



GLOBAL GRIEVANCE REDRESS MECHANISM

OUR MISSION

WCS saves wildlife and wild places
worldwide through science,
conservation action, education, and
inspiring people to value nature.

OUR VISION

WCS envisions a world where wildlife
thrives in healthy lands and seas, valued
by societies that embrace and benefit
from the diversity and integrity of life on
earth.

WCS Global Grievance Redress Mechanism

Introduction

As a public charity, the Wildlife Conservation Society (“WCS”) recognizes that delivering on our conservation mission requires that our personnel honor the trust and confidence placed in us by our partners, donors, governments, guests and local communities. Therefore, WCS is committed to maintaining the highest standards of ethical conduct. These standards are documented in the WCS Code of Conduct, the WCS Conservation and Human Rights: A Framework for Action¹, the WCS Safeguarding Policy, and other policies and procedures that apply worldwide to WCS trustees, officers, employees, volunteers, interns, externs and fellows of WCS (collectively “WCS personnel”). In addition, a number of WCS programs have implemented country and project-specific procedures and mechanisms to address site-specific circumstances and ensure compliance with applicable laws, donor requirements and international best practices. WCS also takes reasonable measures to ensure that consultants, recipients of WCS funding and others acting for WCS or under our direction act in compliance with the standards of conduct reflected in WCS policies.

The Grievance Redress Mechanism (“GRM”) described in this document is an important component of WCS’s commitment to ethical conduct. It ensures accountability and responsiveness to concerns raised about the impact of WCS’s projects and the conduct of its personnel around the world.

Scope and Purpose

The GRM applies to projects or activities undertaken or sponsored by WCS that are reasonably believed to contribute to or cause human rights abuses, safeguarding violations, or violation of the human rights of individuals or communities.

The purpose of the GRM is to:

1. provide a mechanism for affected individuals or communities, and others with knowledge of the circumstances, to raise good faith grievances about the impacts of projects or activities undertaken or sponsored by WCS; and
2. provide a structure to ensure that human rights and safeguarding grievances are handled, responded to and documented in a fair and timely manner.

Who may file a complaint?

The GRM is available to WCS personnel as well as any external “stakeholder” such as (i) donors; (ii) partner organizations; (iii) individual members or representatives of a community and (iv) third parties with knowledge of the circumstances. The person or

¹ <https://www.wcs.org/about-us/literature/conservation-and-human-rights>

entity filing the grievance is referred as the “complainant.” This GRM procedure supplements, but does not replace, the existing processes for WCS personnel to report improper conduct as described in WCS’s Code of Conduct, Safeguarding Policy, Whistleblower Policy and relevant country-specific reporting mechanisms.

What is a grievance?

A grievance is any good faith complaint about a project or activity undertaken or sponsored by WCS that is reasonably believed to contribute to or cause human rights abuses, safeguarding violations, or violation of the human rights of individuals or communities. The term “human rights” refers to the rights contained in the Universal Declaration of Human Rights² and described in WCS’s policies. The term “safeguarding” includes child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse, as defined in the WCS Safeguarding Policy.

Other kinds of complaints are outside the scope of this GRM. For example, the GRM is not an appropriate mechanism to raise routine internal WCS workplace concerns or matters unrelated to WCS projects or activities reasonably believed to contribute to or cause human rights or safeguarding abuses or violations.

Certain grievances may be more suitable for initial review and redress through local site or project-based mechanisms (e.g. Free, Prior and Informed Consent (“FPIC”) or community consultation processes). In such cases, a complainant will be directed to seek recourse first through those procedures.

How is a grievance submitted?

Grievances may be submitted in writing by email to safeguards@wcs.org, an address created for the purpose of receiving human rights and safeguarding grievances. Alternatively, grievances may be submitted in writing by mail or courier to the following address:

WCS Country Program Office addresses available at
<https://www.wcs.org/about-us/offices>

Social Safeguards Management Team, Wildlife Conservation Society, 2300
Southern Boulevard, Bronx, NY 10460-1099, USA

Grievances may be submitted in English, or if submission in English is not possible, the language of the complainant. An optional grievance submission form can be obtained by contacting safeguards@wcs.org.

In cases where the complainant does not have access to email, mail, courier services or is non-literate, the grievance can be submitted verbally by the complainant or a third party

² <https://www.un.org/en/universal-declaration-human-rights/>

with knowledge of the circumstances directly to WCS field staff or headquarters staff. The complaint must then be transmitted by the WCS staff member via email to safeguards@wcs.org.

Additional methods for submitting grievances may be established for particular areas or projects where necessary or appropriate. Those procedures will be communicated to a complainant when applicable.

What information should a grievance include?

A grievance should contain sufficient detail about the alleged conduct or activity to permit an investigation to be conducted and an appropriate response implemented. Grievances should include, at a minimum, the following information:

1. Name(s), affiliation(s), address(es) and other contact information of the complainant(s) and/or their representative(s);
 - a. Representatives must identify the person(s) on whose behalf the grievance is made and provide evidence of the authority to represent such person(s); or
 - b. Complainants may remain anonymous. Note, however, that anonymous grievances may limit WCS's ability to properly investigate and respond to the grievance.
2. A description of the specific facts, circumstances and events giving rise to the grievance: location, date, time, names and descriptions of individuals involved, statements made including exact quotes where possible, actions observed or witnessed, and names or descriptions of any witnesses. The more specific and detailed information provided in support of the grievance, the more thoroughly and effectively the grievance can be investigated and addressed.
3. An explanation of the harm suffered and how the rights of an individual or community were violated. The complainant may refer to codes of conduct, standards, policies or other frameworks (e.g. FPIC) pertinent to the case and, where applicable, should describe any efforts to resolve the grievance through other available redress mechanisms.
4. A description of the relief requested, where relevant or appropriate.

How are grievances handled?

Once a complaint is received, it is referred to the WCS Social Safeguards Management Team ("SSMT"), which develops a grievance review plan appropriate to the location, nature, seriousness and complexity of the grievance. The SSMT includes representatives

from senior line management and the Office of General Counsel. To review the grievance, the SSMT may also involve relevant WCS staff as well as other subject matter experts, including external third parties, as warranted by the circumstances.

The grievance review plan outlines the process for investigating and responding to the grievance, including identifying the focal point for communications with the complainant. This also includes special considerations for the rights, safety, and well-being of survivors of suspected safeguarding violations consistent with the WCS Safeguarding Policy. WCS endeavors to handle complaints promptly and in a fair, objective and transparent manner.

Grievance review and response typically includes the following steps:

- *Investigation:* Investigating the grievance may include interviews with WCS personnel, witnesses and affected individuals (to the extent feasible and appropriate), reviewing relevant documentation and other materials, taking photographs, as well as other information-gathering to ascertain the factual basis of the complaint. Claims determined to be false, frivolous or submitted with malicious intent will be dismissed and excluded from further consideration.
- *Documentation:* All grievances under the GRM will be documented and tracked. The results of the investigation and any recommendations for resolution or corrective action will be documented in writing.
- *Monitoring:* If recommended in the investigation report, WCS will monitor the implementation of any remedial actions taken and document progress on implementation.
- *Communication:* Complainants will be notified that the grievance has been received, and a point of contact will be identified. At the conclusion of the investigation, the results of the investigation and responsive actions will be communicated to the complainant.

Are complaints kept confidential?

Non-public, sensitive, and/or personally identifiable information disclosed in a grievance will be treated as confidential to the extent possible under the circumstances. In cases when reporting a grievance entails risks to the complainant, WCS will make every effort to respond in a way that protects people's privacy and ensures the confidentiality of information provided, while allowing any confirmed wrong to be appropriately remedied. In certain circumstances WCS may be legally compelled to disclose information provided under the GRM.

How does WCS evaluate the performance of the GRM?

To evaluate and strengthen the WCS grievance redress process, the SSMT conducts reviews at least annually, and more often when warranted, of all grievances reported to

WCS under this global GRM to confirm that (i) grievances have been addressed and appropriately dealt with and (ii) necessary follow up actions have been taken. Regular reports on the performance of the GRM are provided to the WCS Board of Trustees.

How do I learn more about the GRM?

WCS managers are encouraged to share and discuss this GRM document with WCS personnel and stakeholders at WCS sites and places of operation, present the GRM process at stakeholder meetings, as well as use locally appropriate methods to ensure dissemination to the wider community, taking into account physical, technical and language capabilities.

Questions concerning the GRM can be directed to the SSMT at safeguards@wcs.org.

