



CAMBODIA

A photograph of four men in a forest setting. They are gathered around a table, looking at a map or document. The man on the left is pointing at the map. The man in the center is wearing a dark blue jacket with a WWF logo. The man on the right is wearing a light blue shirt and a white cap. The background shows lush green trees.

ENVIRONMENTAL & SOCIAL SAFEGUARDS COMPLAINTS RESOLUTION MECHANISM

December 2022

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1. Introduction

This document was developed in accordance with standards and policies of the WWF Network and describes complaint resolution mechanism (CRM) of WWF Cambodia. The CRM is designed to timely and effectively **address complaints or concerns of external parties** in particular, local communities and Indigenous Peoples, non-governmental organizations, individuals, in relation to activities of WWF Cambodia and its partners, inappropriate behavior of its staffs and/or representatives of partner organizations. The CRM includes receiving, acknowledging, investigating, resolving, and closing relevant concerns, complaints, and grievances (hereafter called “complaints”) to WWF Cambodia office.

WWF Cambodia views the effective resolution of complaints as an important part of its work with communities, encourages indigenous peoples and local communities (IPLCs), and local civil society organizations (CSOs) to submit their concerns, feedback, and complaints. Complaints may arise due to the organization and partner staff’s behaviour or due to negative impacts of activities carried out by WWF Cambodia and its partners or its third partner entity. In this context, the CRM serves as an integral part in community engagement with accountable and transparent approaches. Any related feedbacks received through this CRM are important to build a good foundation for improving services and ensuring community engagement of WWF Cambodia in ways that enhances the lives of local communities and indigenous peoples, and recognizes their contributions to the overall conservation agenda.

WWF Cambodia is committed to equitable and consultative working relationships with local communities, Indigenous Peoples, and CSOs to freely raise complaints. We are committed to ensuring any staffs, partners, communities, and indigenous peoples will not be subject to retaliation when voicing concerns, raising complaints, and participating in the complaint resolution process. It is expected that this CRM deepens the relationships between all parties and stakeholders engaged in conservation and community development programs/projects to ensure our joint efforts in enhancing peoples’ economic and livelihood status while protecting wildlife, biodiversity, and nature.

2. Purposes of the CRM

- To ensure that staffs, partners, and donors understand complaints procedures and resolutions of WWF Cambodia
- To ensure that partners, indigenous peoples, communities, and individuals have a way to air complaints that might occur in relation to their human, cultural, and traditional rights, economic well-being, gender equity, security protection, and other aspects as a result of actions by WWF Cambodia and/or its implementing partners and third parties
- To resolve existing or potential concerns and grievances, improve mutual understanding, accountability and responsibility, and build a solid foundation for collaboration of conservation work
- To minimize and manage risks, and ensure that the CRM is promoted, accessible, and transparent to communities, indigenous peoples, and other marginalized groups
- To ensure that IPLCs with whom we collaborate, work with, and support are not inadvertently harmed by our conservation activities (do-no-harm approach)
- To ensure the harmonization of complaint resolution processes and compliances with grievance mechanism of WWF global network reflecting local culture, social, legal, and economic contexts of Cambodia

- To function as an awareness-raising tool that staffs and implementing partners will use to convey a commitment to openness and fairness in addressing complaints
- To promote WWF's values of integrity, accountability, and collaborative partnership

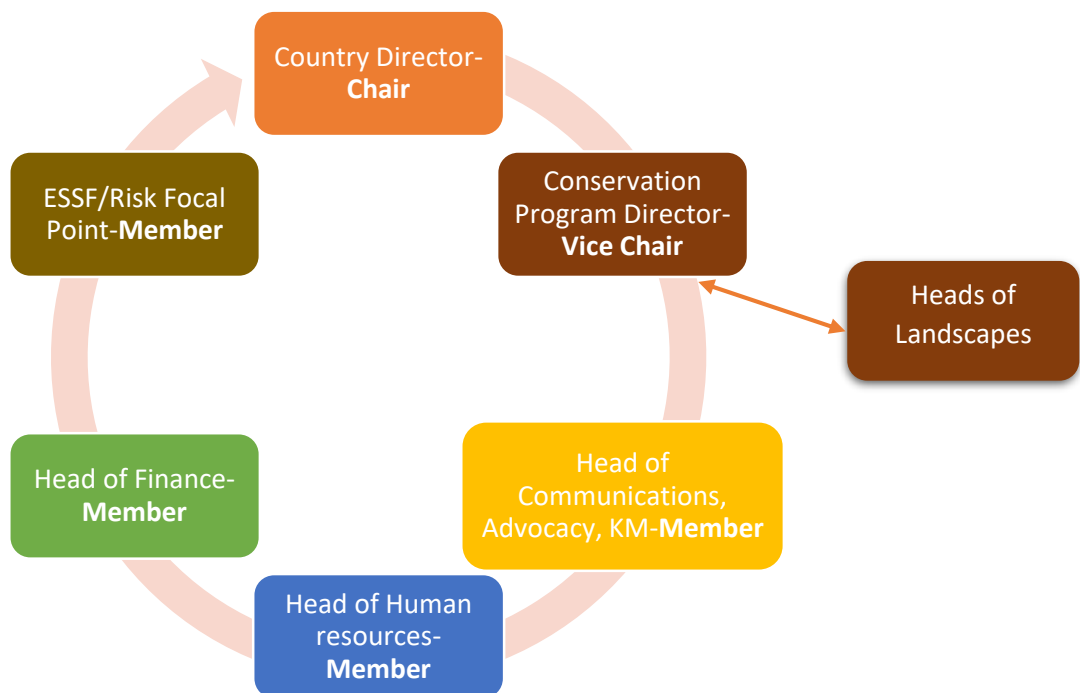
Each staff member and implementing partner has the responsibility to report a concern or complaint. If it does not feel right, it is best to report it.

Source: WWF Complaints Management Framework

3. Complaints Resolution Committee

Complaints Resolution Committee (CRC) is established at national level of WWF Cambodia with responsibilities to coordinate, address, and ensure complaint resolution procedures are transparent, informed, fair, and rational in timely manners. The CRC shall hold meeting as required after pre-screening of received complaints to discuss and determine procedure for investigation and resolutions of the complaints situation (action plan for the grievance redress). CRC meetings will be coordinated by ESSF/Risk Focal Point. The CRC may request explanations and additional information from relevant Head of landscapes/departments, relevant managers, and other staffs involved in the complaints situation, including explanations in writing.

Complaint Resolution Committee



Heads of landscapes will directly engage with the CRC in the absent of Conservation Program Director (CPD). The Chair of CRC shall hold meetings as called by ESSF/Risk Focal Point to consider an exhaustive clarification of the situation and resolution of the complaints. Each CRC member is responsible for the complaints resolution processes, actions, steps and points agreed during CRC meeting, and informing the complainant when complaints are relevant to their department/landscape expertise and accountability. The quality of this CRM processes must be ensured by proper discussion with CRC and under the lead of the CRC Chair/Vice-Chair.

The ESSF/Risk Focal Point is assigned as a focal person in complaints' pre-screening and provides a secretariat support to the CRC, including assisting the CRC Chair/Vice-Chair in the mechanism coordination, consolidating inputs of CRC to resolution processes led by an assigned case owner, documenting written conclusions of CRC, and monitoring complaints received through the Complaint Box at WWF's Phnom Penh Office. The ESSF/Risk Focal Point is also responsible for proper complaints filling in complaint database and hard-copy folder.

The ESSF/Risk Focal Point will – within 5 working days – reviews whether the complaint is related to activities of WWF Cambodia or its partners in close collaboration with relevant Head of Landscape/department. If the complaint is related to WWF, ESSF/Risk Focal Point will coordinate a CRC meeting. A relevant CRC, Head of landscape/department, or relevant manager-based on nature of the complaint and decision of CRC- will communicate to the complainant that the complaint is accepted for consideration by WWF Cambodia and the complainant will be keep updated and engaged during the investigation.

The CRC will assess the effectiveness and practicality of this complaints resolution process on an annual basis, and identify any needs for improvement. The CRC must ensure the full functionality, transparency, and accessibility of the complaint mechanism. In the absent of ESSF/Risk Focal Point, CD will temporary assign CRC member as her/his substitute.

In the event that the internal competencies and resources of WWF Cambodia are insufficient to conduct a reliable investigation and / or to resolve the complaint situation, complaints of human rights abuses, complaints potentially pose high risks for legal or reputational of WWF network, the ESSF/Risk Focal Point with consultation with CRC Chair/Vice-Chair, will notify and escalate the received complaints to the Office of Ombudsperson following the escalation procedures as stated in ESSF Standard on Grievance Mechanism.

4. Processes of Complaints Resolution

4.1. Ways to raise a complaint

A complaint can be raised by anyone, including staffs, partner organizations, indigenous peoples, communities, and their representatives, donors or any other party who may identify a reason to raise a complaint about impacts resulted from program/landscape activities of WWF Cambodia or issues regarding rangers' law enforcement or related human right abuses. It is encouraged that affected parties or communities submit their complaints as soon as they are aware of the issues.

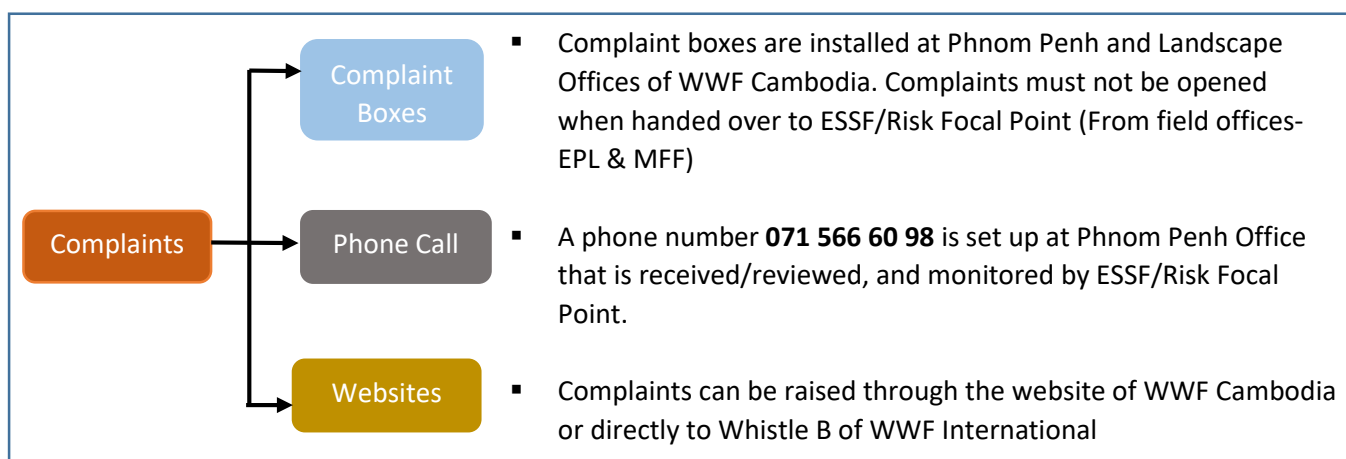
These are ways to raise complaints to WWF Cambodia office:

- **Complaints Boxes:** affected parties, indigenous peoples, and communities can submit their complaints through complaint boxes at WWF Phnom Penh Office, Eastern Plains Landscape (EPL), or Mekong Flooded Forests Landscape (MFF). Complaints received through this channel must be weekly checked by an assigned admin staff of EPL and MFF and timely handed over to ESSF/Risk Focal Point at Phnom Penh Office. The key of the complaint boxes at EPL and MFF will be kept by an assigned Finance staff which is accessible to the assigned Admin staff every Monday of the week. When delivering the received complaint(s) to ESSF/Risk Focal, the assigned Admin staff with a witness must sign with the date of opening the complaint box. The complaints must not be opened or original seal broken when delivered to ESSF/Risk Focal Point. The Complaint box at Phnom Penh office will be weekly checked/monitored by ESSF/Risk Focal Point. ESSF/Risk Focal Point will work closely with Head of Landscapes/Departments when conducting pre-screening of received complaints before

acknowledging the complaint and informing CRC for meeting to discuss the complaint situation.

- **Phone Call:** complaints through phone call is directed to a phone-line **071 566 60 98** at WWF Phnom Penh office who will be received, reviewed, and monitored by ESSF/Risk Focal Point. The phone- phone number is publicly disseminated to communities, partners, and stakeholders by relevant WWF staffs and partners. Complainants will be guided on how to record their complaints with key required information as stated in **Section 6** below.
- **Website:** affected communities and parties can also raise/register their complaint through the web page of WWF Cambodia:
https://www.wwf.org.kh/wwf_cambodia/complaints_resolution/ or directly to Whistle B:
<https://report.whistleb.com/en/wwf> or <https://report.whistleb.com/km/wwf>

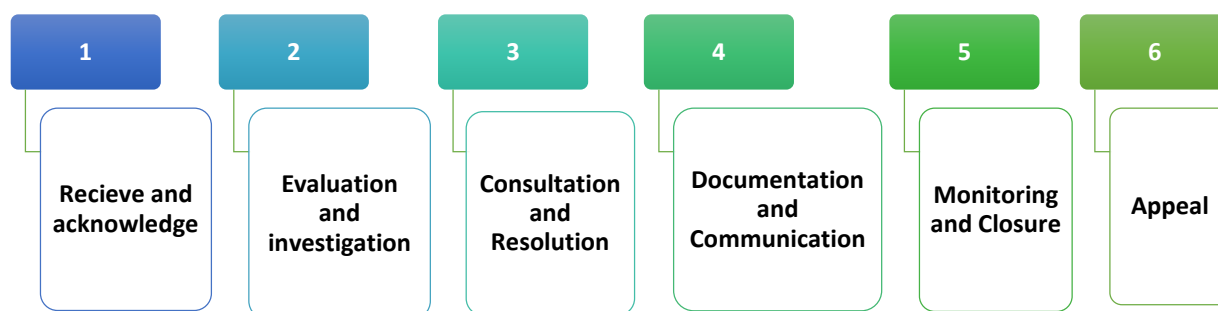
Ways to Raise a Complaint



4.2. Steps of handling a complaint

There are six steps of handling complaints coming to WWF Cambodia, each step must be followed.

Steps of Handling Complaints



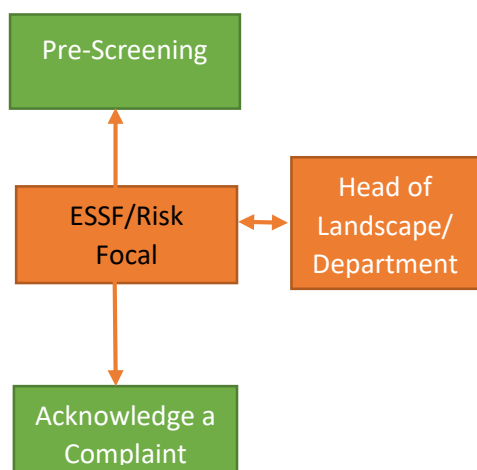
Step1: Receive and acknowledge a complaint

ESSF/Risk Focal Point, in close cooperation with the relevant Head of landscape/department is responsible for conducting a pre-screening to determine the nature of a complaint, risk type/nature, and relevancy to WWF Cambodia within one week of receiving a complaint. Complaints received via complaint boxes, phone call, or website-which will divert from CD- should be properly documented after pre-screening by ESSF/Risk Focal Point.

A complaint summary should be always sent to the CD and CPD (by ESSF/Risk Focal Point) soon after the complaints are logged in the Complaint Database of WWF Cambodia.

The pre-screened complaint will be discussed by CRC. An assigned case owner, who can be a relevant Head of landscape/department or a project manager, will inform the complainant within two weeks after receiving the complaint.

The acknowledgement letter (e-mail or hard copy) will specify the name and contact details of the assigned case owner and a description of next steps and expected timelines that the complaint will be handled by WWF Cambodia. The complainant will be asked to remain available for further dialogues or questions.



- ESSF/Risk Focal Point reviews the complaint within one week after receiving the complaint from landscape complaint boxes (in cooperation with relevant Head of landscape) or Phnom Penh Complaint Box.
- ESSF/Risk Focal Point Sends a summary of the complaint to CD/CPD before coordinating for CRC meeting to discuss the nature and situation of the complaint.
- Assigned case owner sends acknowledgement to the complainant within two weeks after receiving complaint

Step 2: Investigation and evaluation

When CRC discussion determines if a complaint is high risk or low risk, and whether it is relevant to WWF Cambodia, applicable next steps will proceed. For high risk complaints, the ESSF/Risk Focal Point will escalate the complaint to the Office of Ombudsperson or Whistle B (<https://report.whistleb.com/en/wwf>; <https://report.whistleb.com/km/wwf>) of WWF International. The assigned case owner (based on type and nature of a complaint) will lead the action plan with support from ESSF/Risk Focal Point to work with the assigned case manager from Office of Ombudsperson in all steps of the escalated complaint and regularly report progress of the investigation to CRC.

For Low risk complaints, the assigned case owner (based on type and nature of complaint) with support from the ESSF/Risk Focal Point will lead the implementation of action plan and report to CRC on progress of the complaint.

The case owner will work closely with involved staffs of WWF Cambodia and partners, and may contact the complainant if further information required in order to investigate and understand the complaint in a comprehensive manner. Involved staffs of WWF Cambodia and partners shall remain available to assist and support on the action plan approved by the CRC.

Step 3: Consultation and resolution

The case owner, who is the lead, will work with ESSF/Risk Focal Point (low risk complaints) and also assigned case manager of WWF international (high risk complaints) to prepare action plan for discussion and endorsement by CRC and the Office of Ombudsperson and implementation of the plan to ensure timely, quality, and transparent process. **It is the accountability of both WWF Cambodia and WWF international in CRM for any high risk complaints.**

The case owner with support from ESSF/Risk Focal Point will consult and agree upon the resolution plan with the complainant of which the process may need to be repeated with relevant stakeholders

or mediator until the case is satisfactory concluded. It is the case owner, who is the lead, will document the detail of complaint resolution process with support from ESSF/Risk Focal Point who will keep proper filling of all the complaints related documents.

The case owner should regularly update the complainant and allow the complainant to add more information or ask questions during the investigation process. Communication with complainant should be in writing with a follow-up phone call and in a language that is easy to understand by the complainant.

Step 4: Documentation, Filling & Communication to stakeholders

It is mandatory to document and properly filed all related complaint resolution process and steps, and stored all related documents properly both in electronic and hard-copy files that is accessible to CRC starting from receiving complaints to closure. ESSF/Risk Focal point is responsible for registering complaints in complaint database within one week from the date of receiving the complaint and after pre-screening is completed.

All relevant letters of notification to any stakeholders and complainants as well notification of receipt of responses to complainants have to be filed properly. The ESSF/Risk Focal Point is responsible to ensure that all relevant documentation is completed and kept confidential and accessible only to authorized staffs and as per approval from CRC Chair.

All donors funding projects/programs/activities directly link with the complaints shall be informed by relevant Head of landscape/department or Project Manager as appointed by CRC within one week of decision made by CRC. High risk complaints and cases of human rights abuse must be escalated to Office of Ombudsperson or Whistle B (<https://report.whistleb.com/en/wwf>; <https://report.whistleb.com/km/wwf>) of WWF International.

Step 5: Monitoring and closure

It is mandatory that the case owner with support from the ESSF/Risk Focal Point keep reporting and monitoring on the implementation of the resolution plan that has been approved and agreed with satisfaction by the complainant. Relevant staffs of WWF Cambodia and partners must be available to ensure effective communication with the complainant when required to ensure proper implementation and monitoring of the resolution plan at the local level.

Timeframe and key activities must be included in the agreed resolution plan to ensure regular monitoring process and toward the closure of the complaint resolution. For high risk complaints, the Office of Ombudsperson will coordinate periodical check on the status and progress of actions through calls/meetings with the case owner, ESSF/Risk Focal point, and concerned parties, until the resolution action of the complaint is completed and closed.

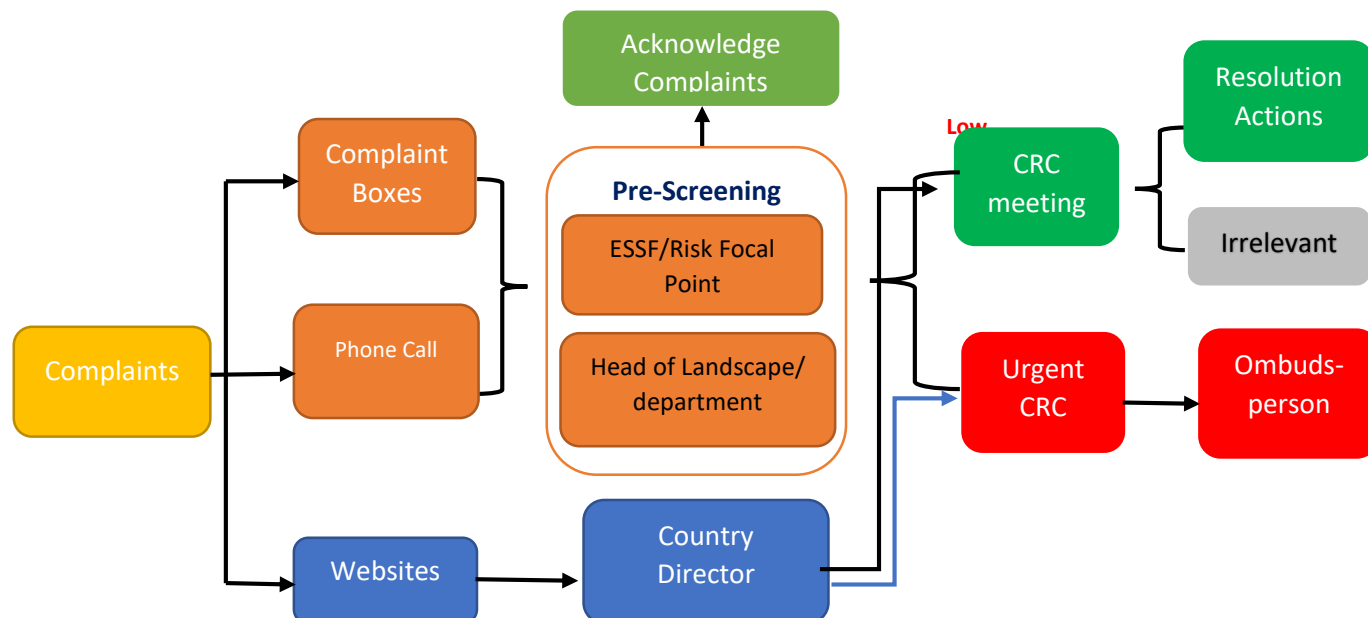
A written agreement must be signed by Country Director and the complainant as a final decision and communication to close the complaint. ESSF/Risk Focal Point must ensure proper filling of the signed agreement for case closure in the designated system of WWF Cambodia.

Step 6: Appeal

In the situation that complaint resolution does not permanently address the complaint, the complainant may raise the issue again or seeking other ways for redress. In such case, WWF Cambodia may consider to re-opening the complaint as needed and when CRC can determine significant information provided by the complainant or third party.

In a re-opening case, CRC and the Office of Ombudsperson (for high risk complaints) may consider including third party or an external mediator to support the process of developing and implementing a satisfactory resolution plan of the complaint. The third party or external mediator will suggest a decision to the CRC and the complainant.

Summary of Complaint Resolution Processes



4.3. Concerns of human rights abuses

In compliance with requirement of human rights abuses allegation of WWF International, ESSF/Risk Focal Point shall escalate the complaint to the Office of Ombudsperson regardless how the issues raised to WWF Cambodia Office upon informing CRC. All relevant information and documents (allegation, correspondences...) including proposed resolution actions by the assigned case owner to the Ombudsperson who will monitor compliance with the proposed actions. If the Office of Ombudsperson received complaints directly which considered as human rights concerns, the Ombudsperson will recommend actions for WWF Cambodia to take, that may require a full investigation of the issues reflecting local law enforcement. The assigned case owner (WWF Cambodia) and case manager (WWF international) with support from ESSF/Risk Focal Point will keep the Ombudsperson and CRC fully informed of progress, challenges, further support needed of the investigation.

4.4. Basic Principles for handling complaints

WWF Cambodia is committed to undergo a fair review of complaints based on the facts provided by complainant in according to its own investigation process. In case of a staff of WWF Cambodia or partner is being accused of misconduct through WWF' activities, the person remains innocent until proven guilty through proper investigation by CRC. However, for human rights violation/abuses allegation, the Country Director has the right to temporary remove the accused staff from professional situation until the investigation is concluded.

CRC will ensure that all received complaints are documented and filed to have sufficient information for proper investigation and case resolution. Relevant Heads of landscapes/Departments and involved managers/staffs must provide support to CRC in the CRM including ensuring local communities and project beneficiaries are well informed and aware of their rights and ways to raise a complaint as

stated in this document. CRC will ensure that the assigned case owner keep the complainant as part of the resolution process as appropriate.

In case of complaints are not relevant or connect to work/activities of WWF Cambodia or its partners, Country Director will send a written letter or email to the complainant explaining that the complaint does not involve activities of WWF Cambodia and no further action will be taken. For malicious complaints to WWF Cambodia, the CRC will determine further relevant actions including seeking support from WWF International.

5. CRM Operationalization

5.1. Awareness and understanding among staffs, partners and communities

CRC and heads of landscapes/departments are responsible to ensure refresh understanding of CRM and its value for conservation work among all staffs and relationship strengthening with partners and communities. Workshops will be held for dialogue between staffs, partners, and local communities to ensure the CRM's practicality, accessibility to diverse groups, transparency, and usefulness in relation to WWF Cambodia's engagement and activities.

CRC and Heads of landscapes are responsible to engage staffs in annual lesson-learned sessions on CRM process and its practicality including challenges in complain resolution process. Such annual reflection session with staffs will help to ensure that CRM of WWF Cambodia receives high level of acceptance among different communities and parties, and remains functional.

Introduction and orientation to this CRM is part of trainings and induction sessions to new staffs and third parties and cooperation/partnership agreements in order to ensure that employees and partners are well accustomed to this CRM with full understanding of its usefulness. **All staffs of WWF Cambodia and contract partners are obliged to promote this complaints resolution mechanism to enhance trustful relationship with local communities, key stakeholders, and project beneficiaries.**

Heads of landscapes and program/project managers are responsible to ensure the CRM is functioned with understanding in project design and implementation, and that communities and stakeholders are well-informed about their rights and are able to use this CRM. A copy of this document should also be shared with relevant partners/stakeholders and communities for reference.

5.2. Accountability and responsiveness

WWF Cambodia is determined to ensure transparency and accountability for its actions of which concerned parties are able to raise complaints caused by its conservation work through this CRM. The effectiveness of the CRM is also determined by staffs and partners' engagement and commitment in the process of handling complaints.

Functioning CRM will contribute to effective protection of wildlife and conservation while responding to the concerns of local communities to sustain their livelihoods. Besides, the CRM is designed to mitigate negative impacts on marginalized groups and also contribute to ensure equality between men and women for their participation in conservation. We promote an open dialogue over conservation measures that could cause impacts and trigger complaints as a result of our interventions.

6. Non-Retaliation and Confidentiality

WWF Cambodia strongly disapproves of and will not tolerate any kind of retaliation or harassment against people raising complaints/concerns in good faith. Any staff of WWF Cambodia, partners or third party who engages in retaliation will be subject to disciplines following WWF Cambodia rules and regulation that could result in termination of employment for severe cases. Anyone who made a complaint and subsequently believes she or he has been subject to retaliation of any kind should immediately report to Country Director of WWF Cambodia or Whistle B:

<https://report.whistleb.com/en/wwf>; <https://report.whistleb.com/km/wwf>. WWF Cambodia will take all feasible actions to protect the reporters of retaliation or harassment.

WWF Cambodia will ensure that the information/cases received are treated with confidentiality and sensitivity and will never share with third party besides CRC and relevant Head of landscape/department and involved staffs. Adhering to this principle is crucial to ensure trustful relationship with communities and partners.

The confidentiality principle may extend to negotiated and agreed resolutions and results in order to protect the integrity of the complainant. WWF Cambodia may also seek agreement with the complainant over non-disclosure until the case is fully resolved while CRC will ensure accountable communication during the process to identify satisfactory resolution with the complainant. However, disclosure of information to third parties involved in resolution process might be necessary of which the complainant will be consulted with consent.

Anonymous complaints shall be treated equally and with sensitivity as complaints with revealed complainant name. The whole process of CRM is to ensure that any raising complaint does not create any disadvantages or trigger further harmful consequences to the complainant or local communities.

7. Required Information to Submit a Complaint

A complaint must be submitted to WWF Cambodia (complaints not raised through website) either through a complaint form or letter written in language fully understood by the complainant.

Complaints may be submitted in the affected party's native language with below required information or by completing the complaint form (Annex 2 attached).

ANNEX 1: What is High Risk Complaint?

If WWF Cambodia office received any complaint, grievance or allegation which could impact the Network legal or reputational status, or put in danger WWF legitimacy or license to operate then WWF Cambodia is required to notify it, through Whistle B or directly, to the International Compliance Team:

- Community complaints or human rights abuse allegations - *All considered High Risk*
- Violence by WWF or implementing partner staff
- Fraud or Corruption
- Event seriously impacting health or safety of staff or stakeholders
- Senior staff/board members misconduct – (person in public domain)
- Illegal labour exploitation - at WWF or implementing partner
- Harm to children
- Grantees/partners involved in money laundering, trafficking in humans or other criminal activity
- Loss (eg by error, hacking or staff misuse) of personal data (regulatory requirement to report)

Source: WWF Complaint Management Framework

Annex 2: Complaint Phone Number and detail address of complaint boxes

Complaint Phone Number & Complaint boxes	Focal Points	Detail address
Phone: 071 566 60 98	ESSF/Risk Focal Point	Phnom Penh Office , #21, St. 322, Boeung Keng Kang 1, Boeung Keng Kang, Phnom Penh, Cambodia
Complaint box at Phnom Penh Office		# 21, St.322, Boeung Keng Kang I, Phnom Penh, Cambodia. PO Box 2467
Complaint box at Mondulkiri field office		Mondulkiri : National Road 76, Ospean village, Spean Meanchey commune, Sen Monorom town, Mondulkiri province
Complaint box at Kratie field office		Kratie : #428 , St. Soramrith, Phum Wat, Sangkat Kratie, Kratie city

ANNEX 3: Sample Complaint Form

The complaint form is also available in Khmer language and should be placed at relevant community groups where WWF Cambodia operates. Complainant must seal it properly after filling the form because the complaint form will only be opened and viewed by the authorized person from WWF Cambodia

Complaint Form	
Name of complainant:	
Detail address (village, commune, district, province/city, country):	
Contact phone number(s):	
Email or Facebook...:	
What is the issue/event?, who have been impacted (you, individual, communities)?	
When did the issue/event happen? (if you don't remember exact date, provide approximate month/period)	
Where did the issue occurred? how it happened and who are the key actors involved in creating the issue/event?	
Can you provide witness names in the issue/event?	
Have you informed other stakeholders such as local authorities, law enforcement team, or any staff of WWF? Please specify	
Has the issue/event been raised to WWF previously?	
Do you request not to share the issue/event with third party? Key reasons?	
Date of submitting the complaint:	
Signature or thump-print of complainant(s):	

Complainant can complete this form and drop into complaint box at EPL, MFF, or Phnom Penh office. Complaint can also raise a complaint via hot-line phone call and website:

https://www.wwf.org.kh/wwf_cambodia/complaints_resolution/ or directly to Whistle B:
<https://report.whistleb.com/en/wwf>; <https://report.whistleb.com/km/wwf>.



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Why we are here

To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

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