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Report on the activities of the Secretariat – Addendum I SEAH Policy Technical Assessment Report

Summary

This document contains the technical assessment of the Policy on the Prevention of and Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH).

**TECHNICAL ASSESSMENT OF THE POLICY ON THE PREVENTION OF AND
PROTECTION FROM SEXUAL EXPLOITATION, SEXUAL ABUSE AND SEXUAL
HARASSMENT (SEAH) POLICY**

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WB is also one of the ten IFIs who issued a Joint Statement on SEAH (outlined above) and pursuant to the IFIs Joint Statement it summarised on its website the main points, reiterating and reinforcing the seven principles listed above, declaring it was “cognisant of the important role they play in both the example they set in their own institutional practices and in how they embed high standards in their projects and operations.” 20

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I. Introduction

1. This technical assessment of the sexual exploitation, abuse and harassment policy of the Green Climate Fund (GCF) builds upon the work done to date by the Independent Integrity Unit (IIU), the Secretariat, the external legal review and the Independent Redress Mechanism (IRM) Advisory Report to the Board. It is informed by the comparative analysis conducted by this consultant of the SEAH frameworks of international organisations.
2. This analysis examined the approaches of several comparable international organisations in order to benchmark and inform the revisions to GCF's current SEAH policy. Where such organizational policies did not exist, the analysis has endeavored to examine any work done to date by organisations on this issue.
3. The assessment aims to identify the gaps and barriers to implementation with a view to suggesting revisions to the current policy which would render it practicable with regards to third parties. It endeavours to adapt industry best practice on SEAH risk mitigation at project-level to the GCF Business Model.

II. Methodology

4. This assessment is based upon a desk review of select internal GCF documents as well as relevant GCF policy documents¹, vis-à-vis the practices of comparable organisations as elaborated in the Comparative Analysis appended in Annex 1 to this document
5. Consultations were conducted with the GCF Secretariat, as well as the Independent Redress Mechanism (IRM)² These interviews were conducted remotely due to the current COVID 19 pandemic.

III. Background on GCF's SEAH policy

6. The Independent Integrity Unit ("IIU") was tasked with developing a SEAH policy at the Board's behest. The Interim SEAH Policy was adopted by the Board at its 22nd meeting in February 2019.³ and an updated SEAH policy was subsequently adopted by the Board at B.23. The Interim SEAH policy was introduced with obligations on 'covered individuals' such as GCF personnel, Board members, alternates and advisors. Through the SEAH policy adopted by the Board at B.23,⁴ the scope of the policy was extended to counterparties and fund-related activity obligations.
7. Critical barriers to implementation of the policy with third parties and fund-related activity obligations on the GCF as well as GCF counterparties were identified by the Secretariat and in December 2019, the Secretariat submitted a request to the Board for a policy implementation deferral decision between board meetings through a Document GCF/BM-2020/01, "Implementation matters relating to GCF obligations under the Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment: Request for Deferral" {"SEAH BBM"}. The SEAH BBM set out a detailed justification for the Secretariat's request to defer, noting that the policy provisions concerning third parties and fund-related activity obligations posed significant implementation impracticalities, including an independent assessment of legal risks and liabilities exposure to the GCF, (" the external legal review"), as well as feedback received from Accredited Entities

¹ Including the Environmental and Social Policy, the Interim Environmental and Social Safeguards, the Gender Policy and Action Plan

² Based on the IRM Advisory Note on SEAH. In addition, efforts have also been made to have consultations with the Independent Integrity Unit, but at the time of this report scheduling has not been possible.

³ Decision B.22/18.

⁴ Green Climate Fund, *Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment* (Decision B.23/16); hereafter "Updated SEAH policy"; Capitalised terms used in this report refer to defined terms as used in the Updated SEAH policy unless the context indicates otherwise.

("AEs") emphasising their inability to satisfy the counterparty obligations introduced through the B.23 policy. Constraints pertaining to in-house technical expertise and implementation cost implications on the Secretariat were also highlighted in the SEAH BBM.

8. The SEAH BBM was subsequently included on the agenda for B.25. The Board, in its decision B.25/05, reiterated its commitment to SEAH principles and rendered inoperative all obligations in relation to third parties in the SEAH policy. The Board further mandated the Secretariat to review the obligations relating to third parties, including "Counterparties" and victims who are not covered individuals 'in line with best practices among international financial institutions, and the business model of the GCF', and propose revisions to the relevant provisions no later than B.27 which is planned to take place in November 2020. The Board also requested that the Secretariat assess the implementation cost implications of such revisions and present a request for the Budget Committee's consideration prior to this meeting. In addition to the recommended revisions to the SEAH Policy, the Board mandated the Secretariat to "present ... amendments to the relevant standards, safeguards and policies of the GCF, to address the requirements placed on accredited entities to integrate the obligations set out in the Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment."
9. In tandem to this, the GCF's IRM developed an Advisory Note on the prevention of SEAH in GCF projects or programmes, which was presented to the GCF Board at B.26. The IRM Advisory Note was developed on the basis of selected case studies on SEAH issues, as part of its mandate to "report to the Board on lessons learned and insights gained from handling cases... and from good international practices, and may recommend reconsideration of relevant policies, procedures, guidelines and systems of the GCF, including environmental and social safeguards".
10. The current proposal is for this Technical Assessment to be presented to the Board at B.27 as an information note, and for all substantive revisions to be presented to the Board for approval at B.28.
11. The Secretariat has deemed that more time would benefit this revision process, ensuring it is fully consultative and thorough, leading to a better chance for a smooth adoption of the policy revisions at B. 28, avoiding multiple iterations. This Consultant concurs that it is preferable to invest additional time now to build a robust, implementable and coherent policy, aligned with the practices of international organisation and the business model of GCF, than to risk numerous proposals and further revisions and iterations of this policy.
12. Deferring this discussion to B.28 enables the Secretariat to engage in meaningful and substantive internal and external consultations to assure that the revised policy is realistic regarding expectations and implementation.
13. The business model of the GCF and its relationship with its counterparties presents challenges which differ from those of other organisations, such as those reviewed in the Comparative Analysis. The lean structure of the GCF is also a challenge, as it is a relatively small organization with limited financial and human resources.
14. In accordance with paragraph (d) of Decision B.25.05, the current practice of peer institutions has been examined as part of the SEAH Policy revision process, with a view to informing recommended revisions, while keeping in mind the above regarding the structure of the GCF. GCF can be a leader in this area and can encourage other peer organisations to do more, however this must be balanced with the practical needs of creating a policy that is realistic in scope and has the capacity to be implemented.
15. This assessment identifies that the principal issue with the current policy is its scope. Therefore, it would be essential to narrow the scope of the SEAH Policy to facilitate its implementability and avoid undue legal liability or reputational risk on the GCF. This assessment highlights the importance of aligning with the framework practices of comparable organisations, investing in prevention resources, the need for consistent definitions and harmonized procedures, and the requirement for regular reporting/monitoring on implementation, which should be incorporated into the annual reporting on projects..

16. It should be noted that comparably, the current GCF SEAH Policy diverges from many peer organisations. By having a stand-alone internal SEAH policy applicable to the conduct of covered individuals, serving to complement the Code of Conduct, and by working to integrate SEA risk assessments in ESS policies and procedures, the GCF's framework will be aligned with the industry standard practice.

IV. Analysis of major implementation challenges

17. It is laudable that GCF recognizes the imperative to prevent and respond effectively to SEAH and to protect persons and victims of SEAH in GCF Funded Activities. These protections are essential to strengthen integrity and accountability throughout GCF. However, though it is commendable that the SEAH Policy aims to set higher standards relative to comparable international organisations, this presents manifold implementation challenges. The SEAH policy needs to take into account the unique nature of the GCF's business model, and fully consider the practicalities of implementation so as not to expose GCF to unreasonable legal liability, financial and reputational risk.

i. Definition of Counterparty

18. A key barrier to implementation of the current policy is the wide scope of the term "Counterparties." The inability of existing AEs to adopt equivalent SEAH policies, as well as the constraints preventing the modification of their institutional standards to match GCF's SEAH Policy obligations, has led to a lack of buy-in from many AEs. The significant implementation costs, both to GCF and to counterparties of the GCF also pose an obstacle to effective implementation.

ii. Scope of Policy

19. It is imperative to note at the outset that the inclusion of harassment in project safeguarding is generally beyond the scope of the frameworks of comparable organisations. Prevention of harassment is typically treated as an internal misconduct issue rather than a project-level obligation to be imposed on counterparties. The inclusion of harassment will open the GCF and indeed its counterparties to inordinate risks and liabilities. Therefore, it is strongly recommended that project-related safeguarding is focused on the prevention of Sexual Exploitation and Sexual Abuse (i.e. SEA).
20. As mentioned above, the SEAH Policy is also problematic with regard to the scope of counterparties and fund related activities. It impacts 'any party which participates in any way in GCF Fund-related activities' which encompasses not only circumstances where an activity is financed, administered, or supported by the GCF, either with its own resources or those of others, but also further extends to 'any activity that materially affects or may affect or otherwise be relevant to the GCF' – thereby creating nebulous boundaries and wide ranging liabilities even for persons with whom GCF has no direct contractual relationship and activities over which GCF has no direct or indirect control.

iii. GCF Business Model

21. GCF's Business Model is predicated on partnerships. Accredited entities take on risks when they undertake projects. Large accredited entities may execute with a local partner, and smaller entities may execute themselves. All accredited entities may also procure goods or services for the implementation of projects and programmes. Enforcement takes place through ad-hoc checks, contractual agreements. The GCF Business Model, in accrediting organisations has a rare separation vis à vis an organisation's capacity to implement and

the agreement itself; i.e. the organization must meet standards first- in order to become accredited- and only then can it submit projects.

22. With regards to SEA, GCF must clearly articulate what it requires of accredited entities and delivery partners at institutional and at project level. As direct application of the SEAH policy by AEs is not feasible and DPs cannot be asked to sign up directly to this policy, there must be a modality to ensure that SEA accountability must be consistent with their structure and business processes. More thought must go into how SEA adherence gets passed down.
23. The relationship of accredited entities to the GCF is different than for many development partners- the GCFs accredited entities are not implementing partners acting on GCFs behalf but rather organisations acting on their own behalf, and they are enabled to do so with GCF funds. The projects are not GCF projects- the ownership lies with the accredited entity- with GCF as the funder. Due to the nature of this relationship, GCF cannot impose its own rules on accredited entities. While GCF cannot do first level due diligence, it can do second level diligence. It is worth noting that many projects will not be implemented by the AEs themselves. Instead, they will provide funding to other entities (EEs), which will perform the agreed activities. GCF does not have a contractual relationship with these EEs.
24. Furthermore, as the IRM Report highlights, there are a multitude of factors affecting when and how SEAH issues manifest in projects, and this requires the application of fit-for-purpose monitoring and risk management procedures.
25. The IRM report urges GCF to pay special attention to SEAH matters when considering projects and in its relations with AEs. In its response to the IRM report, the Secretariat noted the importance of comprehensive and effective SEAH safeguards, especially considering the well-being of and need for rapid action for survivors. However, the Secretariat's response highlighted the limitations of the GCF business model, the lack of staff devoted to SEAH and the overall limited resources.
26. This author concurs that the GCF's project-level SEA framework must focus on the roles and responsibilities of AEs, and ideally with reference to the Environmental and Social (ES) policy. This focus will be aligned to the practices of comparable organisations and render any recommendations tangible and implementable
27. Moreover, this author agrees with the need to avoid impractical liabilities for the GCF. Resource allocation for staffing and related costs of mainstreaming SEAH good practice into the GCF, must be a matter of priority, and as explained below, will entail the provision of necessary budget allocation to put in place proper mechanisms to prevent SEA. These are worth the investment, as the impact on the GCF(reputationally and financially) would be far more severe should a scandal arise. The Secretariat must thus take into account the possible implications for the Fund in the event of a SEAH incident or allegations.

iv. Subject-matter expertise

28. As underscored above, there is currently a gap in subject-matter expertise within the Secretariat. Therefore, there is a critical need to retain in-house subject matter expertise to conduct second level due diligence on the SEA implementation for GCF financed activities . It is strongly recommended that this role should be filled through a long-term fulltime employee position. In addition, the Secretariat would also benefit from access to a supplementary roster of consultants to support its risk assessment reviews and monitoring efforts at project level.
29. This dedicated staff member will be the focal point for SEA related risks in the conduct of SEA risk assessments and mitigation design of new proposals for funding. Furthermore, the Accreditation Panel will require expert support to assess the SEA capacity of existing and prospective accredited entities to safeguard against SEA in projects. This individual could also provide training and capacity building and technical assistance regarding

SEA risk assessment and mitigation to relevant stakeholders. These functions are key if SEA risk mitigation is to be effectively and sustainably incorporated into GCF's operations.

v. Project-level obligations

30. The SEAH Policy requires that all counterparties 'have policies or procedures, or be subject to laws, setting out principles and standards of protection substantively equivalent to the ones set out in the SEAH Policy' .
31. The SEAH policy does not clarify how GCF would implement or reinforce the commitments to the principles and standards outlined in the SEAH policy, especially in consideration of GCF's structure and its relationships with direct and indirect counterparties. However, there are numerous aspects of the principles and standards as detailed in this assessment which would pose a challenge in the ability for GCF's counterparties to adopt substantively equivalent policies and procedures.
32. With the knowledge that not all counterparties will be able to fully integrate the SEAH policy obligations within their own organisations, the suggested approach is that AEs agree to assess and take steps in order to address SEA issues under the relevant provisions of the ES Policy in implementing GCF financed activities.,,..
33. Mechanisms by which AEs work towards the prevention of SEA on project-level are implied in the ES policy and ESS safeguards , and expectations of the standards GCF requires AEs, to meet and by when, must be clearly articulated in the existing Environmental and Social Impact Assessment ("ESIA") framework which will improve the linkage with other relevant GCF policies, toolkits and action plans The ESIA is developed by AEs as part of the first level due diligence and reviewed by the Secretariat. It is recommended that the Secretariat's second level due diligence should adopt an intersectional lens to understand the compounding drivers of sexual abuse and sexual exploitation, and also adopt the ecological model to understanding violence against vulnerable groups such as women and girls and this model should inform risk assessment and mitigation. These models should be taken into account at the outset of the project alongside greater emphasis on the design of prevention strategies.
34. The focus of the risk assessment framework and any action plan, implementation guidelines or toolkit that are created, must be on prevention. The prevention of SEAH is by far the optimal scenario, not only from a survivor, organisational integrity and a human rights perspective but also from an organisational reputational risk and a business perspective.
35. Regarding the business perspective, if investment in creating robust fit-for-purpose frameworks to assess and mitigate for SEA risk is prioritized from the outset, this will be far less costly to GCF than to provide redress in the event of an SEA incident as a result of non-compliance with GCF policy principles. This is true both in terms of human and financial resources needed for an investigation and for any related restitutorial remedies. It is better practice (organisationally and in terms of human rights and integrity standards) to have appropriate robust systems in place from the outset then to do so after an incident.
36. From a reputational risk perspective, GCF can learn from the difficult lessons of other institutions in this regard and avoid the same pitfalls.⁵ As the recent scandals of Women Deliver⁶ and the WE Foundation⁷ demonstrate, it is especially difficult (sometimes impossible) to recover reputationally (and financially) from a scandal than to prevent it altogether.

⁵ See World Bank Group Report of the Global Gender Based Violence Task Force July 2017 <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/482251502095751999/working-together-to-prevent-sexual-exploitation-and-abuse-recommendations-for-world-bank-investment-projects>

⁶ For more on Women Deliver scandal, please see <https://womendeliver.org/commitment-to-anti-racism/>

⁷ For more on the WE Foundation scandal, please see <https://www.cbc.ca/news/canada/we-charity-student-grant-justin-trudeau-testimony-1.5666676>

vi. Overlap with the Environmental and Social Safeguarding (ESS) Framework

37. Following the standard practice of other multilateral organisations, the SEAH policy should be streamlined⁸, by primarily excluding its application to third parties and limiting the scope of “fund-related activities” which extends beyond the scope under the ESS. While appreciating the aspirational ambitions of the SEAH policy, it is strongly recommended that the scope is refined to focus on related misconduct of covered individuals to avoid a conflation of integrity and social risks, as well as overlaps and inconsistencies with the ESS.

vii. Current gaps in policy language

38. The SEAH policy should also aim to bolster the survivor-centered approach, including changing the language from “victim” to “survivor.” Furthermore, the reference to ‘vulnerable individuals’ in the SEAH policy is ambiguous and should be clarified for certainty as to which types of persons fall into this category.
39. There should be definitional coherence with regards to SEAH related terminology across GCF’s policies, and the correct terminology should be utilised. The current definitions of the SEAH policy could benefit from revisions to reflect UN definitions.⁹ The definitions of the terms which appear in the SEAH policy should match the definitions in the GCF’s Code of Conduct and vice versa. Failing this, the definitions in the SEAH policy, which is the more recent document, should supplant those in the GCF’s Code of Conduct. This would avoid two definitions of harassment sitting within one organisation.

viii. Policy Coherence

40. There is currently no clear linkage between the SEAH and other integrity policies of the GCF or wider GCF policies. The linkage must be made laterally between existing policies and procedures, as well as vertically between SEAH and the larger organisations’ vision and ideals which GCF represents. It is important that any new iteration of a SEAH policy cohere, both definitionally and substantively, with other GCF policies; pertinently the Policy on Prohibited Practices and the Policy on the Protection of Whistleblowers and Witnesses, the Gender Policy and Action Plan, the Environmental and Social Policy, the Code of Conduct within the Administrative Guidelines on Human Resources (especially section H on Harassment) and the Administrative Sanctions Policy which is currently under development.
41. The SEAH policy should clearly articulate how these different policies are harmonised throughout the GCF in order to achieve the shared goal of zero tolerance for SEAH as an organisation and GCFs overarching goal of catalysing climate resilient development. The Secretariat should work with the Independent Redress Mechanism (IRM), the Independent Integrity Unit (IIU) and the Ethics and Audit Committee (EAC) to foster collaboration and coherence across the organisation, and to ensure that covered individuals understand appropriate roles, division of responsibility and redress mechanisms with regards to SEAH. A unilateral approach to policy development is strongly discouraged. Therefore, there needs to be a structure in place for policy development involving the Independent Unit (IUs) which delineates who takes the lead on policies impacting the Secretariat’s functions and how work is coordinated amongst the units and with the Secretariat.
42. The IIU’s role in proactive prevention, and investigation of integrity allegations can serve to reinforce the SEAH policy’s implementation organisationally. The IRM’s role in resolving compliance issues regarding ESS matters can serve to provide awareness raising and strengthen the capacity of AEs to identify SEA risks and effectively

⁸ see suggestions below on how this could be accomplished

⁹ See internal comparative analysis report produced by this consultant for UN and other definitions

mitigate same in projects. The Secretariat, IRM and IIU should, respectively, collaborate to assess and mitigate SEAH risks, detect compliance failures and potential violations of GCF standards in funded projects and programmes and aid in investigations into allegations of misconduct .

43. The dots need to be connected amongst all GCF's policies and their implementation mechanisms to ensure accountability and responsibility and to be certain that nothing gets overlooked because it was deemed to be the responsibility of a different section of GCF. Shared ownership and responsibility of all the policies is crucial to their effective implementation.
44. Policy fatigue for GCF covered individuals and external stakeholders is a real concern. Numerous policies, with sometimes conflicting or differing standards or definitions (as is the case with different SEAH definitions amongst GCF's Code of Conduct and SEAH Policy) can cause confusion. Stakeholders do not know which policy or definition takes precedence over another, or if both are equally valid. A proliferation of policies, especially where there are overlapping or duplicative mandates (as in the case of the ES and SEAH policies) may lead to compliance fatigue and to third-parties signing on in name only, without giving due weight to the policies. This must be considered in regards to providing tangible and implementable SEA guidance to third parties. This consultant's recommendation is that the SEAH policy remain an internal document, and the SEA requirements on project-level are addressed with reference to the current ES policy and ESS standards.
45. The upcoming revision of the ESS Standards at B.30 provides an excellent window of opportunity for SEA concerns to be integrated from the outset in the updated document, and this consultant would encourage the Secretariat to take advantage of this opportunity and ensure SEAH expertise and relevant SEAH consultations with accredited entities (and ideally with communities) form an integral part of the development of any new ESS standards.
46. As stated in the IRM Advisory Report, SEAH can be difficult to identify, prevent, and address at the project level. There are a number of reasons for this, many of which are inextricably linked to the social, cultural, and economic contexts within which SEA incidents take place. In many societies, people are stigmatised and shamed for reporting incidents of SEA and some projects in specific settings may be influenced by a range of factors leading to the creation of power differentials that function to the disadvantage of vulnerable groups such as women and children, amongst others.

V. Other implementation considerations

i. Intersectionality

47. It is crucial that any implementation of the SEA risk mitigation in GCF projects, but also the spirit behind its application, adopt an intersectional lens and the principles of diversity equity and inclusion. Sexual exploitation and sexual abuse do not happen in a vacuum, and the dynamics of power and privilege referred to in the introduction apply to race as equally as to gender.
48. The nexus of racism and sexism, and the intersection of multiple and compounding forms of discrimination and marginalisation, must be taken into account in GCFs application of the SEAH policy. Marginalisation, discrimination, and exclusion often go hand in hand with, and indeed are risk factors for sexual exploitation, and sexual abuse. GCF must take into account women of colour, ethnic and minority women, indigenous women, , women with a disability, young women and elderly women, remote and rural women, and the indigent, as these categories will be especially vulnerable to sexual exploitation, and sexual abuse.
49. Application of such an intersectional lens is especially important in this current socio-political climate, where there is heightened sensitivity to both sexual harassment and to issues of race, and where some organisations

have lost leadership, social capital, and credibility as a result of a (perceived) lack of respect for these issues. The current case of Women Deliver is an informative example of a recent situation where an international well-respected international women's rights organisation has lost important standing due to accusations of racism.¹⁰ It is suggested that GCF apply an intersectional approach to all its SEAH work (this could form part of an action plan or strategy).¹¹

ii. Do no harm

50. It is recommended that all projects adopt a do no harm approach, which entails consideration of any negative unintended outcomes of projects. The do no harm approach is part of safeguarding best practice. As is stated in the IRM SEAH Advisory Report, development projects - depending on their scope - can exacerbate existing risks or create new ones. This may be through, for instance, project-induced in-migration or changes to social and economic patterns resulting from projects¹².

iii. The ecological model

51. This model, sometimes referred to as the ecological framework¹³ is the principal model used in the Gender Based Violence field to understand the origins GBV. It delineates out concentric spheres of influence which can impact upon and be enabling factors for GBV, conceptualising violence as a multi-faceted phenomenon, grounded in an interplay of personal, situational and socio-cultural factors. It presents influences predictive of abuse at each level of society. This approach is especially important in the development of a risk assessment tool.
52. The individual level – intergenerational exposure to abuse, educational attainment, employment and income, social networks outside the family. Relationship level, community level, societal level, larger societal level. As stated in the IRM SEAH Advisory Report, “the ecological model posits that there is no single factor that ‘causes’ SEAH; rather that the risk of SEAH is the function of many factors that interact at different levels of the social ecology.

VI. Recommended Approach to SEAH Policy Revisions

53. This section sets out recommendations for the revisions to the SEAH policy and the operationalisation of SEA risk mitigation into GCF's project design and due diligence.
54. This consultant strongly recommends addressing project level SEA risk mitigation through the GCF's Environmental and Social safeguarding framework, and more particularly with reference to the Environmental and Social Impact Assessment conducted on projects. The central basis for this recommendation is in view of the common practice amongst international organisations wherein SEA risk assessments and mitigation on project level is typically considered within the safeguarding framework for Environmental and Social (ES) considerations. Furthermore, most organisations reviewed do not include explicit reference to SEA risk in their ES policies. Nevertheless, SEA risk mitigation forms part of the due diligence undertaken on project design as SEA is generally regarded as a social risk particularly within the context of gender-based violence¹⁴.

¹⁰ For more information see Women Deliver's Commitment to Anti-Racism <https://www.womendeliver.org/commitment-to-anti-racism>

¹¹ See the Revisions document for specific language in this regard

¹² See for example, this study in Bangladesh

https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1585&context=cc_etds_theses

¹³ Heise, L (1998). As seen in UN WHO <https://www.who.int/violenceprevention/approach/ecology/en/>

¹⁴ Gender based violence refers to any harmful act that is perpetrated against a person's will and that is based on socially ascribed differences between male and female individuals, including acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life

55. The GCF has a robust ES framework consisting of the ES Policy and Interim ES Safeguards. Therefore, it is strongly recommended that GCF builds upon its existing ES framework in line with the standard practice of comparable international organisations, and relies upon the relevant provisions under the existing ES Policy to safeguard against the risk of SEA in the implementation of GCF financed project activities.

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56. Addressing SEA as a social risk on project level would be consistent with standard practice across international organisations, none of which have standalone SEAH/SEA policies on project level. An added advantage is the efficiency gains given that the ES policy is already operational.. This approach also minimizes policy fatigue on Accredited Entities (see above) and incurs less impact on GCF regarding the revisions to the Monitoring and Accountability Framework including templates for proposals for funding. Moreover, this option will not require an update to the ES Policy to reflect accredited entity and funded activity obligations in relation to SEA risk, although it may be advisable to provide supplementary guidance notes to raise the awareness of Accredited Entities in order to clarify compliance expectations. One way to do this could be through incorporating guidance notes into the forthcoming amendment to the ES Policy at B.30. Alternatively, the Secretariat could develop implementation guidance which will be integrated into the programming manual and readiness guidebook. This latter option is preferred as it creates flexibility in the review and revision of guidance to keep pace with emerging risks and trends as well as safeguarding practices as they evolve.

57. It is also essential to consider GCF's exposure to legal risks and liabilities, in order to assess alignment with GCF's risk appetite.

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Full consideration should also be given to implementation cost implications. Whilst there are extant SEA related provisions within the GCF's ES Policy, the Secretariat has not been required to explicitly assess this risk in its second level due diligence until the adoption of the SEAH Policy. Therefore, subject-matter expertise necessary to conduct such reviews is not currently available within the Secretariat and in-house subject matter expertise at GCF will be required for implementation. Nevertheless, this option would appear to clarify responsibility on accredited entities which will have the first level of responsibility for SEA due diligence. There will be an expanded scope of ESIA to be provided in funding proposals and, smaller direct access accredited entities which may not have the institutional expertise and will need to invest in developing necessary expertise with the support of the GCF through either the Readiness & Preparatory Support or as an additional cost within funding proposal budget breakdowns.

58. An alternative approach to the policy revisions which could be considered is maintaining a combined standalone SEAH policy impacting internal and project level/third party/counterparty obligations. However, recalling paragraphs (d) and (f) of decision B.25/05, this approach is not recommended as it diverges from the practice of international organisations.

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59. In paragraph (d) of decision B.25/05, the Board requested the Secretariat to '[...]present to the Board, no later than [B.27], the proposed revisions of [SEAH Policy], in line with best practices among international financial institutions and the business model of the GCF'; while in paragraph (f) of decision B.25/05 the Board 'further request[ed] the Secretariat to present to the Board for its consideration, no earlier than the consideration of the proposed revisions to [SEAH Policy] described in paragraph (d) above, amendments to the relevant standards, safeguards and policies of the GCF, to address the requirements placed on accredited entities to integrate the obligations set out in the [SEAH Policy]'.

60. A combined reading of the directions set out under paragraphs (d) and (f) of decision B.25/05 may be construed as implying the Board's intent to maintain a combined standalone SEAH Policy addressing both covered individuals and counterparties/project level obligations, and revise within the SEAH Policy the latter provisions to address the implementation challenges highlighted in the previous section. However, this static interpretation of the directions set forth above would lead to a misalignment from the Board's primary request to the Secretariat.

- 61. Pertinently, taking into account that the Board expects the Secretariat to ‘propose revisions of [SEAH Policy], **in line with best practices among international financial institutions** [emphasis added] and the business model of the GCF’, any approach which integrates covered individual and project level/third party/counterparty obligations into one policy would be a deviation from the practice of international organisations. Therefore, this approach is not recommended.
- 62. Moreover, adopting this approach will (i) create overlaps and duplications with the ES Policy, (ii) present an increased burden for the Secretariat as well as accredited entities - the impact on the Secretariat will concern FP and Secretariat Assessment templates, as well as a conflation of social and integrity risks. The impact on accredited entities, will be the need to deviate from addressing SEA as a social risk on project level and reformulate their approach to SEA risk mitigation outside the lenses of ES safeguarding.
- 63. In terms of cost implications for implementation, the same cost implications anticipated under the recommended approach will also apply. However, additional cost implications related to time spent to revise the Monitoring and Accountability Framework will also be incurred.

VII. Conclusion

- 64. It is key that GCF assures its stakeholders that the organisation takes SEAH seriously. Narrowing the scope of the policy and reducing its aspirational nature to allow for pragmatic approaches to implementation will enable the Fund to make tangible progress in furthering this end. GCF can be a leader amongst its peer institutions internationally and amending this policy does not mean GCF forfeits this role. Rather, it will align the GCF framework with the practices of other international organisations. GCF can have a catalytic influence and can use its convening power to bring peer institutions together around SEAH. GCF can lead by example, pioneering SEA and sharing lessons learned with the international community. GCF can push peers to aim for the highest standards, and not to work to the lowest common denominator of the international community. These require a strategic and cultural organizational shift within the GCF itself, and such a shift should be encouraged amongst its accredited entities through the application of relevant existing provisions in the ES policy.
- 65. GCF should aim to ask how it can promote shifts in the organizational culture. It should also ask how it can promote acceptance of and adherence to SEA risk mitigation at project level, and how this policy dovetails with larger organizational goals and policies. This work entails ownership, buy-in, sensitization and training. It entails widely socialising the GCF’s SEA framework as set out in related provisions in the ES Policy and its importance to the GCF. The threshold should be drawn at zero tolerance. The duty of care with SEAH differs from the other integrity policies and is more critical, as there is a risk of harm to people, and a duty of care to SEAH survivors. The GCF must place primacy on prevention.
- 66. This work by the GCF will further green climate financing while taking into account human rights and gender equality and the importance of protection for vulnerable groups. This strategic shift delineated is one to strengthen organizational capacity and capability across the international aid sector, including building the capability of implementing partners to meet the minimum standards.
- 67. Lastly, the GCF can build upon the experiences, including the failures, and the learnings and knowledge products of its peer organisations. While being cognisant that these may need to be adapted to the operational exigencies of GCF, they nevertheless present excellent material from which GCF can build upon and adapt to its business model. The GCF can also build upon its own excellent resources and publications to further this aim.

ANNEX 1 TO THE TECHNICAL ASSESSMENT OF THE SEAH POLICY:
**A COMPARATIVE ANALYSIS OF THE SEXUAL EXPLOITATION, SEXUAL ABUSE AND SEXUAL HARASSMENT
SAFEGUARDING PRACTICES OF INTERNATIONAL FINANCIAL INSTITUTIONS.**

**CONDUCTED FOR THE GREEN CLIMATE FUND
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INTRODUCTION

In paragraph (d) of decision B.25/05 pertaining to document GCF/BM-2020/01 titled “Implementation matters relating to the GCF’s obligations under the Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment [“SEAH Policy”]”; the Board requested ‘the Secretariat to present to the Board, no later than its twenty-seventh meeting, the proposed revisions of the [SEAH Policy] *in line with best practices among international financial institutions* and the business model of the GCF.’

This comparative analysis sets out the sexual exploitation, sexual abuse and sexual harassment safeguarding frameworks and approaches of international financial institutions so as to benchmark and inform the revisions to the Green Climate Fund’s (GCF) current SEAH policy. Where organizational policies do not exist, the analysis has endeavoured to note relevant work done to date by organisations on this issue.

The methodology for this analysis was primarily based upon desk research of publicly available documents, as well as insights gained from the GCF’s Secretariat’s bilateral engagement with a couple of institutions, notably the World Bank and the Global Environmental Facility on the subject matter.

I. PRACTICES OF INTERNATIONAL FINANCIAL INSTITUTIONS (“IFIs”)

In line with paragraph (d) of the decision B.25/05, the SEAH prevention practices of following IFIs were reviewed.

1. Asian Development Bank,
2. African Development Bank,
3. Asian Infrastructure Investment Bank,
4. European Bank for Reconstruction and Development,
5. European Investment Bank,
6. Inter-American Development Bank,
7. International Finance Corporation,
8. International Fund for Agricultural Development,
9. International Monetary Fund,
10. International Bank for Reconstruction and Development (“World Bank.”)

The review relied upon the information provided in the “Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation “[IFIs Joint Statement] collectively issued by the ten IFIs listed above, to reaffirm their commitment to prevent SEAH, both within their own institutions and in their operations. The IFIs Joint Statement detailed below sets out the practices all of the IFIs agreed to follow in order to achieve this goal.

In addition to the review of the practices of IFIs with reference to the Joint Statement, this Comparative Analysis also looked more closely at the practices of the World Bank¹⁵, ADB¹⁶, IFC¹⁷, EBRD, IMF the Global Fund to fight AIDS, Tuberculosis and Malaria {“the Global Fund”}¹⁸ and the Global Environment Facility (“GEF”)¹⁹

¹⁵ Based on the context of the GCF’s Independent Redress Mechanism (IRM)’s Advisory Note on SEAH

¹⁶ Based on the GCF’s benchmarking of its administrative policies against those of the ADB

¹⁷ Based on the GCF’s adoption of the IFC’s Environmental and Social Safeguard Standards as its Interim Environmental and Social Safeguards

¹⁸ Based on its structural similarities with the GCF

¹⁹ Based on its unique similarities with the GCF in structure and project operations

IFI'S JOINT STATEMENT: The IFI's Joint Statement was issued by ten IFIs in the second quarter of 2018, and reaffirmed their collective commitment to advance standards, shared best practices and developed guidance on preventing SEAH within their own organisations and through their operations.

A statement released at the time read:

“Since the meeting in April 2018, IFIs have continued to actively work to address sexual harassment, abuse and exploitation and related forms of misconduct, both internally within their own institutions and through their operations. IFIs are committed to performing their functions with the highest level of ethics and integrity, and the upholding of their value system requires cooperation across the institutions. Reflecting that ownership is embedded across institutions, a wide range of staff is involved in the formulation of strategy, design and application of policies to tackle these issues, including staff in ethics and compliance offices, human resources, procurement, legal teams, gender and inclusion specialists, and social safeguarding experts.”

The Joint Statement underscores the following seven principles which the IFIs have committed to follow:

1. foster a culture of respect and high standards of ethical behaviour across institutions;
2. establish and maintain standards aimed at preventing sexual harassment, abuse, and exploitation and other forms of misconduct;
3. provide a safe and trusted environment for those affected by sexual harassment, abuse and exploitation to step forward to report incidents and concerns, with the assurance that they will be treated respectfully and consistently;
4. provide protection for those affected, as well as whistle-blowers and/or witnesses within their institutions, and to take appropriate measures against any form of retaliation;
5. maintain robust policy frameworks and clear institutional mechanisms that address how incidents and allegations will be handled should they arise;
6. provide effective training programmes so all staff understand the requirements and standards of behaviour expected of them as international civil servants;
7. to support clients to develop and implement policies and mechanisms that address sexual harassment, abuse and exploitation.

Implementation

The “IFI update on the Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation,” (“Update Note”) was subsequently released by the IFIs in the last quarter of 2018²⁰, in an effort to showcase the work of the various IFIs in this area.

A propos of implementation, on each of the seven principles, the Update Note details the implementation efforts reported by the ten IFIs as follows:

²⁰IFI update on the Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation <https://www.worldbank.org/en/news/statement/2018/10/18/ifi-update-on-the-joint-statement-on-continuous-advancement-of-standards-to-prevent-sexual-harassment-abuse-and-exploitation>

Principle 1: Foster a culture of respect and high standards of ethical behaviour across institutions.

- All IFIs maintain codes of ethics/conduct, to which staff must adhere, and which set out requirements for staff to observe high standards of integrity and ethical conduct, which are applicable to staff's behaviour both within and outside the institution. Many of the IFIs' codes are available publicly online, and are supported by mandatory training for staff (see further Principle 6).
- IFIs have carried out cultural campaigns and promotion of core values, including in communications from senior leadership, and have hosted staff events to create and foster expectations of high ethical behaviour.
- Some IFIs have run, or are soon rolling out, staff surveys on this topic to better identify and subsequently act on areas for improvement.

Principle 2: Establish and maintain standards aimed at preventing sexual harassment, abuse, and exploitation and other forms of misconduct.

- All IFIs maintain codes of ethics/conduct which embed high ethical standards, and include provisions on harassment and misconduct including sexual misconduct which are applicable to staff behaviour both within and outside the institution. Some IFIs have also adopted specific policies aimed at preventing and responding to sexual harassment, exploitation and abuse. These are applicable to all staff and are reviewed periodically and strengthened as needed.
- IFIs include behavioural clauses in contracts of appointment for non-staff members (including consultants, contractors) to ensure that they too adhere to expected high standards of behaviour. Breach of such provisions would provide an IFI with a right to terminate the underlying contract.

Principle 3: Provide a safe and trusted environment for those affected by sexual harassment, abuse and exploitation to step forward to report incidents and concerns, with the assurance that they will be treated respectfully and consistently.

- All IFIs have confidential reporting channels available. Most IFIs allow for anonymous and confidential reporting of complaints and maintain multiple channels through which **staff** can report concerns about misconduct (including ethics or compliance offices, human resources departments, independent employee assistance programmes, respectful workplace units, ombudsperson offices, and/or mediation offices). Staff are either encouraged or mandated to report suspected misconduct. All reports are reviewed and managed in accordance with an IFI's respective internal rules which include protection from all forms of retaliation.

Principle 4: Provide protection for those affected, as well as whistle-blowers and/or witnesses within their institutions, and to take appropriate measures against any form of retaliation.

- IFIs recognise that whistle-blowing is an important tool and a critical aspect of good governance and have policies and/or procedures which provide for whistle-blower protection. For example, most IFIs' codes of ethics/conduct state that any form of retaliation against anyone who, in good faith, reports allegations of misconduct, is itself a form of misconduct.

Principle 5: Maintain robust policy frameworks and clear institutional mechanisms that address how incidents and allegations will be handled should they arise.

- IFIs have in place or are developing clear accountability mechanisms to respond to reports of incidents and allegations of misconduct including sexual harassment, abuse and exploitation. IFIs ensure that procedures for all allegations, and especially serious allegations with respect to sexual harassment, abuse and exploitation, are followed swiftly and effectively, concluding promptly where feasible, and treating complainants with respect.

- Many IFIs report, in aggregate and anonymously, on the number and types of cases of misconduct investigated to their Boards and publicly as part of their annual reports.
- IFIs may refer misconduct to national authorities where considered appropriate.

Principle 6: Provide effective training programmes so all staff understand the requirements and standards of behaviour expected of them as international civil servants.

- Training on codes of ethics/conduct and harassment and misconduct issues is included as part of all IFIs staff on-boarding and induction procedures, which includes clear expectations on ethical behaviour and an explanation of consequences for non-compliance with the codes of ethics/conduct. Many IFIs have dedicated mandatory ethics training sessions, as part of or in addition to, the induction process.
- Many IFIs also have ongoing refresher training programmes for all staff on compliance with the codes of ethics/conduct in the form of online and/or classroom training courses, and specialised courses for managers and supervisors.
- For many IFIs, these training programmes have been recently revised, or are in the process of being revised, to more explicitly address the topic of sexual harassment, abuse and exploitation.

Principle 7: Support clients to develop and implement policies and mechanisms that address sexual harassment, abuse and exploitation.

- IFIs have environmental and social policies, which implicitly and explicitly mandate clients to take measures to prevent and address sexual harassment, abuse and exploitation. As part of project due diligence, IFIs assess related risks and impacts and determine how these will be addressed in the design and implementation of a project. Where IFIs are supporting a program, some IFIs aim to support strengthening of the country's systems and policies that address sexual harassment, abuse and exploitation.
- Some IFIs are in the process of integrating dedicated risk management measures into operations as linked to environmental and social policies, and other operational requirements. Other IFIs are in the process of reviewing or will review environmental and social policies to address more specific risks of sexual misconduct and/or gender-based violence.
- Many IFIs provide guidance, training and materials to support environmental and social specialists in the application and monitoring of compliance with environmental and social policies, including requirements for clients to take measures to prevent and address sexual misconduct.
- Many IFIs require that contractors engaged in a project operate in a manner consistent with IFIs' environmental and social policies. Assessment of the environmental and social risks and impacts associated with such contractors are being made more explicit and improved. Some IFIs have guidelines for the procurement and management of contractors that require contractors having systems in place for preventing sexual misconduct, and for better managing incidents if allegations arise.
- IFIs have project grievance, independent accountability or other reporting mechanisms that enable confidential reporting of incidents and concerns including of sexual harassment, abuse or exploitation or other related misconduct by those outside the IFI, including but not limited to communities affected by projects/programs.
- In addition, IFIs require clients to develop their own worker and community grievance mechanisms that are designed to receive and facilitate the resolution of concerns and grievances of project-affected parties arising in connection with a project. This support may include but not be limited to guidance notes, expert support in training of clients' staff, and establishing resolution and support mechanisms.

- As part of wider efforts across the IFIs to address gender-based violence as a development challenge, many IFIs finance projects/programs that proactively support client and community capacity to improve safety, and implement gender-based violence prevention and response.

Principles 1 to 6 are focused on prevention of staff sexual misconduct as well as protections for internal whistleblowers and witnesses. The 10 IFIs address this through their internal Code of Conduct/Ethics applicable to their staff and contractors. It is worth noting that the covered individual obligations and related obligations on the GCF regarding covered individuals as set out in the GCF's SEAH Policy are in line with the implementation standards in principles one to six.

Pertinently, regarding the outward looking SEAH prevention practices in project operations covered under principle seven, the GCF's SEAH Policy significantly diverges from the common practice of IFIs confirmed in the Update Note. The GCF's SEAH policy also introduces obligations on counterparties institutionally as well as operationally. However, none of the ten IFIs have a standalone SEAH policy focused on project/operational prevention. Rather, IFIs generally approach SEA safeguarding in project operations through the application of their Environmental and Social risk frameworks –which typically does not explicitly refer to SEAH but implicitly covers SEA as a social risk under gender related vulnerabilities including Gender Based Violence (GBV).

Definition

The updated statement acknowledges the fact that the various IFIs have different definitions of harassment, abuse and exploitation, and that these definitions may not cohere: "IFIs use a range of terms to refer to issues that are relevant to sexual harassment, abuse and exploitation, including gender-based violence, social safeguards, misconduct, gender and inclusion more generally, and human rights. This update note captures policies that address the topic substantively, but individual IFI terminology may not match exactly the references made here."

Scope

The scope of this commitment covers both the IFIs own institutions (through the relevant provisions in their codes of conduct/ethics) and their operations, though it is not explicitly defined. The Updated Note stipulates that the codes of conduct/ethics of the institutions applies to staff behaviour both inside and outside the institution. In addition, the Updated Note clarifies that whistleblower and witness protection extends only internally to those whom the institution has control over i.e. staff, consultants etc.

In relation to operational implementation, the Updated Note also clarifies that mechanisms for the prevention and response to SEAH and/or Gender Based Violence is implicitly or explicitly provided for within their Environmental and Social Policies. Furthermore, the IFIs have project grievance, independent accountability or other reporting mechanisms that enable confidential reporting of incidents and concerns including of sexual harassment, abuse or exploitation or other related misconduct by those outside the IFI, including but not limited to communities affected by projects/programs.

II. INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT ("WORLD BANK" / "WB")

The WB in recent years has made a number of updates to relevant provisions and requirements in relation to SEA to further strengthen its Staff Rules, and there are many programs and initiatives designed to enhance and reinforce these rules and related actions. In 2018, the WB issued an update and clarification to its Staff Rules stating explicitly that SEA constitutes a violation of the WB's principles of staff employment. Furthermore, the WB has also adopted a clarifying definition of this particular form of misconduct under WB Staff Rule 3.0, section 6, paragraph 1, "*Scope of Allegations Addressed by Ethics and Business Conduct*".

In addition, following an external review by independent experts, at the behest of the World Bank Group (WBG) President,²¹ the WB's Ethics and Business Conduct Department produced the "WBG Action Plan for Preventing and Addressing Sexual Harassment," 2019-2021, a document of the WB, International Finance Corporation and Multilateral Investment Guarantee Agency (MIGA). The aim was to "create an environment in which people trust that, when they report sexual harassment, their voices will be heard, their dignity will be respected, fair and due process will ensue, and perpetrators will be held to account."

The ensuing Action Plan responded to the 40 recommendations of the external reviewers. It outlines concrete deliverables for the organisation, such as ensuring that all managers are aware of their responsibility to create team environments free from sexual harassment, as well as offering managers new guidance on addressing cases; complementing the WBG's system with new people-centred services; scaling up and broadening the scope of training; transparently and regularly sharing information on the prevalence of sexual harassment and related sanctions inside the WBG; collaborating across departments on enhancing sexual harassment detection and risk assessment; and contributing to international efforts to share best practices.

Moreover, the WB released an official document outlining its policy²² "Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects," in July 2017. Born out of an independent task force of external experts who advised on strengthening the Banks' SEAH systems, in response to SEAH in the Bank's Uganda Transport Sector Project. The report was made to align with the Environmental and Social Framework (ESF), approved in 2016 and which went into effect in 2018 and the WB's Procurement Framework.

WB is also one of the ten IFIs who issued a Joint Statement on SEAH (outlined above) and pursuant to the IFIs Joint Statement it summarised on its website²³ the main points, reiterating and reinforcing the seven principles listed above, declaring it was "cognisant of the important role they play in both the example they set in their own institutional practices and in how they embed high standards in their projects and operations."

Scope

The scope for "the WBG Action Plan for Preventing and Addressing Sexual Harassment," 2019-2021 is largely internal, and aims to integrate the prevention of sexual harassment in all aspects of the internal culture, organization and corporate activities.

The larger IFI statement covers both the IFIs own institutions and their operations, though it is not explicitly defined. The updated statement stipulates that the codes of conduct/ethics of the institutions applies to staff behaviour both inside and outside the institution/place of work.

It is pertinent to note that World Bank does not have a SEA/SEAH policy which applies directly to its project implementers. Instead it addresses SEA risks as a facet of Gender Based Violence and under its recently adopted Environmental and Social Policy. Survivors of SEA at a project level seek redress through the project grievance redress mechanism, and as a last recourse through the World Bank's compliance review mechanism –i.e. the Inspection Panel.

On the other hand, if an act of SEAH is perpetuated by World Bank personnel, this is dealt with misconduct and follows the internal human resource process for resolution. However, World Bank policies do not appear to extend remedies to survivors of SEAH.

²¹ <http://pubdocs.worldbank.org/en/895091561658673520/WBG-Sexual-Harassment-Action-Plan-FINAL-Public.pdf>

²² <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/482251502095751999/working-together-to-prevent-sexual-exploitation-and-abuse-recommendations-for-world-bank-investment-projects>

²³ <https://www.worldbank.org/en/news/statement/2018/04/24/joint-statement-of-ifis-on-continuous-advancement-of-standards-to-prevent-sexual-harassment-abuse-exploitation>

Definition

The document “Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects” provides the following definition

Sexual exploitation and abuse (SEA): Sexual exploitation is a facet of GBV that is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. *Sexual abuse* is further defined as “The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions” (IASC 2016). In the context of Bank-supported projects, SEA occurs against a beneficiary or member of the community.

Sexual Harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature (United Nations 2003). Sexual harassment occurs between personnel and staff (IASC 2015).

Consent refers to when an adult makes an informed choice to agree freely and voluntarily to do something (GBV IMS classification tool). There is no consent when agreement is obtained through:

- The use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation,
- The use of a threat to withhold a benefit to which the person is already entitled, or
- A promise made to the person to provide a benefit.

The WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021 does not offer a definition, however it does commit to strengthening and clarifying the definition of sexual harassment in the WBG regulatory framework.

Implementation

The Action Plan sets out a detailed and thorough implementation plan, consisting of a focus on prevention through: empowering managers; scaling up training; communicating to keep high on agenda; transparent monitoring; developing synergies and knowledge, coupled with efforts to increase fairness and efficacy of the resolution and investigation system through improving regulatory framework; creating a new role of anti-harassment coordinator; Improving investigatory process; victim support guidelines.

It outlines a plan to provide Staff and Managers with skills, knowledge and resources to prevent and address sexual harassment through working with managers to promote a positive environment, prevent sexual harassment and address inappropriate behaviors, scaling up outreach and training, Engage with senior leadership and mid-level management to ensure continued dialogue To create a workplace culture, Implement transparent monitoring as a basis for open dialogue, Integrate explicit ethical considerations into other WBG activities, Leading and setting international best practices

It also aims to enhance trust in the WBG’s ability to address inappropriate behaviors through improving the regulatory framework and by consolidating and clarifying the rules; complementing the system with people-centred services; improving investigatory reporting processes and procedures; enhancing the decision-making function for disciplinary measures; and addressing sexual harassment committed by external parties towards WBG staff or on WBG premises.

The Action Plan also delineates ways to improve accountability, awareness and trust, via the creation of easier reporting, clearer roles for protagonists, clearer rules, the creation of more efficient and transparent processes, and enhanced accountability. The plan also provides guidance on addressing sexual harassment as a risk.

Although the WB's Environmental and Social Framework (ESF) does not include explicit reference to SEAH nor does it include any definition of SEAH, the prevention of SEA in WB operations is addressed through the ESF—particularly under the Gender Based Violence (GBV) risk assessment. Since 2019, WB has also launched an internal risk assessment tool to evaluate risk indicators relating to GBV in the design of new projects. WB does not conduct a retrospective assessment of projects under implementation. Complaints regarding GBV on projects are handled at the first instance through the project level or community based grievance mechanism. Complaints regarding non-compliance with the WB's ESF are reviewed by the WB's Inspection Panel – which is equivalent to the GCF's Independent Redress Mechanism.

III. ASIAN DEVELOPMENT BANK (ADB)

In 2003, the ADB adopted a policy on preventing sexual harassment²⁴ “because of [its] commitment to maintaining mutual respect, safety, and tolerance in the workplace. This policy encourages senior staff, supervisors, and mission leaders to prevent harassment through establishing a climate of mutual respect among their staff.” The remit of this policy is not delineated in terms of its relationship to the ADBs Code of Conduct, however this author's assumption is that it stands in parallel to it. The remit is also narrower as the Code of Conduct applies exclusively to ADB staff.

The Code of Conduct has been more recently updated (March 2017) than the now rather dated 2003 harassment policy, (which to this author's knowledge, has not been further updated).

Definition

The 18 page Staff Guide provides a definition of sexual harassment, defining it as:

“Sexual harassment is any unwanted, offensive sexual conduct. It could be physical conduct ranging from unwanted touching or kissing to sexual assault; verbal conduct such as unwelcome sexual advances or flirtations, propositions or pressure for sexual or social activity, suggestive remarks, or innuendoes; or nonverbal conduct such as the display of offensive pin-ups or written material, sending suggestive e-mail, leering, whistling, or rude gestures.”²⁵

Different than the staff guide, the ADB Code of Conduct defines harassment as:

“any unwarranted or unwelcome behavior, verbal, psychological or physical, that interferes with work or creates an intimidating, hostile or offensive work environment. Harassment includes but is not limited to sexual harassment and bullying. Sexual harassment is any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature which results in physical, sexual or psychological harm or suffering to another person, or which is made or suggested to be a condition of employment, promotion or other personnel action or creates an intimidating, hostile or offensive environment.”

4.21 and 4.22 in the ADBs Code of Conduct under “Discrimination, Harassment and Bullying” cover harassment and cite special responsibility for managers, who must “clearly abide by and communicate ADB's policy on misconduct, including harassment, bullying and retaliation to all their Staff, including to new Staff. ” It also broaches the issue of cultural differences, citing that:

²⁴ Asian Development Bank. “Prevention of Sexual Harassment: A Guide for Staff.” 2003. p6

²⁵ Asian Development Bank. “Prevention of Sexual Harassment: A Guide for Staff.” 2003. p6

“Unwanted, offensive sexual conduct is not acceptable in any culture. Naturally, people’s attitudes to personal space and privacy, touching, and appropriate topics of conversation vary, depending on their cultural backgrounds, gender, religion, education, and upbringing. In an international organization such as ADB, the values of no one particular group can dominate. That is why this policy allows you to decide for yourself what you find offensive and to let others know if you are offended. There is an onus on all staff to treat others with tact and respect. If you are not sure if your conduct or remarks will offend others at work, it is best to be careful.”²⁶

The policy outlines the mechanisms for filing a complaint about harassment. It also stipulates that department/office heads, directors, and supervisors have a particular responsibility for preventing sexual harassment.

Scope

The Prevention of Sexual Harassment: A Guide for Staff policy applies equally to men and women, and has a broad remit that goes beyond ADB staff. It covers professional staff, national officers, administrative staff, consultants, employees of direct contractors to ADB, people seeking work with ADB, and visitors. Although the last three categories extend the ADB’s responsibility to those far beyond the scope of its own staff, ADB retains control over the actions of these categories of individuals to the extent that they are under an obligation to follow ADB’s standards of conduct on ADB premises. The policy also applies to headquarters, resident missions and offices, and in the field, on ADB missions and social functions that are part of official business.²⁷

The ADB does not have any operational policies that explicitly tackle SEAH on project level. However, ADB is one of the ten IFIs which issued the IFI Joint Statement. In relation to project level prevention and response, the ADB’s Safeguards Policy Statement (SPS) which covers environmental, indigenous people and social risks including ‘gender issues’. The SPS is further elaborated through the Social Protection Operational Plan and Social Protection Strategy which also speak to gender issues. However, no one of these documents include explicit reference to SEAH nor include any definition of SEAH.

Implementation

With regards to implementation of the Code of Conduct, staff are required to submit an Annual Declaration of Compliance.²⁸ The GCF has adopted this approach in its Administrative Guidelines on Human Resources.

With regard to implementation of the harassment policy, it, interestingly, also raises the issue of national jurisdiction, in its description of the scope of the policy:

“If the harassment happens at a work-related event such as on ADB Christmas party, it is still covered by the policy. If it happens at an event unrelated to ADB, it may be subject to the Philippines’ anti-sexual harassment law and may be subject to ADB’s disciplinary proceedings.”

Hence in countries where there is an anti-sexual harassment or comparable law, (ie for GCF HQ in South Korea, or if there was such a law in the country where the alleged harassment or sexual exploitation took place) there may be another potential layer of enforcement/remedy.

²⁶ Asian Development Bank. “Prevention of Sexual Harassment: A Guide for Staff.” 2003. p6

²⁷ <https://www.adb.org/documents/prevention-sexual-harassment-guide-staff>

²⁸ (It is interesting to note the ADB was hiring for a Senior Social and Gender Specialist/Sexual Exploitation, Abuse and Harassment (SEAH) Policy Specialist in October 2019,²⁸ hence they have grouped these two roles together, though at GCF the Gender Advisor does not fulfil a SEAH function, and is proposing a separate SEAH officer).

IV. INTERNATIONAL FINANCE CORPORATION (IFC)

The IFC is one of the ten institutions which issued the IFI joint statement. IFC also developed a “Good Practice Note” for the private sector,²⁹ with the assistance of the European Bank for Reconstruction and Development (EBRD), the International Finance Corporation (IFC) and CDC Group (CDC).

Also of interest, though not a policy to guide the IFCs own operations, is a guidance note,³⁰ on addressing GBV in the workforce (created by the IFC, the WBG and CommDev). The note provides tools to help companies address and reduce sexual harassment, sexual abuse and exploitation, and intimate partner violence in the workforce and community.

A more recent document (2020), “COVID-19 and Gender-Based Violence: Workplace Risks and Responses,” provides guidance for employers on GBV in the workplace taking into consideration the specific exigencies of the current pandemic. Though it is presented in terms of a focus on of Covid specifically,³¹ it also includes information about other general policies. Additionally, the IFC forms part of the World Bank’s document³² “WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021, which applies to the WB, the IFC and MIGA.

On project level, IFC’s Environmental and Social Performance Standards (2012) – upon which the GCF’s Interim Environmental and Social Safeguards is modelled - require investees to address gender risks, non-discrimination/equal opportunity, and health and safety of communities. IFC’s Gender Strategy (2017) includes explicit reference to GBVH and assessing gender risks in IFC investment projects. Materials to guide clients and staff on addressing GBVH in projects were created in 2018 and refined and expanded in 2019. IFC screens and assesses new investment projects for GBVH, and requires all but the lowest risk clients to include and implement anti-GBVH and gender equality provisions in their human resource policies. During portfolio supervision, IFC will monitor the implementation of mitigation measures to address GBVH risks.

Definition

The WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021 does not offer a definition, however it does commit to Strengthening and clarifying the definition of sexual harassment in the WBG regulatory framework. The Good Practice Note for the Private Sector offers some definitions of harassment, defining sexual harassment as “A person making unwanted sexual advances, requests for sexual favours or touching or behaving in a way which creates a humiliating or offensive environment,” and sexual abuse as “A person using force or unequal power, for example through sexual assault, rape, attempted rape or forcing someone to perform oral sex. All sexual activity with children is sexual abuse.” And sexual exploitation as “A person abusing their position of relative power or trust to exploit someone through sexual relationships.”

The IFC’s ESS Performance Standards does not include explicit reference to SEAH nor does it include any definition of SEAH.

Scope

Regarding the WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021, the scope of this commitment covers both the IFIs own institutions and their operations, though this scope is not more explicitly defined.

²⁹ https://www.ifc.org/wps/wcm/connect/a808686a-2d10-45b1-86f4-448dcad6125a/191219+GBVH+GPN+V6+CLEAN_for+online+consultation.pdf?MOD=AJPERES&CVID=mYAOadf

³⁰ https://www.commdev.org/pdf/publications/ToolSuite4_Interior_FIN-05-16_LoRes.pdf

³¹ <https://www.ifc.org/wps/wcm/connect/42b50ce3-3867-48b2-9818-acfbc4080ea2/202007-IFC-GBV-COVID+C.pdf?MOD=AJPERES&CVID=ndk4BXw>

³² <http://pubdocs.worldbank.org/en/895091561658673520/WBG-Sexual-Harassment-Action-Plan-FINAL-Public.pdf>

The scope of the Good Practice Note provides the private sector in emerging markets with guidance on how to address GBVH risks in their investments, projects and operations. The primary audiences for this are staff and consultants working for investors and those working for companies. The guidance may also have wider interest for those working in government, state-owned enterprises, trade unions, NGOs, and people making investments in public private partnerships.

Implementation

For implementation of the WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021, please see above. The implementation of the Good Practice Note would be by private sector entities on an individual basis and the implementation of the “Addressing GBV in the Workforce: Tools to help companies address and reduce sexual harassment, sexual abuse and exploitation, and intimate partner violence in the workforce and community” would again, be implemented by the private sector.

V. THE GLOBAL FUND TO FIGHT AIDS, TUBERCULOSIS AND MALARIA (“GLOBAL FUND”)

The Global Fund does not have a specific SEAH policy, but rather a statement delineating the commitment of the Global Fund and Gavi, the Vaccine Alliance (two Geneva based financing agencies with similar mandates and working in a partnership model and without regional or country offices), outlined in “Commitments Made by Gavi, the Vaccine Alliance and the Global Fund to Address Sexual Exploitation and Abuse and Sexual Harassment” dated October 2018.³³ The statement is of note in that it frames SEAH within the larger socio-cultural context of gender inequality and power dynamics from the outset, highlighting any violations as a human rights issue and therefore a social risk

The statement outlines four strategic shifts for the organisation, focused on strengthening reporting, strengthening internal standards and organizational capacity, and incentivizing cultural change.³⁴

1. The first strategic shift outlined vows to ensure support for survivors, victims and whistle-blowers, enhance accountability and transparency, strengthen reporting and tackle impunity. Both organisations commit to achieve this by:
 - a. clearly communicating requirements and guidance for reporting of incidents, including whistleblower protection measures – emphasising that considerations of confidentiality, protection of relevant individuals and relevant legislation will be central,
 - b. reviewing and where necessary renew efforts within and between our organisations, and where possible within the wider international system to deter hiring and recirculation of perpetrators in the aid sector and to hold them to account, including helping to bring them to justice when appropriate in line with due process and human rights obligations,
 - c. ensuring that relevant information about allegations, confirmed cases, prevention measures and response activities, are integrated into reporting mechanisms. (4.) review best practice and lessons from our shared ombudsman services to explore the potential to improve systems of complaints mechanisms and independent accountability.
2. The second shift aims to incentivize cultural change through strong leadership, organizational accountability and better human resource processes.
3. The third shift aims to adopt minimum standards and the Global Fund and its partners meet them. This includes reviewing, and where necessary strengthening internal standards (such as the Codes of Conduct, Employee Handbook and equivalent) and due diligence tools to reflect those standards and include clear and specific language on SEAH, including common definitions. It also includes reviewing, and where necessary strengthening, language for their implementing partners to apply the same minimum standards in their on- granting and contracting requirements for downstream partners.

³³https://www.theglobalfund.org/media/7859/other_exploitationabuseharassmentcommitments_statement_en.pdf?u=637278307920000000

³⁴<https://www.theglobalfund.org/en/updates/other-updates/2018-10-19-gavi-and-global-fund-commit-to-addressing-sexual-exploitation-abuse-and-harassment/>

4. The fourth strategic shift delineated is one to strengthen organizational capacity and capability across the international aid sector, including building the capability of implementing partners to meet the minimum standards, which entails review and if necessary strengthen core oversight and management systems for tackling sexual exploitation and abuse and sexual harassment, use victim/survivor-centred responses, as well as provide guidance and minimum training requirements for relevant staff on prevention and response to sexual exploitation and abuse and sexual harassment.

Definition

The statement does not posit a definition for sexual exploitation, abuse or harassment, nor is it found in the Global Fund's Code of Conduct for Suppliers and their Code of Conduct for Recipients.

Scope

The commitments outlined in the statement apply to staff within Gavi and the Global Fund,. In addition, both organisations state that they ""see these commitments applying to us and by extension to the wider stakeholder environment in which we operate, including our governance bodies and partners who receive funding from us... [and] will focus on prevention and empowering our staff, and work with our governance bodies, implementing partners and suppliers to do the same. We will strengthen the mechanisms by which we hold ourselves and our partners to account and will seek to increase capacity and capability on these issues."

Implementation

The statement does not delve into the specifics of implementation, only stating that the Global Fund will "act on every allegation in line with agreed procedures of each organization," indicating that the two organisations have different procedures, though they both work in partnership with regional and country offices.

VI. GREEN ENVIRONMENTAL FACILITY (GEF)

GEF is one of the financial mechanisms of the United Nations Framework Convention on Climate Change (UNFCCC) and is an independent organisation under the convention. However, the WB provides administrative services for the GEF Secretariat. Therefore, staff of the GEF Secretariat are contractually employees of the WB. Whilst the GEF does not have a SEAH Policy, staff of the GEF Secretariat are subject to WB Staff Rules and Procedures relating to, *inter alia*, misconduct and SEA. .

The GEF has a similar structure to the GCF in terms of its operations as it works through implementing entities referred to as Partner Agencies who are the equivalent of GCF Accredited Entities. In relation to safeguarding in GEF project-operations, in July 2019 the GEF commenced the implementation of its Policy on Environmental and Social Safeguards (adopted in December 2018) which includes explicit reference to GBV and SEA.

Definition

The term SEA is defined under the ES Safeguards Policy as follows: "Sexual Exploitation and Abuse means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another; and, specifically in the case of Sexual Abuse, the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions."

Scope

The WB Staff Rules applicable to staff of the GEF Secretariat covers staff obligations to prevent SEA as well recourse for survivors who are staff members. On the other hand, the GEF's ES Safeguards Policy is applicable to GEF Partner Agencies and sets out requirements for project assessments and grievance mechanisms in relation to social risks – including GBV and more specifically SEA.

Implementation

The GEF's ES Safeguard Policy includes the following provision as part of Minimum Standards on Environmental and Social Assessment that must be in place at all GEF Partner Agencies:

- *Adverse Gender-Related Impacts, Including Gender-Based Violence and Sexual Exploitation and Abuse*
 - Any risks or potential adverse impacts on women, men, girls and boys are identified as early as possible as part of project or program screening and reflected in relevant safeguards instruments, and differentiated by gender where relevant, including adverse impacts on Gender Equality, Gender-Based Violence (GBV), and Sexual Exploitation and Abuse;
 - Discrimination against women or girls, or gender-based discrimination are prevented; and
 - In case incidences of Gender-Based Violence and/or Sexual Exploitation and Abuse occur, there are:
 - (i) Established reporting and response protocols in place, with specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases, that indicate when and where to report incidents, and what follow-up actions will be undertaken; and
 - (ii) Modalities to provide services and redress to survivors.

The ES Safeguards Policy also includes requirements for each GEF Partner Agency to have independent accountability and grievance response systems to responds to complaints from people and communities that might be affected by GEF-funded projects, which would include claims relating to SEA.

VII. EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT (EBRD)

In addition to signing on to the IFI Joint Statement, the EBRD has its own document (co-commissioned by IFC, EBRD and CDC) entitled 'Addressing Gender Based Violence and Harassment: Emerging Good Practice from the Private Sector'.³⁵ This document focuses on gender-based violence and harassment, outlining assessing risks, prevention, responding to and encouraging reporting, and monitoring and highlights.

EBRD's Environmental and Social Policy and Performance Requirements (2020), require its clients to adopt measures to effectively prevent and address any form of violence and harassment, including GBVH.

It is noteworthy in that unlike the other approaches, this document also lays out the business case for addressing sexual exploitation, abuse and harassment. It also illustrates overarching principles which should be considered.

It also provides helpful background and context to better understand sexual exploitation abuse and harassment and why it occurs as well as useful principles which should underpin all work in this area.

Definition

The EBRD utilises the definitions below in its report "Addressing Gender Based Violence and Harassment: Emerging Good Practice from the Private Sector":

- Sexual exploitation-Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.
- Sexual abuse-The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined by the UN Convention on the

³⁵ Addressing Gender Based Violence and Harassment: Emerging Good Practice from the Private Sector.

Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence.

- Sexual harassment-Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment
- GBVH- Umbrella term for violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment

Scope

EBRD's Environmental and Social Policy and Performance Requirements (2020), require its clients to adopt measures to effectively prevent and address any form of violence and harassment, including GBVH.

As it is documenting emerging good practice from the private sector, as opposed to an organisation policy or code of conduct per se, the scope is not applicable for the purposes of this comparative analysis. However, it provides useful guidance on understanding how to screen operations, projects and investments for GBVH risks, and how to assess company capacity and resources to prevent and respond to GBVH.

Implementation

As it is documenting emerging good practice from the private sector, as opposed to an organisation policy or code of conduct per se, implementation outlines is more applicable to the private sector, however the document provides relevant information which can inform organisational policies. For example, it suggests useful questions to assess company capacity and resources as well as example KPIs on this topic for managers.

VIII. INTERNATIONAL MONETARY FUND (IMF)

The IMF has no stand-alone SEAH policy but has an updated standards for staff conduct, published in a General Administrative Order. In a 2017 statement the IMF claimed that it had updated its standards of conduct for staff to enhance standards of conduct, introduce new reporting requirements on close personal relationships in the workplace and update the institution's policies on harassment and discrimination. They also reinforce protection against retaliation for staff who report suspected misconduct, while clarifying procedures for conducting and overseeing investigations of such misconduct.³⁶ The Fund also benchmarked its policies against those of comparator institutions and reviewed best practices in a cross-section of other organizations, delineating:

- o *a new policy on close personal relationships in the workplace*, which requires that a supervisor who has an intimate personal relationship with a subordinate report such relationship to the Ethics Advisor, his/her supervisor, or the Human Resources Department to seek resolution to potential conflict of interests and workplace fairness concerns. Failure to report and then resolve the potential conflict of interest constitutes misconduct and is grounds for disciplinary action.
- o *a new policy concerning protection against retaliation*: retaliation against a staff member for reporting suspected misconduct or participating in the Fund's dispute resolution system has been added explicitly as a form of misconduct;
- o *greater emphasis on prevention and early resolution in policies on harassment and discrimination*. The IMF's policy on harassment, including sexual harassment, already made clear that harassment in any form is not tolerated, constitutes misconduct, and triggers disciplinary actions up to and including termination of employment, but the new standards of conduct emphasize early action; and

³⁶ Ethics Framework. "IMF Updates Standards for Staff Conduct." July 28, 2017 <https://www.imf.org/external/hrd/conduct.htm>

- *an update of investigative and disciplinary procedures*, including clarifying the respective authority of the Ethics Advisor, Human Resources Department Director, and other IMF officials.

Definition

As per the IFI joint statement (see above). The updated statement acknowledges the fact that the various IFIs have different definitions of harassment, abuse and exploitation, and that these different definitions may not cohere: “IFIs use a range of terms to refer to issues that are relevant to sexual harassment, abuse and exploitation, including gender-based violence, social safeguards, misconduct, gender and inclusion more generally, and human rights. This update note captures policies that address the topic substantively, but individual IFI terminology may not match exactly the references made here.”³⁷

The Staff Code of Conduct may present definitions of sexual exploitation, abuse and harassment, however, this author was unable to retrieve it online.

Scope

The IMF Code of Conduct is presumably applicable to staff as the title implies. Regarding how IMF addresses SEA risk in its project-operations, based on the IFIs Joint Statement which IMF is a party to, it is assumed that IMF also tackles this risk through its Environmental and Social Policy or equivalent.

Implementation

The implementation mode outlined in the statement is primarily via an independent ethics advisor, an independent ombudsperson and an integrity hotline, enabling staff and the general public to report misuse of IMF resources or misconduct by staff or vendors securely and anonymously.

IX. CONCLUSION

The various policies, statements, toolkits and instruments outlined above all contain elements which could inform or enrich the current GCF SEAH policy. Care will need to be taken to decide which elements are inspired from other organisations’ policies or approaches (especially with a view to legal liability for GCF vis a vis accredited entities and other parameters). That being said, the examination of differing approaches has yielded a rich repository of knowledge and approaches which can and should inform not only the SEAH policy itself, but also its implementation.

The WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021 is particularly strong and should be mined for information and especially for implementation approaches. Regarding systems, policies and procedures the WBG Action Plan for Preventing and Addressing Sexual Harassment,” 2019-2021 provides the most thorough, comprehensive and up to date suggestions comparatively for the purposes of this analysis. It also covers three of the IFIs hence it can claim to be the most comprehensive and credible. It also is arguably the most relevant and applicable to GCFs work.

Elements from other organisations’ documents that could potentially inform GCF approaches include strong language and definitions in a variety of the documents which could be emulated. The EBRD document could be mined for KPI examples, as well as useful questions to assess company capacities and resources, amongst others, and the IFC documents for their rich context and understanding of gender and GBV dynamics. The Global Fund also has a strong contextualization piece that should inform the renewal/revisions to the SEAH policy.

³⁷ Due to a non-functional link and nothing yielding on organisational website searches, this author could not access the code of conduct to ascertain if it contained a definition for SEAH.

The emphasis on tackling social norms and on creating an organization culture of respect was a red thread which wove across all the organizational documents. Another theme was the importance of leading by example and the impact of strong leadership to support this cause. Another highlight was the responsibility of managers and senior staff to set the tone for the organisational culture and to champion new ways of working vis a vis SEAH and its implementation.

Overall, in terms of tackling the risk of SEA in project operations, the common practice amongst all institutions reviewed is with reference to their respective Environmental and Social policy framework. The ES policy framework of all the IFIs reviewed does not contain explicit reference to SEA. Furthermore, of the two multilateral funds reviewed in this Comparative Analysis, only the GEF has included explicit reference to SEA - and this reference falls within the context of GBV. In order to do so, the GEF capitalized on a window of opportunity provided by a scheduled general review and update to its ES Policy.

All of these elements can serve to inform the next iteration of the SEAH policy, hopefully rendering it not only more in tune with international best practice and standards in this area, but also more sustainable and robust as a policy in and of itself.