

Call for Public Inputs: Joint CSO Comments on a Draft of Green Climate Fund's Updated Gender Equality and Social Inclusion (GESI) Policy and Action Plan

Thank you for the opportunity to comment on the revised draft Gender Equality and Social Inclusion (GESI) Policy and Action Plan. As organizations that actively engage in the Green Climate Fund (GCF) and that have previously provided detailed comments and substantive inputs in both the formulation of the existing Gender Policy and Action Plan¹ adopted in decision B.09/11² as well as their Board-mandated review and update, we appreciate the progress the GCF is making on developing a best-practice gender mainstreaming approach for the Fund.

A number of civil society organizations actively engaged in GCF proceedings³ has elaborated the following joint response following the GCF Secretariat's request for public inputs on the draft Gender Equality and Social Inclusion Policy and Action Plan. The comments elaborate on as well as reiterate detailed previous civil society comments during the April 2017 call for public input,⁴ including continuing overarching comments and concerns (Section I), responses to some of the concrete questions posed (in Section II), as well as proposed specific textual edits and suggestions on the updated Gender Equality and Social Inclusion Policy and Action Plan (Section III, covering Annexes I-III).

I. Overarching Comments and Concerns

We appreciate that in response to the April 20, 2017 Call for Public Inputs on the review and update of the GCF Gender Policy and Action Plan the GCF Secretariat has released a new draft of an updated Gender Equality and Social Inclusion Policy and Action Plan. We note that this incorporates a number of our joint CSO recommendations from the previous round, such as grounding the updated policy on a human-rights based approach and highlighting mandates to increase not just the gender balance but the inclusion of gender and social expertise in important Board committees and panels, and we appreciate their inclusion in the new draft policy and action plan, even though, in several cases, this integration could be strengthened

¹ The GCF Gender Policy and Action Plan are available at:
[https://www.greenclimate.fund/documents/20182/818273/1.8 -
_Gender_Policy_and_Action_Plan.pdf/f47842bd-b044-4500-b7ef-099bcf9a6bbe](https://www.greenclimate.fund/documents/20182/818273/1.8_-_Gender_Policy_and_Action_Plan.pdf/f47842bd-b044-4500-b7ef-099bcf9a6bbe).

² Decision B.09/11 is available at:
[http://www.greenclimate.fund/documents/20182/24949/GCF_B.09_23 -
Decisions_of_the_Board_Ninth_Meeting_of_the_Board_24_-_26_March_2015.pdf/2f71ce99-7aef-4b04-
8799-15975a1f66ef](http://www.greenclimate.fund/documents/20182/24949/GCF_B.09_23_-_Decisions_of_the_Board_Ninth_Meeting_of_the_Board_24_-_26_March_2015.pdf/2f71ce99-7aef-4b04-8799-15975a1f66ef)

³ A number of civil society organizations provided inputs on this draft and additional civil society organizations signed on in support of the draft. They are listed at the end of this submission.

⁴ CSO submission,
[https://us.boell.org/sites/default/files/uploads/2012/10/joint_csosubmission_on_gcf_gender_policy_gap_r
eview_final.pdf](https://us.boell.org/sites/default/files/uploads/2012/10/joint_csosubmission_on_gcf_gender_policy_gap_review_final.pdf)

and improved as suggested below. However, a number of important concerns and shortcomings remain (to be discussed in more detail later in this section).

At the outset, we would like to make two observations regarding the background of this second call for public input. First, 37 submissions from 80 organizations were received in the first round of public input, yet summary documents following GCF own best practices were not made available (GCF best practice on publishing summary documents of submissions received in response for calls for inputs for other operational policy development exits).⁵ The review and update of the GCF gender policy is obviously of great importance and concern for a wide range of stakeholders and one core tenet of improving the gender mainstreaming approach in the GCF has to be increasing the transparency and accountability of all gender-related efforts by the GCF and its partners.

Second, as we suggested in our earlier submission during the first round of public inputs, it would have been useful to have strengthened the review process in particular with a thorough desk project/programme analysis of the extent to which gender is considered in the 43 projects and programmes approved by summer 2017 on the outset of the review. Not only would this have provided a de facto GCF portfolio baseline for the *status quo* of integration of gender considerations in GCF funding (with the opportunity to provide maybe some targeted recommendations for project/programme-specific improvements, since so far only a few projects are under implementation), it would also have helped with the identification of lacunae in the existing GCF Gender Policy and Action Plan to be addressed as part of the review and update. Such a portfolio gender-review must be a regular feature of GCF accountability procedures, including through regular reporting to the GCF Board, the COP and the wider public.

Nevertheless, the updated policy and action plan shows some welcome improvements, including by drawing on some of our joint CSO suggestions. In the following, some of them -- as well as proposed ways of further strengthening them -- are elaborated:

Human rights-based approach: We welcome the grounding of the updated draft policy and action plan on a human rights-based approach. This is correctly elaborated as a guiding principle in Section V.5.1, including by providing a detailed elaboration on the intersectionality and social inclusion approach (in Section 5.1.(b)) that such a human rights-based focus requires. Nevertheless, from a rights-based perspective, the language of the updated policy and action plan should be further strengthened. The term and the recognition of women and men as "rights holders" is missing throughout key parts of the updated policy such as in Section III (Objective) and IV (Scope of application). The use of the term "rights holders" (in addition and/or instead of stakeholders) is particularly important for Section 6.3 on project-level implementation requirements. We have provided suggested textual edits to the draft policy to reflect this.

⁵ See for example in Spring 2017 the compendium of submission on the revised ToR for the GCF IRM; available at: http://www.greenclimate.fund/documents/20182/584114/GCF_B.16_Inf.14_-_Submissions_following_the_call_for_public_submissions_on_the_updated_Terms_of_Reference_of_the_Independent_Redress_Mechanism.pdf/70bcd831-aa4e-4bd7-8e22-394761a28c76

We are pleased that a mention of “customary/religious tenets” regarding country-level implementation, which was included in an earlier version of the updated policy during the GCF informal Board meeting in Cairo has been removed in the version presented for public input. We hope this will be maintained. The GCF has to take a very clear stance that a “national contextualization” and presumably watering down or non-acceptance of international human and women’s rights conventions and agreements that form the guiding framework for the GCF gender policy obligations on the basis of “customary/religious tenets” cannot be accepted. Project/programme proposals that do not follow international human and women’s rights standards should not be regarded as being in compliance with the updated gender policy and the policy has to make it clear that the GCF will not provide financing to projects and programmes where the policy cannot be complied with. Vigilance to maintain this core value in the final version of the updated gender policy is important, given that, in recent years in many GCF recipient countries, religion and culture have been used to curb women’s human rights despite their having signed on to international conventions such as UDHR, CEDAW and ICESCR. Thus, para.6.2.3 referencing that the GCF will put in place a human rights compliance mechanism to ensure adherence by NDAs/FPs and AEs to human (including women’s) rights principles is welcomed although we would like further information on the functions and capabilities of such a compliance mechanism, including its ability to propose sanctions and/or remedy in cases of non-compliance and how it will interact with the GCF’s IRM.

Gender-responsive resource allocation and accessibility: We appreciate that the updated draft policy and action plan includes specific references to the possibility of providing dedicated and targeted resources to address gender inequality, its intersectionality and broader issues of social inclusion, such as references to special requests for proposals (RFPs), the simplified approval process, or small grants facility/ies (under Priority 3 of the updated action plan). Those are key approaches to ensure gender equity in accessing GCF resources as well as ensuring that the GCF addresses the inequity of climate change impacts in a gender-responsive way. They should be complemented by creating an assured financial set-aside for gender equality efforts in the GCF administrative budget, including a secured amount to target climate action by women’s groups and grassroots women operating at the local level. However, we would like a clear reflection of these approaches also in the policy itself, which (in contrast to the original GCF gender policy) no longer references resource allocation and the accessibility of GCF resources as a core principle. Thus, as a benchmark, the updated policy in its Section VI. on policy requirements should make it clear that any project/programme proposal without sufficiently articulated gender equality components will not be considered for funding until improvements have been made. Such a clear policy announcement is for example part of the Adaptation Fund (AF) Gender Policy⁶ with corresponding follow-through by both the AF Board Secretariat and its Board as part of the AF’s two-stage approval process. The planned revision of the current GCF proposal approval process to consider a two-step approval thus provides

⁶ See para.22 of the AF Gender Policy, available at: https://www.adaptation-fund.org/wp-content/uploads/2016/04/OPG-ANNEX4_Gender-Policies-and-Action-Plan_approved-in-March-2016-1.pdf

opportunity for the successful implementation for such a mandate if anchored in the updated policy.

Developing gender and social competencies and capacities: We are pleased that the updated action plan in its Priority area 2 on competencies and capacity development pays detailed attention to and commits the GCF to focus on increasing the inclusion of strong gender and social expertise into core Board-appointed technical panels and committees, such as the Accreditation Panel (AP), the Accreditation Committee, the Investment Committee, the Risk Management Committee and the Private Sector Advisory Group (PSAG) as well as the Independent Technical Advisory Panel (ITAP) and the fulfillment of this commitment should be included in the action plan log frame as an indicator. Ongoing revisions of the mandate and performance of the AP and ITAP provide a timely opportunity to make those needed capacity improvements. We also welcome the requirement in the updated action plan for all Secretariat staff to undergo multi-disciplinary training on gender-responsiveness, social inclusion, diversity and ethics as well as the acknowledgement that all GCF Management and staff are accountable for gendered results, including as part of their annual performance review.

However, the strong focus on competencies and capacity development in the action plan is not sufficiently reflected as a mandate in the policy itself. It would have been useful to reflect under the section on GCF Secretariat responsibilities (Section VI, 6.1) under GCF secretariat responsibility, a firm commitment for sufficient staff with gender, human rights and social expertise to address gender mandates is needed. With just one person as gender focal point (to be hired early next year to fill the current vacant position) and no prospect for a multi-person in-house gender-team with several gender and social experts anchored in various Secretariat operational units (at a minimum in the Country Programming and Portfolio Management Units as well as the Private Sector Facility), the danger is that the under capacity of the Secretariat will result in over reliance on consultants as suggested in the only reference to the Secretariat's own gender capacity in the updated policy (in para. 6.1.12). In this context, we are worried that the Board-approved staff expansion of the Secretariat to 250 people by the end of 2018 still foresees only 4 staff positions for environmental and social safeguards (ESSs) and gender combined.⁷ This is of particular concern in view of the increasing workload by the Secretariat.

Likewise, para. 6.1.12 of the updated policy leaves an opening, but does not give a firm mandate for the establishment of a gender expert advisory group. CSOs would welcome such an advisory group, possibly modeled in functions and composition after the Private Sector Advisory Group (PSAG), and ask that its composition should comprise CSO gender, human rights and social experts as well as representatives from national grassroots women's groups. Local women's groups' specific experience and expertise should also be made available in support of the Secretariat's still budding overall gender capacity through the establishment by the Secretariat of a roster of gender, human rights and social experts.

⁷ See GCF Document GCF/B.18/10; available at: http://www.greenclimate.fund/documents/20182/820027/GCF_B.18_10_-_Structure_and_staffing_of_the_Secretariat.pdf/876af58a-ee96-42f7-81a4-2fac29b0d17f.

Inclusion of an Action Plan Log Frame: It is welcome that the updated action plan includes as Annex III a draft detailed log frame in addition to the descriptive narrative of Annex II, which does list some required actions, identifies responsible actors, timelines and deadline and specific indicators measuring proposed outputs under the time-bound action plan. CSOs in their joint submission in the first round of public inputs had urged for the inclusion of such a log frame to ensure accountability in follow-through of proposed actions and interventions. It is also encouraging to see some budget figures included, although they seem overall very low given the task at hand and primarily reflect the cost of hiring one senior level gender and social specialist and his/her salary over a three-year period.

However, as currently presented, the log frame needs update and revision, as it was essentially taken from the draft initial gender policy and action plan presented in document GCF/B.09/10 (Annex IV). While a few more indicators were added, this “recycled” log frame still reflects the focus areas of the old gender action plan and not the proposed actions and focus areas of the updated and revised one. Importantly, it misses, for example, reference to the Priority Area 3 on resource allocation, accessibility and budgeting entirely. A new and updated action plan to accompany a strengthened policy must include a realistic budget with clear cost requirements for its implementation. This action plan should also be updated at least annually in conjunction with annual reviews on implementation process and ideally consistent with the annual work programmes of the GCF Board and Secretariat to ensure that policy development and required updates to policy and operational guidelines are gender-responsive.

CSOs have provided some recommendations on strengthening the log-frame by suggesting additional indicators. We would also like to get a better understanding of how some of the proposed indicators, for example under the current focus area d) on “Number of projects where women and men from vulnerable communities and socially excluded groups report improvements in their quality of life” are measured. Will there be qualitative reporting by affected men and women? And who will determine what the definition of “improvements in their quality of life”? We also remain concerned about accountability and transparency and whether this is sufficiently taken up in the log frame. For example, the updated policy in para.6.1.6 references that the annual performance to be submitted by the AEs under the current Monitoring and Accountability Framework will be checked by the Secretariat “against gender and social inclusion requirements, targets and goals”. It is not clear how this is reflected in the log frame and whether this will form the basis of annual reporting by the Secretariat to the Board and the COP on advances in fulfilling the gender mainstreaming mandate of the GCF.

Given the importance of such a log frame to hold the GCF to account for the implementation of the updated policy and action plan, we would urge some further work is done on it to update it in accordance with the new proposed action plan and strengthen it further.

Project-level mandatory gender and social inclusion assessment and action

plan: We welcome a clear mandate in the updated policy that AEs in addition to already required initial gender and social impact analysis will in the future also have to provide as a requirement a project-level gender and social inclusion action plan and checklist of project-level gender-responsive processes, procedures and implementation risks (paras.6.1.4 and 6.3.1(ii)) at the project inception stage. It is vitally important that such an analysis and plan also include a consideration of the marginalization of rural communities and rural women's activities, including by ensuring they are further not disadvantaged concerning the allocation of project/programme-specific funding allocations. The Secretariat commits to checking all as part of the requirements for advancing the proposal further. We note, however, that in the updated gender action plan in Priority Area 4 on operational procedures a reference to the mandatory project-level action plan is missing. The action plan should list in para.21(a) both the mandatory initial gender and social impact assessment and the accompanying project-level action plan (the terminology for the assessment document is also inconsistent). Both documents should be published, in an annex to the project proposals, on the project/programme specific sub-pages on the GCF website, which started with the 15th GCF Board meeting, to increase transparency.

At the same time, a look at current project-level gender action plans shows that many are not fully costed and in many cases measures and actions described in them are not integrated with the broader project but still treated as an "afterthought" or "add-on". For example, the integration of gender-specific actions in the risk management or as project-specific gender-responsive indicators in the project's overall performance measurement log frame is often missing. AEs too often "outsource" actions to consultants, thus reducing the likelihood of their thorough integration with the rest of the project activities. This also undermines the ability of the AE project team, which often does not include an in-house gender and social expert to provide sufficient oversight to executing entities during implementation, including backstopping them with gender and social expertise when needed. Thus, an important focus of the gender action plan should be on how to improve the quality of project-level gender action plans, including through joint AE learning events.

Strengthening the Role of the Board: The focus in the updated action plan on the significance of the Board in para.1.2.10 in the priority area on competencies and capacity development is welcomed. CSO in their earlier submission in the first round of public inputs had stressed the importance of building Board members' understanding and capacity on gender equality and gender mainstreaming issues through targeted information sharing sessions. This is a necessary requirement to ensure that draft policies, policy frameworks and project/programme proposals that the Board approves are sufficiently gender-responsive and that the Board becomes comfortable with sending policies and frameworks back for revision when they are not or in the case of project/programme proposals approved attach meaningful gender-specific conditions. Thus, the proposed inclusion of learning lessons on gender equality, human rights and social issues as part of Board members' "on-boarding procedures" as suggested is an important action plan deliverable that should be also included in the action plan's log frame.

Likewise, the updated gender action plan acknowledges that the Board composition need to be improved in terms of diversity, gender balance and inclusiveness of experiences and backgrounds, complying with the **Governing Instrument mandate of gender balance in the Board**. As of December 2017, only 6 of the 24 Board members are women (and 7 of the 24 alternate members). Regional Board member groups should ensure female Board member candidates are prioritized in the rotation. Likewise, those developed countries sending both a member and alternate member to the Board (the United States, the UK, France, Germany, and Japan) should commit to being represented by one man and one woman at all times as the rule. The objective of reaching gender balance has also been reinforced through the Gender Action Plan just approved at COP23.

While the updated action plan also highlights the responsibility of the Board to approve and oversee the implementation of the updated policy and action plan (in para.1.1.5), in the policy itself, there is insufficient acknowledgement for the role and responsibility of the Board. There should be a clear reference to the accountability of the GCF Secretariat to the Board in para. 16, as well as a clarification in para. 6.1.4 that the Board will not approve project/programme proposals submitted for their consideration without sufficient integration of gender equality considerations. We have suggested some textual edits to this effect.

Important Remaining Concerns:

Despite these welcome specific advances in a number of important issues in the updated policy and action plan, for which we have suggested further improvements for the Fund's consideration, CSOs continue to have a number of concerns with the proposed policy and action plan that should be addressed prior to their adoption:

From Gender Policy to Gender Equality and Social Inclusion Policy: With the updated gender equality and social inclusion (GESI) policy and action plan, the Secretariat seems to be pursuing a much broader social mandate with the suggestions to fold the previous gender policy and action plan into a common social inclusion framework although it is not clear that such a revision -- and the corresponding renaming of the policy -- will not reduce the primary focus on gender equality and women's empowerment, which should remain the fulcrum of the mandated review and update of the current stand-alone GCF gender policy.⁸

In particular, there is a concern that the already limited human, financial and material resources that are envisioned to be catalyzed and utilized for the implementation of the GCF

⁸ Feedback from CSO colleagues working with women's and local groups supports this. CSO colleagues contributing to this submission have pointed out that in projects and programs related to climate change as well as other donor funded projects/programs when a broader reference to social inclusion dimension is added the focus on women's empowerment and gender equality is submerged under the category of social group, ethnic group, poor etc. and the danger of not having standalone policy and activities for women's empowerment and gender equality in national level projects and programs related to climate change increases

mandate for a gender-sensitive approach in all of its funding actions might be even further stretched by broadening the scope to a wide social inclusion mandate, making focused actions in the GCF to advance gender equality and women's empowerment in the context of Fund operations even more restricted and limited. However, a focus on gender responsiveness and women's agency and equal participation in all GCF operations must remain at the core of the updated policy and action plan. That potential competition for scarce resources and attention under the suggested broad social inclusion framing of the updated policy and action plan (the reasons for which are only elaborated in a footnote on page 1 of the introductory paper, but not explained in the policy itself) could lead to the inadvertent exclusion of women from benefits and participation. This is a danger where the focus reverts back to the "different needs of vulnerable communities" and their equal sharing in benefits, especially if there aren't sufficient safeguards for example explicitly addressing gender inequalities within "vulnerable communities".

It is thus not clear why the GCF, having developed its first ever Indigenous Peoples (IP Policy) as a stand-alone policy in recognition of the persistent and historical marginalization of and discrimination against indigenous peoples (and not as a "Indigenous Peoples and Social Inclusion Policy"), would revise and potentially weaken a similarly justified stand-alone gender policy and action plan. Turning the GCF gender policy formally into a GESI policy would also run counter to the existing best-practice in other climate funds (the CIFs, the GEF and the Adaptation Fund), all of which have stand-alone gender (equality) policies, and the UNFCCC, which at the recent COP 23 adopted its first ever Gender Action Plan. Lastly, a note on the revised action plan which foresees in para.16 under its priority area on competencies and capacity development a heavy reliance on the gender and climate change toolkit developed by the GCF Secretariat with UN Women for capacity building on the updated policy and its requirements, although the toolkit does not adequately address financing issues and challenges and does not include a GESI approach.

Undoubtedly, the issue of social inclusion is not unrelated to a gender mainstreaming approach. CSOs in their joint submission in the first round of inputs have specifically asked for a **broad and more inclusive gender policy** (but not a broad gender and social inclusion policy) that takes into account the intersectionality of gender equality with disability rights, sexual and reproductive health and rights, geography, ethnicity, class, age, health etc. with a focus on the rights of participation of grassroots women. Thus, social inclusion components in a revised and updated GCF gender policy should be viewed as part of this intersectionality understanding. This also recognizes the mutually reinforcing nature of gender (in)equality as it intersects with other key socio-economic factors, but it sees efforts to advance gender equality and gender mainstreaming as the key approach to understand and address much broader issues of social exclusion. Such an understanding can be fostered by anchoring intersectionality and wider social inclusion as guiding principles in the updated policy (under Section V.) while still retaining the name of the policy as "Gender Policy" or "Gender Equality Policy. Indeed, such social intersectionality aspects are already inherent and reflected in the updated policy's description of a human rights approach (in para. 5.1(b)).

Interestingly, the policy itself seems not quite clear what a GESI approach is. While the updated policy suggests a definition of social inclusion borrowed from the World Bank (para. 1.1 (k)), the definitional section lacks an exact description of the nature, scope, or meaning of a “gender equality and social inclusion (GESI)” approach and the policy itself vacillates between sometimes focusing exclusively on gender equality and other times primarily on vulnerable and marginalized communities (without acknowledging that women are a significant part of those who are marginalized and excluded and often doubly excluded within those communities). Overall it seems to struggle with a coherent integration of both goals on equal footing. Thus, an elaboration of a GESI approach⁹ under the updated policy’s guiding principles could be a worthwhile alternative for the time being. This would also allow the GCF as a learning institution the time and space to determine--as this discussion has not yet happened in the Board and as part of wider consultation with the public--if in the future a separate complementary GCF “Social Inclusion Policy” might be the right answer. Alternatively, the Board may decide that an intersectionality understanding and approach applied to existing stand-alone human-rights based GCF gender and Indigenous Peoples’ policies respectively might be sufficient, especially if applied together with an ESP which is also adequately grounded in a human-rights approach.

Going beyond a “Do no harm” approach at project/programme level: A GCF gender-responsive approach requires a focus on the voice, agency, participation and the knowledge of men and women in different circumstances and communities with a particular focus on those marginalized and already most severely affected by climate change. While the updated draft action plan on p.17 explicitly recognizes the role of the initial socioeconomic and gender assessment to proactively build in a gender-responsive approach to projects beyond a “do no harm” of just safeguards application, the language in some of the policy section frames seems overly focused on a project-related “do not harm”, for example in Section III on objectives and Section IV on scope of application. One reason for this might be the strong focus on the vulnerability of communities, instead of on their contributions through community and traditional knowledge and innovations as part of the solutions the GCF wants to support. Thus, the tenor of the documents should shift to highlighting the role of GCF operations to equally support the agency, voice and the resiliency of women and men and their communities. Accordingly, language should be strengthened to ensure that both the policy and the action plan clearly articulate a more pro-active “do good” approach.

The updated policy seems frequently too narrowly focused on projects or various stages in the project-cycle. (most overwhelmingly in deliberating the policy requirements in

⁹ Relevant for the GCF gender policy and action plan, GESI integration can be understood as “a process and strategy for ensuring the concerns of women and men from all social groups (ethnicity, caste economy, age, disability, geographic locations) as an integral dimension in the design, implementation, monitoring and evaluation of policies and programs in all political, economic and social spheres. It aims to promote equality and strengthen the legitimacy by addressing existing disparities and gaps which are highlighted in access and control over resources, services, information and opportunities and the distribution of power and decision making.” Gender Equality and Social Inclusion Toolbox, Government of Nepal 2014; available at: http://www.aepc.gov.np/docs/resource/resqfm/20140602014209_Final%20design%20Toolbox-GESI.pdf.

Section VI) instead of clearly articulating that investments outside of the project-cycle, as well as a focus on policy formulation and policy framework and institutional capacity building will be necessary to implement the GCF gender mandate. Thus, the “enabling environment that integrates gender and social inclusion vertically and horizontally across diverse stakeholders” (as promised under Section IV on scope of application in para.13) must be achieved by measures outside the project-cycle and not just “through the course of the project life-cycle and climate investments”. The policy and the action plan will fail if they are just applied to individual projects but do not shape and influence the larger enabling environment by shifting the discourse via strengthening the gender-responsiveness related to the policy frameworks and processes (such as policy planning documents) related to GCF-supported climate investments.

Role of NDAs/Focal Points and Country Processes insufficiently reflected: We are concerned that the updated policy reflects the role of NDAs/FP with respect to realizing gender equality and social inclusion in Fund operations too narrowly and not comprehensive enough. For example, while the policy recognizes country ownership as a guiding principle and outlines a set of specific plans and programmes that should be guided by the policy and action plan, it does not specify the role the NDAs/FPs play in serving ideally as country coordination mechanisms and in in-country stakeholder engagement activities. Nor does it provide the requirements of non-discrimination, empowerment of women and inclusion that this entails as well as a need for pro-active outreach and communication tasks. Similarly, the NDA’s/FP’s role and commitment should be explicitly acknowledged in Section 6.2 with respect to country coordination and stakeholder engagement as well as their lead in developing NDA/FP country programmes. Thus, paras. 5.2(a) and 6.2(4) should be updated as suggested in CSO textual edits to the policy. Likewise, Section 6.3 should acknowledge a role for concept notes (especially as the GCF might move to a two-stage proposal approval process) that can be submitted by NDAs/FPs and should be both gender-responsive and developed in a gender-responsive way. Thus, the development of relevant guidance and guidelines as well as showcasing best-practice examples of gender-responsive country coordination and stakeholder engagement efforts should be reflected as core tasks for the updated action plan as well.

Some Significant Shifts/Omissions: While the proposed upgrade to the policy and gender action plan makes a number of improvements, including integrating some of the lessons learned from the gender mainstreaming efforts of other organizations as outlined in the introductory note (p.3), there are some shifts and one omission from the current gender policy and action plan that might result in the weakening of the updated policy. For example, we perceive it to be a potential weakening of the policy that the provision of adequate resources for the implementation of the policy is treated as a priority area of the action plan, but not as a policy commitment in itself. And in the updated gender action plan, there is no provision for accountability for resource allocation, accessibility and budget. Ideally, a section on resource allocation, accessibility and budget should be part of Section VI. on policy requirements in the updated policy. In comparison, the current GCF gender policy listed GCF resource allocation as one of its six principal elements.

Another of the current policy's principal elements, the comprehensiveness in scope and coverage, is likewise not sufficiently addressed in the revised policy. Para.12 under Section IV on the policy's scope of application should indicate that the GCF applies its gender policy to all financing activities, mitigation or adaption, international or direct access, public or private, as well as to the increasing number of public-private partnerships (PPPs). This focus to include all financed activities is an important clarification as the policy focuses in its policy requirements only on AEs, but not on PPPs (which might include non-AEs on equal footing with separate financing contributions) as implementation partner. It needs to be clear that PPPs have to be fully compliant with the updated policy and contribute to the implementation of the revised gender action plan by building competencies, tools and processes to achieve gender-responsive results with their GCF funded activities.

Lastly, the revised action plans drops an important priority area included in the current action plan on monitoring and related evaluation and reporting. While para. 24 under the priority area of operational procedures talks about monitoring and reporting at the portfolio level, it only references the existing results management and performance measurement frameworks (GCF/B.08/07), which in their current form are inadequate to provide a comprehensive quantitative and qualitative assessment of portfolio level gender equality results and outcomes of GCF financing. In contrast, the current gender action plan had proposed two portfolio gender indicators, including a scorecard or portfolio classification system. As our prior CSO submission had stressed, such a scorecard approach ranking the projects/programmes for their level of anticipated and actualized gender equality outcomes and impacts on entry (to provide a baseline) as well as on exit (to report on progress achieved) and aggregating this information on the portfolio level, is an important accountability tool and necessary to monitor progress over time. Such a scorecard should be integrated in the action plan log frame.

II. Specific input in response to the following questions:

CSOs in their joint submission in the first round on public input on the revision and the update of the current GCF Gender Policy and Action Plan have provided detailed responses to what is essentially the same set of questions.¹⁰ Drawing on some of our previous recommendations, we reiterate here some core proposals that we feel are either not at all or only insufficiently addressed in the updated proposed policy and action plan.

(a) **Accountability: What are some operational and accountability mechanisms that need to be put in place to ensure quality and enhanced results of the GCF's updated Gender Equality and Social Policy and Action plan**

¹⁰ Earlier comprehensive CSO comments on those questions are available at: https://us.boell.org/sites/default/files/uploads/2012/10/joint_cso_submission_on_gcf_gender_policy_gap_review_final.pdf.

Regular reporting on the implementation progress of the updated policy and action plan is indispensable to strengthen accountability. The new action plan foresees an annual progress report to the Board, but should be complemented with more frequent policy monitoring reports to each or every other Board meeting such as regular progress reports on the project pipeline or the readiness program at each Board meeting. It should include coordinated input/commentary from implementing partners and stakeholders to include institutional as well as portfolio and project-level review.

A **GCF annual gender mainstreaming progress report to the Board** should be timed mid-year so as to include summary gender findings into crucial external accountability reporting, such as the mandatory annual GCF report to the COP. This would not only increase the accountability of gender mainstreaming progress (or lack thereof) to UNFCCC parties, but also allow for improved guidance on gender efforts by parties toward the UNFCCC's financial mechanism and a better alignment with UNFCCC COP decisions and mandates, including on gender and climate change and the UNFCCC's own gender action plan.

Gender-focused portfolio indicators are currently not elaborated in Annex II (the updated action plan) while they are included among illustrative indicators in Annex III. While a quantitative assessment of how many GCF projects include gender elements at the proposal stage is a start, it needs to be complemented by a qualitative assessment of the level of gender-responsiveness at project entry, but also throughout implementation and at project end. The integration of gender reporting in the monitoring and accountability framework, particularly in the annual self-reporting, half-time project assessments, and final project assessments should be strengthened, including requirements for Secretariat and independent/third party verification. This is the prerequisite to allow for aggregated portfolio-level reporting on quantity and quality in implementation and at exit by the Secretariat, for example as part of its regular gender progress reports. Such a portfolio overview would be also what the Independent Evaluation Unit, whose role for gender accountability needs to be formally acknowledged in para 6.1.13 of the updated policy, could build on in separate gender impact evaluation reports, for example, at the end of a time-bound updated GCF gender action plan.

Gender-specific portfolio indicators are adding to already mandated gender-responsive results management (RMF) and performance measurement frameworks (PMF) (decision B.08/07) for which gender-disaggregated and gender qualitative data collection at the project level related to core and outcome indicators is the prerequisite. The PMFs for mitigation and adaptation with their respective indicators need further strengthening, including through better guidance for Accredited Entities (AEs) on the methodologies for gender-disaggregated data collection for those already approved indicators to increase their gender-responsiveness. Likewise the development of the sustainable development co-benefit indicator, already foreseen under the mitigation PMF, should be a priority going forward and a similar indicator should be established for adaptation performance measurements to look at.

At the **project level**, Accredited Entities (AEs) should be mandated to collect and provide quantitative and qualitative gender-disaggregated baseline and progress data

throughout the project cycle. Qualitative and quantitative indicators must take into account the local realities of the communities that the projects are addressing and should be developed in consultation with the communities as part of a participatory monitoring approach, which is already mandated under the Initial Monitoring and Accountability Framework. The updated action plan should include as one action item the development of metrics assessing the extent of use of gender-disaggregated data in all proposals and all aspects of GCF projects.

Improvements in Accreditation Practice: The GCF implements through Accredited Entities (AEs), which therefore must be held accountable as key actors on how gender-responsive GCF projects/programmes are and to what extent they promote gender equality and the empowerment and agency of women in recipient countries. The fit-for-purpose accreditation practice over the last few years has revealed some weaknesses and the upgraded policy and action plan may not address these weaknesses. For example, despite the requirement in para. 6.2.2 for applicant entities to demonstrate gender policies, procedures and competencies as proof of their ability to implement the policy, a number of entities continue to be accredited “conditionally” without such policies in place. How and when the Secretariat and the Accreditation Panel decide that an organisation has fulfilled the requirement is not transparent. Moreover, the development/crafting of a gender policy (often by an external consultant) to fulfill an accreditation condition is not proof of the establishment of relevant institutional gender competency in the accredited organization. This contributes to the sidelining of gender within the accredited entity, which then keeps on preparing its project/programme proposals for the GCF without gender mainstreaming them.

To address those weaknesses, with respect to gender accountability through accreditation of AEs, the GCF GP/GAP should focus on developing better gender policy guidance for applicant entities as well as improving the gender and human rights due diligence for the application review. For example, by its own admission, the Accreditation Panel (AP) is lacking social and gender expertise among its technical experts. Currently, in evaluating if the accreditation requirements for compliance with the GCF gender policy are fulfilled by the applicant entity, the AP focuses primarily on whether a gender policy/procedures/capacity exists at the applicant entity (the paper trail) instead of looking at the actual implementation experiences and its real impacts on project/programme affected people (the entity’s gender-related internal and external track record). This is also a problem with respect to evaluating the ability of applicants to implement environmental and social safeguards and should be improved. The current review process of the mandate and work of the Accreditation Panel provides an opportunity. In addition, the strengthening of the gender expertise of core GCF technical and review panel such as the AP, should be a strong focus of the GCF GAP going forward.

Clearly, more capacity building for institutional gender capacity for applicant entities, particularly direct access and private sector entities, as well as continued gender capacity building once entities are accredited, is needed. For applicant entities, this can be

provided as part of readiness financing as acknowledged in para 22 of the updated action plan. While currently readiness financing, including for support for the accreditation of direct access entities is only provided at the request of the NDAs, the GCF Secretariat should retain the ability to use readiness finance to support institutional gender capacity building for all applicant entities, even in cases where the NDAs do not specifically request for it, or for international access or private sector applicant entities with significant gender capacity weaknesses (which do not need NDA endorsement). With support measures in place, proven applicant entity gender capacity should be first verified, and only then should the accreditation take place. Ultimately, no applicant entity should be accredited without exhibiting a strong gender policy and/or strong institutional gender commitments and procedures (including their own staff's gender capacity and expertise). Otherwise, the ability of the AE to meet the GCF gender policy requirements in implementation is in doubt.

Increasing transparency: The precedent established since the 15th Board meeting that the project/programme proposal annex containing the mandatory initial socioeconomic and gender assessment and the project-specific gender action plan (which under the updated policy is now also mandatory) are publicly available as part of the Board documentation and included in the project/programme-specific sub-pages on the GCF website, should be maintained.

Increasing accountability through more transparency also holds true for the detailed documentation and description of in-country stakeholders' consultations during project design and implementation, which in line with the requirements of the updated action plan (para. 21(b)) is to be gender-equitable and inclusive. This mandate will improve description of stakeholder consultation in published project documentation, which is currently often only cursory and with few details. The annexes detailing consultations during the project preparation phase and stakeholder engagement plans during project implementation should also be made public to allow for verification by the public of how gender-equitable and gender-responsive they really are. Increasing the transparent and early disclosure of gender relevant project/programme documentation should be an important priority is an easy way to contribute to improved gender accountability in the GCF and in line with the Fund's comprehensive Information Disclosure Policy, as acknowledged in the updated policy which lists accurate, gender-responsive and timely disclosure as one of its guiding principles.

Under the GCF initial monitoring and accountability framework, the review of project/programme implementation progress by the AEs currently takes the form of annual self-reporting. While the GCF Secretariat might do spot-checks, those are likely to be cursory and infrequent. While it is encouraging that the updated policy promises in para. 6.1.6 that the Secretariat will check the annual AE performance reports against gender requirements, such "gender checks" of project/programmes under implementation on paper should be accompanied by unannounced project site visits of GCF gender and social experts. Additionally, to ensure that the AEs in their self-reporting pay detailed attention to a quantitative and qualitative analysis of gender mainstreaming efforts and

successes during implementation, the Secretariat should provide some guidance for AEs on how to report honestly and self-critically on gender mainstreaming successes, challenges or failures during project / programme implementation as a tool for course correction and further learning.

Strengthening gender-related country-level accountability: With country ownership a core guiding principle of the Fund's gender policy, National Designated Authorities (NDAs) and focal points (FPs) play an important role for the full implementation of the updated gender policy and action plan and the success of GCF gender mainstreaming efforts. They do this particularly through functions that they are supposed to fulfill with respect to country coordination and stakeholder engagement. It is thus surprising that the role of NDAs/FPs in those areas is not better integrated in the proposed new policy.

The development of relevant guidance and guidelines for best practice gender-responsive country coordination and stakeholder consultation efforts in the engagement of NDAs/FPs in compliance with the new updated gender policy should be one priority action under the updated action plan. Detailed guidance should encourage NDAs/FPs to identify and reach out to national women's machineries (such as the government agencies and offices charged with national commitments to implement CEDAW) as well as national and local women's organizations and networks as part of a wider engagement of civil society. Such gender-inclusive outreach is crucial, as the NDAs/FPs are also charged with the development of GCF country programmes which are to detail national funding priorities and their alignment with national climate plans and development strategies and form the basis for engagement with AEs for concrete project development. In order for these country programmes to be gender-informed, national level gender expertise has to be brought in, as does the experience of women at the grassroots and local levels, who are directly affected by climate change and often leading the local response to address its challenges. Representatives from national women's machineries as well as women's groups including indigenous women and gender experts should also be included in the regional structured dialogues hosted by the GCF Secretariat, which serve as match-making opportunities to bring NDAs/FPs and national-level stakeholders from several countries in the region into contact with AEs to develop a GCF project pipeline based on country programmes/country priorities.

The setup of an effective gender-responsive outreach and communications mechanism by the NDA/FP to notify stakeholders about GCF-related reports and activities that are taking place at the national and regional level in a timely manner is crucial to ensure true country-ownership. This would involve for example the timely notification about upcoming concept notes that the NDA/FP prepares for submission to the Secretariat or about projects for which the NDA/FP has to issue a letter-of-no-objection to hear if there are stakeholder objections and concerns that would prohibit or should delay such a letter being issued.

Such communication and outreach efforts must be gender-equitable and proactive, especially by encouraging and supporting the active participation of CSO organisations, particularly those focused on women's rights as well as from local women's grassroots groups and including indigenous women. GCF readiness funding for NDAs/FPs could for example be used for a mapping or census exercise to identify gender agencies and women's groups that should be involved in the development, budgeting, implementation, monitoring, and reporting of projects and activities, at the national and sub-national levels. NDAs could be encouraged to set up a database of relevant women's groups in their country. For this, NDAs could link up, as an example, with existing national and regional women's funds, who have a clear overview of the women's groups that are active at the national and local levels.

(b) **Management response: What type of GCF management-related recommendations can the review recommend and what type of pursuant actions need to be considered in the GCF's updated Gender Equality and Social Inclusion Policy and Action Plan?**

The GCF gender policy must be implemented throughout the Fund's administrative and operational processes. Both, the Board and the Secretariat through their respective roles and interactions share responsibility and must be held to account for how well an updated policy and action plan are implemented and the GCF mandate for gender-responsiveness in all its actions is achieved.

Role of the Board: The role of the Board in an updated policy and action plan goes beyond its current narrow reflection in the policy as final arbiter on how well the GCF does in implementing its gender mandate. It goes well beyond just receiving regular progress report by the Secretariat. In order to ensure that draft policies and project/programme proposals brought by the Secretariat to the Board for its consideration and approval are sufficiently gender-responsive, the Board's own capacity on gender issues and gender mainstreaming needs to be enhanced, including through learning events for the Board or targeted information sessions. It is good that a commitment to such knowledge-sharing with the Board is now part of the updated action plan. The composition of relevant Board Committees and Groups, including the Investment Committee, the Accreditation Committee, the Risk Management Committee, the Budget Committee and the Private Sector Advisory Group should include Board members with relevant gender and social competencies. While the updated action plan holds out the option for the **creation of a formal Gender Advisory Group**, the Board should commit to establishing one right away. Such an advisory group bringing together Board members, experts from developing and developed countries and observers, including civil society observers representing women's groups and networks and including local/grassroots women, could be modeled after the existing Private Sector Advisory Group (PSAG). This would convey the priority attention that the Board and the Fund give to GCF gender mainstreaming efforts.

Role of the Secretariat: The Secretariat needs to ensure that its own administrative and human resource policies reflect the mandate of the gender policy. Being a gender champion within the Secretariat should be a plus, for example for staff advancement or bonus pay. Likewise the mandate for gender equality and giving men and women equal opportunities must be reflected in human resource policies in hiring, compensation, and in the procurement of contractors.

According to the Governing Instrument, Secretariat staff has to strive toward regional and gender balance. While with the expansion of the Secretariat the percentage of female staff members has increased, female staff remains underrepresented in the professional level international positions and overrepresented in the administrative support function. Thus, with many professional international positions in an expanding Secretariat yet to be filled, active head-hunting for female talent, especially from developing countries, should be pursued.

The action plan specifies the role of a senior social development and gender specialist to act as gender focal point within the Secretariat. This is clearly not enough. It is impossible for one dedicated gender specialist to ensure that gender considerations are effectively mainstreamed across the different GCF Secretariat divisions and policies. With the assignment of the existing position under the country programming division (responsible for accreditation, readiness and engagement with NDAs/FP), at a bare minimum two corresponding positions under the Project Management Unit and the PSF should be created to improve gender integration and provide gender capacity support during project development from concept stage to project proposal submission and then throughout project management.

Even with an expanding number of staff with increased gender capacity due to envisioned training and capacity building under Priority Area 2 of the action plan, the Secretariat will be reliant on outside gender, human rights and social expertise to supplement its internal capacity. It should develop a roster of gender and social experts who can be on call to provide gender and sector-specific expertise and regional or national support to all GCF entities, for example capacity-building support to NDAs and FPs, gender analytic support to implementing entities, support in proposal reviews for the ITAP or for accreditation reviews for the AP. Such a roster should focus on the inclusion of expertise from developing countries, including engagement on the grassroots and local levels.

Following the example of the GEF, which established a Gender Partnership as an inter-agency working group involving all of its partners under its own gender equality action plan (GEAP), the Secretariat could also consider setting up a similar inter-agency coordination and exchange mechanism on gender. It should involve all GCF partners, including representatives from different divisions of the GCF Secretariat, NDAs, AEs, other support providers (for readiness), as well as observers and including civil society as a way to facilitate communication and coordination on implementation of the GCF gender mandates.

The Secretariat should greatly expand development of gender-informed guidance documents for various operational policies and processes. While the GCF Secretariat, in collaboration with UN Women, has recently published a guidebook on *Mainstreaming Gender Considerations in Climate Change Projects*¹¹, this document misses some specificity and contextualization related to the GCF templates and procedures related to project proposal development, submission, due diligence review, and Board consideration. Many AEs and GCF partners need more concrete guidance, maybe using some real practice examples from actual GCF projects -- in an effort to support peer-to-peer-learning. With the updated policy highlighting the importance of the sector level, more sector-specific guidance by the Secretariat is needed, for example regarding the engagement of private sector actors, the special circumstances of public-private partnerships (PPPs) or related to results-based payment approaches as those pursued through REDD+ projects. Such sector-specific guidance should clarify gender equality expectations related to results in different sectors, for example on enhanced livelihoods (access to services, job and income generation); resilience and risk reduction (social protection, access to services); information flow or increasing women's voice and agency.

One concrete example for the need for better integration of gender and human rights considerations in developing Secretariat guidance is the case of current guidance provided on ESSs, for example through GCF readiness support providers.¹² As the GCF is currently completing its Environmental and Social Management System (ESMS) with an Environmental and Social Policy (ESP) and is tasked to develop its own ESSs (instead of using the IFC performance standards as it is doing in the interim), relevant guidance to be elaborated by the Secretariat for AEs and GCF partners should clarify the need for gender-responsive actions at each stage of ESMS operations. The ADB's safeguard elaboration on involuntary resettlement, for instance provides some good practice examples.¹³ Without

¹¹ Available at: <http://www.greenclimate.fund/documents/20182/194568/LEVERAGING+CO-BENEFITS+BETWEEN+GENDER+EQUALITY+AND+CLIMATE+ACTION.pdf/95dd0426-6d58-4413-bbbc-45e4d6c7e7d5>

¹² Available at: <http://www.gcfreadinessprogramme.org/sites/default/files/Environmental%20and%20Social%20Safeguards%20at%20the%20Green%20Climate%20Fund.pdf>

¹³ At the ADB gender-related requirements are placed in most of the detailed ADB safeguard requirements, meaning that, in theory, at every step, gender issues must be addressed. The examples below from the ADB's Involuntary Resettlement safeguard may be instructive. (Similar language is found in ADB Environment and Indigenous Peoples' safeguards). ADB Involuntary Resettlement policy principles for example state:

"1. Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, **including a gender analysis**, specifically related to resettlement impacts and risks. 2. **Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations.** ... 5. **Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide**

such explicit requirement, those responsible for implementing or monitoring safeguards or responding to safeguard violations are unlikely to take the steps necessary to ensure that women and men benefit equally from GCF projects and are not harmed by them.

Gender-mainstreaming and gender-capacity building and learning events are an important way that the GCF Secretariat can further the implementation of the updated gender policy. Activities already happening under the readiness support programme should be expanded and related activities should be made more inclusive by bringing in representatives from national women's machineries and in particular more civil society actors, including women from the grassroots level and indigenous women, with local experience and local/traditional knowledge.

The Secretariat's and Fund's external communication strategy should ensure that GCF senior management, starting with the Executive Director, prominently discuss the commitment to gender-responsiveness of all Fund actions in their outreach and advocacy efforts. This should not just be a special feature reserved for gender panels or at "gender days", but mainstreamed into broader technical climate change and finance discourses in all GCF international and national appearances. This responsibility is shared by GCF Board Members, with a particular role for the GCF Board Co-Chairs.

(c) **Engendering climate change: What are some principles of gender mainstreaming that could be integrated into the GCF's updated Gender Equality and Social Inclusion Policy and Action Plan and in the delivery of climate change results in programmes/projects?**

The GCF Governing Instrument places all climate actions by the Fund "in the context of sustainable development". In looking at engendering climate change and in delivering gender-responsive climate change results in GCF projects/programmes, the Fund needs to be mindful and cognizant of this much broader context, for example by drawing on discourses and work (including for indicators) done with respect to the 2030 Agenda's Sustainable Development Goals (SDGs). While the new updated policy acknowledges this link, it has to clearer articulate how the GCFs operations and process relate to the SDGs. It is not advisable, as the new policy suggests, to focus on SDG5 on gender equality and SGG13 on climate action only. Nor can the mandate of the governing document to consider the sustainable development context be reduced to the SDGs.

Gender bias and social exclusion reduce women's access to resources and their public voice in decision-making. Climate shocks exacerbate women's vulnerability. This results in gender differences in outcomes. Women are also over-represented in natural resource-based occupations such as agriculture, with consequences for livelihoods.

them with appropriate income sources and legal and affordable access to adequate housing." [emphasis added].

Engendering climate change thus goes beyond a narrow understanding of how to reduce emissions or build resilience. At the programming level, it should focus on how its support for climate actions for example addresses **food security** (in line with SDG 2); **health, including sexual and reproductive health** (in line with SDG 3); **girls dropping out of school** (in line with SDG 4); **gender-based violence** (in line with SDG 5); **access to clean water and sanitation** (in line with SDG 6); **access to energy and clean cooking solutions** (in line with SDG 7), **decent work and just transition** (in line with SDG 8) and the **full and effective participation of women** -- focusing particularly on the inclusion of grassroots women groups and gender and human rights groups -- **throughout the project/programme cycle**, and **gender budgeting**. Of particular interest in this context is SDG target 13b, which mandates the promotion of “mechanisms for raising capacity for effective climate-change related planning and management [...], including focusing on women, youth, local and marginalized communities.”

Given that the discriminations and inequalities that women are facing are multi-dimensional (social, cultural, economic, political, and legal) and intersectional (often compounded by age, ethnicity, disability, religion, or class) effective gender-responsive climate change actions financed by the GCF must **focus on addressing multiple challenges and providing multiple benefits**.

While the following is not an exhaustive list, engendering climate change thus means, for example, that the following concerns need to be recognized and addressed in GCF-funded mitigation and adaptation projects, including through mandatory collection and analysis of gender-disaggregated data:

- **Human Rights:** The requirement that both procedural and substantive human rights are respected and acknowledged as critical for effective climate action. The right to participation of women in climate decision making, especially the participation of grassroots women, as well as the right of access to information, needs further emphasis in climate decision making. Substantive rights such as the rights to food, water and shelter can be undermined by climate action if a human rights based approach, which ensures the full and meaningful participation of women in decision making at all levels is not adopted.
- **Access to resources and services:** the requirements that projects/programmes establish procedures to ensure that women have access and/or control of necessary resources for their livelihoods such as water, forests and lands and that their access to productive assets and services, including energy services, is increased.
- **Income:** the requirement that projects/programmes ensure an increase in women's income and livelihood status as well as access to financial resources and credit, and that they prevent any degradation/decrease in income or livelihood as a result of project/programme impacts; gender-disaggregated assessments of economic impact of projects/programmes on women with careful attention to informal sector economic activities and activities dependent on location of housing and community networks should be provided.

- **Providing opportunities:** the requirement that projects/programmes should contribute to narrowing opportunity and outcome gaps between males and females and provide women with employment and job opportunities; projects/programmes should look at pro-actively supporting women as professionals and business entrepreneurs in providing clean energy and climate adaptation services.
- **Climate-induced displacement and migration:** the requirement that projects/programmes analyze and address the gender differences among environmental refugees as women, adolescents, and young girls are the most vulnerable when facing different climate phenomena.
- **Land rights:** the requirement that women's landholdings and land and forest use are clearly documented prior to project/programme design, are protected during project/programme design, implementation, and assessment and that there is no loss of land or forest or loss of access to land or forest by women. Instead, projects/programmes should support women's improved tenure security and forest resource use.
- **Gender-based violence:** the requirement that mandatory steps to prevent gender-based violence often associated with the presence of security forces to "protect" projects/programmes are taken. In post-climate chaos environments, women are at risk of sexual violence and rape.
- **Gendered focus on health and well-being:** the requirement that mandatory steps be taken to provide information and services on sexual and reproductive health to prevent sexually transmitted infections (STIs), including HIV and AIDS, which is associated with the presence of largely male labor forces and security forces associated with construction/infrastructure projects/programmes. As such awareness and educational programmes, support, and referral services should be made accessible, available, and at no cost to women and girls who are at risk of STIs. Additionally, beyond women's mortality rate and vulnerability to disease, the physical and mental well being of women also need to be taken into account and post-trauma mechanisms should be available.
- **Free, Prior and Informed Consent:** The requirement that projects/programmes apply the FPIC principle in their engagement with stakeholders in a gender-equal way, ensuring specifically the voices of Indigenous women and young women are heard. FPIC should be applied in an iterative process before and during project/programme implementation.

(d) **Key priority/results areas:** What type of gender-informed key priority and results areas should the review of the updated Gender Equality and Social Inclusion Policy and Action Plan consider at the institutional, operational and programming levels?

In order to make substantial progress with gender mainstreaming in all GCF-funded actions and in the engagement with the Fund by all relevant internal and external actors (including the GCF Board, the Secretariat with top management, the Accredited Entities and their executing partners, readiness support implementation partners, National Designated Authorities/Focal Points, observers, and in-country stakeholders), a few key priority and results areas stand out. The following, *inter alia*, provides a short overview of some of these key areas.

Institutional:

Gender budgeting and gender financial audits/financial accountability: In most cases, proponents of GCF project/programme proposals perform the mandatory initial gender assessment and might even articulate priority measures in a project/programme specific gender action plan. However, such mainstreaming measures are rarely fully costed and integrated in the overall project/programme budget. The added requirement in the updated gender policy for a mandatory project/programme gender action plan should specify that such action plans need to be fully costed and their financing integrated into the overall project/programme budget. In general, a gender-responsive budgeting approach for GCF projects/programmes is still missing as that would require an analysis of the budget's differing impacts on men and women and allocating money accordingly. At the moment, AEs do not account for and report to the Secretariat the amount of GCF funding for projects/programmes that supports target actions in support of gender equality and women's empowerment. Such gender financial reporting should be included as part of AEs regular monitoring and reporting requirements. Correspondingly, without relevant AE reporting, there is no accounting, and thus no accountability for how much of the overall GCF portfolio funding is supportive of gender mainstreaming goals. Ultimately, as part of the regular GCF financial audit process, gender financial audits should be performed. The new action plan should set minimum gender financial targets for the GCF portfolio, to be progressively raised. This information should also be reported to the Standing Committee on Finance (SCF) as well as the COP to increase the gender-responsiveness of financial reporting, for example in the regular SCF Biennial Assessment.

Operational:

Increasing the full and effective participation of women: Probably the most important single results area -- which involves a comprehensive set of necessary actions and priority activities -- is to focus on increasing women's voice and agency through their full and effective participation in all aspects of the Fund's operations. This includes amplifying women's voices as observers and input providers in GCF Board decision-making on operational policies and in mandatory policy reviews and the elaboration by the GCF Secretariat of those draft policies and guidance documents. It most fundamentally has to focus on including grassroots civil society organizations, especially women's groups, gender and human rights groups, and indigenous women as those most vulnerable to and affected by climate change throughout the project/programme cycle in recipient countries (to be further elaborated under question (g)). Full and effective participation cannot be limited to proof that a consultation has happened or to

counting attendance, but means a prioritized focus on increasing women's agency and decision-making power. While this is important at any level, it must be especially enforced by empowering local women's role in adaptation, transport, land-use, and energy-related decision-making processes throughout the GCF project/programme cycle.

Programming:

Early and improved access to information: Improved and early access to information needs to be prioritized for local stakeholders, in particular grassroots and indigenous women. The early and comprehensive gender-responsive disclosure of project/programme proposal information for early consultations on project design with local women, men and their communities (for example at the pre- or concept stage), for NDAs' no-objection- letter and for timely feedback before Board consideration and approval is a key example. Such information provision and consultations need to take place through communications means and in places that are easily accessible by the women of the communities, and in languages that are understood by them. Here the Secretariat, the Board, the AEs, and NDAs/FPs are equally responsible to ensure that this happens as a high priority focus.

Participatory monitoring: Early and comprehensive access to information in turn is the requirement for successful participatory monitoring by local women stakeholders, in particular grassroots and indigenous women. Enshrined as a mandated approach under the GCF Monitoring and Accountability Framework, its current definition and application as an annual stakeholder forum organized at the national level by the NDA/FP needs to be significantly expanded. Participatory monitoring means for example also involving local stakeholder women in elaborating project-specific performance indicators. Grassroots and indigenous women who are supposed to benefit from GCF project/programme implementation should have a say in what they would see as indication of success. Likewise, in giving them a say in defining appropriate indicators, they can actively contribute to monitoring such indicators in their respective communities and thus provide "red flag early warning" to the AE and the Secretariat if the local execution of project/programmes goes awry and to prevent significant environmental and social harm from occurring in the first place.

Resource allocation and accessibility: the proposed new action plan includes Priority Area 3 on resource allocation, accessibility and budgeting and allows in para.19 for targeted funding support for women's climate action if deemed necessary to correct existing discriminations and inequalities. It should also propose that projects/programmes with well-designed gender mainstreaming elements might be looked on favorably in project/programme assessment and Board consideration. A gender bonus for project/programme proposal consideration should for example apply in scorecard approaches where extra percentage points could be added for project/programme proposals with thorough gender mainstreaming efforts. The GCF Secretariat uses such scorecards for special requests-for-proposals (RFPs), where only concept notes with a minimum percentage score are invited to be developed into full proposals for GCF funding. Special funds or an RFP for showcasing best-practice gender-responsive approaches for proposals for adaptation, mitigation and the PSF should be

considered. Correspondingly, as is the practice in the Adaptation Fund, project/programme proposals without sufficiently articulated gender components should not be considered for funding until improvements have been made. Targeted funding support could also come in the form of a GCF dedicated funding mechanism in support of women's climate actions, including support for climate actions delivered by women's organizations working at the local level. Some best practice examples for such set-aside funding in climate funds exist, for example in form of the Forest Investment Program's (FIP) Dedicated Grant Mechanism for Indigenous Peoples and Local Communities¹⁴. Such a commitment to targeted funding support for women's climate action should be integrated in the gender policy and operationalized with a focus on grassroots and indigenous women in the gender action plan through the proposed establishment of a dedicated funding support for this purpose, ideally in the form of a small grant facility.

(e) Outline and content of the updated Gender Equality and Social Inclusion Policy and Action Plan.

In our joint CSO submission in the first round of public input, we had made some specific recommendations for strengthening/improving in particular the outline and content of the updated action plan. Some of those issues that we feel need further addressing are briefly described here. Specific suggested textual edits on the updated policy as well as the updated the action plan and an action plan log frame respectively are included in Section III of this document (proposed Annexes I-III).

It is the purpose of a gender action plan to provide a time-bound accountability tool for the GCF on concrete actions, steps, and measures that should be taken in order to achieve progress in the Fund-wide implementation of the gender policy. These should be prioritized in a log frame listing actions correlated with relevant time-lines, responsible actors, indicators, and budget lines and staff requirements in order to be both credible and actionable. The draft update action plan provides such a framework, but it does not correspond to its priority areas and instead only slightly upgrades a much older draft work plan¹⁵ presented for the Board together with the original gender policy and action plan at its 9th meeting and rejected then. Before such a plan can be approved, it needs to be brought in line with the priorities outlined in the updated gender action plan.

The gender action plan 2018-2020 should not be handled as a static document, but treated as a "living document" to be updated at least yearly in conjunction with the Board's and the Secretariat's annual work plan and through ongoing engagement with stakeholders and outside experts, for example via a newly formed Gender Advisory Group. Thus, the action plan should include the explicit mandate for an ongoing cross-checking

¹⁴ For more information, see <http://www.dgmglobal.org/>.

¹⁵ See Annex IV of GCF Board document GCF/B.09/10. Available at: http://www.greenclimate.fund/documents/20182/24949/GCF_B.09_10_-_Gender_Policy_and_Action_Plan.pdf/fb4d0d6c-3e78-4111-a01a-e5488f9ed167.

and cross-referencing with the Board work plans as well as with other relevant operational policies and procedures to be developed or refined during that time. For example, the gender action plan should include a time-bound framework for integration of language pertaining to gender requirements into various aspects of the ESMS, such as the ESP and the development of the Fund's own ESSs as well as the articulation of detailed relevant guidance for AEs and other implementation partners.

The proposed Priority Area 3 on resource allocation, resource accessibility, and budgeting in the new updated GAP should be further expanded. It must include a clear commitment for the GCF proposal approval process (currently under Board review) to ensure that the gender-relevant elements of a project/programme are fully funded with guidance provided by the Secretariat to AEs on how to do gender-budgeting for GCF proposals. As part of the AEs regular monitoring and accounting under provisions of the GCF Monitoring & Accountability Framework, for example, AEs should indicate the actual percentage of the project's budget allocated to addressing specific gender elements and gender-responsive implementation arrangements. Likewise, NDAs/FPs should disclose transparently how much of the readiness financing they receive, such as for country coordination, multi-stakeholder engagement country programme development, and project pipeline preparation is supporting efforts to improve their respective gender-responsiveness. It should also clearly elaborate that the Fund's administrative budget must include adequate dedicated resources for the full implementation of the gender policy. There should also be a commitment to regular gender financial auditing of the Fund's activities. This will allow for an accounting of how much of the resources in the GCF portfolio enhance gender equality and women's empowerment through GCF-funded climate actions.

An updated action plan should also further expand commitments and planned activities under Priority Area 5 on knowledge generation and communication section. The action plan should state a commitment to contribute to research and knowledge generation on what transformative and paradigm-shifting gender-responsive climate action looks like. For example, this could include some analytical work on large-scale renewable energy infrastructure, and its gender impacts, or research and collaboration with the Climate Technology Centre & Network (CTCN) on the most appropriate energy technologies and projects supportive of gender equality and social inclusion and ready for widespread replication and scale-up. There is also a dire need for knowledge generation on how the fulfillment of updated gender policy requirements can be assured in financial intermediation and equity investments, such as fund-of-fund approaches, where AE oversight might be very remote.

An updated action plan should commit to an iterative engagement with stakeholders, in particular women from grassroots civil society organizations, gender and women's rights groups, and representatives of indigenous groups, to bring their traditional and specific knowledge, experiences, and capacities on addressing local climate change impacts and drivers to GCF actions and the implementation of the GCF gender policy and

action plan. Such a continuous and regular check-back with civil society and community stakeholders during the three years of the gender action plan provides a participatory monitoring approach to whether both the updated gender policy and action plan are on track to achieve the desired results.

(f) **Scope and principles of the updated Gender Equality and Social Inclusion Policy and Action Plan.**

We support an update of the gender policy by continuing a principles-based approach to guide its implementation according to core values and premises. There has been some adjustment suggested from the current policy, both in terms of welcome clarification, but also including some unwelcome omissions (as described in more detail in the corresponding paragraphs in our overarching comments and concerns in Section I of this document). The latter relate specifically to a missing statement on the comprehensiveness of scope and coverage of the gender policy by applying it to all GCF-funded activities as well as to the removal of a section on resource allocation and accessibility from the draft updated policy. More detailed suggested text edits to the updated policy and action plan are included in Section III of this document.

In our joint CSO submission in the first round of public input, we had made, *inter alia*, some specific recommendations for strengthening/improving in particular the scope and the principles of the gender policy. The extent to which those initial recommendations are reflected in the draft updated policy, as well as concern over important omissions is elaborated briefly below.

- **Non-regression:** the updated policy could be more explicit in the inclusion of a statement on non-regression (a prohibition to go back on the protection achieved; norms which have already been adopted cannot be revised in a way that weakens them).
- **Strengthening of the human/women's rights framing:** We are pleased that the updated policy recognizes a human-rights based approach as a guiding principle and clearly states that the implementation of all GCF funding activities must be in accordance with international agreements on human rights, such as the Universal Declaration of Human Rights and the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and core conventions of the International Labour Organization (ILO) such as C169 - Indigenous and Tribal Peoples Convention. It also references the Paris Agreement's commitment to human rights and gender equality, as well as key UNFCCC decision. .
- **Evolving from gender-sensitivity to gender-responsiveness:** language in the update to the policy and action plan reflects a clear commitment to gender-responsiveness as best practice standard (from the weaker language on gender-

sensitivity). This is in line with language used in UNFCCC decision 18/CP.20 and the Paris Agreement (see in particular Article 7 and Article 11).

- **Increase the focus on women's agency:** While in the update efforts have been made to better balance a focus on the vulnerability of women and their communities with a focus on increasing women's agency to address climate change as consumers, community leaders, resource managers, and entrepreneurs, those are uneven. Further improvements are needed for example in the draft policy's Section 6.3 on project-level implementation. Language in the draft policy on the vulnerability of men and women should also be shifted to acknowledge and support the capabilities and resilience of women and men in marginalized and/or climate-vulnerable communities.
- **Guard against "national contextualization" efforts in the name of culture/religion:** While country ownership must be maintained as a core principle in the updated policy, it should be clarified that it is not exclusively defined by the actions/decisions of the NDA/FP or national policies but must also consider citizens as individual rightsholders. The GCF has to take a very clear stance that a "national contextualization" and presumably watering down or non-acceptance of international human and women's rights conventions and agreements that form the guiding framework for the GCF gender policy obligations on the basis of "customary/religious tenets" cannot be accepted and that the GCF will not provide financing to projects and programmes where the policy cannot be complied with.
- **Address both allocation and accessibility of resources:** The reference of a guiding principle to gender-equitable allocation of GCF resources delivered in a way that does not perpetuate or make worse existing gender inequalities needs to be re-integrated in the updated policy. It should also articulate the possibility of targeted allocation of GCF funding in support of women's climate change actions as a way to redress those inequalities and include a commitment to address and improve the access of women's groups to such funding. This will help to ensure funds are allocated for women's issues and concerns. It can also enable women's stand-alone projects/programmes or gender-specific request-for-proposals.
- **Comprehensiveness in scope of application:** A sentence should be re-introduced in the updated policy to emphasize that it applies to all GCF activities, including all its funding activities for mitigation and adaptation; public, private and PPPs.

(g) **Entry points for engagement and participation of women and men of all ages from most vulnerable communities.**

Some of our responses to questions (a) and (d) have already highlighted a number of entry points and recommended actions to improve the engagement and participation of men and women of all ages from the most marginalised and vulnerable communities in GCF funding actions. Thus, in this section here, we highlight some additional considerations already covered in the first round of inputs that we feel are worth repeating.

In the recipient countries, the NDAs/FPs and AEs have the main responsibility for ensuring inclusive engagement of those men and women from the most marginalised and vulnerable communities with respect to a) readiness and (sub)national-level planning processes; b) throughout the project/programme cycle; c) in early stage awareness raising and outreach efforts; and d) gender-equitable benefit-sharing of GCF-supported outputs and outcomes with communities most affected by climate change impacts.

Some potential entry points include:

- **NDAs/FPs should utilize available their readiness and preparatory support** to raise awareness with women and men from the most marginalized and vulnerable communities as a prerequisite for their meaningful engagement. GCF readiness support should also be used for building the capacity of local CSOs that focus on local women, communities, and women's rights to engage at every level of decision-making on climate projects/programmes, such as in interactions with the NDA, the AEs, and executing entities and advocating for their needs and rights with the GCF Board.
- **Early, comprehensive, and meaningful multi-stakeholder engagement in (sub)-national level planning processes** should focus on involving men and women from grassroots and community-based organizations with a specific focus on the **inclusion and pro-active outreach to local community women and indigenous women**. Language barrier or illiteracy amongst men and women from the most vulnerable communities should not be an excuse used to justify not engaging them in the project processes. Free, prior and informed consent (FPIC) should be applied as the best practice standard for engagement with all, particularly marginalised and vulnerable individuals and communities.

This is relevant for NDAs/FPs as part of their country coordination and stakeholder engagement efforts and for the development of NAPs or GCF country programmes (all of which can be supported by GCF readiness and preparatory support funding) as well as for AEs in project design and early project development phases. Entry points for engagement and participation of women and men from the most vulnerable and marginalized communities are opening up during the development of concept notes, which both NDAs/FPs and AEs can submit/proposal stage. The engagement of men and women from vulnerable and marginalized communities should be an ongoing

process throughout the project cycle (from design, implementation, monitoring and evaluation and exit stages).¹⁶

- **Gender-responsive assessments of both the needs and capabilities of women and men from the most marginalized and vulnerable communities** that are supposed to benefit from proposed projects/programmes are needed. Such assessments, which should also take into account traditional and local knowledge, should form the basis for GCF-supported interventions. It may be necessary to ground truth the consultations and needs assessment done by the project/programme proponents with local stakeholders from vulnerable communities. This should be done through GCF CSO observer organizations to avoid objections to the project on the ground of missing consultations with proposed beneficiaries.
- **Focus on gender-responsive social mobilization and institutional development through enhancing the agency/leadership role of local women in local resource governance**, such as water user organizations or local cooperatives. As recent experience with some GCF adaptation water infrastructure projects has highlighted, in order for such projects to provide guaranteed benefits for the women and men from the most marginalized and vulnerable communities affordability and accessibility as well as multiple-use of resources such as land or water to include household use and women's care work need to be taken into account.
- **Clear articulation of project/programme benefits for the most vulnerable men and women from climate change affected communities and the monitoring of their achievement..** To ensure that the most marginalised and vulnerable individuals and communities receive benefits from the GCF's projects/programmes, those should include clear gender targets in employment, training, and governance; quotas or reservations for grants to women and/or female-headed households for local adaptation activities; targeted awareness and outreach campaigns including demand-side management; development of women's leadership, skill, and mobility opportunities; or identifying potential benefits for women's economic opportunities and leadership.
- **Increased and simplified access to GCF projects/programme funding for men and women from the most vulnerable communities, for example as beneficiaries of national small grant approaches under the Enhanced Direct Access Pilot Programme.** At (sub-)micro level, the recently approved simplified access modalities should allow for smaller gradients of funds to be made available. Local women's groups, including women's cooperatives, should also be considered as possible partners of AEs in project/programme implementation, for example as Executing

¹⁶ The GCF Guidelines for Enhanced Country Ownership and Country Drivenness (paragraphs 12 -14) provide relevant guidance.

Entities for certain project/programme (sub-)components. Such engagement should become the norm, not the exception. It would be strengthened if GCF project/programme implementation would be guided by the principle of subsidiarity, namely the notion that GCF funding should be implemented through the most local executing entity possible.

(h) Human and financial resource requirements and roles and responsibilities in operationalizing the updated Gender Equality and Social Inclusion Policy and Action Plan.

Operationalizing the updated GCF gender policy and action plan is the responsibility of all GCF institutions and partners, in particular that of GCF Secretariat, AEs, and NDAs/FPs. GCF observer organizations, especially CSOs, also play a key role in advocating on behalf of and giving voice to the concerns of local men and women from grassroots groups in GCF proceedings and policy development. GCF CSO observer groups also share information about the GCF with women's groups and build their capacity to engage on GCF-related matters, for example to encourage them to reach out directly and interact with the NDA/FP or project/programme proponent.

The Secretariat has a core role in coordinating the efforts of all GCF institutional partners to operationalize the updated policy and action plan. Therefore, it is essential that both the GCF administrative budget managed by the Secretariat as well the Secretariat's staffing plan reflect the financial and human resource needs for the implementation of the GCF gender mainstreaming mandate. Unfortunately, the Secretariat's 2018 budget and staffing plan do not foresee a much needed increase in gender and social development staff positions. Thus building the gender competency of non-gender expert staff within the Secretariat, which is scheduled to reach 250 staff by the end of 2018 beyond the current one staff person assigned as a gender focal point becomes even more important. Therefore, in hiring new staff, preference should be given to candidates that have gender and social development capabilities on top of specialised technical expertise. Only then is it possible to provide the gender-related due diligence as part of the accreditation and proposal approval processes, to integrate gender considerations into policy documents and operational guidelines, or to engage with NDAs/FPs to enhance their gender awareness and the gender-responsiveness of country programmes and readiness and preparatory support activities.

AEs must be compelled by the updated policy, and supported as needed, to build their own gender competency and not just outsource it by engaging external gender experts as consultants. AE project/programme teams need to have the gender capacity to supervise and guide concrete gender actions implemented by executive entities. For financial intermediaries working with the GCF, an in-house gender specialist must become as important as an in-house financing expert. NDAs/FPs should actively reach out to women's machineries in their own country as part of their country coordination efforts and to domestic and local gender

experts and women's groups as part of their wider stakeholder outreach and engagement. They can support those activities through GCF readiness and preparatory support financing.

III. Suggested CSO textual edits and comments to the draft GESI Policy and Action Plan

Annex I: Gender Equality and Social Inclusion Policy for the Green Climate Fund

I. Background

1. The Governing Instrument gives the Green Climate Fund ('The Fund') a clear mandate to enhance a gender - sensitive approach in its processes and operations. It recognizes the importance of gender considerations in terms of impact and access to climate funding:

(a) *"3. ... The Fund will strive to maximize the impact of its funding for adaptation and mitigation, and seek a balance between the two, while promoting environmental, social, economic and development co-benefits and taking a gender-sensitive approach."*

(b) *"31. The Fund will provide simplified and improved access to funding, including direct access, basing its activities on a country-driven approach and will encourage the involvement of relevant stakeholders, including vulnerable groups and addressing gender aspects."*

2. Paragraph 71 lists women explicitly among GCF stakeholders. Finally, the Governing Instrument calls for gender balance among members of the Board (paragraph 11) and staff of the Secretariat (paragraph 21).

3. This updated policy and action plan expresses GCF's commitment to promote comprehensive action for progressing on a more comprehensive understanding of the inter-related goals of gender equality, and improving the understanding of its intersectionality and social inclusion within the Secretariat, across its investment portfolio criteria and as an integrated measure and necessary component to achieve the Fund's overall mandate to promote the paradigm shift towards low-emission and climate-resilient development pathways in recipient countries. ~~of the social dividends of the overall portfolio.~~ These goals are not accidental co-benefits, but are deliberate and intentional goals at process, performance and portfolio levels.

1.1 Definitions³

(a) Agency

The capacity to make decisions about one's own life and act on them to achieve a desired outcome, free of violence and coercion, retribution or fear.

(b) Empowerment of women

The ability and agency of every woman to shape her own destiny, exercise her rights and make her own choices. Women's empowerment has five components: a woman's sense of self-worth; their right to have and to determine choices; their right to have access to opportunities and resources; their right to have the power to control their own lives, both within and outside the home; and their ability to influence the direction of social change to create a more just social and economic order, nationally and internationally.

(c) Gender

Gender refers to the social, behavioral and cultural attributes, expectations, responsibilities and norms associated with being male or female. They are context/time-specific and changeable, and therefore consideration of gender identity should also be taken into account.

(d) Gender equality

As enshrined in international conventions and national constitutions and other human rights agreements, gender equality refers to equal rights, power, access, responsibilities and opportunities for women and men, as well as equal consideration of the interests, needs and priorities of women and men, recognizing the diversity of different groups of women and men and considering gender identity as well.

(e) Gender equity

Refers to the process of being fair to women and men. To ensure equity, measures often need to be taken to compensate (or reduce) disparity for historical and social disadvantages that prevent women and men from otherwise operating on an equitable basis. The process of gender equity leads to gender equality as a legal right and obligation.

Gender Mainstreaming

Refers to a globally accepted strategy for promoting gender equality. Mainstreaming involves the process of assessing the implications for women and men of any planned action, including legislation, policies or programmes, in any area and at all levels. It is a strategy for making the experiences and concerns of women as well as men an integral part of the design, implementation, monitoring and evaluation of policies and programmes, so that women and men benefit equally and inequality is

not perpetuated, if necessary through targeted actions to ensure that women's voices as important actors are heard.

(f) Gender responsive

Refers to the consideration of gender norms, roles and relations and to addressing inequality generated by unequal norms, roles and relations through remedial action beyond creating gender awareness.

(g) Gender sensitive

Refers to raising awareness and consideration of gender norms, roles and relations but does not necessarily address inequality generated by unequal norms, roles or relations through remedial action beyond creating gender awareness.

(h) Intersectionality

Can be defined as the study or concept of ~~discriminatory~~~~discriminative~~ or oppressive institutions on disenfranchised groups or minorities, and the way these groups are interconnected. The theory of intersectionality is based on the concept that oppressive institutions within a society, such as racism, ageism, sexism and homophobia, do not act independently, but are instead interrelated and continuously shaped by one another. In the context of gender, intersectionality describes how gender overlaps with other socio-cultural factors such as race, ethnicity, religion or belief, health, status, age, class, caste and sexual orientation and gender identity, race, poverty level, ethnic group and age.

Comment [1]: I am standardizing the terms by using CEDAW language. CEDAW/C/2010/47/GC.2

(i) Resilience

Resilience to climate change can be understood as (1) the capacity to absorb shocks and maintain function in the face of stresses caused by climate change; and (2) adapt, reorganize and evolve into more sustainable socio-economic behaviors, leading people to be better prepared for future climate change impacts.⁵

(j) Rights-based approach

In a rights-based approach, every human being is recognized both as a person and as a rights holder. A rights-based approach strives to secure the freedom, well-being and dignity of all people everywhere, within the framework of essential standards and principles, duties and obligations. The rights-based approach supports mechanisms to ensure that entitlements are attained and safeguarded. Rights are indivisible, interdependent and interrelated. The human rights-based approach focuses on those who are most vulnerable, excluded or discriminated against.

Rightsholder

Means an individual or a major group that enjoys specific rights recognized under International Law, and that represents assumed beneficiaries of sustainable development support

Stakeholder

Means an individual or group that has an interest in the outcome of a GCF- financed activity or is likely to be affected by it

(k) Social inclusion

Refers to the process of improving the terms for individuals and groups to take part in society, and the process of improving the ability, opportunity, and dignity of those disadvantaged on the basis of their identity to take part in society.⁶

(l) Women's empowerment

~~Can be best understood as~~ Means an expansion of agency throughout women's lives, especially via active effective ~~through~~ participation and decision-making, including differential and/or pro-active support. ~~It generally refers to differential or pro-active support to increase:~~

- (i) Women's sense of self-worth;
- (ii) Women's right to have and ~~make~~determine choices;
- (iii) Women's right to have access to opportunities and resources;
- (iv) Women's right to have power to control their own lives both within and outside the home; and
- (v) Women's ability to effectively influence the direction of social change to create a more just social and economic order, nationally and internationally.

II. Rationale

4. In the context of sustainable development, using for example, the Sustainable Development Goals (SDGs) as a reference, the GCF shall consistently apply gender-responsive and socially inclusive implementation arrangements and frameworks to its project/programme delivery. The updated GESI Policy and Action Plan recognizes that gender relations, roles and responsibilities exercise important influences on women and men's access to and control over decisions, assets and resources, information and knowledge. Guided by a human-rights based approach, it further acknowledges that climate change project initiatives are more sustainable, equitable and effective when gender equality and women's empowerment considerations are integrated into the design and implementation of projects.

5. The GESI Policy and Action Plan is closely aligned with the broader set of 17 SDGs which make explicit commitments to gender, both as a standalone goal on gender equality and women's empowerment (SDG5) as well as a crosscutting theme across all the SDGs. SDG13 on combating climate change aims to promote mechanisms for raising capacity for effective climate

change-related planning and management in least developed countries and small-island developing states, and includes focusing on women, youth, and local and marginalized communities. Other relevant SDGs include SDG2 (zero hunger); SDG3 (good health and well-being); SDG4 (inclusive and quality education), SDG6 (clean water and sanitation); and SDG7 (affordable and clean energy); and, SDG8 (decent work for all).

6. The GESI Policy and Action Plan is guided, among others, by the UNFCCC, whose parties noted that when addressing climate change principles of gender equality and empowerment of women should be respected, promoted and considered.⁷ It is also guided by the Paris Agreement, which urges parties to “when taking action to address climate change, respect, promote and consider their respective obligations on human rights, the right to health, the rights of indigenous peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity”, and which reflects the commitment by Parties that adaptation action should be “gender-responsive” (Article 7.5).⁸ This policy is, therefore, congruent with international agreements and conventions, in particular with the Universal Declaration of Human Rights, CEDAW, Beijing Declaration and Platform for Action, International Labour Organization’s core conventions, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights.

7. This policy also aligns itself with GCF procedures, language and guidance of the Environmental and Social Management System (ESMS), its of the interim environmental and social safeguards (ESS) standards and Environmental and Social Policy (ESP) and with the policies or other standards that the GCF upholds or will come up with prospectively (e.g. Indigenous Peoples’ Policy, accreditation framework, monitoring and accountability framework, simplified approval process, country ownership guidelines, etc.).

Comment [2]: There should be a reference to the broader ESMS, with the ESS and ESP (currently under development), but no specific reference to the interim ESS (= the IFC performance standards) as they are expected to be superseded by the development of the GCF’s own ESS

Comment [3]: I agree. However, given the separation in this paragraph between current policies and policies that the GCF will come up with should the ESMS, ESP, and ESSs be in the prospective section?

III. Objectives

8. This policy reinforces the responsiveness of the GCF to the multiple, heterogeneous, culturally diverse contexts of gender equality, its intersectionality and social inclusion to better address and account for the links between such a comprehensive approach to gender equality, its intersectionality, social inclusion and climate change. The policy commits to (i) enhancing a comprehensive approach to gender equality, its intersectionality and social inclusion within its governing structures and day-to-day operations; and (ii) promoting the goals of gender equality, its intersectionality and social inclusion through its fund allocation decisions, operations and overall impact.

9. This policy spells out the principles for achieving gender responsiveness and, through an action plan and supporting technical guidance, the operational requirements for rightsholders and stakeholder involvement in the design, implementation and evaluation of policy processes, frameworks and projects and programmes.

10. This policy moves beyond ~~a narrow understanding conventional treatment~~ of gender to consider, respect and value the full diversity of women and men ~~and their gender identity, considering gender identity as well,~~ as affected by their ~~race, ethnicity, religion or belief, health, status, age, class, caste and sexual orientation and gender identity, marital status, income levels, ethnicity, sexual orientation, religion, belief or non-belief, physical abilities, locations and mobility.~~

Comment [4]: Revised to CEDAW language

11. The policy has three main objectives:

- (a) Support climate change interventions and innovations through a comprehensive gender-responsive approach applied both within the institution and by its ~~executing network of partners (including accredited entities, executing entities, and NDAs/Focal Points);~~
- (b) Promote climate investments that (i) advance gender equality and social inclusion through climate change mitigation and/or adaptation actions; and (ii) minimize social and gender-related climate-related risks while also safeguarding and promoting women and men's human rights in all climate change actions; and
- (c) Reduce the gender gap of climate change-exacerbated social, economic and environmental vulnerabilities and exclusions through strategic climate investments.

Comment [5]: A reference to "executing partners" excludes a crucial reference to NDAs/Focal Points which have a key role to play...

IV. Scope of Application

12. The GE policy is comprehensive in scope and coverage. The Fund applies its updated GE policy to all its activities, including all of its funding activities for mitigation and adaptation, public and private. The policy objectives apply across four interconnected levels:

- (a) At the institutional level: Adopt, implement and document the GCF gender-responsive approach and adherence to social and cultural diversity in its day-to-day governance, operations and procedures, and its performance measurement frameworks while committing the necessary resources to make this approach robust and effective;
- (b) At the project/portfolio level: Address and minimize social risks and gender inequality, achieve more meaningful deeper-rightsholder and stakeholder engagement and deliver better accountability to men and women to generate sustainable livelihood opportunities, health and well-being, and resilience against climate induced shocks and risks;
- (c) At the regional and national level: support and sustain an enabling environment among GCF stakeholders – including NDAs/FPs, AEs, delivery partners, and beneficiaries such as local communities – which builds on gender equality and social policy commitments, environmental and social standards and redresses mechanisms to achieve gender equality and social inclusion; and

(d) At the sector level: contribute to high quality, more comprehensive and systematic sex-disaggregated data, qualitative and quantifiable gender analysis, and a knowledge base that supports gender-responsive learning outcomes.

13. In this way, the GCF will support an institutional culture and provides an enabling environment that integrates gender equality, its intersectionality and social inclusion vertically and horizontally across diverse stakeholders and rightsholders and climate change relevant policy processes and frameworks and through the course of the project life-cycle and climate investments.

Comment [6]: This policy fails if just applied to individual projects but not to the larger enabling environment of changing the discourse via integration in policy frameworks and processes related to climate investments

V. Guiding Principles

14. The guiding principles underpin the core values and premises of the policy and are aligned with the guiding principles of the GCF Governing Instrument.⁹ These principles include the following:

5.1 Human Rights Approach

(a) The GCF recognizes the centrality of human rights to sustainable development, poverty alleviation and ensuring fair distribution of development opportunities and benefits and supports “universal respect for, and observance of, human rights and fundamental freedoms for all.”¹¹ All GCF activities shall respect the rights and responsibilities set forth in the Universal Declaration of Human Rights (UDHR), the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), the 1995 Beijing Platform for Action and other applicable international instruments relating to ~~the~~ human rights such as the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights (ICESCR), as well as the human rights of indigenous peoples, including ILO Convention No.169, the International Covenant on Economic, Social and Cultural Rights, United Nations Declaration on the Rights of Indigenous Peoples, and the International Convention on the Elimination of All Forms of Racial Discrimination (CERD).

(b) The GCF upholds the principles of accountability and the rule of law, participation and inclusion, and equality and non-discrimination, noting that prohibited grounds of discrimination include race, ethnicity, gender and gender identity, age, language, disability, sexual orientation, religion, political or other opinion, national or social or geographical origin, birth or other status, including as a member of a minority.

5.2 Country Ownership

- (a) The GCF informs NDAs/FPs that proposed GCF framework and plans, including country programmes, readiness, national adaptation plans, nationally appropriate mitigation actions and other projects, proposals and plans submitted to the GCF by NDAs/FPs or AEs shall be aligned with national policies and priorities on gender and with ~~of with~~ the GCF GESI Policy and Action Plan, within the framework of international human and women's rights agreements. Additionally, the NDAs/FPs serving as country coordinating mechanisms (CCMs) for the engagement of their countries with the GCF shall apply the principles of inclusion, equality and non-participation within the framework of international human and women's human rights agreements, and build on the country ownership guidelines approved by the GCF Board at B.M17.

5.3 Stakeholder Engagement

- (a) The GCF requires that women and men, and members of marginalized and vulnerable groups and communities, including local CSOs and women's groups, shall be provided with equal and equitable opportunity to be engaged in meaningful consultations and decision-making throughout the project cycle, in line with the initial best-practice options for country coordination and multi-stakeholder engagement outlined in decision B.08/10 Annex XIV and decision B.10/10 according to the country ownership guidelines adopted at B.M17 ~~during project and programme preparation, implementation and evaluation~~. Special efforts may be required to support stakeholder engagement where individuals and/or communities are particularly marginalized, excluded or isolated.

5.4 Free, Prior and Informed Consent (FPIC)¹²

- (a) The principle of FPIC ~~must needs to~~ be applied across all GCF-~~financed~~ ~~unded~~ activities. FPIC shall be an iterative process, requiring the consent of project/~~programme~~ ~~stake~~ ~~rights~~ holders in all their diversity, before any GCF-financed activities are undertaken. This consent is made on the basis of their own independent deliberations and decision-making process, based on adequate information to be provided in an accessible manner and through transparent, inclusive and culturally appropriate consultations, including with women, girls and youth. FPIC shall have the meaning described in this policy. FPIC does not require unanimity and may be achieved even when individuals or groups within or among vulnerable or project affected communities explicitly disagree. As part of the operational guidelines ~~for~~ ~~the~~ ~~FPIC principle~~, the GCF Secretariat, in consultation with indigenous peoples women and men, vulnerable and/or project affected communities, will develop and maintain guidance on the application of the FPIC. This guidance shall be developed

in a timely manner, and the Secretariat shall ensure that it is followed by all relevant parties.

Comment [7]: I don't know that we need to emphasize it again since it talks about participation in the previous sentence, but it could be worth re-emphasizing that it shall be developed in a "timely manner with the full and effective participation of indigenous peoples, vulnerable and/or project-affected communities" or in a "timely and fully participatory manner" or something akin to that.

5.5 Disclosure of Information

(a) This principle aligns with the requirements of the comprehensive Information Disclosure Policy (IDP) of the GCF. The GCF recognizes the importance of transparency, public access to information, and accountability in all aspects of its operations. Through the employment of the IDP, the GCF will endeavour to provide accurate, gender-responsive, culturally appropriate and timely information to its stakeholders and to rightholders, including marginalized individuals and communities, including local CSOs and women's groups, and the public at large, about its policy guidelines, standards, procedures and project/programme operations.

VI. Policy Requirements

15. The policy requirements are categorized as follows:

- (a) GCF Secretariat and Board responsibilities;
- (b) Accredited entities' and NDAs'/FPs' roles and commitments; and
- (c) Project/programme-level implementation requirements.

6.1 GCF Secretariat and Board Responsibilities

16. The GCF reports/accounts to its Board on the ~~for~~ results and outcomes of the GE Policy and Action Plan. The Secretariat is responsible for dedicating adequate financial, human and other resources as required to fully implement the ~~GES~~ Policy and Action Plan, including:

6.1.1 The GCF shall ensure that applicant entities are screened, selected and presented for accreditation to the Accreditation Panel (AP) and the Board on the basis of their commitment and capacity to implement the principles of this policy;

6.1.2 The GCF shall ensure that the accreditation master agreements and funded activity agreements with AEs obligate them to comply with the requirements of the ~~GES~~ Policy and Action Plan and ensure adequate means, capacities and expertise are retained for compliance with this policy;

6.1.3 The AP shall examine policies, capacities and compliance procedures of prospective entities applying for accreditation in line with the requirements of the GESI Policy and Action Plan and require that any gaps identified are addressed within a specified timeframe as a condition of accreditation or renewal of accreditation;

6.1.4 The GCF shall require AE's to submit a project/programme-level gender and social impact assessment and an accompanying review each AE's project/programme-level gender equity and social inclusion action plan. It will review each AE's project/programme-level gender equity and social inclusion action plan and a checklist of project/programme-level gender-responsive processes, procedures, budget, desired outcomes and implementation risks against which the project can be monitored. The GCF Secretariat will only advance project/programmes with sufficiently articulated gender equality and social inclusion integration effort for consideration by the Board. Project/programme proposals without such gender integration shall not be approved by the Board to receive GCF resources. As the rationale for this policy is to promote gender equality, the Board may consider giving additional weight to activities proposed for GCF financing with well-designed gender components.

6.1.5 The GCF shall ensure that its projects/programmes target the poor, vulnerable, marginalized individuals and female/widowed/adolescent/female-headed households/ child-headed households, the elderly, differently abled and those living in climate hotspots (e.g. hilly terrains, arid and semi-arid, delta regions, islands);

6.1.6 The GCF shall ensure that annual performance reports submitted by AEs report against gender and social inclusion requirements, targets and goals, including in alignment with the SDGs;

6.1.7 The GCF shall commit resources as necessary towards independent third-party verification and independent project reviews and assessments to document, publish and archive the value-added benefits and considerations of gender-responsive actions and achievements;

6.1.8 The GCF shall develop guidelines for gender assessments that go beyond the collection of sex-disaggregated data to also account for intra-community diversity and complexity, including intersecting categories, such as race, ethnicity, religion or belief, health, status, age, class, caste and sexual orientation and gender identity, and age rural vs. urban, and socioeconomic level/wealth quintile;

6.1.9 The GCF shall develop specific targets and progress indicators aligned with the SDG framework, not limited to only particularly SDG5, but also to other related SDGs too; integrate both qualitative and quantitative targets and indicators into the GCF results management framework; and require all projects/programmes financed by the GCF report progress and impact against this framework;

6.1.10 The GCF commits to generate, document, publish on its website and archive experience gained through its actions and project/programme investments, to promote learning from best practice implementation of its partners. The GCF shall also commit to capitalize on knowledge and expertise gained from other partner organizations;

Comment [8]: it may be necessary to include "Female maintained households". We have found on the ground that many women in marriages take on the responsibilities of men as the bread winner while the men are just figure heads referred to as head of the family. These women because they are regarded as in a marriage miss out from many opportunities.

Comment [9]: "Child-headed households" is a difficult issue. Omitting it from the text means this group will not be considered. Including it into the text might directly/indirectly suggests that GCF promotes child and early/forced marriage in some way.

6.1.11 The GCF is responsible for organizing gender training or providing any gender resource as requested by the Board. As requested by the Board, the Secretariat will organize gender training and capacity-building for AEs and intermediaries by the GCF, especially through integration of a gender training module in its readiness support activities and via project preparation grants.

6.1.12 Additionally, the Secretariat will strengthen its own gender capacity through mandatory training and capacity building on gender equality, its intersectionality and social inclusion goals, including the SDGs, for its staff. It can complement its own gender capacity with consultants drawing on a roster of gender and social experts and/or through the establishment of a gender advisory group of experts.

6.1.13 The Independent Redress Mechanism (IRM)-~~Unit~~ is responsible for ensuring that in the context of addressing a complaint or request, GESI Policy requirements are complied with by the GCF ~~in all redress cases~~. The Independent Evaluation Unit (IEU) is responsible for periodic comprehensive independent reviews of how well the GE Policy has been complied with in all GCF activities and operations.

6.1.14 The Senior Management of the Secretariat, Co – Chairs of the Board and Board members shall be responsible for reviewing progress made on the implementation of the policy and action plan at every or alternate Board meetings. Such periodic progress reports will be published as part of Board meeting documentation.

6.2 Accredited Entities' and NDAs'/FPs' roles and commitments:

6.2.1 AEs, including intermediaries, shall dedicate the necessary financial, human and other resources as required to implement the GCF GESI Policy. Through the accreditation process and the fit-for-purpose accreditation approach,¹³ all entities shall meet the GCF GESI Policy and gender requirements for accreditation. They are required to have policies, procedures and competencies in place with which to implement the GESI Policy, including the generation and use of sex-disaggregated data and gender analysis throughout all GCF supported activities;

6.2.2 After accreditation, and at the project/programme level, the AE shall be responsible for implementing the GESI Policy as it relates to the GCF-approved project/programme through in-country project/programme identification and implementation, as well as for results reporting;

6.2.3 The NDAs/FPs and AEs shall respect internationally proclaimed human rights and shall not be complicit in violence or human rights abuses of any kind as defined in the Universal Declaration of Human Rights.¹⁴ A compliance mechanism will be put in place by the GCF to ensure adherence to human rights principles; and

- 6.2.4 NDA/FP country coordination and stakeholder engagement efforts; NDA/FP country programmes; AE work programmes, as well as individual pProjects/programmes shall not discriminate with regards to participation and inclusion.

6.3 **Project/programme-level Implementation Requirements:**

6.3.1 At the project/programme inception stage:

- (i) Apply robust gender-responsive standards and FPIC principle to all concept notes and full proposals;
- (ii) All AEs submitting funding proposals shall submit a gender and social impact assessment and a project/programme-level gender equality ~~and social inclusion~~ action plan at the project preparation stage. These analyses ~~shall s-may~~ be used to inform project formulation, implementation, and monitoring and evaluation. Project/programme proposals without articulated gender equality and social inclusion considerations shall not be considered by the Board for approval; and
- (iii) All AEs shall ensure gender-responsive approaches in meaningful stakeholder consultation throughout the project/programme lifecycle: information sharing equitably with female and male stakeholders is a minimum standard, in which information is both available and presented in accessible formats across all stakeholder groups, including those more marginalized (e.g. women, girls, youth, indigenous peoples, etc.). The approach also includes opportunities for stakeholders to share information in a two-way exchange, give regular feedback during implementation as part of participatory monitoring approaches and ensure their views and priorities are effectively incorporated in design and practice.

6.3.2 At the project/programme design stage:

- (i) AEs shall outline design elements that encourage women and men from all sections of society to participate equitably and meaningfully in project/programme design; to mitigate risks of a project/programme intervention to ensure that it does not increase gender inequality ~~uity~~; and to optimize the project/programme benefits for the underprivileged or for women and men from vulnerable communities;
- (ii) AEs are required to understand and integrate sociocultural factors underlying climate change-exacerbated gender inequality to optimize and leverage the potential contributions of women, men and their communities to build individual and collective resilience to climate change;

(iii) AEs may adopt methods and tools to promote gender equality and reduce gender and social disparities, including through the application of social and environmental safeguards standards; and

(iv) Accredited entities will be expected to:

1. Describe how the activities proposed for GCF financing will be consistent with the updated GCF GESI Policy, and particularly regarding the FPIC process during project and programme design, implementation and expected outcomes related to the impacts affecting the communities;
2. Describe the involvement of women and men in their full social and cultural diversity in the design and the implementation of GCF-financed activities, and document detailed outcomes of the consultation process; and
3. Provide documented evidence of the mutually accepted process within the GCF-financed activities between the implementing entities and the affected communities and evidence of an agreement between the parties as the outcome of the negotiations.

6.3.3 At project/programme implementation stage:

- (i) To level the playing field for women, intentionally optimize women's empowerment, agency, choice and opportunities;
- (ii) Measure the outcomes and impacts of project/programme activities on women and men's resilience to climate change by, among other things, specifically requiring sex- disaggregated data and gender analysis (qualitative and quantitative) throughout the project's/programme's life-cycle; and
- (iii) Establish specific social impact and gender-performance indicators and gender- responsive data collection and measurement methods, including by aligning them -aligned with SDG5 and other related SDGs.

6.3.4 At project/programme monitoring and reporting stages:

- (i) The performance measurement and reporting frameworks will collect baseline information for each project/programme; specify desired gender equality and social inclusion outcomes; identify which projects/elements may contribute towards which aspects of gender equality and social inclusion (and which ones may not); identify, mitigate and manage possible risks and trade-offs with respect to gender equality and social inclusion; design and integrate necessary safeguards measures to mitigate social risks faced by vulnerable communities, including women and girls; and set up accountability and compliance mechanisms to ensure that planned activities related to the empowerment of women and other marginalized or vulnerable social groups are implemented in an adequate and timely manner.

VII. Implementation Arrangements, Compliance and Reporting

17. The GCF adopts a GESI Action Plan to operationalize the policy and accordingly focuses on five priority areas:
- (a) Governance and integrity;
 - (b) Competencies and capacity development;
 - (c) Resource allocation, accessibility and budgeting;
 - (d) Operational procedures; and
 - (e) Knowledge generation and communications.
18. The proposed duration of the action plan is three years, to enable the GCF to dedicate and invest the required resources both institutionally to develop robust GESI capacity as well as through climate change financing.

VIII. Dates of Effectiveness and Revision

19. This GESI Policy and Action Plan will come into effect upon adoption by the GCF Board, and will remain in effect until amended or superseded by the Board.
20. This GESI Policy and Action Plan will apply immediately to all new projects that are seeking GCF support and will require that all applicants demonstrate compliance with the mandatory requirements of the policy.
21. The GESI Policy and Action Plan will not apply retroactively to projects currently undergoing funding application or to entities who have undergone the accreditation process. The latter will need to demonstrate compliance with the mandatory requirements of the policy as part of their re-accreditation process.
22. The GCF Secretariat understands that gender mainstreaming and inclusivity at the institutional and the project level is a long-term undertaking and a sustained commitment, which includes tracking and reporting on its progress. It also acknowledges that approaches to gender equality, women's empowerment and social inclusion evolve over time. The policy will be reviewed and updated every three years or as determined by the Board. The review and update will be conducted with the full and effective participation of and in consultation with civil society and affected and potentially affected individuals and communities.

Comment [10]: I wasn't sure whether to have this as a separate sentence or to be part of the prior sentence after "three years" as my fear was that putting it as part of the prior sentence after "three years" and followed by "or as determined by the Board" could create ambiguity and allow the Board to decide that the review/update wouldn't include civil society.

Annex II: Action Plan {Phase II} 2018–2020

1. The operationalization of this policy rests equally with Secretariat roles, commitments and responsibilities and with the compliance required of NDAs/FPs and AEs on project implementation and evaluation. To support the enabling environment of national contexts, NDAs/FPs and AEs, the GCF needs to develop sufficient institutional capacity and expertise to promote its gender equality and social inclusion objectives and ambitions.
2. The purpose of the action plan is to provide a time-bound framework within which to operationalize this policy. Implementation of the action plan will require the GCF and all implementation partners, public or private, to build competencies, tools and processes to achieve gender-responsive and socially inclusive results. It also provides the Board with the information required to exercise its oversight responsibility for the GCF GESI Policy, as mandated by the Governing Instrument.
3. The plan is structured into five priority areas with accompanying details of implementation actions required for each priority area.

1.1 Priority Area 1: Governance and Integrity

4. The Fund shall strive to reach gender and diversity balance in all key advisory and decision-making bodies, including in the appointments of members of the Board, the AP, the Independent Technical Advisory Panel (ITAP), the Private Sector Advisory Group (PSAG) and the Secretariat management and staff.
5. The Board approves the updated GESI Policy and Action Plan and oversees the implementation of the action plan through the review of periodic monitoring reports from the Secretariat, particularly the Country Programming Unit (CPU), the Portfolio Management Unit (PMU), impact evaluation reports from the Independent Evaluation Unit (IEU) and any reports from the Independent Redress Mechanism (IRM).
6. The Secretariat will undertake its due diligence for the implementation of the updated GESI Policy and Action Plan through internal gender and social inclusion audits, through country-level engagement and readiness and preparatory support, through the accreditation of entities and intermediaries, and through a robust project approval and monitoring process. This will require strong gender equality and social inclusion competencies and integrity within the Secretariat, the AP, the ITAP and the Board. The Secretariat will report to the Board on the implementation of the updated GESI Policy and Action Plan on an annual basis mid-year.
7. The overall implementation of the updated GESI Policy and Action Plan is the responsibility of the Secretariat and the GCF operational structure comprising of AEs, NDAs/FPs, delivery partners, executing entities and contractors. The main operational responsibility for the implementation of the policy will be with the AEs, including implementing entities and intermediaries. Through the accreditation process, and

Comment [11]: An annual report provided mid-year for the second Board meeting of the year allows for a summary of the findings to be included in the GCF annual report to the COP. This would thus be in line with expected gender activity reporting expectations under the UNFCCC Gender Action Plan.

considering the fit-for-purpose accreditation approach,¹⁵ entities shall be required to put in place necessary policies, procedures and competencies to implement the updated GESI Policy and Action Plan. After accreditation, and at the project/programme level, the AE will be responsible for implementing the updated GESI Policy and Action Plan as it relates to the GCF-approved project/programme, through in-country project identification and implementation, monitoring and results reporting. ~~On the other hand,~~ NDAs/FPs may request readiness and preparatory support from the GCF to develop and/or strengthen their policies, planning processes, country coordination and stakeholder engagement procedures and competencies to meet the requirements of the updated GESI Policy and Action Plan.

8. The NDAs will verify through the no-objection procedure that project proposals are aligned with the countries' gender policies and international human and women's rights and gender equality commitments, as well as with their climate change policies and priorities. The GCF will expect that the NDAs use, as appropriate, the countries' gender competencies to review their climate change plans, gender and social inclusion action plans and programmes and projects.

9. This policy is aligned with the GCF risk management framework. The GCF will have zero tolerance towards its staff and Board members not adhering to the GESI Policy and Action Plan.¹⁶

1.2 Priority Area 2: Competencies and Capacity Development

10. The GCF will ensure that social/human ecology and gender-responsive learning become a valuable and required asset available to all staff and that this requirement is integrated into key qualification criteria across the organization. The GCF will ensure that significant resources are dedicated and earmarked for internal learning at many levels, from junior staff to the AP, ITAP, PSAG and the Board to fully subscribe to a gender equality/~~diversity/rights-based mandate~~social inclusion principle, not just as an operational project/~~programme and policy~~ impact issue but as a fundamental way to include people in all their diversity to engage with, contribute to and benefit from GCF policies and investment decisions. To that purpose it, and to increase the budget accountability of its internal gender efforts, it will include a dedicated budget line in its administrative budget and all budget reports.

11. The GCF management and staff are accountable for gender ~~equality~~ results, including as part of their annual performance review. This is reflected in the GCF administrative policies and procedures, including human resource management and the procurement of contractors.

12. Strengthening the Environment and Social Safeguards (ESS) unit in the Country Programming unit (CPM) as well as the Portfolio Management Unit (PMU) and the Private Sector Facility (PSF) from a social and gender and human rights perspective and resource (human and financial) will make for an entirely more-effective organization. The role of this

~~core~~ e gender ~~team focal point~~ in the Secretariat should be that of leadership and coordination on gender mainstreaming activities, both within and outside the Secretariat.

13. ~~Given the significance of the Board, it~~ needs to represent more diversity and inclusiveness in its overall make-up and ~~importantly~~, should establish qualifications and experience criteria for members that ~~will~~ reinforce these perspectives and viewpoints throughout the governing body. This implies that as part of their on-boarding procedures, all Board members shall complete a series of learning sessions on gender equality and social inclusion and commit to be guided by these principles in their formal Letter of Appointment.

14. All staff should be required to receive multi-disciplinary training on ethics, diversity, human rights, social inclusion and gender responsive approaches, and be supported to develop their own operational guidelines, filters and procedures within and among the various units to operationalize the updated GESI Policy and Action Plan. Basic training could be offered as an in-house, online module and further deepened through face-to-face intra-unit case study discussions.

15. The Secretariat shall appoint senior staff member(s) with competencies and experience in gender, human rights and social development reporting to the Executive Director to lead the implementation of the policy as an intra-Secretariat coordination group. The Secretariat shall support the Board in striving for relevant gender and climate change competencies to be included in the AP, the Accreditation Committee, the Investment Committee, the Risk Management Committee and the Private Sector Advisory Group, as well as in the ITAP.

16. GCF ~~has~~, in partnership with UN Women, published a gender and climate change toolkit which provides details on how to programme gendered results in the climate change space and tools that could inform AEs on how to be used by projects/programmes to mainstream gender in the overall project/programme life-cycle. This toolkit and other already existing relevant resource and guidance documents or toolkits by GCF partner and observer organizations will be disseminated widely among GCF partners and training will be provided to NDAs/FPs/delivery partners/AEs on how to interpret and operationalize the GCF/UN Women toolkit. The gender ~~unit specialist~~ at GCF will work closely with the Division of Country Programming, Division of Mitigation and Adaptation, and Private Sector Facility to conduct training sessions on the understanding and use of the toolkit.

17. The GCF will leverage national and regional outreach and capacity development events and activities to raise awareness, build capacity, and share knowledge on gender equality and the empowerment of women and girls in the climate change space.

Comment [12]: The Secretariat will have to work conjointly with the Board. Decisions about Board Cte. Members are made by the Board, not the Secretariat. In its support of the various Ctes and panels, the SEcretariat can provide some expertise and related guidance.

1.3 Priority Area 3: Resource Allocation, Accessibility and Budgeting

18. GCF resource allocation for adaptation and mitigation projects and programmes contributes to gender equality and social inclusion. The GCF shall ensure that all its projects and programmes support initiatives addressing the inequity of climate change impacts and provide gender-responsive solutions to climate change mitigation, adaptation or readiness.

The GCF will not fund project and programme proposals without sufficiently articulated gender considerations. As the rationale for this policy is to promote gender equality, the Board may consider giving additional weight to activities proposed for GCF financing with well-designed gender components.

19. When it is necessary to correct for climate change-exacerbated gender and social inequalities ~~---which might include development component in some adaptation initiatives---~~ the GCF will use ~~determine its strategy for~~ targeted funding (e.g. through request for proposals, simplified approval process, small grants facility, stand-alone technical assistance) to support women and men's climate change adaptation and mitigation initiatives at the grassroots.

Comment [13]: I am trying to push this ie the development and adaptation nexus

20. At the Secretariat level, adequate human, financial and material resources will be allocated through the administrative budget ~~required~~ to carry out knowledge management, monitoring, evaluation and learning, capacity development, implementation support. A separate finance set-aside for such activities might be created.

1.4 Priority Area 4: Operational Procedures

21. The policy will be implemented throughout GCF administrative¹⁷ and operational processes. AEs need to build in-house gender capacities and competencies to operationalize the GESI Policy. Guidelines will be issued for the benefit of external partners: NDAs/FPs and AEs. The guidelines will apply to all activities, including private sector activities and public-private partnerships (PPPs), and to the GCF project/activity cycle described in document GCF/B.07/03. Core elements will include:

Comment [14]: AS the project cycle might be revised during the 3 year period to reflect the two-stage approval process envisioned by the Board as a possibility, it might be better to avoid specific document reference here.

(a) A mandatory initial socioeconomic and gender assessment and accompanying mandatory project/programme-level gender action plan, complementary to the ESS process, which AEs will be required to undertake to collect baseline data, and to:

- (i) Determine how the project/programme can respond to the needs of women and men¹⁸ in view of the specific climate change issue to be addressed;
- (ii) Identify the drivers of change and the gender dynamics to achieve the project/programme adaptation or mitigation goals;
- (iii) Identify and design the specific gender elements to be included in the project/programme activities, in particular to increase the voice and agency of both men and women, especially those in affected and local communities;
- (iv) Estimateully cost the implementation budgets;

- (v) Select appropriate and measurable quantitative and qualitative output, outcome and impact indicators; and
- (vi) Design project/programme implementation and monitoring institutional arrangements, including through participatory monitoring.
- (b) Gender-equitable, ~~and~~ inclusive and fully participatory meaningful stakeholder engagement and consultations, conducted and documented throughout the design and implementation of the project, and:
 - (i) Guidance on the application of ~~the~~ FPIC ~~principle~~ will be developed and maintained in consultation with communities in their full diversity as part of the operational guidelines of this policy;
 - (ii) Inclusion of gender, human rights and social perspectives in the application of the mandatory project/programme social and environmental safeguards in line with project/programme-specific requirements of the ESS in accordance with decision B.07/02;¹⁹ and
 - (iii) Project/programme screening for gender responsiveness and inclusiveness at various stages of the project/programme preparation, appraisal, approval, and monitoring process, by the relevant bodies (NDAs/FPs, AEs, the Secretariat).

22. NDAs/FPs and AEs entities may request readiness and preparatory support from the GCF to enhance their capacity to implement the policy. The GCF ~~will may~~ develop sector-specific notes on gender as needed, that promote use of knowledge and lessons learned on gender issues, methodologies for assessing outcomes results and impacts and conduct in-house learning to promote gender-responsive climate investments.

23. The GCF proposal process will guide project developers to select and apply a range of gender indicators to measure progress, outcomes and social impacts. Areas of measurement sheould include:

- (a) Measuring added social value to a project's development impact through its contribution to gender equality, women's empowerment, human rights and social inclusion;
- (b) Measuring activity outcomes that target and address gender and social gaps. These may include economic opportunities; voice, agency and leadership; and addressing time poverty

24. The GCF accounts to its Board for gender and climate change results and outcomes, and reports annually in a transparent manner. Additional qQualitative and quantitative gender and social monitoring, impact and outcome indicators as well as methodologies for gender-disaggregated data collection will be developed to complement those already-are included in the results management and performance measurement frameworks (GCF/B.08/07). Progress on gender integration results is also reported to

Comment [15]: it would be good to go beyond the impact, which is more difficult to assess, but generally results

Comment [16]: how is this going to happen? It is not clear to me, whether Secretariat develops additional guidance?

UNFCCC parties as part of the GCF annual report to the Conference of the Parties. The Secretariat will provide regular (i.e. quarterly) policy monitoring reports to the Board.

1.5 Priority Area 5: Knowledge Generation and Communications

25. As a learning institution, the GCF will work with NDA/FPs and AEs to document experience and knowledge gained from applying GESI Policy to readiness support programming; country programme development, concept notes, funding proposals and project/programme activities. It will seek to identify good practices from NDAs/FPs and their countries, ~~and~~ AEs, other implementation partners and GCF observer organizations and tap into the contextual knowledge already available on gender and climate mitigation and adaptation programmes and projects implemented by other partners. The GCF will support knowledge exchange activities on gender and climate change finance.

26. Communicating the GCF commitment to gender equality and social inclusion, its policy and its implementation guidance will be a strategic communications activity and an integral part of the GCF communications plan. It will be important to communicate to the public not only how the GCF is implementing its GESI Policy, but also to seek periodic feedback from stakeholders and partners on the implementation of the policy and on possible improvements in the action plan.

27. The proposed duration of the GESI Policy and Action Plan is for three years (2018-2020) to allow the GCF to implement activities, make assessments of what is working or not working, undertake mid-course corrections and, if found suitable, revise/update the policy and subsequent action plans accordingly.

Annex III: CSO Suggested Edits on Illustrative Gender and Social Inclusion Indicators

Focus Areas	Results to be achieved: Implementation of the updated GESI Policy				
	Action	Indicators	Responsibility	Timing	Budget estimates
a) Governance and institutional structure	Approval of the updated policy		Board	February 2018	
	Periodic monitoring of reports on the implementation of the gender and social inclusion policy action plan	<ul style="list-style-type: none"> <u>regular (at least twice a year) Annual progress reports to the Board of the GCF</u> Gender and social inclusion is covered in the annual redress mechanism report <u>Progress on gender and social inclusion is covered in the annual report of the GCF to the COP</u> <u>Percentage of board and alternate members (men vs. women) to promote gender balance</u> 	Board/ Secretariat/ PMU/Independent Redress Mechanism Unit	Annually	No additional costs envisaged
	Appointment of a senior gender specialist <u>as well as additional staff with gender and social inclusion expertise (building a team of in-house gender and social inclusion experts)</u>	<ul style="list-style-type: none"> Recruitment of senior staff with high-level gender and social inclusion competencies, <u>as well as additional staff with gender and social inclusion expertise</u> 	Secretariat	January/February 2018 <u>for senior gender specialist and throughout 2018 for additional Secretariat staff</u>	\$395,000 <u>(already budgeted in GCF Admin Budget); additional staff costs</u>

Comment [17]: It would be good to include an extra action: Action: Enforce gender mainstreaming within GCF country ownership procedures. Indicator: Percentage of NDAs conducting gender and inclusive stakeholder consultations for the identification of country investment priorities/projects

December 6, 2017

Joint CSO Submission/Gender

	Include gender and social inclusion performance in the accreditation requirements related to GCF policy	<ul style="list-style-type: none"> Percentage of AEs with <u>adequate</u> policy and procedures on gender and social inclusion <u>at accreditation</u> Percentage of AEs with <u>adequate</u> gender and social inclusion competencies and track records in gender issues <u>at accreditation</u> <ul style="list-style-type: none"> <u>Percentage of direct access AE applicants requesting readiness support for the development of adequate policy and procedures on gender and social inclusion</u> 	AP/Secretariat	Starting in March 2018; applicable to entities that submit their application for accreditation after publication of the updated GESI Policy	No cost implications <u>for accreditation percentages; financial implications under readiness financing support</u>
b) Administrative & operational guidelines	Include gender and social inclusion in the GCF Operational Manual, in particular: 1. Guidance for NDAs, AEs on the mandatory socio- economic and gender assessment <u>and action plan</u> at the start of each project/programme; and	<ul style="list-style-type: none"> Guidelines issueds and communicated to NDAs and AEs through the GCF website <u>and through active information outreach (public events, regional dialogues etc.)</u> 100% of all approved funding proposals contain a gender and social assessment and a project- level gender and social inclusion action plan; <u>these are made publicly available on the GCF project-websites</u> Number of training sessions on the guidelines provided to NDAs and AEs, and the qualitative reporting of that training <ul style="list-style-type: none"> <u>Provision of South-south learning opportunities on challenges and best practices of GESI project-level assessments and action plans and GESI-conform project implementation</u> 	Secretariat	<u>Guidelines issued in 2018</u> 2018–2020	\$30,000 annually for training <u>and South-South learning sessions</u>

Results to be achieved: Implementation of the updated GESI Policy

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Joint CSO Submission/Gender

Focus Areas	Action	Indicators	Responsibility	Timing	Budget estimates
	2. Guidance on gender-responsive and inclusive project design elements, budgets, results, monitoring, and impact indications, preparation, implementation and the monitoring of institutional arrangements		Secretariat	2018	
	Develop toolkits and sourcebooks for NDAs/AEs on gender and climate change mitigation and adaptation, including for specific sectors	<ul style="list-style-type: none"> Number of toolkits, sourcebooks and references posted on the GCF website Number of NDAs/AEs who use the toolkits and sourcebooks 	Secretariat	2018-2019	\$75,000
c) Capacity Building	1. Increase the knowledge of GCF partners on gender and social inclusion; and 2. Improve the understanding of how to programme for gendered results amongst GCF partners by disseminating the GCF/UN Women gender and climate change toolkit	<ul style="list-style-type: none"> Number of development partners/stakeholders/NDAs/ AEs which received gender and social inclusion training GCF/UN Women gender toolkit disseminated and guidance provided to NDAs/FPs/AEs/ delivery partners on how to interpret the information contained in the toolkit 	Secretariat and partners	2018-2020	\$100,000

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d) Outputs, outcomes and impact monitoring indicators and reporting	Application of gender and social inclusion guidelines in project preparation/design/implementation/monitoring	<ul style="list-style-type: none"> Percentage of projects/programmes that have applied gender and inclusive stakeholder consultations Number of funding proposals whose principle objective is to promote gender equality and social inclusion in climate action Number of projects where women and men from vulnerable communities and 	PMU/IEU/ Gender Specialist	2018–2020	\$150,000 for third party evaluation (bi – annual exercise)
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Focus Areas	Results to be achieved: Implementation of the updated GESI Policy				
	Action	Indicators	Responsibility	Timing	Budget estimates
		<p>socially excluded groups report <u>improvements in their quality of life</u></p> <ul style="list-style-type: none"> Number of projects that demonstrate reduced vulnerability of women and men from socially excluded groups to the adverse impacts of climate change Number of projects that demonstrate increased adaptive capacity of women and men from vulnerable and excluded communities to respond to the impacts of climate change Number of projects that contain strategies and specific budgets to leverage co-benefits between gender equality and social inclusion and climate action Projects with <u>resilient- infrastructure measures</u> in place to prevent economic losses and mitigate social risks, including gender-related risks <u>Number of project proposals where improvements in gender and social inclusion (f.ex. in the GESI assessment and action plan) was made a condition for Board approval</u> 			

Comment [18]: What is the definition for "improvement in quality of life"? It needs to be spell out to make is measurable.

Comment [19]: What is the definition of "resilient infrastructure measures"? How will it be measured?

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Joint CSO Submission/Gender

e) Knowledge generation, communications & outreach	Assess the implementation of the GCF Gender and Social Inclusion Policy and Action Plan	<ul style="list-style-type: none"> • 'Stock-taking' report posted on the website • Gender-informed communications and dissemination strategy developed 	Board/Gender Specialist/ Communications Unit/NDAs/FPs/AEs	2018-2020	\$300,000
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Focus Areas	Results to be achieved: Implementation of the updated GESI Policy				
	Action	Indicators	Responsibility	Timing	Budget estimates
		<ul style="list-style-type: none"> • Gender-responsive communication materials developed and disseminated to internal and external stakeholders • Gender-responsive public outreach activities undertaken at the national and grassroots level • Multi-media campaign on gender and climate change launched at the country level through readiness programmes and projects/programmes financed by GCF 			

December 6, 2017

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<u>f) Resource Allocation, Accessibility and Budgeting</u>	<u>Provision of targeted funding to support gender-responsiveness and social inclusion in GCF & partner operations</u>	<u>--accounting of amount of approved GCF financing provided for targeted gender-responsive and socially inclusive grassroots support at the portfolio level</u> <u>- percentage of annually approved GCF financing targeting gender equality and social inclusion efforts (proxy: budgeting for project-level gender and social inclusion plans and their implementation)</u> <u>-- percentage (and expected increase) of annual GCF administrative budget supporting gender and social inclusion expertise (staff, consultants, contractors), training, communication, outreach and M&E</u>	<u>AEs/Secretariat</u>	<u>Annually, with expected increase over 2018-2020 time-frame</u>	<u>No additional costs (should be part of normal reporting requirements)</u>
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Submitted by:

CSO Contact for this submission

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This submission was compiled and written by the Heinrich Böll Stiftung North America based on input provided by the following civil society organizations (CSOs) in support of this submission (in alphabetical order):

- All India Disaster Mitigation Institute (AIDMI), India
- Asian-Pacific Resource and Research Centre for Women (ARROW), Malaysia
- BothEnds, Netherlands
- CARE International
- Center for International Environmental Law (CIEL), United States
- Centre for 21st Century Issues, Nigeria
- Colorado State University
- Ecoltd Group
- Global Forest Coalition, Paraguay
- Heinrich Böll Stiftung North America
- National Council of Women's Organisations (NCWO), Malaysia
- Rainforest Foundation, Norway

Additionally, the following civil society organizations (CSOs) had contributed to a joint CSO submission in the first round of the GCF Secretariat's call for public on the revision and update of the GCF Gender policy and Action Plan in May 2017¹⁷, which this input drew upon (in alphabetical order):

- Aksi! for gender, social and ecological justice, Indonesia
- Asia Pacific Forum on Women, Law and Development (APWLD), Thailand
- Church World Service, United States
- Fondo Centroamericano de Mujeres (FCAM), Nicaragua
- Global Alliance for Green and Gender Action (GAGGA), Nicaragua/The Netherlands
- Hivos International/Energia, The Netherlands
- Ulu Foundation, United States

¹⁷ Available at:
https://us.boell.org/sites/default/files/uploads/2012/10/joint_cso_submission_on_gcf_gender_policy_gap_review_final.pdf

Finally, the following civil society organizations (CSO) have signed on in support of this submission (in alphabetical order):

- African Women's Network for Community management of Forests (REFACOF), Cameroon
- Alliance des Peuples Autochtones et Locales d'Afrique Centrale (APALAC) Coalition
- APEDDUB, Tunisia
- Asian Peoples Movement on Debt and Development, Asia Region
- Asociación Interamericana para la Defensa del Ambiente, AIDA, Latin America
- Association pour le Développement Global des Batwa au Rwanda (ADBR), Rwanda
- Barnabas Charity Outreach, Nigeria
- Bretton Woods Project, United Kingdom
- CADIRE CAMEROON ASSOCIATION, Cameroon
- Center for Participatory Research and Development-CPRD, Bangladesh
- Centre for 21st Century Issues, Nigeria
- Centre for Human Rights and Development, Mongolia
- CEPLAES, Ecuador
- Coalition for Human Rights Education, Uganda
- ECOLISE, India
- E Co./Vrije Universiteit/IVM, United Kingdom
- ENVIRONICS TRUST, India
- Forest Peoples Programme, United Kingdom
- FORUM INTERNATIONAL DES FEMMES DE L ESPACE FRANCOPHONE, DR Congo
- Foundation for GAIA, United Kingdom
- Friends of the Earth US, United States
- Gender Action, United States/Canada
- Gender and Environmental Risk Reduction Initiative (GERI), Nigeria
- GenderCC- Southern Africa, South Africa
- GenderCC – Women for Climate Justice, Germany
- Global Ecovillage Network, Scotland/United Kingdom
- Global Ecovillage Network of Europe, Germany
- Human Rights Foundation Aotearoa, New Zealand
- Institute for Policy Studies, United States
- International Work Group for Indigenous Affairs (IWGIA), Denmark
- INTLawyers, Switzerland
- Italian Climate Network, Italy
- Maleya Foundation, Bangladesh
- NGO Forum on ADB, Philippines

- Organisation des Femmes Vulnérables pour la Lutte contre la Violence (OFVLV), Rwanda
- Oyu Tolgoi Watch, Mongolia
- PELUM ZAMBIA, Zambia
- Planetary Association for Clean Energy, Canada
- Project Survival Pacific, Fiji
- Reacción Climática, Bolivia
- Regional Center for International Development Cooperation.(RCIDC), Uganda
- Taiwan Youth Climate Coalition, Taiwan
- Tebtebba (Indigenous Peoples' International Centre for Policy Research and Education), Philippines
- TI Korea Chapter, South Korea
- Ulu Foundation, United States
- Unnayan Onneshan, Bangladesh
- Women Engage for a Common Future, Germany and France