



Further Management Response to *Human Rights and Conservation: A review of WWF-Australia policies relating to human rights and their implementation* by Dr Jennifer Zerk

WWF-Australia is grateful to Dr Jennifer Zerk for reviewing WWF-Australia human rights policies and their implementation. WWF-Australia is gratified at Dr Zerk’s finding that WWF-Australia has a high degree of alignment in the objectives and approaches of the existing Australian Government, NGO development sector and WWF International and network human rights related standards and initiatives. In WWF-Australia’s initial management response to her report, WWF-Australia adopted all Dr Zerk’s recommendations and commenced their implementation. This further management response outlines WWF-Australia’s continuing implementation of Dr Zerk’s recommendations.

Recommendation January 2020	WWF-Australia Management Response February 2020	WWF-Australia Further Management Response January 2022
Recommendation 1: Code of Ethical Conduct. Amend the Code of Ethical Conduct to more explicitly locate human rights in WWF-Australia organisational values and decision-making structure in accordance with Box 9 on page 24-25	WWF-Australia adopts the Recommendation and will commence implementation forthwith. WWF-Australia will endeavour to complete the work within four months	The amendments, together with other improvements to better comply with the ACFID Code of Conduct, have been made to the draft updated Code of Ethical Conduct. WWF expects to adopt the updated Code of Ethical Conduct by 30 April 2022.
Recommendation 2: Structure of policies. Restructure the present “human rights suite” of policies as suggested in Box 10 on page 25-26	WWF-Australia adopts the Recommendation and will commence implementation forthwith.	Work to restructure the “human rights suite” of policies is presently underway (and will reflect recent external policy developments, including the WWF Environmental and Social Safeguards Framework and ACNC External Conduct Standard 4).
Recommendation 3: Complaints processes. To the extent permitted by WWF network level guidance and approaches, and in consultation with representatives of prospective user groups: <ul style="list-style-type: none"> • streamline and consolidate complaints and feedback processes; • continue to investigate and invest in options for improving 	WWF-Australia adopts the Recommendation and will commence implementation forthwith.	The amendments, together with other improvements to better comply with the ACFID Code of Conduct, have been adopted in the draft updated Complaint Handling Policy. WWF expects to adopt the updated Policy by 30 April 2022.

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<p>accessibility of such mechanisms;</p> <ul style="list-style-type: none"> develop an easily understandable and easily translatable guide for users of mechanisms 		
<p>Recommendation 4: Engagement with WWF Environmental and Social Safeguards Framework (ESSF) system.</p>	<p>WWF-Australia adopts the Recommendation and will commence implementation forthwith</p>	<p>WWF-Australia uses the ESSF for landscape-level environmental and social safeguards screening. The Southeast Australia screening was submitted to the WWF-International ESSF workgroup.</p> <p>WWF-Australia has finalised the Southern Australia and Northern Australia screening and is about to finalise the Great Barrier Reef screening. WWF-Australia will submit them to WWF-International shortly.</p> <p>In the intervening period, WWF-Australia has been using the screening tools for programme and project management.</p>
<p>Recommendation 5: WWF-Australia Programme and Project Management Standards (PPMS). Review and refresh the WWF-Australia PPMS with a view to</p> <ul style="list-style-type: none"> Supporting and encouraging greater systematisation of human rights risk assessment of WWF-Australia projects; Ensuring rigorous managerial supervision of higher risk projects; Providing more guidance to WWF-Australia staff; Ensuring that the insights gathered as a result of the above processes are a source of continuous learning for WWF-Australia. 	<p>WWF-Australia has commenced a review and refresh of the WWF-Australia PPMS. WWF-Australia adopts the Recommendation and will incorporate it into the existing process underway.</p>	<p>WWF-Australia has incorporated Dr Zerk's recommendations regarding PPMS as follows:</p> <p>(1) WWF-Australia regularly refreshes the PPMS templates (most recently in October 2021). In addition to fully complying with the WWF network PPMS templates, WWF-Australia has developed a more systematic and comprehensive project internal review and approval process for project risk assessments (including human rights related risks).</p> <p>(2) WWF commits to respect and promote human rights and treat human rights risks seriously. Any projects with potential medium or high human rights risks will not be approved by WWF-Australia. Projects with other risks are thoroughly evaluated and risk-registered. They are supervised through stricter monitoring and report procedures.</p> <p>(3) PPMS guidance materials have been provided to all relevant WWF staff, and periodic PPMS training has been run at least once per quarter</p>

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		<p>since late 2020. More guidance and training materials are being prepared and will be provided in 2022.</p> <p>(4) A PPMS Experience Survey was conducted in May 2021 to improve the PPMS further, as well as hands-on “learning by doing” programs. “Learning brief”, Fail Fest, and other workshops have promoted continuous learning towards better practice.</p>

