



Speak Up

A WWF Network Standard

WWF-Australia October 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.

For many years, WWF's Whistleblower Policy and associated processes have been a key tool for managing the risk of misappropriation of WWF and donor resources by encouraging and supporting WWF personnel to safely and discreetly report suspected or identified cases of fraud and corruption. This new Standard updates and replaces the WWF Network Whistleblower Policy (versions 2012 and updates), and the WWF-Australia Whistleblower Policy 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, exploitation and sexual abuse, bullying, intimidation, verbal or physical assault, child abuse and other child protection issues, 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.

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, safe, discrete and accessible manner which builds trust (See WWF-Australia's Complaint Handling Policy <http://www.wwf.org.au/ArticleDocuments/391/doc-policy-wwfaus-complaint-handling-jul18.pdf.aspx?Embed=Y>)
- 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 issues to WWF International senior officers noted herein, who will, on behalf of the Network, coordinate external communications to manage risks and add support if needed..
- Build awareness with staff and contracting parties (consultants, service providers, implementing organizations etc) through, for example: 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 implementing this standard, assure full awareness to all staff and key stakeholders, and occasional review for compliance (e.g., via internal audits).

Employee, Board Member, Volunteers, Interns, Partner Organisations and Subcontractor Responsibilities

Employees, Partner Organisations and subcontractors 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.

Employees, Partner Organisations and subcontractors are also responsible for reporting inappropriate conduct they witness, and to avoid complicity, for example by “turning a blind eye” to the inappropriate conduct of others.

Who Can Report?

A reporter (also known as whistleblower) 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 the 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 (field sites, meetings, etc).

How Can People Safely Speak Up?

People wishing to report an issue are encouraged to reach out to local senior staff. In WWF-Australia reports can be made to:

- Any WWF-Australia Board Member or any of the following WWF-Australia Executives:
- Chief Executive Officer (dogorman@wwf.org.au), People & Culture Director (kdixon@wwf.org.au), Chief Financial Officer (rlokuge@wwf.org.au),

Alternatively, people can make a confidential report through a variety of channels:

- WWF International senior officers:
 - Executive Director Operations (+41 22 364 9278) or
 - Director, Human Resources (+41 22 364 9275)
- WWF Network independent Whistleblowing mechanism¹:
 - E-mail: wwf@expolink.co.uk
 - Web: www.expolink.co.uk (Code: wwfint)
 - Telephone – see per country listing [here](#). (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](#).

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*.

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.

¹ This mechanism is provided by [Expolink](#)

How We Respond

Offices should develop their own procedures to assure that all reports are responded to with an 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.

WWF-Australia will inform DFAT of any suspected or detected fraud or corruption involving DFAT funds within 5 business days of a cases becoming known and will immediately report any suspected or confirmed child protection cases involving DFAT funds.

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 protect people who report an issue from retaliation (see below).

WWF has a duty of care to also protect accused parties, who have a right to an impartial investigation, confidentiality of information raised, and fair treatment.

No Retaliation

WWF will not tolerate 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 WWF-Australia policies including but not limited to:

- Complaints Handling Policy
- Fraud and Corruption Prevention Policy
- Policy on Counter-Terrorism and Prevention of Criminal Misuse of Funds
- Policy on Child Protection
- Policy on Human Rights and Working with Marginalised Groups and Vulnerable People
- Bullying, Harassment & Discrimination Free Workplace Policy
- Grievance & Dispute Resolution Policy
- Internal Investigations & Disciplinary Panels Procedure Policy

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
- Employee, service provider and partnership Contract templates (integrity clauses) – under development at time of writing
- Crisis Communications

If you have any questions or comments on this Standard, please contact the WWF-Australia People & Culture Team.

This WWF-Australia Speak Up Standard was approved by the WWF-Australia Executive Team on the 26 February 2019 and endorsed by the WWF-Australia Board of Directors on 3 April 2019.