

World Wildlife Fund, Inc. (WWF-US)

Community-Based Grievances Mechanism and Review Guidelines

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INTRODUCTION

World Wildlife Fund, Inc. (WWF-US) has established an institutional grievance mechanism (the "Mechanism") to allow for the expression of and response to community-based grievances related to the implementation of its projects and activities under its Environmental and Social Safeguards Framework (ESSF). This Mechanism addresses concerns raised by potentially affected peoples and potentially affected communities or groups, or their chosen representatives (Affected Party or Affected Parties), regarding environmental and social consequences of WWF-US's place-based activities. WWF-US recognizes the importance of being able to hear directly from Affected Parties about concerns they may have and/or impacts they may experience related to WWF-US's work as it relates to delivering on ESSF commitments. This Mechanism is intended to provide a safe space for raising such concerns. These guidelines are designed to help ensure that WWF-US receives, tracks, addresses, and resolves community-based grievances promptly, effectively, and consistently.

PURPOSE AND SCOPE

WWF-US's community-based grievance mechanism enables the receipt, assessment, evaluation, management, monitoring, and addressing/resolution of grievances from Affected Parties. The aim of the Mechanism is to provide people who are concerned about actual or potential adverse impacts (1) with the opportunity to be heard and (2) to have their concerns evaluated and addressed in an effective, independent, and transparent manner that ensures continuous learning (see the Guiding Principles and Grievance Procedures sections below). It is designed to address the concerns of the community(ies) with a particular project, identify the root causes of the conflicts, and find options to address and/or resolve grievances. Therefore, it is an essential tool to foster good communication with project stakeholders and help ensure project and program outcomes.

This Mechanism is applied within the context of WWF-US's ESSF and is intended to address incidences of non-compliance or the need for the adaptive management of WWF-US's place-based activities or mitigation measures. It is important to note that the Mechanism is specific to these purposes, with principles and procedures designed to address these particular kinds of concerns, as further described below.

GUIDING PRINCIPLES

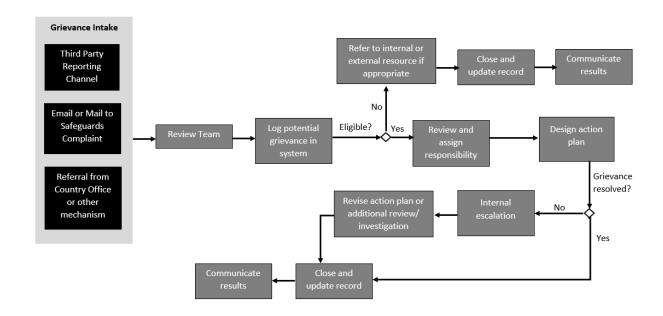
The Mechanism is based on the following principles:

- Accessibility. The Mechanism and reporting channels should be accessible and available to stakeholders, communities, and groups, to include providing multiple methods for reporting, considering language and technology challenges.
- **Responsiveness.** All reports and allegations are taken seriously grievances will be promptly and thoroughly reviewed, as described herein.
- Independence and Objectivity. The process of addressing grievances should be impartial, unbiased, and without conflicts of interest. Reviews of all grievances will be

- conducted by individuals who have objectivity, nothing at stake in the result of the review, and no personal connection to the parties.
- **Confidentiality and Care**. Confidentiality, if requested, is honored and maintained to the extent practical, possible, and reasonable under the circumstances. A survivor centered and gender-responsive approach will be applied in appropriate circumstances.
- **Predictability and Transparency.** The Mechanism fosters dialogue with Affected Parties and provides updates and follow up on action plans including timelines.

GRIEVANCE PROCEDURES

Figure 1: Grievance Procedure Overview



RECEIVING AND ASSESSING GRIEVANCES

Rather than a single point of entry for Affected Parties, WWF-US's community-based grievance mechanism consists of multiple channels for submitting a grievance or concern:

- a country-level grievance mechanism established by each WWF-US office;
- a third-party <u>reporting channel</u> that facilitates anonymous reporting and communication via a web-based or phone option, which refers all reports to WWF-US's Review Team (described below); and
- direct reporting to WWF-US's Review Team (via email to SafeguardsComplaint@wwfus.org or delivered by post to World Wildlife Fund,

Attn: Safeguards Complaints, 1250 24th Street NW, Washington, DC 20037, USA).

In addition to the WWF-US grievance mechanism, concerned parties may utilize the grievance mechanisms of project implementing partners/executing entities or the mechanisms for project funders.

Grievances may be submitted in the Affected Party's native language and should include the following information:

- Complainant's name and contact information;
- If not filed directly by the complainant, proof that those representing the affected people have authority to do so;
- The specific project or program of concern;
- The harm that is or may be resulting from the project;
- The relevant Environmental and Social Safeguards requirement that is in place (if known);
- Any other relevant information or documents;
- Any actions taken so far to resolve the problem, including contacting WWF-US;
- Proposed solutions; and
- Whether confidentiality is requested.

Such information is not necessary to raise and address a concern, but failure to include this information will affect WWF-US's ability to address an issue via the grievance mechanism and the concern may be deemed ineligible for this process. To be eligible for review under this process, grievances must be:

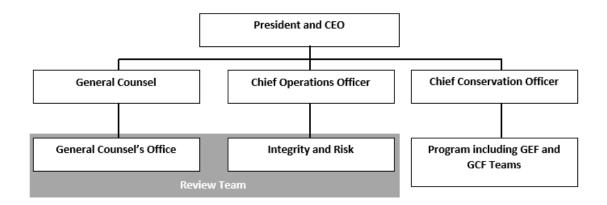
- Connected to Environmental and Social Safeguard Framework commitments in placebased work;
- From any individual, community, or group that believes it is or may be negatively affected by WWF's place-based work. If a representative is filing a grievance on behalf of an individual, group, or community, it must provide concrete evidence of their authority to represent them.
- Received no more than 2 years after the Affected Parties become aware of the negative impact and no more than 2 years after the end of the project that gave rise to the grievance.

WWF-US will maintain a system of record for all grievances received by the Mechanism. WWF-US will record important information such as relevant documentation and resolution of the grievance, including identification of the Affected Party, nature of the concern, when it was received, and its eligibility. The system of record shall be updated to regularly track progress.

When a resolution has been reached and communicated to the Affected Party, the grievance record will be updated to reflect that it has been closed, and the documentation will be retained in accordance with WWF-US's Document Retention and Destruction policy.

Regardless of the channel where the grievance is submitted, all grievances are recorded in the grievance system of record and WWF-US will acknowledge receipt within 10 business days. To ensure independence, all potentially eligible grievances received from reporting channels, including the third-party channel (web-based and phone), email channel (SafeguardsComplaints@wwfus.org), mail channel (WWF-US headquarters in Washington, DC), or country-level grievance mechanisms (as escalated for further assessment and/or review to the Review Team) will be received by the Review Team comprised of a member of the Integrity & Risk function and a member of the General Counsel's Office to assess the eligibility of the grievance and provide a response as to whether it is eligible, in accordance with the above criteria. If the grievance is not eligible, WWF-US will, whenever possible, refer the issue to another internal team for follow-up (such as subject matter expert) or direct them to another external party that may be more appropriate to address the issue.

Figure 2: Review Team



ADDRESSING AND CLOSING GRIEVANCE

Once the Review Team has completed intake and determined that a grievance is eligible, they will assign an appropriate lead to coordinate the activities to address the matter, with technical support as needed. The lead will be someone with the appropriate capacity and knowledge to manage the grievance. Based on the results, WWF-US will work with Affected Parties to develop an action plan and time frame of steps required to resolve any issues identified. The Review Team will provide oversight, with regular updates from the lead, including at key stages

such as when an action plan and timeline are established. The Review Team will ensure that each lead properly documents the process and closure of each grievance, including updating the record.

WWF-US will address grievances in a timely manner, recognizing that some grievances will be more complex than others. If a grievance cannot be resolved by the lead, or if a grievance is not resolved in a timely manner, the Review Team can reassign or escalate the grievance for additional support or resources. Any grievance that is not resolved and closed within 60 days will be escalated to the General Counsel and Chief Operating Officer who can identify additional internal or external support or resources for resolution.

NON-RETALIATION

WWF-US expressly prohibits any form of retaliation for raising or reporting a bona fide grievance or for assisting in a review or investigation. Any employee who is found to have participated or engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination. Staff members who reasonably believe that they have been victims of any such retaliation should inform the General Counsel's Office immediately.

MONITORING AND EVALUATION

Agreed-upon action plans should establish time frames for monitoring actions to resolve the grievance. WWF-US will assess the effectiveness of this grievance resolution process on an annual basis and identify any needs for improvement.

REPORTING

WWF-US will report the number of grievances at an aggregate level with information by region and grievance status (open/closed).

EXECUTING ENTITIES UNDER GEF AND GCF PROJECTS

In compliance with the ESSF, project executing entities for WWF-US implemented Green Climate Fund and Global Environment Facility projects are generally required to ensure a project level grievance mechanism where there are place-based activities.

These mechanisms are designed to:

- Address potential concerns regarding the project's implementation of environmental and social safeguards;
- Be independent, transparent, and effective;

- Be accessible to project-affected people;
- Keep complainants abreast of progress of cases brought forward;
- Maintain records on all cases and issues brought forward for review; and
- Inform WWF-US of all grievances.

Project Affected Parties and other interested stakeholders may raise a grievance at any time to the project team, WWF-US staff, the project or country level grievance mechanism, WWF-US's institutional grievance mechanism, or available donor mechanisms. In addition to the above, projects requiring FPIC or triggering an IPP will also include local conflict resolution and grievance mechanisms in the respective safeguard's documents. These will be developed with the participation of the Affected Parties in culturally appropriate ways and will ensure adequate representation from vulnerable or marginalized groups and subgroups.