

# **Policy on Accountability and Grievance Mechanism**

# Introduction

WWF's Policy on Accountability and Grievance Mechanism, also known as WWF Project Complaints Resolution Policy, is not intended to replace projectand country-level dispute resolution and redress mechanisms. This mechanism is designed to:

- Address potential breaches of WWF's policies and procedures;
- Be independent, transparent, and effective;
- Be accessible to project-affected people;
- Keep complainants abreast of progress of cases brought forward; and
- · Maintain records on all cases and issues brought forward for review.

Project-affected communities and other interested stakeholders may raise a grievance at any time to the Project Team and WWF. The Project Team will be responsible for informing project-affected parties about the Accountability and Grievance Mechanism. Contact information of the Project Team and WWF will be made publicly available.

### **Procedures**

A grievance can be filed with the Project Complaints Officer (PCO) who is responsible for the WWF Accountability and Grievance Mechanism and who can be reached at:

Email: SafeguardsComplaint@wwfus.org

#### Mailing address:

**Project Complaints Officer** Safeguards Complaints, World Wildlife Fund 1250 24th Street NW Washington, DC 20037

The PCO will respond within 10 business days of receipt, and claims will be filed and included in project monitoring.

In addition to the above, projects requiring FPIC<sup>7</sup> or triggering an IPP will also include local conflict resolution and grievance redress mechanisms in the respective safeguards documents. These will be developed with the participation of the affected communities in culturally appropriate ways and will ensure adequate representation from vulnerable or marginalized groups and subgroups.

Annex 8 provides more details about this policy.

# **ANNEX 8**

# Procedures for Policy on Accountability and Grievance Mechanism

# 8.1 Introduction

WWF's Policy on Accountability and Grievance Mechanism has established a grievance mechanism to allow for the expression of and response to complaints related to the implementation of its projects. This mechanism is designed to allow project-affected people to ask critical questions about WWF projects.

The grievance redress mechanism is designed to enable the receipt of complaints of affected women and men and public concerns regarding the environmental and social performance of the project. In short, the aim of the mechanism is to provide people fearing, or suffering adverse impacts, with the opportunity to be heard and assisted. 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 for the resolution of grievances. Therefore, it is an essential tool to foster good cooperation with project stakeholders and ensure adequate delivery of previously agreed-upon results.

# 8.2 Eligibility

Any community or group (at least two or more people) that believes it is or may be negatively affected by a failure on the part of WWF to follow its safeguards, gender mainstreaming, and community rights and resources policies in the design or implementation of a WWF project activity is considered an "Affected Party." Any Affected Party may file a complaint. Representatives filing a complaint on behalf of an Affected Party must provide concrete evidence of authority to represent them. While anonymous complaints will not be considered, complainants can request confidentiality. Since this complaints process is oriented toward direct dialogue and engagement among all parties, there is a risk that confidentiality may limit efforts to resolve complaints, and complainants will be informed if confidentiality is impeding the process.

# 8.3 Complaint Filing Process

WWF has designated its Senior Director for Public Sector Support as its "Project Complaints Officer" (PCO). As PCO, this individual is responsible for ensuring that the institution executes the procedures required under this policy.

Confidential complaints should be directed to the WWF Project Complaints Officer, Senior Director for Public Sector Support and Government Affairs in Washington, DC. Complaints may be submitted by email to <a href="mailto:SafeguardsComplaint@wwfus.org">SafeguardsComplaint@wwfus.org</a> or delivered by post to Safeguards Complaints, 1250 24th Street NW, Washington, DC 20037.

Complaints 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 policy or provision (if known):
- Any other relevant information or documents;
- Any actions taken so far to resolve the problem, including contacting WWF;
- Proposed solutions: and
- Whether confidentiality is requested (stating reasons).

# 8.4 Complaint Review Process

The WWF Project Complaints Officer will acknowledge receipt and—within 10 business days—assess the eligibility of the complaint and provide a response as to whether or not it is eligible, in accordance with the above criteria. The source of the complaint is treated with confidentiality, unless this is waived.

If the complaint is eligible, the PCO will notify the Project Team and request that it provide a response. The Project Team will provide a response within 10 business days with information on how it plans to look into the complaint and a time frame for this process. The PCO will communicate this information to the Affected Party, The Project Team will then look into the matter, with technical support as needed, for example, through investigation of the issues raised and dialogue with the Affected Party (unless confidentiality is requested) and other concerned parties. Based on the results, the Project Team will work with concerned parties to develop an action plan and time frame of steps required to resolve any issues identified. A summary of the concerns raised, actions taken, conclusions reached, follow-up plan, and time frame for completion will be documented and communicated as agreed to by the parties and provided to the PCO. (If confidentiality has been requested, the PCO will then communicate the response to the Affected Party.)

At the country level, the Project Team is required to provide information on this policy to Affected Parties. Typically this is provided during consultations in the design phase of the project. This requirement is established in this policy.

### 8.5 Non-retaliation

WWF expressly prohibits any form of retaliation against any employee for raising or reporting a bona fide complaint under this policy or for assisting in a complaint 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 Human Resources, the General Counsel's Office, or the PCO immediately.

### 8.6 Monitoring

Agreed-upon action plans should establish time frames for regular process monitoring toward resolution of the complaint. The PCO 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 will also assess the effectiveness of this complaints resolution process on an annual basis, and identify any needs for improvement.