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Management response to the Independent Evaluation of the GCF Approach to Gender

Summary

This document presents the Secretariat management response to the Independent Evaluation of the GCF Approach to Gender, undertaken by the Independent Evaluation Unit.

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I. Introduction

1. The Secretariat welcomes the Independent Evaluation of the GCF Approach to Gender and thanks the Independent Evaluation Unit (IEU) for its professionalism in conducting this first dedicated evaluation of the GCF gender approach. The Secretariat appreciates the consultative approach adopted throughout the evaluation process, including opportunities for dialogue and feedback through interviews, webinars and review of emerging findings and recommendations. In accordance with the Evaluation Policy for the GCF, the Secretariat will consider the findings and recommendations of the evaluation in its decision-making, management, operations, strategies, budgets and practices.

2. The following sections present the Secretariat's overall response to the evaluation findings and recommendations, followed by responses to the specific recommendations contained in the report.

II. General response to findings and recommendations

3. The evaluation arrives at an opportune moment for GCF and provides a valuable basis for reflection. The Secretariat particularly welcomes the evaluation's recognition of the strong policy foundations established under the Gender Policy and the Gender Action Plan (GAP) 2020–2023, its alignment with international commitments, and the constructive, detailed and operational orientation of the recommendations, which seek to shift the GCF gender architecture from a compliance-driven model towards meaningful implementation, monitoring, learning, and the achievement of gender-responsive results. However, the constraints of the Secretariat based on the GCF programming and implementation model have been insufficiently recognized.

4. The Secretariat would also like to raise, in a constructive spirit, a point regarding the scheduling of the evaluation, which was brought forward from the forty-sixth meeting of the Board (B.46) to B.45, in relation to the draft updated Gender Action Plan for the GCF 2026-2031 (updated GAP) being presented to the Board for consideration at B.45. This led to a constrained timeline. At the same time, the Secretariat very much values the interactions with the IEU on the alignment between the Gender Evaluation and the draft updated GAP. As the final report was received on 9 June 2026, the Secretariat's internal process, including engagement across the relevant functions and approval from the Executive Leadership Team (ELT), requires one month. This is consistent with the timelines that are usually agreed between the IEU and the Secretariat. In addition, the highly granular and operational nature of the recommendations needed more careful consideration. The Secretariat raises this with a view to strengthening coordination on timelines for future exercises.

5. In the course of the review process, the Secretariat provided detailed feedback on the factual draft. The primary purpose of this feedback was to support a factual check and to ensure that the report accurately reflects the institutional context, policy framework and operating realities within GCF. The Secretariat is pleased to note that a number of these comments have been satisfactorily reflected in the final report, and it appreciates the care taken by the evaluation team to incorporate them.

6. At the same time, the Secretariat wishes to draw attention to an important factual matter. In Chapter 8, paragraph 217, the evaluation refers to a "2018 Gender Equality and Social Inclusion (GESI) Policy" in seeking to define intersectionality. The Secretariat notes that no such policy was approved by the Board. The inclusion of the definition has resulted in a recommendation that is not clearly set within the remit of the GCF updated Gender Policy and GAP 2020–2023. To the extent that the evaluation assesses, or appears to assess, the GCF against a 2018 Gender and Social Inclusion Policy, this rests on an incorrect assumption, as GCF

cannot be evaluated against a draft policy that was never adopted by the Board. The Secretariat would be grateful if this could be corrected to ensure that the report's findings and conclusions are anchored in the actual GCF policy framework. It should be noted that under the updated Gender Policy GCF has been able to address the differentiated needs of communities based on the gender assessments and action plans provided to it. The IEU's evaluation itself has attested to that effort but has also pointed out various limitations in implementation across its portfolio.

7. Beyond this, the Secretariat is of the view that several substantive comments have not been sufficiently addressed in the final report:

- (a) Findings concerning delays and the timeliness of feedback to accredited entities (AEs) would benefit from being contextualized within the Board cycle, the Secretariat's established service standards (including the nine-month timeline from Concept Note submission), and the staffing transitions associated with the 2025 reorganization;
- (b) Observations drawn from individual cases are at times presented as indicative of systemic patterns, and conclusions on institutional ambiguity and private-sector gender integration would benefit from clearer substantiation and supporting evidence;
- (c) The treatment of gender-transformational outcomes would benefit from calibration to baseline capacities and country context, as well as from a clearer recognition of the differentiated roles and responsibilities of AEs, national designated authorities (NDAs), and the Secretariat, the latter performing second-level due diligence and oversight functions;
- (d) Methodological aspects – including project sample selection and representativeness, the use of artificial intelligence-assisted analysis, and the assessment of gender mainstreaming across the programming cycle – are not sufficiently explained, limiting the traceability and robustness of findings;
- (e) The application of intersectionality as an analytical lens is not clarified as either a policy requirement or an evaluator-introduced framing, affecting the interpretation of related findings; and
- (f) The use of the Adaptation Fund as a comparator does not adequately account for the material differences in scale, scope and modality complexity between the two institutions.

8. These limitations constrain the extent to which the evaluation contributes to strengthening the availability of robust and actionable evidence to inform institutional learning and decision-making. The Secretariat would welcome the opportunity to engage further with the evaluation team on these matters.

9. The following section presents the Secretariat's responses to the specific recommendations of the evaluation.

III. Response to specific recommendations

Recommendation	Secretariat Response
<p>STRENGTHEN INSTITUTIONAL COHERENCE AND ACCOUNTABILITY</p> <p>The GCF Secretariat should reinforce institutional coherence, clarify institutional roles and establish a clear institutional accountability model for the operationalization of the Policy and gender mainstreaming. The GCF Secretariat should consolidate the gender coordination architecture by establishing a mechanism spanning the relevant departments and offices, including the Operational Safeguards team, regional desks, Liaison Officers, and the Monitoring, Evaluation and Learning function.</p>	<p>Partially Agree.</p> <p>The Secretariat will introduce a Secretariat-wide governance framework that anchors clear oversight, accountability and institutional leadership for implementation of the Gender Policy and the draft updated Gender Action Plan for the period 2026–2031 (updated GAP). At the institutional level, this will involve establishing a centralized accountability architecture through an intra-Secretariat Steering Committee under the oversight of the Executive Leadership Team.</p>
<p>1</p> <p>a) Staff incentives: Integrating gender-related responsibilities and performance indicators into job descriptions and performance frameworks for staff in pipeline, investment and country programming functions, either as stand-alone gender KPIs [key performance indicators] or as a component of broader inclusion KPIs.</p>	<p>Gender responsibilities are being institutionalized through the draft updated GAP, which defines clear roles, responsibilities and expected contributions across Secretariat functions. Gender competency requirements will also be developed and integrated into relevant staff performance frameworks and decision-making processes to strengthen accountability, including assessment of how staff integrate gender considerations into project design and funding recommendations, and how to promote inclusive team environments and gender-balanced recruitment. The Secretariat will implement institutional competency and capacity development, embedding gender considerations into the GCF competency framework, delivering organization-wide and specialized training, and allocating dedicated administrative resources to sustain internal expertise and external advisory support. Gender integration is being embedded across operational functions through existing institutional frameworks rather than stand-alone incentive systems.</p>

Recommendation	Secretariat Response
<p>b) Operational Manual: Updating and operationalizing the Operations Manual and related SOP to clearly articulate the responsibilities for each across the entire project cycle, from project ideation and origination to monitoring and reporting.</p>	<p>The Secretariat is strengthening operational clarity through updated guidance, procedures, and standard operating procedures (SOPs) that articulate responsibilities across the full project cycle, from design and origination through implementation and reporting. The Operations Manual is retired and replaced with more comprehensive SOPs and operational resources, which will reflect the current institutional structure.</p> <p>As established in the existing operational processes, AEs hold first-line responsibility for implementation; Secretariat functions provide second-line review and oversight. Given ongoing regionalization and broader strategic changes, updates will be undertaken through phased, incremental revisions to guidance and procedures rather than through a single consolidated manual.</p>
<p>c) Regionalization: Ahead of the 2027 establishment of regional offices, defining minimum gender responsibilities and shared accountability standards at and across the distributed regional desk level, including whether dedicated gender focal points will be embedded in regional structures or whether responsibility will be distributed across existing roles:</p> <ul style="list-style-type: none"> • Developing TOR for the regional offices to include clear roles and responsibilities on gender mainstreaming, with allowances for flexibility in approaches and modalities of support for tailoring to different institutional capacities and regional contexts; • Considering establishing a network of regional gender focal points who can provide contextualized support to AEs, NDAs, and delivery partners, and can help 	<p>The Secretariat acknowledges the importance of defining gender responsibilities in the context of the planned regional offices. Specific modalities remain under active consideration – including the balance between centralized and distributed gender functions, embedding of expertise, shared accountability standards and potential resource implications – as regional structures are developed. The updated GAP provides a clear institutional framework for the Secretariat, and regional arrangements will be aligned with the Gender Policy and the updated GAP while allowing flexibility to reflect institutional capacities and regional contexts.</p>

Recommendation		Secretariat Response
	ensure consistent implementation of the Policy.	
	d) Consistency in use of terminology: Aligning IF and other relevant policies and frameworks terminology with the updated Gender Policy by replacing all references to gender-sensitivity (e.g. “gender-sensitive development impact” of the IF) with “gender-responsive” language consistent with the 2019 Policy for consistent guidance for AEs in preparing proposals and for reviewers in assessing them.	<p>The Secretariat agrees on the importance of consistent use of terminology aligned with the updated Gender Policy, including gender-responsive language where relevant. Since the Policy's adoption, gender-responsive language has been applied progressively across institutional updates and operational processes. Terminology alignment will continue to be incorporated into guidance for AEs and into internal review processes going forward.</p> <p>The Secretariat notes, however, that it is not in a position to commit to retroactively revising Board-approved policies and frameworks – such as the Investment Framework – to align terminology. Instead, it will implement alignment through the updated GAP and updates to institutional policy documents and guidance, including the draft Harmonized Results Management Framework (HRMF), reporting templates and guidance, and subsequent policy updates. The draft HRMF is to be presented to the Board for consideration at B.46 to replace the Integrated Results Management Framework (IRMF).</p>
2	<p>BOARD ACCOUNTABILITY FOR EFFECTIVE IMPLEMENTATION OF THE INSTITUTIONAL GAP</p> <p>The GCF Board should reinstate its accountability for implementation of the future institutional GAP and require the Secretariat to report periodically through a dedicated reporting mechanism. The Secretariat should establish a financial visibility mechanism necessary to track gender-related expenditure at the institutional level.</p>	<p>Partially Agree.</p> <p>The recommendation addresses both Secretariat and Board responsibilities. 2a and 2d are for consideration of the Board.</p>
	a) Board oversight mechanism: Reinforcing the oversight of institutional GAP implementation to a Board committee or working group, aligned with implementation of the GAP. Mandating a Board	<p>This recommendation is for consideration of the Board, as Board-level oversight mechanisms fall within the Board's mandate and are not for Secretariat decision. The Secretariat will, however, support informed Board consideration of GAP implementation through its mandated periodic reporting channels. The updated GAP includes structured indicators and monitoring arrangements designed to enable systematic reporting to the</p>

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<p>committee to periodically review and inform the Board on implementation of the institutional GAP.</p>	<p>Board. Any formal committee-based oversight arrangement would depend on a Board decision.</p>
<p>b) Budget tracking: Requesting the development of a dedicated gender budget tracking system that disaggregates gender-dedicated expenditures across administrative and programmatic budgets; furthermore, commissioning a scoping exercise to define what constitutes gender dedicated expenditure and identify a methodology for tracking it.</p>	<p>The Secretariat acknowledges the importance of improving the visibility and tracking of gender-related expenditures.</p> <p>At the institutional level, the updated GAP includes actions to identify and cost the human, financial, and material resources required for its implementation, to be reflected in multi-year and annual work programming and budgets. It will introduce gender budget tagging to monitor resource allocation against the five priorities of the updated GAP. Budget utilization will be reported annually to the Board as part of the Report on the Activities of the Secretariat.</p> <p>At the project level, current measures include requirement for project-level gender action plans to include dedicated budget provisions within funding proposals. Under the updated GAP, the Secretariat will enhance budget tracking and transparency, including clearer categorization of gender-related costs and improved monitoring and reporting of expenditure. These improvements will be pursued through existing financial and reporting systems rather than a separate parallel mechanism.</p>
<p>c) Future institutional GAP: Ensuring the institutional GAP is systematically updated with clear, measurable, and monitorable indicators, including both institutional process indicators (e.g. procedures, staffing, guidance, accountability mechanisms) and outcome-oriented indicators linked to gender-responsive climate results. Aligning these indicators with the HRMF/IRMF and the emerging work on gender co-benefits, supported by a dedicated institutional tracking system with defined responsibilities across teams and units.</p>	<p>The updated GAP introduces clear, measurable, and monitorable indicators covering both institutional process dimensions and outcome-level results.</p> <p>The results measurement on gender is aligned with the ongoing work on the draft HRMF to be presented to the Board for consideration at B.46. It is important to note that, in the draft HRMF, the Secretariat proposes to move away from focus on co-benefits and project-specific indicators to mainstreaming measurement of gender-relevant outcomes and outputs through standardized indicators. This includes introduction of a dedicated gender indicator, besides mandatory gender disaggregation on people-count indicators. As part of the HRMF, such indicators will be monitored through existing data and reporting systems.</p>

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	d) Strategic consideration: Embedding gender more explicitly as an institutional objective in USP-3, ensuring alignment with the future institutional GAP and reinforcing gender as a cross-cutting priority across programming, operations, and institutional performance.	This recommendation is for consideration of the Board. The third updated Strategic Plan (USP-3) is currently under development, with initial Board discussions on potential priorities planned for the sidelines of B.45. The updated GAP clarifies its relationship to the USP-3 process, affirming the primacy of Board direction. Gender is being positioned as a cross-cutting institutional priority across programming, operations, and performance frameworks through both the updated GAP and the forthcoming HRMF.
3	<p>CAPACITY-BUILDING FOR A SHARED GENDER RESPONSIBILITY</p> <p>To ensure that gender integration further becomes a shared responsibility across GCF and its ecosystem of funded activities, the Secretariat should strengthen system-wide capacity-building and guidance to support the implementation of the updated Policy. Capacity-building should include all relevant stakeholders.</p>	<p>Agree.</p> <p>The Secretariat broadly supports the objective of shared gender responsibility and is already taking steps to strengthen system-wide capacity. Implementation of specific measures will be subject to available resources and sequenced accordingly.</p>
	<p>a) Capacity baseline: Commissioning an organizational gender capacity assessment to map where gender expertise sits across the Secretariat, identify gaps and provide the evidence base for a staffing and training strategy aligned with the future GAP.</p>	<p>The updated GAP includes actions to strengthen internal and partner gender capacity. Capacity development needs assessments will be undertaken to map existing expertise and identify gaps, providing the evidence base for targeted interventions and a staffing and training strategy aligned with the updated GAP.</p> <p>In addition, the Secretariat will embed gender considerations into the GCF competency and job family framework, delivering organization-wide and specialized training and allocating dedicated administrative resources to sustain internal expertise.</p> <p>Learning on gender equality and climate action will be provided to all staff along with mechanisms to monitor uptake, progress and consistent application of gender-responsive practices across the organization. The Secretariat will also establish a gender advisory group of external experts to complement its internal technical capacity and will strengthen peer learning networks and the GCF Women Group.</p>

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<p>b) Leadership engagement: Introducing mandatory orientation on the updated Gender Policy for senior management and Regional Directors, either as a stand-alone onboarding requirement or integrated into the next scheduled all-staff training cycle.</p>	<p>The Secretariat recognizes the importance of leadership engagement in advancing institutional ownership of the Gender Policy.</p> <p>While the introduction of a dedicated mandatory orientation for senior management is a constructive suggestion, it is not considered feasible at this stage given current operational priorities and capacity constraints. Instead, leadership engagement will be ensured through implementation of the updated GAP, which includes mandatory gender-related training integrated into the broader institutional training framework. This approach supports consistent, institution-wide capacity-building while ensuring alignment with existing training cycles and resource availability.</p>
<p>c) Gender champions: Further leveraging gender champions across divisions and regions of the GCF Secretariat who receive more advanced training and serve as gender focal points providing first-line support.</p>	<p>The Secretariat is strengthening distributed gender capacity and first-line support through existing gender functions and enhanced guidance to operational teams and implementing partners, and the idea of gender champions will be explored with a positive intent. The updated GAP defines clear roles and responsibilities across units, supporting more consistent application of gender requirements. External capacity support is also extended through Readiness and engagement with NDAs, AEs, and delivery partners.</p>
<p>d) Guidelines and toolkit: Updating the 2017 Mainstreaming Gender Guidelines and Toolkit to reflect the 2019 Gender Policy and future GAP; and thereafter, widely disseminating guidance and toolkit to GCF Secretariat staff, AEs, NDAs and all other identified stakeholders in the Policy.</p>	<p>The Secretariat will review and update its gender mainstreaming guidelines and toolkit to reflect the updated Gender Policy and updated GAP 2026–2031. The updated toolkit will be widely disseminated to Secretariat staff, NDAs, AEs, delivery partners, and other relevant stakeholders, accompanied by targeted training on its operationalization.</p>

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<p>e) Readiness: Ensuring that Readiness support is leveraged strategically, to continue building gender capacity, including through clear guidance for NDAs on how to integrate gender into national coordination mechanisms, NAP development, and country programming and platforms.</p>	<p>The Secretariat already leverages Readiness as a primary mechanism for advancing gender capacity at the country level, including through support for gender-responsive nationally determined contributions (NDCs), national adaptation plans (NAPs), sectoral plans, policies and strategies and strengthening the institutional capacity of NDAs and direct access entities (DAEs) to design, implement and monitor gender-responsive climate action. This provides systematic, context-specific support, rather than ad hoc interventions.</p> <p>The Secretariat is examining how Readiness can be further mobilized strategically to advance gender outcomes as part of the updated Readiness strategy development, including the launch of an Engagement-to-Access Pathway aiming to deliver targeted outreach, strengthen the broader partner ecosystem, and improve access for women's and women-led organizations.</p>
<p>f) Enhance intersectionality: Developing clear guidance on intersectionality across design, implementation, monitoring and reporting; and integrating minimum expectations on how projects address the needs of different vulnerable groups across project design, implementation, safeguards, monitoring and reporting.</p>	<p>The Secretariat notes that the Gender Policy does not include a specific definition of intersectionality and has not set out explicit requirements in this area; guidance to AEs and countries has accordingly not specifically addressed this concept.</p> <p>The updated GAP strengthens attention to vulnerable groups consistent with the Gender Policy's commitment to recognizing the differentiated impacts of climate change and, drawing on the IEU evaluation of the GCF approach to Indigenous Peoples, includes a specific indicator on the meaningful engagement of Indigenous women.</p> <p>Subject to Board approval, the forthcoming HRMF also offers a further opportunity to consider how intersectionality can be reflected and tracked across the portfolio. This approach is premised on acknowledging women and girls as agents of change, even within diverse and often compounded vulnerabilities and fragile contexts and communities, and the Secretariat expects to strengthen reporting on outcomes and impacts relevant to gender in an intersectional manner.</p>

Recommendation	Secretariat Response
<p>EFFECTIVE COMPLIANCE: FROM COMPLIANCE TOOLS TO IMPLEMENTATION AND LEARNING</p> <p>The Secretariat should fundamentally redesign the function and use of ge GAs, Gender Action plans, and portfolio-level M&E to shift from compliance documentation to active implementation guidance and evidence-based learning. It is important for the Secretariat that these requirements function not only as entry-point compliance tools for FP approval, but also become active instruments for guiding implementation, monitoring, reporting and course correction throughout the project cycle.</p>	<p>Partially Agree.</p> <p>The Secretariat broadly supports strengthening the effectiveness of gender assessments (GAs) and GAPs as instruments for implementation and learning. However, the introduction of mandatory new project-level requirements – including mandatory mid-term GAP updates with Secretariat clearance – would impose significant additional burdens on AEs and is not supported.</p>
<p>4</p> <p>a) Project-level GAs and Gender Action Plans: Reinforcing GA and Gender Action Plan integration with core project elements. GAs must inform the project's theory of change and risk management approach; Gender Action Plan indicators must be reflected in core project KPIs, not maintained as a siloed parallel tracking system.</p> <ul style="list-style-type: none"> • Conducting project-level Gender Action Plan updates at the mid-term review stage of the project, with updated GAPs to be reviewed and cleared by Secretariat gender staff. • Developing differentiated GA and Gender Action Plan guidance for programmatic models, multi-country projects, and private-sector intermediary financing, 	<p>Gender assessments and GAPs are mandatory components of all funding proposals, including associated human and financial resources. The Secretariat recognizes that quality and implementation vary across projects depending on AE capacity and context. Early-stage engagement with AEs is used to ensure GAPs are embedded in project design and implementation rather than treated as stand-alone deliverables, and targeted guidance is being provided to strengthen gender indicators and their alignment with project theories of change and results frameworks. The gender toolkit is being updated to address this systematically.</p> <p>The Secretariat does not support the introduction of mandatory mid-term GAP updates with Secretariat clearance, as this would impose additional budgetary and capacity burdens on AEs across large and diverse portfolios where such requirements may not be feasible. The updated GAP provides an enhanced framework for gender integration across the project lifecycle, and current efforts focus on improving the effectiveness of existing mechanisms through established supervision and reporting processes. Implementation accountability rests primarily with AEs; the Secretariat performs second-level oversight and compliance assurance. For programmatic, multi-country, and private-sector modalities, gender integration is addressed through programmatic-level assessments</p>

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<p>where design-stage specificity is structurally limited.</p> <ul style="list-style-type: none"> • Clearer guidance to AEs on budgeting for gender at the design stage, alongside systematic tracking of gender-related expenditures. 	<p>with GAP principles applied progressively across downstream design and implementation stages.</p> <p>The Secretariat will promote transparency in project-level gender budgeting by updating budget templates to clarify how GAPs are to be resourced, enabling AEs to incorporate relevant costs within existing project budget structures. Actions to strengthen budget tracking and reporting are included in the updated GAP. The actions in the updated GAP will be prospective in application and will not affect existing funded activity agreements unless changes are agreed with relevant AEs and reflected in appropriate contractual amendments.</p>
<p>b) Project Preparation Facility: Continuing to use PPF to improve the quality, depth and operationalizability of Gender Action Plans for DAEs, private-sector proponents, and mitigation-focused projects where gender gaps are most pronounced.</p>	<p>The Secretariat agrees that the Project Preparation Facility (PPF) has an important role in strengthening the quality of project preparation, including supporting the development of robust gender analyses and GAPs as part of high-quality funding proposal packages. Through upstream project preparation support, the PPF contributes to strengthening project design and promoting more context-specific and operationally relevant GAPs that are responsive to the needs, risks and opportunities identified during project development.</p> <p>The Secretariat notes that expectations regarding the quality and content of GAPs are guided by the GCF Gender Policy and its associated guidance, which apply consistently across all AEs and project-specific assessment approach applicants. In this context, the PPF does not establish differentiated gender requirements for particular categories of applicants or projects, but rather supports entities in meeting existing policy expectations through fit-for-purpose studies, assessments and technical inputs during project preparation.</p> <p>The Secretariat further notes that the PPF operates upstream in the GCF programming cycle. While it can strengthen the quality of gender integration at entry by informing project design and improving the readiness of funding proposal packages submitted for consideration, the implementation and operationalization of GAP commitments ultimately depend on accredited entities and their capacity and systems during project implementation.</p>

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	<p>c) Portfolio oversight: Considering the introduction of a Gender Quality Score (modelled on the Adaptation Fund's Gender Scorecard) as a portfolio-level diagnostic tool, enabling assessment of GA and Gender Action Plan quality beyond binary compliance, applied at both project approval and mid-term review stages.</p>	<p>The Secretariat recognizes the importance of moving beyond binary compliance to quality and results assessment. Current work focuses on strengthening monitoring and reporting systems – including the HRMF (in development) and the updated annual performance report (APR) – to capture outcome-level gender results and improve portfolio-level aggregation. The updated GAP includes measures to track gaps between design and implementation and to strengthen evidence-based adaptive management. Rather than introducing a stand-alone scoring mechanism, quality and performance assessment is being embedded within existing institutional monitoring frameworks.</p>
5	<p>STRUCTURAL PATHWAYS FOR MEANINGFUL ACCESS AND IMPLEMENTATION</p> <p>The GCF Secretariat should consider strengthening and leveraging the role of gender-focused and local actors through a partnership model that aims to deepen inclusivity, integration of gender-responsive practice and broader transformative outcomes at country level.</p>	<p>Partially Agree.</p> <p>The Secretariat broadly supports strengthening the role of gender-focused actors in implementation, while noting that certain structural elements of this recommendation will require careful consideration within existing governance and partnership arrangements.</p>
	<p>a) A partnership model for engagement and access: Developing a partnership and access model that should apply across all partnerships, defining how different actors are identified, engaged, supported and leveraged. Such a model should establish pathways for women's organizations, government bodies, and civil society organizations (CSOs) as strategic partners. Readiness support for these partners to support access should be deployed.</p>	<p>The Secretariat already supports national and local stakeholders through Readiness, including in country programming processes, the development of NDCs, NAPs, and sectoral plans, and the strengthening of coordination mechanisms between NDAs and national gender and climate change focal points. Readiness supports country-driven approaches to gender-responsive climate finance and helps address structural barriers to access. The Secretariat is also examining how Readiness can be further leveraged to advance partnership models for engagement and access as part of the Readiness 3 strategy, including the launch of an Engagement-to-Access Pathway aiming to deliver targeted outreach, strengthen the broader partner ecosystem, and improve access for women's and women-led organizations.</p>

Recommendation	Secretariat Response
<p>b) Capacity location: Making in-house gender capacity-building, not external consultant engagement, the explicit goal of AE capacity development programmes, with multi-year, sustained support for DAEs to develop institutional gender expertise rather than project-by-project consulting arrangements.</p>	<p>The Secretariat prioritizes institutional gender capacity development through multi-year Readiness support under the country and DAE windows. Readiness interventions are designed to strengthen institutional systems, policies, and technical expertise within partner institutions – including NDAs and DAEs – with the objective of embedding gender mainstreaming as a core institutional function and building long-term capacity for gender-responsive climate action. The updated GAP includes actions to develop the capacities of AEs, NDAs and delivery partners through tailored support, peer-to-peer learning platforms, and systematic knowledge communication. Inclusion of targeted outreach and engagement of women's and women-led organizations in the scope of Readiness 3 will also be pursued.</p>
<p>c) Gender-focused standard setting: Setting minimum thresholds for gender-focused institutional involvement in country programming processes, going beyond consultation to include co-design roles in identifying national gender priorities and shaping the pipeline.</p>	<p>The Secretariat already requires gender integration in country programming processes and funding proposals. Through Readiness and programming, gender considerations are incorporated into national planning frameworks – including NDCs, NAPs and long-term strategies – and into coordination mechanisms that enable gender-focused institutions and relevant stakeholders to contribute to climate priorities and pipeline development. The updated GAP strengthens expectations for gender integration across programming processes.</p>
<p>d) Civil society participation: Establishing clearer modalities for engaging CSOs in third party monitoring, including through Readiness support where appropriate; clarifying the roles of NDAs and regional desks in facilitating these engagements.</p>	<p>The Secretariat supports stakeholder engagement through existing processes, including consultation and gender assessment requirements in funding proposals. At the project level, participatory monitoring, which could include civil society organizations, is articulated in the Monitoring and Accountability Framework (2025) and can be applied where appropriate within project implementation structures. The roles of NDAs and implementing partners are being clarified through the ongoing update of the Country Ownership Guidelines, which define responsibilities for all stakeholders, including NDAs, the Secretariat (including within Regional teams), AEs, and Readiness delivery partners.</p>
<p>e) Private-sector participation: Clarify the application of the updated Gender Policy in private sector projects, including investments financed through co-financing mobilized from development</p>	<p>The Gender Policy applies to all GCF-funded activities, including private-sector operations, and private-sector AEs are subject to the same accreditation standards and due diligence requirements as public-sector entities, including the requirement for gender assessments and GAPs in all funding proposals. The Secretariat's position is that the Gender Policy principles are clear and consistently applied across investment modalities, and that there</p>

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	finance institutions, where the policy boundary is currently ambiguous.	is no inherent ambiguity in their application to private-sector projects. The updated GAP includes actions to strengthen implementation guidance across different project types, and relevant tools and guidance will be updated to support consistent application.
6	<p>STRENGTHEN MONITORING, EVALUATION AND LEARNING FOR GENDER-RESPONSIVE RESULTS</p> <p>The GCF should strengthen its monitoring, reporting and learning systems so that gender-responsive results are effectively tracked and aggregated and also used to inform decision-making and adaptive programming. The revision of the institutional GAP presents a critical opportunity for addressing long-standing gaps in results definition, indicator quality and institutional ownership of gender outcomes.</p>	<p>Agree.</p> <p>The Secretariat broadly supports strengthening monitoring, evaluation and learning for gender-responsive results, and a number of related measures are underway. Progress in some areas will be sequenced with broader institutional reform processes, including the HRMF revision and GAP implementation.</p>
	<p>a) Co-benefits categorization: (1) Standardizing gender-results reporting through harmonized gender co-benefit categories, associated indicators, and clearer reporting guidance linked to APRs and the IRMF architecture, and (2) strengthening quality assurance through periodic spot checks, targeted validation exercises, and clearer expectations for evidence of reported results. The ongoing APR revision offers a timely entry point to integrate these improvements.</p>	<p>The Secretariat aims to strengthen reporting of gender results through the draft HRMF, including the development of harmonized outcome indicators and improved portfolio-level aggregation. Subject to Board approval, the HRMF proposes to mainstream gender-relevant reporting into the main indicator architecture, moving away from a co-benefits approach, with outcome and output indicators disaggregated by sex as a standard requirement. Once approved, associated guidance will be introduced and funding proposal and APR templates revised accordingly. The ongoing APR revision provides a timely entry point for these improvements. Data validation processes are being strengthened, and spot checks will be implemented in accordance with the provisions of the Monitoring and Accountability Framework.</p>
	<p>b) Cross-institutional learning: Leveraging the expertise of UNFCCC gender focal points and other climate finance institutions to strengthen cross-institutional learning and the transfer of effective gender-responsive practice.</p>	<p>Through the updated GAP, the Secretariat will strengthen its learning and knowledge functions, including through engagement with United Nations Framework Convention on Climate Change (UNFCCC) gender focal points and other multilateral climate funds. This collaboration enhances cross-institutional learning and promotes the transfer of effective gender-responsive practices. The updated GAP reinforces monitoring and learning by drawing on existing reporting products, including APRs, Annual Portfolio Performance</p>

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	<p>Reports, and project completion reports. The Secretariat will also ensure coherence and complementarity with broader multilateral climate fund initiatives and relevant GCF partnerships in this area.</p>
<p>c) Belém GAP anchor: Anchoring GCF updated knowledge architecture explicitly to the BGAP (2026–2034) priority areas, positioning GCF as a knowledge contributor within the UNFCCC gender architecture and providing external accountability for commitments that would otherwise remain internal, all based on a clear articulation of the GCF positioning and comparative advantage.</p>	<p>GCF will align, where appropriate, with the Belém Gender Action Plan (2026–2034) and contribute to its implementation within its own mandate. It will continue to engage in areas of capacity development, knowledge management, communication, monitoring and reporting – areas of ongoing collaboration with other multilateral climate funds in the context of the continuous complementarity and coherence mechanism.</p>
<p>d) Complementarities across climate funds: Harmonizing gender indicators among climate funds for a more intensified engagement with the other climate funds, to remain actively engaged in efforts to harmonize gender responsive indicators and monitoring approaches across climate funds, while ensuring that its own systems remain interoperable and aligned with broader climate finance standards. The scope and pace of this reform may be sequenced with the planned IRMF and Harmonized Results Monitoring Framework revision cycle.</p>	<p>The Secretariat is aligning gender results measurement through the forthcoming HRMF architecture, including the development of harmonized indicators. In preparing the draft HRMF, the GCF engaged closely with other multilateral climate funds to ensure alignment of relevant indicators and methodologies. The HRMF aims to mainstream gender-relevant reporting by mandating disaggregation of outcome and output results by sex among other identifiers, enabling the measurement of results at the intersection of gender and other areas of intervention. Full harmonization with all multilateral climate funds may not be achievable in all respects given differences in institutional mandates. Monitoring reforms will be sequenced with the framework revision cycle.</p>