

Speak Up!

WWF Network Standard

Version 1 – June 2018

WWF's Commitment to a Speak Up Culture

WWF is committed to a "Speak up" culture which allows people to safely raise concerns of inappropriate conduct by employees of WWF, its partners and people associated with WWF, without fear of reprisals.

This new Standard updates and replaces the WWF Network Whistle blower Policy (versions 2012 and updates), with some key changes:

- Encourages reporting of a broader range of conduct issues.
- Promotes a safe "speak up" environment, with reporting at office level while maintaining the option to report through existing Network channels.
- Stipulates escalation of issues to a WWF Network team to address global risks.
- Invites external stakeholders and beneficiaries to raise issues.

What is Inappropriate Conduct, or Misconduct?

Inappropriate conduct, or misconduct, includes a wide range of personal actions or behaviours at the workplace or in performing WWF duties, including but not limited to: discrimination, harassment, sexual harassment, bullying, intimidation, verbal or physical assault, child abuse, abuse of power, theft, fraud, corruption including bribery, breach of personal data privacy and confidentiality, or other breaches of internal policy which create legal, financial or reputational risks to WWF, including negligence or lack of action by management which encourages such conduct.

Whose Misconduct should we report?

We should report misconduct of a WWF employee; employees of a WWF partner or implementing organization; or WWF board members, consultants, volunteers, and interns. In some cases, misconduct effected outside of WWF's work or workplace, but which has a negative impact on WWF's reputation, may be construed as misconduct for this policy.

Every WWF Office Must at a Minimum....

- Provide a choice of effective local reporting channels for staff, contracting parties, external stakeholders and beneficiaries, including local and Network mechanisms, noted herein
- Make available reporting channels in appropriate languages and technologies. These
 are explained and available to local community members and stakeholders in a culturally
 appropriate manner which builds trust as part of our conservation and outreach
 activities.
- Respond quickly and in an independent, timely and effective manner. This includes but
 is not limited to: investigation; communications; discipline; report to donors and
 authorities; and fix underlying causes.
- **Escalate.** Network leaders note there may be occasional requests for information to be escalated to a Network level, to manage brand risks and accountability, and will work together to find appropriate procedures which respect issues of privacy, need to know, and legal considerations. **For US managed offices**, the link to all relevant policies and contact information can be found here in English and here in Spanish.

- Build awareness with staff and contracting parties (consultants, service providers, implementing organizations etc) is done: e.g., inductions, management training, capacity building.
- Staff and contracting parties commit to the principles herein as part of contracting conditions;
- Fulfil our **duty of care** to victims, those raising issues, and accused (see below)
- Comply with donor requirements in escalating issues.
- Office leadership is accountable for implement this standard, assure full awareness to all staff and key stakeholders, and occasionally review for compliance (e.g., via internal audits).

Employee Responsibilities

Staff must commit to conduct themselves appropriately when representing WWF; to inform themselves of local codes of conduct and policies; and seek guidance when they have questions.

Staff are also responsible for reporting inappropriate conduct they witness, and to avoid complicity, for example by "turning a blind eye" to inappropriate conduct of others.

Who Can Report?

A reporter can be a WWF employee, contracting party, volunteer, board member, or an external stakeholder or beneficiary of WWF activities. This may include members of a community who works with, or is impacted by, WWF activities.

Anyone who is a victim of, or has witnessed WWF or a non-WWF person being victim of, inappropriate conduct by a WWF or contractual party's employee should report their concerns. The problem may have occurred inside WWF offices or in the context of WWF's activities (e.g., field site, meeting, etc).

How Can People Safely Speak Up?

Reporters are encouraged to reach out to local senior staff. But sometimes we prefer to communicate our concerns in a more confidential manner. So WWF offers a variety of channels:

- Office senior staff: offices should identify and make readily available contact details in their own policy and communications.
- WWF International senior officers:
 - o Executive Director Operations (+41 22 364 9278) or
 - Director, Human Resources (+41 22 364 9275)
- WWF Network independent Whistleblowing mechanism¹:
 - o E-mail: wwf@expolink.co.uk
 - Web: www.expolink.co.uk (Code: wwfint)
 - Telephone see per country listing <u>here</u>. (Attention: in a few countries there are no toll-free or local numbers available. In these cases we encourage you to use other channels listed here).
- For US managed offices, the link to all relevant policies and contact information can be found here in English and here in Spanish.

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¹ This mechanism is provided by Expolink

Escalation to the Network

Office leaders are requested to escalate, within 24 hours, reports or events of inappropriate conduct to WWF International, *who receives the reports on behalf of the WWF Network*. For **US managed offices**, please escalate as per your relevant policies.

Escalation helps the Network to support the office, coordinate external communications beyond the office's remit, and analyse trends, global risks, and good practices for the benefit of the Network.

How We Respond

Offices should develop their own procedures to assure that all reports are responded to with appropriate level of investigation, which may be performed by internal or external resources, so long as it is deemed sufficiently complete and independent. If misconduct has been confirmed, WWF commits to robust discipline which may go beyond the legal requirements, in order to protect WWF's integrity and reputation, and to safeguard from the risks of "passing on" misconduct to other organizations.

For allegations of misconduct of a contracting party's or partner's employee, we will immediately raise the allegation to the partner, and seek assurances that the concerns were appropriately investigated and responded to. WWF holds the right and an ethical responsibility, to sanction partners for their lack of appropriate response: this may include but is not limited to immediate termination of the contract.

Duty of Care

WWF has a duty of care to protect victims from further abuse, including quickly making available a skilled "first responder" who can provide victims the care and support they need.

WWF also has a duty of care to reporters – from retaliation (see below) – as well as to accused parties, who have a right to an impartial investigation, confidentiality of information raised, and fair treatment.

No Retaliation

WWF strongly disapproves of any form of retaliation against anyone who reports concerns of misconduct in good faith. Any employee who engages in retaliation – whether toward a victim or a reporter of alleged misconduct, will be subject to discipline up to and including termination.

Anyone who subsequently believes they have been subjected to retaliation should immediately report it through the channels herein. Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the employee of the results of the investigation.

Related Policies and Guidance

This standard supports and/or is cross-referenced in other Network Standards including but not limited to:

- WWF Code of ethics
- A Discrimination-free and Harassment-free WWF
- Child Safeguarding and Protection of Rights
- Prevention and Investigation of fraud and corruption
- Crisis Communications

Offices are encouraged to add their local codes, policies and guidelines.

If you have any questions, please contact your office's senior management, or Donna Lusti, Manager, Governance, Ethics & Compliance, WWF International at dlusti@wwfint.org.

This Network Standard was endorsed by the WWF International Board of Trustees, June 2018