuses should be handled as per the guidelines outlined in the **Network Response Protocol For Human Rights Abuses**, which is an annex to this Standard.

2. Global level - Independent Monitoring & Review Function (IMRF - Ombudsperson)

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 (and hereafter referred to) as the Ombudsperson.

The operating procedures of the Ombudsperson will be developed by the appointee to that role¹. The Ombudsperson can supplement localized grievance mechanisms and provide an impartial mechanism for parties to resolve disputes through mediation. The grievance can be lodged by an affected party, a third-party group on behalf of an affected party and WWF staff. All parties must agree to engage in dispute resolution.

Where human rights abuses are alleged to have occurred, the local office shall escalate to the Ombudsperson even if the issue has been reported to a landscape or country level grievance mechanism. All relevant information (allegation, correspondence, etc) including the proposed management actions will be sent to the Ombudsperson, which will monitor compliance by WWF management with proposed actions in the case file and report out routinely to the relevant WWF Board as well as the WWF Network Executive Team.

If the Ombudsperson has received the complaint directly and review suggests there are human rights concerns, they will recommend actions for the WWF office to take, which may include immediate support to the alleged victim and a full investigation of the issue in coordination with local authorities.

3. Monitoring

Agreed action plans should establish timeframes for regular process monitoring towards resolution of the complaint. The concerned office and the Ombudsperson will coordinate the monitoring by organizing periodic checks – bringing together the concerned parties and relevant technical advisors for calls, meetings or other communication on the status of action plans, until they are completed. WWF offices will also assess the effectiveness of their complaints resolution processes on an annual basis, and identify any needs for improvement.

4. Ensuring Compliance with this Process

WWF offices are accountable for ensuring they are aware of and understand this process and their responsibilities to comply with it.

4. Non-retaliation

WWF strongly disapproves of and will not tolerate any form of retaliation against those who report concerns in good faith. Any WWF employee who engages in such retaliation will be subject to discipline up to and including employment termination. WWF will take

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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all feasible actions to protect reporters against retaliation. Anyone who has made a report of suspicious conduct of a WWF employee and who subsequently believes he or she has been subjected to retaliation of any kind should immediately report it by the same channels as noted herein.

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Annex to Standard on Grievance Mechanisms

Response Protocol For Human Rights Abuses

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 Ombudsperson².

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;

² [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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