



**GREEN
CLIMATE
FUND**

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25 April 2022

Report on the activities of the Independent Integrity Unit

Summary

This report provides an update on the progress made by the Independent Integrity Unit in the implementation of its 2022 Work Programme as adopted by the Board at its twenty-seventh meeting. The reporting period is from 24 February to 15 April 2022.

I. Introduction

1. This report on the activities of the Independent Integrity Unit (IIU) provides an update on the progress made by the Unit in implementing its 2022 Work Programme as approved by the Board¹. It provides an update by key priority areas in the reporting period from 24 February to 15 April 2022.
2. Consistent with the IIU 2022 Work Programme, activities during the reporting period were focused particularly on the following priorities:
 - (a) Optimise investigation efficiencies and capacities;
 - (b) Integrity policy guidance and implementation oversight;
 - (c) Technical assistance to strengthen capacity of Accredited Entities;
 - (d) Integrity risk assessment and Proactive Integrity Reviews (PIRs);
 - (e) Intelligent automation and risk mitigation; and
 - (f) Awareness raising, communications, and enhancing operational efficiencies.

II. Activities of the Independent Integrity Unit during the Reporting Period

2.1 Optimise Investigation Efficiencies and Capacities

3. **Case Information.** The IIU opened five new cases by the end of the current reporting period as illustrated in Table 1 below. These include two project-related cases and three cases of staff misconduct. The aggregate summaries can be found in Tables 1 and 2 respectively.

Table 1: All Opened and Closed Cases (2018-2022)

Year	Open	Closed	Cases Carried Over
Pre-2018			4
2018	21	5	20
2019	41	37	24
2020	31	31	24
2021	8	18	14
2022	5	6	
Total Open Cases			13

¹ Board decision B.30/09.

Table 2: Opened and Closed Staff Misconduct Cases (2018 – 2021)

Year	Open	Closed	Cases Carried Over
Pre-2018			3
2018	15	4	14
2019	25	20	19
2020	16	21	14
2021	3	9	8
2022	3	5	
Total Open Staff Misconduct Cases			6

4. The succeeding tables provide further summary statistics of IIU cases to date.

Table 3: All Opened and Closed Cases (including the respective year of closure)

Year Received	Cases Opened	Year Closed					# of Open Cases
		2018	2019	2020	2021	2022	
2018	21 (+4 carried over from 2017)	5*	15**	4†	1		0
2019	41††		22	15	0	4	0
2020	31			12	14	1	4
2021	8				3	1	4
2022	5					0	5
Total	110	5	37	31	18	6	13

*Of the five closed cases in 2018, two were opened the previous year.

**Of the 15 closed cases in 2019, one was opened in 2017.

†Of the four closed cases in 2020, one was opened in 2017.

†† One case from 2019 was split into two cases in 2022.



Table 4: Opened and Closed Staff Misconduct Cases (including the respective year of closure)

Year Received	Cases Opened	Year Closed					# of Open Cases
		2018	2019	2020	2021	2022	
2018	15 (+3 carried over from 2017)	4*	10	4**			0
2019	25†		10	11	0	4	0
2020	16			6	8	0	2
2021	3				1	1	1
2022	3					0	3
Total	65	4	20	21	9	5	6

*Of the four cases closed in 2018, two were carry-over cases from the preceding year.

**Of the four cases closed in 2020, one was opened in 2017.

† One case from 2019 was split into two cases in 2022.

Table 5: Count of Cases Closed by Type

Type of Cases	2018	2019	2020	2021	2022
Project-Related Reports	0	5	2	5	1
Abuse	-	-	-	-	-
Collusion	-	-	1	-	-
Conflict of Interest	-	-	-	-	1
Corruption	-	2	1	1	-
Fraud	-	3	-	3	-
Other Project-Related Reports	-	-	-	1	-
Staff Misconduct	4	20	21	9	5
Abuse	-	6	5	2	1
Collusion	-	1	-	-	-
Conflict of Interest	1	8	1	1	3
Fraud	1	1	-	-	-
Harassment	-	3	10	3	1
Other Misconduct	-	-	1	-	-
Retaliation against Whistleblowers and Witnesses	-	1	1	1	-
SEAH	2	-	3	2	-
Non-Integrity Violation	1	12	8	3	-
External	-	-	-	1	-
TOTAL	5	37	31	18	6

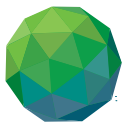


Table 6: Count of Cases Opened by Type

Type of Cases	2019	2020	2021	2022
Project-Related Reports	4	4	5	2
Abuse	-	-	1	-
Collusion	1	-	1	-
Conflict of Interest	-	1	-	1
Corruption	2	1	2	-
Fraud	1	2	-	1
Other Project-Related Reports	-	-	1	-
Staff Misconduct	25*	16**	3	3
Abuse	8	1	1	3
Collusion	1	-	-	-
Conflict of Interest	6	1	1	-
Fraud	1	1	-	-
Harassment	6	8	1	-
Other Misconduct	-	1	-	-
Retaliation against Whistleblowers and Witnesses	1	1	-	-
SEAH	2	3	-	-
Non-Integrity Violation	12	10	-	-
External	-	1	-	-
TOTAL	41	31	8	5

*One case from 2019 was split into two cases which brought the total count of cases to 41 from the previous 40. One was classified as Abuse and another as Conflict of Interest.

** One case from 2020 was reclassified as External.

Table 7. Count of Cases Closed by Quarter

Year	Q1	Q2	Q3	Q4	Total
2019	1	1	15	20	37
2020	5	8	9	9	31
2021	1	8	9	-	18
2022	6	-	-	-	6

5. **Launch of the Case Management System and Online Reporting Platform.** Following successful user acceptance testing and configuration in the previous year, the IIU started to fully utilise its Case Management System (CMS) in 2022 for receiving and recording complaints and for managing its case intake and portfolio. The Unit also launched a new and integrated online reporting platform on the GCF and IIU websites with a secure 24/7 hotline service available in multiple languages. This new platform was introduced to all GCF Personnel during a virtual session hosted by the IIU in March.

6. **Implementation of the Investigation Standards.** With the Board's approval of the Investigation Standards² (the Standards) in December 2021, the IIU continued to apply and operationalise the principles and procedures described in the document in undertaking its investigations. To raise awareness of the Standards for internal stakeholders, the IIU organised a virtual session open to all GCF Personnel where it presented on the scope, process, and general principles of IIU investigations as defined by the Standards.

7. **Development of the Investigation Manual and Templates.** The IIU continued to progress the development of the Investigation Manual (the Manual) for further consultation with relevant divisions of the Secretariat and other Independent Units. The Manual is an internal document intended to support the Investigation Standards by articulating specific operating procedures of the IIU's investigation function. The IIU also continued to improve and streamline its processes by updating various investigation forms and templates, including those related to intake and preliminary assessments, as well as investigation reports.

2.2 Integrity Policy Guidance and Implementation Oversight

8. **Provision of Guidance on Policy Implementation.** As an important tool to prevent and mitigate risks of integrity violations in Fund-related Activities, the IIU continued to provide advisories and guidance to relevant stakeholders upon request. In the current reporting period, nine advisories have been provided.

9. Such advisories covered the interpretation and application of GCF integrity policies in Fund-related Activities pertaining to:

- (a) Conflicts of Interest for Board Members, Board-Appointed Officials, and External Members;
- (b) Integrity Safeguards in Contractual Agreements with Counterparties; and
- (c) Implementation of Policies under the GCF Integrity Policy Framework.

2.3 Technical Assistance to Strengthen Capacity of Accredited Entities

10. **Strategy Development on Capacity Building and Technical Assistance.** IIU undertakes to develop a forward-looking capacity building strategy and technical assistance programme in 2022 in close partnership with implementing partners to catalyse and streamline support actions. Continuing from December 2021, IIU extended the deadline for its Needs Assessment Survey to 25 February 2022 to allow as many GCF Accredited Entities and Delivery Partners as possible to respond and identify their respective capacity building requirements. IIU is presently conducting an initial analysis of the survey responses to gain preliminary insights from the exercise and help inform a way forward.

11. **Engaging with Accredited Entities.** The IIU continued to engage in important dialogues with counterpart offices of Accredited Entities to facilitate cooperative activities ranging from information sharing and joint investigative activities, to providing technical assistance on capacity building. During the reporting period, the IIU has advanced its efforts on establishing cooperation modalities by facilitating negotiations on Memoranda of Understanding (MoUs) with 32 Accredited Entities.

12. **Cooperation with the International Community.** The IIU continued to identify and establish opportunities for cooperation with the communities of integrity offices from

² Board decision B.BM-2021/22.

International Financial Institutions and Multilateral Development Banks and other regional financial institutions.

- (a) *Meeting with the World Bank – Integrity Vice Presidency.* On 25 March 2022, the IIU hosted an in-person meeting in Songdo with representatives from the World Bank – Integrity Vice Presidency (WB-INT) East Asia and Pacific Investigations team. The engagement was an opportunity for the IIU and WB-INT to identify potential areas for collaboration and learning exchanges, particularly on GCF’s proactive approach to managing and addressing integrity risks. Other areas of interest to be explored include the IIU’s work on Proactive Integrity Reviews (PIRs) and Integrity Due Diligence Platform (IDDP), and capabilities on digital forensics and analytics.

2.4 Integrity Risk Assessment and Proactive Integrity Reviews

13. **Proactive Integrity Reviews.** The IIU continued its collaboration with the Secretariat in the development and implementation of the PIRs, notably on:

- (a) *Presentation to the Senior Management Team (SMT).* IIU presented on the progress of the PIRs to the Executive Director and to the wider SMT in March. The discussions centred on the project selection process for the inaugural PIRs, potential areas for further collaboration and synergies, enhancing relations with Accredited Entities in the context of integrity capacity building, and the type of support that IIU requires from the Secretariat to fully implement the PIRs.

2.5 Intelligent Automation and Risk Mitigation

14. **Development of an Integrity Risk Rating Tool.** Using insights from the project selection process for the inaugural PIRs, IIU continued to develop and enhance its Integrity Risk Rating Tool for assessing integrity risks in GCF-funded projects. The tool aims to objectively rank projects by propensity to exhibit integrity violations, both in aggregate and broken down into constituent integrity risk types.

2.6 Awareness Raising, Communications, and Enhancing Operational Efficiencies

15. **Communication Strategy.** In line with the 2022 Workplan, discussions on the communication strategy have commenced with a focus on the message of establishing the value of the IIU as a vital partner in the mission of the GCF.

16. **Development of a Good Practice Guide.** The IIU is working to develop a cross-sectoral Good Practice Guide focusing on integrity in climate-financed projects. The Unit intends to benchmark and document international best practices in the implementation of climate projects financed by GCF and other comparator international financial institutions. The Guide will be used as a reference document on cross-sectoral anti-corruption best practices that can provide learning for different stakeholders. It is also intended to be used as a learning tool to disseminate lessons learned and proactive integrity measures.

17. **Online Training on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH).** IIU worked in close collaboration with the Secretariat in designing the structure and resources for the SEAH Training for GCF Personnel. The online learning tool was formally launched in February as a mandatory course for all GCF

Personnel to be better informed on their obligations and available protections under the SEAH Policy.

18. **International Women’s Day (IWD) 2022.** In solidarity with the international community, IIU commemorated IWD 2022 in March. The centerpiece of this year’s celebration is a feature article interviewing women colleagues in IIU and highlighting the indispensable role of women in efforts addressing climate change and promoting integrity. The article was released on the IIU website, and supplemental digital collaterals were published on the GCF intranet and on IIU social media platforms. The combined audience reach in LinkedIn and Twitter of related social media collaterals is 2,034 impressions.

19. **Improvements to the IIU Website.** In collaboration with the Division of External Affairs, IIU is undertaking a refresh of the IIU website to integrate better functionality, streamlined user interface, and structured information. Thus far, the IIU website now features a more robust case intake facility through an introduction of an online reporting form integrated with the IIU case management system and an updated list of reporting channels (24/7 multilingual hotline, email, and post).

20. For this reporting period, the IIU website received 624 unique visitors. Notably, the feature article page for IWD 2022 received the most views at 209, followed by the Integrity Policies page at 156. 64% of audiences were direct referrals from LinkedIn and direct links, while a notable 31% of the audiences found the website using a search engine.

21. **Social Media Platforms.** The combined number of impressions or views from official IIU accounts in LinkedIn and Twitter is 4,608 coming from 14 posts during the reporting period supporting messaging and announcements.

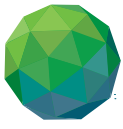
22. **Internal Communications.** The IIU contributed two informational entries to the ‘Green Shift’ (GCF intranet) with a combined view rate of 170. Within the Unit, a ‘Fireside Chat’ was initiated to be held twice a month to discuss learnings and promote knowledge sharing and camaraderie among team members. Moreover, the first stage of establishing a new visual branding system has been implemented by distributing updated presentation templates to IIU staff.

23. **Brownbag Sessions.** The IIU hosted an ‘Ask IIU Live’ webinar on 15 April, to which 45 GCF Personnel attended. The inaugural topic was “Investigation Standards at the IIU.” The IIU aims to make this a series of knowledge-sharing events for GCF Personnel to learn more about integrity-related matters at the Fund.

24. **Speaking Engagements.** The Head of IIU was invited as guest speaker in the podcast, ‘Planet Policy Pals’ published on 22 and 29 March to introduce the role of integrity in international climate finance. The podcast was downloaded 57 times by its target audience of youth interested in environmental policy, science, and community development. Moreover, the IIU Integrity and Compliance Officer was invited as a resource speaker in the webinar, ‘Strengthening Integrity: Climate Finance and Adaptation in the Water Sector and Beyond’ jointly organised by the Water Integrity Network and GCF on 15 April.

25. **Staffing.** The following are updates on staff capacity:

- (a) *Lead Investigator.* With the conclusion of the recruitment process in February, the IIU has successfully onboarded its Lead Investigator on 01 April.
- (b) *Team Assistant.* With support from the Office of Human Resources, IIU has concluded the recruitment for the Team Assistant role in early April. The successful candidate is scheduled to be onboarded in the second quarter of the year.
- (c) *GCF Internship Programme.* IIU is taking active involvement in the 2022 GCF Internship Programme and furthering its partnership with the Secretariat. In this year’s cohort



recruitment, IIU will select a total of four interns (two per six-month term) for its Prevention and Investigation workstreams. The IIU has shortlisted candidates for the final panel interviews due to take place in May.
