

Action Plan for Addressing Sexual Exploitation, Sexual Abuse, and Sexual Harassment

“SEAH Action Plan”

March 2022

I. Introduction

1. The Action Plan for Addressing Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH) (hereinafter “SEAH Action Plan”) operationalizes the SEAH provisions in the Revised Environmental and Social Policy (hereinafter “revised ESP” or “the policy”).¹ The revised ESP was adopted by the Board on 13 September 2021 pursuant to decision B.BM-2021/18 to reaffirm the Fund’s commitment to addressing SEAH. As part of GCF’s roles and responsibilities to meet the objective of the policy, the SEAH Action Plan aims to stipulate how the requirements of the policy with regard to SEAH will be implemented by the Secretariat for all GCF-financed activities.

2. The purpose of the SEAH Action Plan is to provide a framework to ensure SEAH provisions of the revised ESP are operationalized across the GCF. The implementation of the SEAH Action Plan by the GCF will ensure that:

- (a) The SEAH provisions of the policy are applied to all GCF-financed activities;² and
- (b) The requirements related to SEAH in the policy are applied to both public and private sector entities and to the development of activities and their implementation once approved.

3. Five areas of priority are identified by the Secretariat to operationalize the SEAH provisions in the revised ESP with accompanying details on the implementation actions required for each priority area.

4. The SEAH Action Plan will be implemented as part of the GCF programming-cycle to strengthen integrity and accountability. The implementation of the SEAH Action Plan will consist of a set of activities, as outlined in the Annex.

5. The SEAH Action Plan may be updated periodically if needed by the GCF Secretariat, to ensure that it remains relevant within the GCF-policy landscape, and to ensure that good practice and lessons learned can be incorporated into the way that the objectives are addressed. Any updates to the SEAH Action Plan will be in line with the SEAH provisions adopted by the Board in the revised ESP.

¹ Revised Environmental and Social Policy (decision B.BM-2021/18),

<https://www.greenclimate.fund/sites/default/files/document/revised-environmental-and-social-policy.pdf>

² GCF operates through a network of AEs and delivery partners who work directly with developing countries for project design and implementation, https://www.greenclimate.fund/sites/default/files/document/financing-climate-action_0.pdf

II. Objectives

6. The objectives of the SEAH Action Plan are to:
- (a) Ensure the GCF, in carrying out its mandate of promoting a paradigm shift towards low-emission and climate-resilient development pathways in the context of sustainable development, will effectively and equitably manage SEAH risks as part of the environmental and social risks and impacts, and improve outcomes of all GCF-financed activities;
 - (b) Ensure SEAH provisions of the revised ESP, as part of the overarching policy applied by the GCF, are coherent and linked with the relevant policies and practices of GCF in order to avoid, and where avoidance is impossible, mitigate the risks of SEAH to people impacted by GCF-financed activities, including compensating harm as appropriate;
 - (c) Elaborate, in line with the requirements of the revised ESP, how GCF integrates SEAH issues into its processes and activities where the policy applies; and with respect to projects and programmes submitted for consideration by the Board on or after the thirty-second meeting of the Board;
 - (d) Support the development of an environmental and social management system (ESMS) that incorporates a systematic gender-sensitive and intersectional approach to integrating environmental and social performance and risk management on SEAH into the operations of GCF and those of the AEs and other development institutions with which GCF is associated;³
 - (e) Increase institutional capacity within the GCF to ensure relevant corporate processes are put into place to address SEAH risks in GCF-financed activities; and
 - (f) Provide guidance to AEs to assist them to undertake their responsibilities under the revised ESP.

III. Definitions

7. The following terms are defined in the revised ESP and relevant policies and guidance of the GCF. The definitions are repeated below for ease of reference and for clarity:
- (a) “**Accredited entity (AE)**” means an entity that is accredited by the Board in accordance with the Governing Instrument and relevant Board Decisions. The role of an accredited entity relates to the management and oversight of project implementation, which includes the origination and preparation of a funding proposal, the subsequent management of the necessary stages of the implementation process until its conclusion (project management) on behalf of the provider of funds, and reporting obligations. An accredited entity may also be the executing entity, responsible for the operational implementation and execution of the project;
 - (b) “**Activities**” refers to programmes, projects and subprojects;
 - (c) “**Delivery partners (DPs)**” are institutions selected by the National Designated Authorities or Focal Point to implement activities approved under the Readiness and Preparatory Support Programme. Delivery partners may be AEs or other institutions who meet the financial management capacities requirements of the Fund. Delivery partners who are not accredited entities must undertake a Financial Management

³ Paragraph 4(c) of the revised ESP. GCF operates through a network of AEs and delivery partners who work directly with developing countries for project design and implementation.

Capacity Assessment to be approved to implement readiness support in developing countries;⁴

- (d) **“Due diligence”**, in the context of environmental and social management system, means the process of investigating potential investments to confirm all facts, such as reviewing environmental and social safeguards, audits, assessments, and compliance before consideration of funding or entering into an agreement with another;
- (e) **“Environmental and social impact assessment (ESIA)”** refers to a process or tool based on an integrated assessment where the scale and type of potential biophysical and social, including, where appropriate transboundary risks and impacts of projects, programs and/or policy initiatives, are predicted, acknowledged and evaluated. It also involves evaluating alternatives and designing appropriate mitigation, management and monitoring measures to manage the predicted potential impacts;
- (f) **“Environmental and social management system (ESMS)”** refers to a set of management processes and procedures that allow an organization to identify, analyse, control and reduce the environmental and social impacts of its activities including transboundary risks and impacts, in a consistent way and to improve performance in this regard over time. For the purposes of this document, “ESMS” refers to the environmental and social management system of GCF. When used in the long form, “environmental and social management system”, it refers to the entities’ management system;
- (g) **“Environmental and social management plan (ESMP)”** refers to a document that contains a list and description of measures that have been identified for avoiding adverse environmental and social impacts, including, where appropriate transboundary risks and impacts, or minimising them to acceptable levels, or to mitigate and compensate them and usually the main output of the ESIA process;
- (h) **“Environmental and social safeguards (ESS)”** refers to a set of standards that specifies the desired outcomes and the specific requirements to achieve these outcomes through means that are appropriate to the nature and scale of the activity and commensurate with the level of environmental and social risks and/or impacts. For the purposes of this policy, “ESS standards” refer to the environmental and social safeguards standards, which is currently the interim ESS standards adopted by GCF until GCF develops its own standards. When used in the long form, “environmental and social safeguards standards”, it refers to the Accredited Entities’ own standards;
- (i) **“Executing entity”** means any entity, which includes, as the case may be, a developing country that is a party to the Convention, through which GCF proceeds are channelled or used for the purposes of a funded activity or part thereof, and/or any entity that executes, carries out or implements a funded activity, or any part thereof;
- (j) **“GCF-financed activities”** means any Activities financed with GCF proceeds;
- (k) **“SEAH”** means Sexual Exploitation, Sexual Abuse and Sexual Harassment;
- (l) **“Sexual Abuse”** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
- (m) **“Sexual Exploitation”** 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
- (n) **“Sexual Harassment”** includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature, that interferes with work, is

⁴ Readiness and Preparatory Support Programme Guidebook, (March 2020), GCF, <https://www.greenclimate.fund/document/readiness-and-preparatory-support-guidebook>

made a condition of employment, or creates an intimidating, hostile, or offensive environment in connection with a GCF-financed activity.

IV. Priority areas of action

4.1 Priority area 1: Governance and responsibilities

8. At the strategic and institutional level, as the revised ESP responds to the mandate expressed in the Governing Instrument and links to other operational strategies and policies including internal structures and governance frameworks of GCF, a culture of “zero tolerance” for all forms of SEAH in GCF-financed activities must be actively promoted throughout the GCF. In this regard, the Secretariat plans to:⁵

- (a) Increase awareness of SEAH prevention and response with regard to GCF-financed activities, and in particular on how it can be effectively addressed in a survivor-centred and gender-responsive way;
- (b) Sensitize GCF staff and AEs on their respective roles and responsibilities following the revision of the ESP, for translating the commitment to zero-tolerance of SEAH into the operations and decision-making of GCF, and;
- (c) Ensure SEAH safeguarding is undertaken and promoted, as an important pathway for going beyond “do no harm”, to improve social outcomes and generating co-benefits for the communities affected or potentially affected by GCF-financed activities; and to strengthen the integrity of the GCF-financed activities.

9. The Secretariat plans to create alignment with accreditation and reaccreditation processes. The revised ESP requires AEs establish and maintain robust, systematic, accountable, inclusive, gender-responsive, participatory and transparent systems to manage risks and impacts, including in relation to SEAH, from GCF-financed activities, pursuant to the policy and the Environmental and Social Standards (hereinafter “ESS standards”). These requirements complement the accreditation framework and are considered in the accreditation and reaccreditation processes.⁶

10. At the activity level, pursuant to the Board decision (B.BM-2021/18) and the revised ESP, the Secretariat has commenced undertaking second-level SEAH due diligence for Funding Proposals for Board consideration at B.32 onwards, as part of social safeguards due diligence. This will include all GCF-financed activities, including subprojects⁷ financed from GCF-funded programmes or through financial intermediaries, regardless of the financial instruments used or whether these are solely supported by GCF or co-financed by other institutions.⁸

11. The Secretariat will review the implementation of the SEAH provisions in the revised ESP through project design, approval and monitoring processes, and will require the AEs to ensure that the measures to manage environmental and social (including SEAH) risks and impacts, including, as relevant, information disclosure, stakeholder engagement, and grievance redress, are incorporated in the agreements with executing entities (EEs) including tendering documents and contracts.⁹

⁵ Paragraph 5 (a) and 8 (k) of the revised ESP.

⁶ Paragraph 5 (b) of the revised ESP.

⁷ Subprojects of larger projects/programmes that were considered at B.32 onwards.

⁸ Paragraph (c) of decision text B.BM-2021/18 and Paragraph 5(c) of the revised ESP.

⁹ Paragraph 15 of the revised ESP.

4.2 Priority area 2: Capacity development and tools

12. To facilitate an understanding of the SEAH provisions in the revised ESP and enhance competencies and capacity of relevant entities, GCF will undertake a capacity assessment of GCF and AEs. This is in relation to the level of understanding of SEAH risk and risk-management in GCF-financed activities. The assessment would inform the development of capacity building and training activities by the Secretariat.

13. The GCF will develop a SEAH Risk Assessment Tool (hereinafter “the Tool”) to be used by the Secretariat in the assessment of SEAH risk in all GCF-financed activities to which the policy applies. Training on the Tool in relation to GCF-financed activities will be provided for GCF staff.¹⁰ The Tool will also be made available to AEs to assist in their own assessment of SEAH risks.

14. The GCF will provide guidance to AEs on how they may use the Tool to undertake the necessary SEAH risk assessments. GCF will also provide direct access entities, upon request, resources (such as funding for third party advice) through the Readiness and Preparatory Support Programme to assist them in conducting their SEAH risks assessments.¹¹

15. Due diligence will still be undertaken prior to the Tool being finalized. However once published the Tool can assist in improving and structuring the approach to SEAH due diligence.

16. The Secretariat will periodically improve the Tool to incorporate good practice and lessons learned, and as GCF develops its own ESS standards.

17. GCF will use outreach events, capacity building events, online resources and other activities to raise awareness of, and disseminate good practice on, SEAH safeguarding and the use of the Tool.

4.3 Priority area 3: Resource allocation, accessibility and budgeting

18. At the Secretariat, appropriate human, financial and material resources will be allocated initially through the Board-agreed budget for SEAH, and thereafter through the administrative budget to carry out due diligence, knowledge management, monitoring, evaluation, learning, capacity development, and implementation support.

19. GCF will require AEs to submit funding proposals that have gone through first-level SEAH due diligence as part of the social safeguards due diligence, per the SEAH provisions in the revised ESP. Direct access AEs can elicit the support of the Readiness and Preparatory Support Programme to aid them with conducting the risk assessments.¹²

4.4 Priority area 4: Operational procedures

20. The GCF, when reviewing and approving proposals, will require the AEs to undertake all necessary measures to ensure that activities financed by the GCF are developed and implemented in a manner that aligns with the SEAH provisions of the revised ESP (or similar requirements employed by the AEs that are equivalent to those of the GCF in all material respects).¹³

¹⁰ Paragraph 11 (h) of the revised ESP.

¹¹ Paragraph 11 (i) of the revised ESP.

¹² Paragraph 40 and 11 (i) of the revised ESP.

¹³ Paragraph 19 of the revised ESP.

4.4.1. Accredited Entities requirements

21. In the case of activities proposed for GCF financing, GCF will require the AEs to:¹⁴
- (a) Identify any SEAH risks or potential adverse impacts on women, men, girls and boys as early as possible as part of GCF-financed activities screening and reflect such risks or impacts in relevant safeguards instruments (including ESIA and ESMP as appropriate), and differentiated by gender and age where relevant, including SEAH (or the similar terms employed by the AEs that are equivalent to those of the GCF in all material respects); and
 - (i) Include measures (including pre-project implementation awareness raising for host communities and project workforces) to enhance gender equality, and to prevent, address and eliminate SEAH in the relevant projects or programmes and safeguards instruments;
 - (ii) Implement, monitor and continuously improve all measures to mitigate and manage the identified SEAH risks and impacts;
 - (iii) Monitor and report progress and performance on SEAH to GCF and stakeholders throughout implementation of the GCF-financed activities.
 - (b) In case incidences of SEAH occur, GCF will require the AEs put into place:
 - (i) Established and operate accessible and inclusive survivor-centred and gender-responsive grievance redress mechanisms (GRMs) (namely project-level mechanisms and their own institutional level GRMs), with specific procedures for SEAH including confidential reporting with safe and ethical documenting of such cases, that indicate when and where to report incidents, and what follow-up actions will be undertaken; and
 - (ii) Modalities to provide timely services and redress to survivors, including as appropriate, medical care, psychosocial support, legal support, community driven protection measures, and reintegration.

4.4.2. Screening and risk categories

- (a) As general requirements for environmental and social risk management, in screening activities, GCF will require that SEAH risks and impacts are considered, including direct and indirect, induced, long-term and cumulative impacts, potential environment and social risks to the activities, and will take into account the activities' areas of influence including associated facilities and third-party impacts.¹⁵
- (b) The risk category, aligned with the fit-for-purpose approach, will be proportional to the nature, scale, and location of the activity, its environment and social risks and impacts, including in relation to SEAH, and the vulnerability of the receiving environments and communities.¹⁶

4.4.3. First- and second-level due diligence

- (a) GCF will require AEs to undertake environmental and social due diligence, including SEAH due diligence, on all the activities proposed for GCF financing. This first-level environmental and social due diligence conducted by the AEs is to ensure that the activities proposed for GCF financing comply with their

¹⁴ Ibid.

¹⁵ Paragraph 27 of the revised ESP.

¹⁶ Paragraph 31 of the revised ESP.

environmental and social safeguards standards (including SEAH) pursuant to the ESS standards and the revised ESP of GCF.¹⁷

- (b) An emphasis should be placed on SEAH due diligence, as part of social due diligence, for funding proposals going for Board consideration at or after B.32.¹⁸
- (c) GCF will require AEs to undertake assessments of environmental and social, including transboundary and SEAH risks and impacts to ensure that the activities proposed for GCF financing meet the ESS standards and the revised ESP, and contain measures to manage and mitigate the identified risks and impacts.¹⁹ GCF will also require AEs to ensure that stakeholder engagement is gender-sensitive, inclusive, and participatory.²⁰
- (d) GCF will require and ensure that the AEs' ESMP be designed with appropriate measures to address adverse environmental and social risks and impacts including SEAH, as well as opportunities to pursue and enhance positive environmental and social outcomes.²¹
- (e) As part of second-level due diligence, GCF will ensure SEAH risks and impacts are adequately screened, assessed, and planned to be mitigated and managed by the AEs. The due diligence of GCF will verify the adequacy and consistency of the assessments and proposed management measures by the AEs with the ESS standards and the revised ESP and recommend to the Board for GCF financing only those proposed activities that meets the requirements for managing environmental and social risks and impacts (including SEAH), pursuant to the ESS standards and the revised ESP.²²
- (f) The Secretariat will perform its second-level SEAH due diligence for Funding Proposals presented at or after B.32. This includes screening activities by the Secretariat (in relation to allocating risk categories).²³
- (g) The Secretariat will carry out monitoring, review and reporting in relation to the environmental and social performance (including SEAH) of GCF-financed activities, as may be required pursuant to the monitoring and accountability framework, ESS standards, and the revised ESP.

4.4.4. Grievance redress mechanisms

- (a) GCF requires AEs to ensure that the institutional level and project/activity-specific GRMs be established and operated by the AEs and/or EEs, and that the GRMs effectively address complaints of SEAH in a survivor-centred and gender-responsive manner in addition to other environmental and social impacts of the GCF-financed activities.²⁴
- (b) Furthermore, GCF requires such GRMs established by the AEs and/or EEs should be scaled to the risks and impacts of the activities. The mechanism will facilitate the resolution of grievances promptly through an effective, efficient, legitimate, and independent and constructive process and in a manner that is accessible, equitable, predictable, transparent, and allows for continuous learning; and that such process is also survivor-centred and gender-responsive in the case of SEAH with specific procedures, including confidential reporting and modalities to provide timely services and redress to survivors.²⁵

¹⁷ Paragraph 40 of the revised ESP.

¹⁸ Paragraph (c) decision text B.BM-2021/18.

¹⁹ Paragraphs 41, 43 and 46 of the revised ESP.

²⁰ Paragraph 69 of the revised ESP.

²¹ Paragraph 46 of the revised ESP.

²² Paragraph 36 of the revised ESP.

²³ Paragraphs 31, 37 and 40 of the revised ESP.

²⁴ Paragraphs 20 and 77 for the revised ESP.

²⁵ Paragraphs 19 (b), 77, 79 and 81 of the revised ESP.

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- (c) GCF requires AEs to bring to the attention of people and beneficiaries affected, or likely to be affected, by the GCF-financed activities the availability of and ways to access the GCF's Independent Redress Mechanism, AEs' own institutional level GRMs, and activity level GRMs, for redressing grievances, including those related to SEAH, providing them with information through brochures, website references, meetings and workshops and other culturally appropriate and gender-responsive means.
- (d) GCF also require AEs to ensure that the measures to manage environmental and social (including SEAH) risks and impacts, including grievance redress related to SEAH, are incorporated into agreements with EEs including tendering documents and contracts.²⁶

4.5 Priority area 5: Knowledge generation and communications

22. As a learning institution, the GCF will work with the national designated authorities or focal points, AEs, and delivery partners, as well as other international financial institutions operating in the climate financing space, to document lessons, experience and knowledge gained in relation to SEAH prevention and response. The GCF will support global, regional, national and sub-national knowledge exchange activities and good practices on addressing SEAH, as part of social safeguarding in climate finance.

23. Communicating the GCF commitment to addressing SEAH will be a strategic communications objective. It will be important to communicate SEAH safeguarding as an important pathway for going beyond "do no harm", to improving social outcomes and generating co-benefits.

24. The Secretariat will seek periodic feedback from stakeholders and partners on the implementation of the SEAH provisions in the revised ESP and use of the SEAH Risk Assessment Tool.

²⁶ Paragraph 15 of the revised ESP.

Annex: SEAH Action Plan Results Table

Priority Areas	Key actions	Indicators and details	Responsibility	Timeline
1. Governance and responsibilities	1.1. Support cultural change and organisational accountability in relation to SEAH for activities proposed for GCF financing by undertaking sensitization activities on SEAH	1.1.1 At least 1 information session on SEAH due diligence provided to the Secretariat per year	ORMC	Annually
	1.2. Undertake SEAH due diligence	1.2.1 All funding proposals reviewed 1.2.2 FPs benefit from the SEAH Risk Assessment Tool once it is available	ORMC	On a continuous basis
	1.3. Provide inputs to accreditation and reaccreditation processes to ensure coherence regarding SEAH	1.3.1 Meetings held with the Accreditation Panel, where requested, to discuss SEAH in relation to accreditation and reaccreditation 1.3.2 Written inputs provided to the Accreditation and Entity Relations Unit and Accreditation Panel to clarify SEAH issues as needed	Secretariat	In 2022 and thereafter on a needs-basis

	1.4. Ensure reporting on SEAH is undertaken	1.4.1 Information on the implementation of the SEAH provisions of the revised ESP, and the SEAH Action Plan is included in the Report on the activities of the Secretariat for each Board meeting and other relevant reports as needed.	ORMC	Periodically
2. Competencies and capacity-development	2.1. Undertake capacity assessment of GCF and AEs. This is in relation to the level of understanding on SEAH risk and risk-management in GCF-financed activities. The assessment would inform the development of capacity building and training activities	2.1.1 Online survey undertaken	ORMC with Secretariat wide participation	July 2022
	2.2. Secretariat training on prevention of, and response to, SEAH in GCF-funded activities	2.2.1 Training and information sessions on SEAH prevention and response in GCF-financed activities	ORMC & consultants	First session September 2022; one per year thereafter
	2.3. Develop SEAH Risk Assessment Tool to be used by the Secretariate in the assessment of SEAH risks in all GCF financed activities, and provide training to Secretariate staff	2.3.1 Tool developed (including guidance on application) 2.3.2 Trainings provided to the Secretariat on the SEAH Risk Assessment Tool	ORMC & consultants	October 2022 First training session – March 2023; ongoing

	2.4. Disseminate the Tool with guidance to the AEs to assist in their own assessment of SEAH risks	2.4.1 Tool published on GCF website 2.4.2 Ensure that AEs are made aware, and have access to the Tool if they wish to use it 2.4.3 Undertake awareness-raising events 2.4.4 Create specific resources for the Readiness and Preparatory Support Programme, in relation to SEAH	ORMC	October 2022 Virtual event held annually, recording also made available
	2.5. Develop a list of examples of potential co-benefits related to SEAH safeguarding to inform project development	2.5.1 A list of examples of SEAH safeguarding co-benefits developed and shared within the Secretariat	ORMC	December 2022
	2.6. Conduct additional outreach and capacity development events and activities to raise awareness, build capacity, and share knowledge about SEAH for GCF-financed activities	2.6.1 Number of activities conducted	Secretariat	July 2023 onwards, and at relevant events e.g. COPs
3. Resource allocation, accessibility and budgeting	3.1. Allocate appropriate human, financial and material resources through the Board agreed budget	3.1.1 Budget already available in 2022 3.1.2 Further budget is allocated from 2023 onwards	Secretariat	March 2022 2023 onwards

4. Operational procedures	4.1. Provide advice to the Accreditation Panel on specific aspects to look for in relation to SEAH (as part the existing ESS criteria)	4.1.1 Informal checklist sent to AP	Secretariat	April 2022
	4.2. Develop guidance on GRMs for AEs as to required elements to be included to ensure an effective survivor-centered and gender-responsive approach to SEAH complaints	4.2.1 Guidance finalized and approved	Secretariat (ORMC) with assistance from the IRM	August 2022
5. Knowledge generation and communications	5.1. Document experience and knowledge gained in relation to the SEAH prevention and response in and beyond GCF	5.1.1 A list of case studies is compiled including co-benefits from SEAH safeguarding	Secretariat	Annually if possible
		5.1.2 Event on SEAH safeguarding for climate financing conducted		
		5.1.3 Global and regional, SEAH-related events/sessions conducted/attended		
5.2. Develop a communications strategy and continue refining it on SEAH safeguarding in projects and programmes	5.2.1 SEAH safeguarding becomes an integral part of the GCF communications plan.	Secretariat	Annually	
5.3. Seek periodical feedback from stakeholders on the implementation of SEAH provisions and use of Tool	5.3.1 Feedback collected through the outreach and capacity development activities	Secretariat	Biannually, reaching out to different stakeholders as needed	