 Discrimination- & Harassment-free WWF

WWF Network Standard
Version 1 – June 2018
1. WWF’s Commitment

WWF commits to take all reasonable steps to prevent and promptly respond to any discrimination, bullying, harassment, sexual harassment and violence in the workplace (see definitions in Section 4) by an employee towards another employee or a person with whom the employee comes into contact (e.g., partners, stakeholders, beneficiaries, volunteers, interns or supporters).

Specifically, the WWF Network Leaders commit to:

- Take appropriate steps to safeguard communities, groups and individuals who work for WWF, or who have contact with, or are impacted by, WWF’s activities, from discrimination, bullying, and harassment.
- Communicate this as an integral part of our desired culture and values.
- Develop and share best practices around the Network.
- Enforce this Standard.

2. Specifically, every WWF office MUST at a minimum:

1. Have a policy and/or code of conduct in line with this Network Standard and local legislation, whichever is stronger, and which defines the standards of personal conduct; and assure all staff have access to it in a language they understand well.

2. Appoint a “go-to” focal point in human resources to raise concerns or ask advice, who is trained and skilled in these issues.

3. Communicate the standard and related procedures including reporting channels on internal and public websites, and in community outreach, as appropriate. Ensure external stakeholders and beneficiaries understand our commitments and where to raise issues of concern (see section 8). This may mean culturally acceptable outreach (e.g., community meetings).

4. Recruit and develop the right behaviours. Staff, volunteers, and board members understand and commit to the standard, through mandatory induction and training, and are held accountable for their conduct. This includes understanding inappropriate behaviours, how to respond to them, and how to raise complaints. Managers/HR should observe a duty of care, for example in recruiting, to assess an applicant’s integrity and perform independent background/reference checks, and to hold staff to account for inappropriate conduct as part of performance management procedures.

5. Encourage partner and supplier integrity. Engage partners, suppliers, and service providers who commit to preventing discrimination and harassment in their workplace.

6. Build prevention especially in high-risk situations, such as missions or working in remote places (e.g., sleeping arrangements, locked doors, communications availability).

7. Identify risks and mitigation actions as part of office and project risk management.
8. **Encourage a “Speak Up” environment.** Staff, volunteers, stakeholders, third parties, implementing partners and external beneficiaries have easy access to the Network “Speak Up” Standard and contact details of those mandated to receive a report. Have a variety of reporting options (e.g., verbal reporting for illiterate individuals).

9. **Escalate.** Network leaders note there may be occasional requests for information to be escalated to a Network level, to manage brand risks and accountability, and will work together to find appropriate procedures which respect issues of privacy, need to know, and legal considerations.

10. **Respond** in a timely and appropriate manner to events and allegations. All allegations should be reviewed and documented with agreed steps through closure. Offices should design response procedures, which may include response team, investigation protocols, handling witnesses and victims, etc.

11. **Maintain confidentiality** to protect the privacy of staff, including complainants and witnesses, as far as possible consistent with a full and fair investigation, and to ensure the integrity of the investigation in line with legal requirements.

12. Commit to **“no retaliation”** of allegations made in good faith: this includes protecting the confidentiality of those coming forward with complaints, as described above. Retaliation against a victim or witness is itself a form of harassment and should be disciplined according to this standard.

13. **Investigate impartially.** Those investigating issues provide a truthful and complete account of findings, are independent and not influenced by victims, accused parties, or management. (See Section 5)

14. **Perform duty of care.** WWF is committed to ensure appropriate treatment of alleged victims, accused parties and witnesses. This includes protecting against retaliation, maintaining confidentiality as described above, respecting privacy regulations, and fair treatment in investigation and disciplinary procedures.

15. **Implement disciplinary measures.** Confirmed acts of misconduct shall result in firm discipline up to and including termination of employment, and, if appropriate, referral to local law enforcement.

16. **Monitor and document.** Maintain a secured, confidential repository of allegations, investigations, response, control improvements and disciplinary measures.

17. **Keep it alive.** Offices are encouraged to do more than the above actions, and share good practices with other offices in the Network.

### 3. Responsibilities

**Staff** are responsible to speak up if they witness an event and to cooperate with investigations.

**WWF Office leaders** are accountable for the full compliance with this Standard, and to seek guidance in local legislation or in the Network if there are questions. Offices will collaborate with other WWF offices and WWF International to streamline and harmonize responses to issues which reach a global audience.
WWF Network will monitor and as appropriate report on the compliance with this Standard.

Global Media coordinates responses in case of global media coverage of allegations or events, and provides support to offices that do not have media or communications resources.

4. Definitions

Bullying includes conduct, where repeated or occurring as part of a pattern of behaviour that includes physical assault of any kind, threats of harm, and/or psychological harassment or intimidation.

Harassment is behaviour which creates a hostile working environment; and that is unwelcome, unreciprocated, uninvited and usually repeated. It includes misconduct or abuse of power that interferes with another’s ability to perform his/her work.

Sexual harassment is any physical, visual, verbal or non-verbal conduct or communication of a sexual nature which is unwelcome, non-consensual, usually repeated, and which can include (but not limited to):

- Demands for sexual favours
- Pervasive offensive or demeaning comments, jokes and innuendo
- Sexual propositions or advances
- Displaying, sending, emailing or downloading offensive material
- Remarks about a person’s sexual activities
- Physical contact (e.g. kissing, touching, patting or brushing against a person)
- A direct or implied threat, benefit or promise

Sexual Harassment does not include sexual interaction, flirtation, attraction or friendship that is invited, mutual, consensual and reciprocated.

Discrimination is the less favourable treatment of an individual or group that is made on the basis of a certain attribute, in comparison with treatment of another individual or group without that attribute, including, but not limited to:

- Age
- Family responsibilities, family/marital parental status, pregnancy, breastfeeding, status as a parent or carer
- Intellectual, physical or psychiatric Impairment or Disability
- Gender
- Gender identity
- Sexual orientation/preference
- Physical features
- Medical/health situation
- Race, colour, ethnic or ethno-religious background, descent or nationality
- Religious belief/activity
- Political belief/activity

Occupational Violence: Incidents where an employee is physically attacked or threatened in the workplace.

“Workplace” includes work related events such as work related functions, meetings, conferences, field work etc.
5. Raising, Escalating and Responding to Issues and Allegations

WWF offices should make available, and communicate frequently, a range of options to allow victims or witnesses of misconduct to raise allegations, to allow people to use the channels with which they feel most comfortable, for example: “Go to” focal point (noted above); CEO/Country Director; Grievance committee; and Whistleblowing contacts which should be well publicized in case a victim or witness is afraid to speak up openly in their office or to avoid retaliation.

Individuals should raise concerns in writing in the language that they feel more comfortable with or orally in case they cannot write, outlining the nature of the conduct and the details of the incidents, together with details of any witnesses or other complainants. Witnesses should provide as many details as possible to help WWF follow up in an appropriate manner.

6. Guidance, Support and Other Relevant Standards

- WWF Code of ethics

(for offices to include “Speak Up”, whistleblower or other Codes of Conduct as appropriate)

For questions or comments on this Standard, please contact your Human Resources Department, or Donna Lusti, Manager, Governance, Ethics & Compliance, WWF International (dlusti@wwfint.org).

This Network Standard was endorsed by the WWF International Board of Trustees, June 2018