



Core
Standard

Speak Up!

WWF Network Core Standard on Whistleblowing and Complaints Management

Version 2.0 – September 2020

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This Network Core Standard was endorsed by WWF Network Executive Team and the WWF International Board of Trustees in September 2020, and this version 2.0 informed to same in March 2021.

This Standard is subject to review on a regular basis and at least every 3 years.

VERSION HISTORY:

Version	Title	Released
NA	Whistleblowing Protocols (attached to Prevention and Investigation of Fraud & Corruption Network Standard)	2012
V1.0	Speak Up! Network Standard on Whistleblowing and Escalation of Issues	August 2018
V2.0	Speak Up! Network Standard on Whistleblowing and Complaints Management	September 2020

1. Purpose & Scope

We are committed to conducting our organisation with honesty and integrity, and we expect all Staff to maintain high standards in accordance with our values and Network core standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

WWF is committed to responding to concerns about illegal or unethical conduct by WWF Staff and associated third parties, and to addressing negative impacts of WWF activities. Examples of illegal and unethical conduct include but is not limited to:

- Theft, fraud, bribery, or corruption, or abuse of power;
- Threats to health, safety, security and duty of care of Staff and those impacted by WWF activities;
- Serious misconduct e.g., discrimination, harassment, sexual harassment, verbal or physical assault;
- Criminal activities, including illegal labour, money laundering, tax evasion, trafficking in humans including by contracted partners or third parties;
- Harm or potential harm to children or other vulnerable groups;
- Unauthorised disclosure of confidential information including personal data In breach of national regulations;
- Grievance raised by, or harm or possible harm to local communities including indigenous peoples in breach of our environmental and social safeguards and policies.
- Failure to comply with legal or regulatory requirements
- Damage to the environment in breach of our environmental and social safeguards
- Breach of our fundamental policies and procedures
- Conduct likely to damage our reputation or financial wellbeing
- The deliberate concealment of any of the above matters.

As part of our commitment, this standard aims to ensure all Offices have appropriate policies and channels available to raise a complaint or concern (together herein, “complaints”) related to WWF Staff or WWF-funded activities or partners. It encourages voices to be heard, and helps us to demonstrate our integrity, accountability, and respect for people working for and impacted by WWF in line with our Network Values and our safeguards.

Additionally, it aims to:

- (a) Encourage Staff and Offices throughout the WWF Network to report inappropriate conduct as soon as possible, escalating along global lines where appropriate;
- (b) Provide requirements for Offices as to how concerns should be raised and dealt with;
- (c) Ensure all Staff– as well as associated third parties including local communities impacted by our work, are able, and understand how, to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This standard is a requirement for all Offices. References to “Staff” in this Standard is intended to include all employees, officers, consultants, contractors, volunteers/interns in all

Offices. References to “Offices” includes both National Offices and its affiliated offices, and WWF International and its Reporting Offices unless specified otherwise.

2. Requirements of all Offices

1. **Ensure through publicising dedicated policies and training that all Staff and managers know how to, and are encouraged to, report** witnessed or suspected illegal or unethical conduct or activities in the performance of WWF duties (including the ability to report anonymously),. Examples of illegal and unethical conduct are outlined above.
2. **Provide Staff with information** on how to access reporting channels (as below), appeal any decision/outcome and emphasize non-retaliation for those who raise concerns in good faith
3. **Provide a choice of channels for Staff and any associated third parties** (including local communities) to report complaints, which are trusted, effective, easy to access, and in appropriate languages. These must include both:

Access to one of these **Global Reporting Channels** - which must be prominently displayed in relevant communications, including for example posters at local sites, and internal and external websites - as follows:

- a. WWF International and its reporting offices and National Organizations (save for WWF-US and its reporting offices): “WhistleB” system ([HERE](#)). These are routed to the WWF International Director General’s office. Procedures can be obtained from WWF International Compliance Team [HERE](#)
- b. WWF-US and its reporting offices: use EthicsPoint ([HERE](#)). Refer to your intranet’s Policies page for more information and links

AND

Access to **Local Reporting Channel(s)** available to all Staff and associated third parties (including local communities) overseen by an identified local WWF manager, with procedures to securely receive reports and escalate information to an identified senior manager or board member. Offices are in turn required to report to a Global Reporting Channel where appropriate (see above). Channels may be a phone number, email address, post box or other.

Note: - If the Office works with a third party with its own complaints or reporting procedures (for example a community centre which takes in community complaints around a National Park where WWF works), the Office must agree a procedure with that third party to quickly and securely pass reports to an identified WWF officer who in turn must notify a Global Reporting Channel (where applicable) and relevant parties, in line with clauses below.

4. **Notify the appropriate Global Reporting Channel** (see above) as soon as possible and within 24 hours, if the Office receives a complaint (from Staff or any third party)

which it considers could seriously damage WWF's reputation. Examples include but are not limited to those listed in section 1 above. Information reported should include at a minimum the type of infraction (e.g., potential fraud), date of event (if applicable), impact (or possible impact) on WWF and/or people or assets, contact person. Offices must cooperate with any reasonable investigation commissioned by WWF.

*For **WWF International reporting offices**, all complaints regardless of perceived seriousness, must be notified immediately into WhistleB or to the [WWF International Head, Compliance](#).*

*For **WWF-US and its offices**, all complaints regardless of perceived seriousness must be notified promptly into [EthicsPoint](#) or to the WWF-US Senior Director of Enterprise Risk Management.*

5. **Report matters to Regulators** in accordance with local law as applicable (e.g. Charity Commission – UK) **and to donors** in accordance with terms and conditions.
6. **Establish notification procedures** to inform your Board, relevant donors, and other stakeholders and ensure these procedures comply with any existing requirements.
7. **Respond** in a timely and professional manner to all complaints raised. Develop localised response procedures in line with any Network procedures which may be in force from time to time.
8. **Appeal** – have a process to allow Staff to raise further concerns about the way their concern has been handled if they are not happy with the outcome.
9. **Build awareness** with Staff, contracting parties, partners and local communities (in line with WWF's Environmental & Social Safeguards Framework) about reporting complaints, through inductions, training, outreach and contractual commitments.
10. **Protect and support** Staff who have raised a concern and adopt “no retaliation” commitments as noted herein.
11. **Retain records of complaints** and office's response to them, in line with local auditing and retention policies, and legislation including on data protection.
12. **Monitor compliance** of this Standard, and respond to Network-level requests for updates on its implementation.

3. What Staff Need to Know

Offices must ensure Staff are aware of the following:

1. **Staff Must Report any concerns of illegal or unethical conduct** by Staff or any associated third party connected with WWF or any grievance by another interested party (e.g. local communities) to any of the reporting channels detailed above, and cooperate with related investigations. Employees should be made aware a person who raises a concern does not need to have firm evidence for it. However, reckless or

deliberate reporting of false information is forbidden and may result in disciplinary action.

2. ***This standard is not meant to address every workplace concern.*** Concerns around matters that do not rise to the level of potentially illegal or unethical conduct can and should be resolved locally, with the help of supervisors, human resources, and others. However, if staff fear retaliation or feel the issues will not or cannot be adequately addressed locally, they always have the opportunity to raise it with senior management or through the global reporting channel as per this Standard.
3. ***Can Staff report something anonymously?***
Staff should feel able to voice concerns openly under this Standard. Staff have the ability to report concerns anonymously if they wish. Doing so may limit WWF's ability to fully investigate. Staff members who provide their identities may request confidential treatment of their complaint, which WWF may agree to do as far as possible, consistent with the organization's obligations to fully investigate and comply with all applicable laws.

4. Response to Allegations, Grievances or Complaints

Responding to complaints consists of a number of steps, which may include initial fact finding, dialogue with complainants, investigation, engaging with donors and stakeholders, reporting to regulators, safeguarding victims or assets and more. Each response depends on the context and the content of the complaint itself. Nonetheless Offices should always adopt the following principles when responding wherever possible:

- **Take swift action** - to respond to those who raise concerns, safeguard potential victims or assets at risk, and resolve issues.
- **Be impartial**, fair and independent in fact finding, investigation, dialogue or mediation. In some circumstances, we will need to appoint an investigator, team of investigators, or independent mediator.
- **Protect and secure** sensitive information (where applicable), in particular personal data of complainants, victims, witnesses, and accused.
- **Assume good faith** of the reporting party, unless proven otherwise.
- **Support** the reporting party ensuring non-retaliation against/by victims, witnesses and accused.
- If wrong-doing is confirmed, hold individuals (or organizations) to account and fix underlying problems in operations to **prevent reoccurrence**.
- Keep relevant parties **informed** of the progress of any investigation and likely timescales wherever possible.
- **Inform** regulators and/or authorities if appropriate
- **Understand WWF's role** and limits of power. For example criminal investigations are done by authorities rather than WWF staff.
- **Document** response steps, to demonstrate good practice and

Allow an appeals process to take place if the person raising concerns is not satisfied with the outcome. With regard to complaints related to actions by non-WWF actors (e.g., partners or their staff), WWF holds the right to use our agency to drive corrective actions, and to sanction partners. This may include but is not limited to immediate suspension of funding or termination of contractual relationships.

For more guidance on response to allegations and complaints, contact the [WWF International Compliance Team](#).

5. Commitment to protect those who report concerns and non-retaliation

WWF is committed to protecting those who report concerns and any injured parties from further misconduct by WWF Staff or third parties. WWF seeks to extend protection wherever possible to witnesses, and any other parties involved including those accused of misconduct who all have a right to non-retaliation and a fair investigation. Offices should make available a point of contact to provide support if needed.

WWF strongly disapproves of any form of retaliation or other repercussions against anyone who reports concerns of unethical or illegal conduct in good faith. We aim to encourage openness and support Staff who raise genuine concerns, even if they turn out to be mistaken. Offices must make sure informers do not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Staff should be advised by their Office that if they believe that they have suffered any such treatment, they may raise this as a complaint, and that they may also follow any applicable grievance procedure. Offices must advise their Staff that they must not threaten or retaliate against those who report concerns in any way and that any employee who engages in retaliation may be subject to disciplinary proceedings.

ENDS