COMPILATION AND ANALYSIS OF GENDER-RELATED POLICIES AND PROCEDURES OF THE FUND
Background and Introduction

1. At its 25th meeting, the Adaptation Fund Board (the Board) discussed the possibility of having a separate gender policy for the Adaptation Fund (the Fund). The issue was brought up prior in the Ethic and Finance Committee (EFC), where some members felt that such a separate policy was needed while others were of the view that the inclusion of gender equity as a principle under the Fund’s environmental and social policy sufficed.\(^1\) Having considered the comments and recommendations of the EFC, the Board decided to “request the secretariat to prepare a compilation and analysis of any of the Fund’s gender-related policies and procedures in order to inform the seventeenth meeting of the EFC.”\(^2\)

2. The overall goal of the Fund is to “support concrete adaptation activities that reduce vulnerability and increase adaptive capacity to respond to the impacts of climate change, including variability at local and national levels.”\(^3\) The Meeting of the Parties of the Kyoto Protocol (CMP) mandates the Fund’s projects and programmes “to give special attention to the particular needs of the most vulnerable communities.”\(^4\) Climate change in the developing countries that are Parties to the Kyoto Protocol and thus eligible for funding by the Fund affects people within a community or even within the same household differently. Largely due to persisting gender inequalities, very often women’s adaptive capacities are undermined by a lack of access to resources, legal rights or political participation and decision-making. Extreme poverty is more prevalent among women. These factors exacerbate women’s disproportionate vulnerability to climate change impacts. Therefore gender equality is a critical factor and gender equity and women’s empowerment are important tools to fulfill the overall goal and specific mandates of the Fund.\(^5\) The Fund’s policies and procedures and how they are implemented are thus of relevance to ensure that men and women share equally in the benefits of the Fund’s concrete climate actions.

Analysis of Relevant Gender-related Policies and Procedures in the Adaptation Fund

3. In response to Board decision B.25/21, this document analyses key Fund policies, procedures and guidelines to determine whether the issues of gender equality, gender equity and women’s empowerment are sufficiently covered and addressed or if an elaborated Fund gender policy (with the possibility of a corresponding gender action plan to create accountability for its implementation) might be needed to ensure consistency and follow-through in Fund supported adaptation measures.

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\(^1\) Document AFB/EFC.16/8, recommendation EFC.16/5

\(^2\) Decision B.25/21


\(^5\) Gender equity refers to a process whose ultimate result would be to achieve gender equality. In order to do so, because of historical and social discriminations, special targeted actions to empower women might be needed.
Specifically, this document analyses in more detail Fund policies and procedures for gender-related content, either by looking at the explicit mention of gender considerations or women as a vulnerable or beneficiary group in the text or the policy intent (in cases where such an elaborated reference is missing but should be considered). The documents are grouped along the following lines:

- Operational policies and guidelines and applicable guidance and instruction documents
- Results–based management system
- Project performance and reporting and applicable guidance and instruction documents

Operational Policies and Guidelines

Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund

5. The Fund’s *Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund (OPG)*, which were amended in October 2014, in the main text currently do not make any specific reference to gender considerations, although they include gender within the Fund’s Environmental and Social Policy (ESP) (Annex 3 to the OPG), which highlights gender equity and women’s empowerment as one of its principles.

6. The main text of the OPG focuses instead on the broader mandate of the Fund to finance concrete adaptation projects and programmes in countries that are Parties to the Kyoto Protocol “aimed at addressing the adverse impacts of and risks posed by climate change” and “at producing visible and tangible results on the ground by reducing vulnerability and increasing the adaptive capacity of human and natural systems to respond to the impacts of climate change, including climate variability.”

7. However, gender norms and related cultural rules are part of what structures the interactions and reactions to threats and opportunities in human systems. By supporting gender equity and empowering women in its activities, the Fund increases the adaptive capacity of human systems as it actively addresses the disproportionately high vulnerability of women in beneficiary populations. As the OPG serves as the preambular policy for the Fund, the explicit inclusion of a reference to gender should be considered.

OPG Annex 1: Strategic Priorities, Policies, and Guidelines of the Adaptation Fund Adopted by the CMP

8. *Annex 1 to the OPG* elaborates the strategic priorities policies and guidelines of the Fund adopted by the CMP and guided especially by decision 1/CMP.3 (paragraphs 1 and 2), decision 5/CP.7 (paragraph 8), and decision 5/CMP.2 (paragraphs 1 and 2). While OPG Annex 1 does not reference gender considerations or women as a vulnerable group specifically, it underscores

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that eligible Parties should pay special attention “to the particular needs of the most vulnerable communities” and to “information generated under the Nairobi work programme on impacts, vulnerability and adaptation to climate change.” It also advises the Board in its consideration of project and programme proposals to pay special attention to the consistency of those proposals with national sustainable development strategies, including poverty reduction strategies and national adaptation plans of action (NAPAs) and “other relevant instruments; where they exist” and to environmental, economic and social benefits of these proposals.

9. These references are clearly gender-related, given that a larger share of women than men is in absolute poverty, meaning that poverty reduction efforts in order to be effective must consider gender. UNFCCC decision 26/CP.7 also mandates the preparation of NAPAs to be guided inter alia by gender equality and UNFCCC decision 5/CP.17 highlights that enhanced adaptation action taken under national adaptation plans (NAPs) should be guided by gender-sensitive approaches. Lastly, UNFCCC decision 6/CP.17 on the Nairobi work programme asked for “gender-sensitive tools and approaches” to be included as cross-cutting issues.

**OPG Annex 3: Environmental and Social Policy**

10. **Annex 3 of the OPG** covers the Environmental and Social Policy (ESP) of the Fund, which was approved in November 2013. The adoption of the ESG brought the Fund’s practices into line with those of other leading environment and development financing institutions and is intended to ensure that in implementing Fund projects and programmes no unreasonable environmental and social harms are done and positive environmental and social benefits are promoted.

11. The ESP consists of 15 separately elaborated and clearly delineated environmental and social principles, although the policy recognizes that not all of the 15 principles might be relevant to every project/programme.

12. One of these principles directly addresses gender equity and women’s empowerment. It reads:

**Gender Equity and Women’s Empowerment**

Projects/programmes supported by the Fund shall be designed and implemented in such a way that both women and men (a) are able to participate fully and equitably; (b) receive comparable social and economic benefits and (c) do not suffer disproportionate adverse effects during the development process.

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8 OPG Annex 1, paras. 7 and 8.
9 FCCC/CP/2001/13/ADD.4, Decision 28/CP.7, para. 7.
10 FCCC/CP/2011/9/ADD.1, Decision 5/CP.17, para. 3.
11 FCCC/CP/2011/9/ADD.2, Decision 6/CP.17, para. 4.
13 Ibid, para. 16.
13. Several others of the 15 ESP principles are clearly gender-related:

- The principle on **Access and Equity**\(^{14}\) stipulates the safeguarding of equitable access to benefits related to basic services and livelihoods (health, water, sanitation, education, housing, safe and decent work), which are also the focus of basic human rights. Unequal access to resources and services is a key contributor to gender inequality and the discrimination of women.

- The principle on **Marginalized and Vulnerable Groups**\(^{15}\) identifies women and girls explicitly as one of several listed marginalized and vulnerable population groups, who need to be considered in screening proposed projects/programmes. Women and girls are also often part of other disadvantaged groups (elderly, indigenous peoples, tribal groups, or groups with different races, ethnicities, sexual orientation, religion or caste), indicating that a gender-disaggregated look at any identified marginalized and vulnerable group is advisable for Fund projects.\(^{16}\)

- The principle of **Human Rights**\(^{17}\) mandates that Fund supported projects/programmes respect and promote international human rights, including women’s human rights. In addition to the gender dimension of guaranteeing the enjoyment of basic human rights (f.ex. economic, cultural and political or the right to food or water), the international human rights cannon also includes the Convention Against the Discrimination of All Form of Discrimination Against Women (CEDAW).\(^{18}\)

- The principle of **Core Labour Rights**\(^{19}\) demands that Fund projects/programmes support core standards identified by the International Labor Organization (ILO). These include as one of four fundamental principles and rights at work the elimination of discrimination in respect of employment and occupation, for example on the basis of sex (in ILO 111) and demand equal remuneration for equal work for men and women (in ILO 100).\(^{20}\)

14. While the importance of gender considerations is at first glance less clear in other ESP principles than those highlighted above, a few additional ones will profit from integrating gender considerations into their application in project/programme screening and implementation, so for example the principles on **Involuntary Resettlement**\(^{21}\) (where women are often excluded from compensation schemes because they hold fewer legal ownership rights), **Public Health**\(^{22}\) (where women’s reproductive health and how it is impacted by vector-borne diseases aggravated by climate change might need special attention), or **Land and Soil Conservation**\(^{23}\) (where women’s contribution as subsistence farmers to safeguarding national food production must be considered).

\(^{14}\) Ibid, para.13.
\(^{15}\) Ibid, para.14
\(^{16}\) The concept of intersectionality recognizes the interactions between various forms or systems of discrimination and marginalization such as biological, cultural and social categories and identities that are often mutually reinforcing.
\(^{17}\) OPG Annex 3, para.15
\(^{18}\) http://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx
\(^{19}\) OPG Annex 3, para.17
\(^{21}\) OPG Annex 3, para.19
\(^{22}\) OPG Annex 3, para.24
\(^{23}\) OPG Annex 3, para.26
Guidance Document for Implementing Entities on Compliance with the Adaptation Fund Environmental and Social Policy

15. In 2015, the Fund secretariat published on its website a Guidance Document for Implementing Entities on Compliance with the Adaptation Fund Environmental and Social Policy. This document gives implementing entities (IEs) practical examples, suggestions and recommendations on how to achieve and demonstrate compliance with the ESP in the project and programme cycle, clarifying that a project/programme proposal needs to be screened against all 15 ESP principles to determine which are applicable. The IE will then have to assess all principles that may apply.

16. Section three of the document provides then interpretation assistance for each of the 15 principles, which are divided into principles that always apply (here principle 5 on gender equity and women’s empowerment is not specifically mentioned) and those only relevant to a particular project/programme.

17. On Principle 5: Gender Equity and Women’s Empowerment, the guidance document highlights the foundation of this principle in the UNFCCC, human rights treaties, the ILO core conventions, the Millennium Development Goals (MDGs) and follow-up Sustainable Development Goal (SDG) and the post-2015 process. The document clarifies that principle 5 must be applied in the project/programme design and its implementation “regardless of the legal and regulatory framework in which the project/programme is set.” It proposes possible elements to be considered in IE assessment against principle 5 in project/programme design and implementation, including:

- An analysis of the legal and regulatory context with respect to gender equity and women’s empowerment in which the project/programme will take place to identify obstacles to compliance;
- Equal participation of men and women in project/programme activities and stakeholder consultation; or
- Equal access to benefits of a project/programme for men and women achieved through means such a gender analysis or pro-active measures such as separate stakeholder consultations for men and women at times and locations in line with respective gender roles and cultural norms.

18. The consideration of gender in any other ESP principles beyond principle 5 is not further elaborated in the guidance document, except for two short references. In guidance on Principle 3: Marginalized and Vulnerable Groups a definition for vulnerable groups is provided, women and girls are identified as such a group and data disaggregation for the identification and quantification of marginalized and vulnerable groups is encouraged. And the guidance on

25 Ibid, p.9f
26 Ibid, p.7f.
Principle 7: Indigenous Peoples references CEDAW as one of the applicable international instruments relating to indigenous peoples.

19. A future update of the guidance document could provide further examples, suggestions and recommendations on how the principle of gender equity and women’s empowerment intersects with other principles. This would also eliminate the danger of an IE falsely determining that principle 5 is not applicable to the implementation of its specific project/programme and would underscore the principle’s cross-cutting nature.

OPG Annex 4: Request for Project/Programme Funding from the Adaptation Fund

20. Annex 4 of the OPG consists of the form which IEs complete and transmit to the Secretariat to request project/programme funding for fully prepared and appraised proposals (in step 2 of the two-step approval process). It is divided in four parts with the first three covering project/programme information, project/programme justification and implementation arrangements respectively. Part IV refers to government endorsement and IE certification.

21. Specific descriptions of applicable gender considerations are explicitly requested under part II on project/programme justification. IEs are asked to describe how the project/programme provides economic, social and environmental benefits, “with particular reference to the most vulnerable communities, and vulnerable groups within communities, including gender considerations” (Part II, B). IEs must also detail the consultative process undertaken during project/programme preparation, including by providing a list of consulted stakeholders, and “with particular reference to vulnerable groups, including gender considerations” (Part II, H). IEs then must provide an overview of the identified environmental and social impacts and risks by filling out a checklist with all 15 ESP principles, including principle 5 on gender equity and women’s empowerment, and by detailing for each principle whether or not further assessment and management of risks and impact is required to comply with the ESP (Part II, K).

22. The funding request form demands information from IEs on a number of issues, where a consideration of gender – although not indicated explicitly – would make sense. These include in particular under part I on project/programme information an elaboration of the gender-specific cultural or legal context in which the project/programme would operate, in addition to the social, economic development and environmental context the form demands. Information requests from the IE dealing with learning and knowledge management (Part II, G) and more broadly with implementation arrangements under Part III could also benefit from a reminder to the IE to include gender considerations (for example with respect to risk management, M&E or regarding the project/programme-specific results framework). A future update of the form could take such

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27 Ibid, p.11f.
29 Ibid, p.3.
31 Ibid, Part III, sections C, D and E, p.5f.
references into account, for example by referring to “environmental, social and gender impacts and risks” more broadly as the default.

**Instructions for Preparing a Request for Project or Programme Funding from the Adaptation Fund**

23. The Secretariat’s document with instruction to IEs to help them in preparing their project/programme funding request was upgraded in November 2013 to reflect the adoption of the ESP and related information requirements from the IEs. The instructions currently reference gender considerations explicitly under sections that demand information on benefit provision (Part II, B) and the consultative process during project preparations (Part II, H), which for fully developed proposals, including in cases where a project formulation grant (PFG) was requested, must “involve all direct and indirect stakeholders of the project/programme, including vulnerable groups and taking into account gender considerations.” The consultative process must be documented in detail (although for example a gender-disaggregation of participants was not requested).

24. In most other instances gender is subsumed under the generic reference to social risks or impacts and their management. This poses the danger of underreporting of gender considerations in funding requests as it might be perceived by IEs not to be an important part of the requested information. The instructions to IEs to disaggregate indicators and targets by sex in providing information about a results framework for a project or programme proposal (Part III, E) are an example of how such an instruction document can serve in showing ways to integrate gender considerations more broadly, even though the original information request does not include a gender reference.\(^{33}\)

**Adaptation Fund Project/Programme Review Criteria**

25. This document, updated in 2015, lists the main review criteria for both small-size and regular projects/programmes under the single-step approval process and for the first step of regular project/programme concepts under the two-step approval process, which the Project and Programme Review Committee (PPRC) will consider in recommending a project for Board approval. It requires less detailed information than for the second step for regular funding approval under the funding approval template (see sections above).

26. The document makes reference to the inclusion of gender considerations under its list of project eligibility criteria, by asking: “Does the project/programme provide economic, social and environmental benefits, with particular reference to the most vulnerable communities, including gender considerations?” The review criteria also include the question “Does the project/programme align with the AF results framework?” which has a significant gender dimension for the reporting during project/programme implementation. IE’s in the project/programme proposal stage are asked to fill out a separate table, the **Results Framework**


\(^{33}\) Ibid, p.11

Alignment Table\textsuperscript{35} to directly link, where relevant, project objectives and outcomes to the Fund level outcome and outputs and its set of core indicators, several of which ask for gender-disaggregation of data. Once project/programs align with certain indicators, IEs are requested to report on the progress toward these indicators using the results tracker of the Project Performance Report (explained in more detail in a separate section).

27. For small-size projects/programmes and regular projects/programmes under the single-step approval process, the review criteria for implementation arrangements include the request for the sex-disaggregation of relevant targets and indicators directly at this stage.

OPG Annex 5: Accreditation Application Form

28. Annex 5 of OPG\textsuperscript{36} is the accreditation application form for prospective IEs (in the version amended in November 2013 to incorporate the then approved ESP). Section III, dealing with institutional commitment and capacity to comply with Fund requirements, including its ESP, and section IV, which amongst other issues looks at the availability of a mechanism to address complaints about environmental and social harms caused by projects, are gender-related and gender-relevant, although no direct reference to gender can be found in the document. Relevant competencies include project preparation and appraisal, risk assessment, project M&E during implementation and project closure and final evaluation under section III and a documentation of the commitment and capacity of the applicant to apply the Fund’s ESP (including its principle on gender equity and women’s empowerment) and the existence of a complaints mechanism to address project/programme harm caused under section IV.

29. This existing shortcoming with respect to a direct gender reference could be easily remedied by an update of the application form that would incorporate some information request to specifically ascertain the commitment and capacity of the applying organization to assess gender-related risks and impacts as well as its ability to monitor and manage them. Right now, this capacity is inferred with a reference to demonstrate the applicant’s commitment and capacity to address, monitor and manage “environmental and social risks” or to assess impacts or implications of the “technical, financial, economic, environmental, social and legal aspects of projects” in accordance with the Fund’s ESP. The wording could be easily upgraded to refer to “environmental and social, including gender-related risks” and to explicitly list gender aspects of the projects.\textsuperscript{37}

30. More gender-specific language in the accreditation application form would put the applicant entity on notice that its commitment and capacity to address the gender dimensions of projects are an important and integral part of what the Fund expects it to do. This would also ensure that the Fund’s Accreditation Panel gets the support documentation and information from

\textsuperscript{35} Results Framework Alignment Table; http://www.adaptation-fund.org/wp-content/uploads/2015/03/Results\%20framework\%20alignment\%20table\%20Aug2011.doc.


\textsuperscript{37} Should the Board decide to adopt a separate gender policy for the Fund, then in places where there is currently reference to the ESP, it should read “ESP and the gender policy”.


the applicant entity to address its ability to assess projects against all 15 principles of the ESP, including principle 5 on gender equity and women’s empowerment as one that applies to all projects/programmes. Lastly, a more explicit inclusion of gender language in the application form would also help to first reveal and then allow to address some existing knowledge gaps on IEs’ commitment and capacity to address gender, for example through the Fund’s readiness programme, especially for national implementing entities (NIEs). As Fund experience with applicant entities shows, quite often the ability or experience is there, but not necessarily codified and documented, particularly in national entities applying for Fund accreditation, which however might have a gender-positive implementation track record, This indicates that a flexible approach with respect to documentation requirements might be necessary for applicant entities to showcase their commitment and capacity to gender considerations in project/programme implementation at the application stage.

**Adaptation Fund Results Based Management System**

31. With decision B.10/13, the Board in 2010 adopted a results-based management (RBM) approach for the Fund with a strategic results framework, which includes long-term goal, outcomes, outputs and a small set of indicators for the Fund as a whole. The Fund’s **Strategic Results Framework** has been slightly amended since then. It includes seven key outcomes and associated outputs to facilitate aggregation and present Fund level results that contribute to the overall goal and objectives of the Fund. In 2013, to improve the tracking of results at the Fund portfolio level, the Board adopted **two additional impact-level results and five associated core indicators** to track under those impacts. For both sets of indicators (under the strategic results framework and the core indicators), there are associated guidance documents and descriptions of indicator methodologies. These indicator sets and the guidance and methodologies to develop relevant indicators are gender-related as they speak directly to the development and use of gender-responsive indicators to create accountability for gender-responsive results on both the Fund portfolio and the individual project level.

**AF Strategic Results Framework**

32. In the most recent version of the **strategic results framework** only one direct reference to gender can be found, namely under output 2 with the related indicator 2.1.1. It reads: “2.2.1. No. of staff trained to respond to, and mitigate impacts of, climate related events (by gender)”.

33. However, several outcomes and outputs under the framework have a gender dimension, for example by referring to “targeted population groups”, “percentage of targeted population”, “vulnerable people in targeted areas” or “percentage of households and communities”.

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38 AFB/EFC.13/4, Results Tracking, Annex I; http://www.adaptation-fund.org/wp-content/uploads/2015/01/AFB.EFC._13.4%20Results%20Tracking.pdf

39 Ibid. This includes the following: outcome 6; output 1.2, output 3, output 6; indicator 1.2., indicator 1.2.1, indicator2.1.1, indicator 3.1, indicator 3.2, indicator 6.1, indicator 6.2, indicator 6.2.1.
Results Framework and Baseline Guidance – Project Level

34. The most updated M&E-related Fund guidelines for IEs can be found in the 123-page document *Results Framework and Baseline Guidance – Project Level*[^40]. It responds to the Board’s mandate in decision B.10/13 for the Secretariat to develop a practical guide or manual on how project baselines and project results frameworks may be prepared.

35. It includes a number of specific references to gender and women (30 in total), suggesting concretely the disaggregation of collected data by gender for several Fund strategic framework indicators and giving suggestions for how women can be identified or selected as a targeted group in various measurement categories. For example, for indicator 2.2.2, the guidance document suggests to break down the number of people affected by climate variability by gender; for indicator 3.1. which asks for the percentage of the targeted population aware of climate change impacts and responses, the document provides the example of a qualitative assessment of awareness by questioning women as a selected focus group; or for indicator 6.1.1. which requires the number and type of adaptation assets created or strengthened in support of individual or community livelihood strategies, the guidance document gives the examples of “special strategies for women” or references micro-finance as such a strategy, which is disproportionally benefitting women.

36. The document gives some specific requests for gender-disaggregation of data, although all other gender-related guidance remains at the level of optional, not mandatory considerations for IEs. This document is thus to be seen in conjunction with the results tracker of the Project Performance Report (see section below) that includes the possibility to report gender-disaggregated date for some additional indicators.

Methodologies for Reporting Adaptation Fund Core Impact Indicators

37. At its 23rd meeting in March 2014, the Board in decision B.23/19 approved the use of a set of core indicators and methodologies for reporting on Fund core impact indicators as suggested by the EFC in document AFB/EFC.14/6.

38. The document *Methodologies for Reporting Adaptation Fund Core Impact Indicators*[^41] details the rationale, the technical definition, the data sources, the reporting format and the methodology for measuring for each of the approved five core indicators. Gender considerations are integral to the measuring methodologies for two of the five indicators to differing degrees.

39. The gender dimension is a key consideration of the first core indicator on number of beneficiaries, with the methodology for measuring this indicator clearly outlining that “the indicators is expressed in absolute numbers of beneficiaries disaggregated by category of

reporting (direct/indirect) and gender reported at the project level” and demanding further that “[e]fforts should be made to disintegrate the reported direct and indirect beneficiaries by gender and youth (age 15-24).”. The guidance also focuses on possible data sources pointing out the importance of social and vulnerability baseline surveys and analyses as the basis for monitoring to “allow for disaggregation [sic] of the number of poor, female and youth beneficiaries.”

40. The key indicator on increased income, or avoided decrease in income makes some effort in its methodological instructions to underline the importance of collecting and analyzing additional information for the key parameters of the indicator, which include the number of targeted households. It suggests collecting more information “by breaking down the number of households in different categories of analysis (income level, total number of persons integrating the household, desegregation by gender or vulnerable groups, etc.) […] To do this, consider additional baseline information and adjustment in questionnaire.” It also points out that if insufficient socioeconomic data is available from census information, “project specific surveys [sic]” could be used.

Project Performance and Reporting

41. As part of the Fund’s reporting requirements, IEs are required to submit a Project Performance Report (PPR) on at minimum an annual basis to the EFC through the Secretariat. The PPR requires reporting on a number of areas which include financial procurement, risks, progress of implementation and toward outputs and outcomes and self-assessment by the IE against identified project/programme milestones. Disbursements of tranches of funding are tied to the clearance of PPRs. The review process of the PPRs thus provides a structured process to flag shortcomings, such as in project/programme compliance with the Fund’s ESP principles, including its principle 5 on gender equity and women’s empowerment.

Project Performance Report (PPR) Template

42. IEs fill out a PPR template, which was approved by the Board in a revised form in June 2012 and has been updated most recently. The PPR template is a collection of seven separate spreadsheets, which request annually updated information on:

1) financial data (actual and planned expenditure and co-financing);
2) procurement (listing contracts and bids);
3) risk assessment (risks identified in project preparation, their current status and steps taking to mitigate them);
4) rating (on implementation progress against key milestones by project managers and the IE from highly satisfactory to unsatisfactory);

42 Ibid, p.1f.
44 http://www.adaptation-fund.org/projects-programmes/project-performance/
5) project indicators (being tracked for the project with baseline, progress since inception and end-date);  
6) lessons learned (a set of qualitative assessment questions dealing with implementation and management as well as lessons derived from the concrete implementation experience for adaptation measures more general); and  
7) results tracked (linking individual project performance to specific indicators tracked across the AF portfolio).

43. Within the PPR template the data sheets dealing with risk assessment, rating, project indicators, lessons learned, and AF portfolio results tracking are clearly gender-related, although their reporting of gender-relevant data and information will vary with the individual project. For example, if the IE did not identify gender-responsive project indicators in its project proposal or assessed that there were no gender-related risks or impacts from the project, then the annual PPR will not capture the project-specific gender dimension sufficiently. However, the qualitative self-assessment under the data-sheet on lessons learned includes the following questions, which will have to be answered every reporting period, meaning at least annually:

“How have gender considerations been taken into considering during the reporting period? What have been the lessons learned as a consequence of inclusion of such considerations on project performance or impacts?”

44. More generic questions on lessons learned for climate resilience measures, concrete adaptation interventions and community/national impact in the same data sheet, on which the IEs have to report at project mid-term and project completion allow for the integration of gender considerations, e.g. related to the question on “the most successful aspects for the target communities?”, which presumably will include women.

PPR Results Tracker and Results Tracker Guidance Document

45. As part of the PPR, the Fund’s results tracker is used to aggregate specific indicators across the Fund portfolio. The results tracker is a list of indicators made up of indicators from the Fund’s strategic results framework and its five core indicators (see sections above for their respective gender-related importance). It measures results throughout the project implementation by requesting data on the baseline, the target at project completion, performance at the mid-level and the performance at project completion.

46. IEs are asked to gender-disaggregate data throughout the project’s implementation on a number of indicators as listed in the table below. These look for example at the percentage of women among targeted stakeholders, ask what percentage of staff trained was female, look at

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46 Ibid, data sheet on “Qualitative Measures and Lessons Learned”.  
47 Ibid.  
48 PPR template, data sheet on “Results Tracker for Adaptation Fund (AF) Projects”.  
49 Results Tracker Guidance Document, see Table 3 with a list of indicators included in the results tracker, p.4; http://www.adaptation-fund.org/wp-content/uploads/2014/09/AF-ResultstrackerGuidance-final.pdf
the percentage of women among total numbers of beneficiaries or request information on the percentage of targeted households that were headed by a female. The gender-related indicators in the Fund’s results tracker are captured in detail in the table below.

**Table: Gender-related indicators in the Fund results tracker**

<table>
<thead>
<tr>
<th>Impact: Increased resiliency at the community, national, and regional levels to climate variability and change</th>
<th>Core Indicator: No. of beneficiaries</th>
<th>Total number of beneficiaries</th>
<th>% of female beneficiaries</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outcome 1: Reduced exposure to climate-related hazards and threats</td>
<td>Indicator 1: Relevant threat and hazard information generated and disseminated to stakeholders on a timely basis</td>
<td>Total number of targeted stakeholders</td>
<td>% of female stakeholders targeted</td>
</tr>
<tr>
<td>Outcome 2: Strengthened institutional capacity to reduce risks associated with climate-induced socioeconomic and environmental losses</td>
<td>Indicator 2: Capacity of staff to respond to, and mitigate impacts of, climate-related events from targeted institutions increased</td>
<td>Total number of staff targeted</td>
<td>% of female staff targeted</td>
</tr>
<tr>
<td>Output 2.1 Strengthened capacity of national and sub-national centres and networks to respond rapidly to extreme weather events</td>
<td>Indicator 2.1.1: No. of staff trained to respond to, and mitigate impacts of, climate-related events</td>
<td>Total number of staff trained</td>
<td>% of female staff trained</td>
</tr>
<tr>
<td>Output 3: Targeted population groups participating in adaptation and risk reduction awareness activities</td>
<td>Indicator 3.1.1: Percentage of targeted population awareness of predicted adverse impacts of climate change, and of appropriate responses</td>
<td>Total number of targeted beneficiaries</td>
<td>% of female beneficiaries targeted</td>
</tr>
<tr>
<td>Outcome 6: Diversified and strengthened livelihoods and sources of income for vulnerable people in targeted areas</td>
<td>Indicator 6.1: Increase in households and communities having more secure access to livelihood assets</td>
<td>Total number of targeted households</td>
<td>% of female headed households</td>
</tr>
<tr>
<td>Indicator 6.2: Increase in targeted population’s sustained climate-resilient alternative livelihoods</td>
<td>Total number of targeted households</td>
<td>% of female headed households</td>
<td></td>
</tr>
</tbody>
</table>

**Findings from the Independent Evaluation’s First Phase Review of Fund Operational Processes**

47. An independent evaluation of the Fund is underway in two phases. Its first phase, scheduled to be completed in 2015, focused on the evaluation of the Fund’s processes, including its project/programme cycle and its knowledge management, assessing the Fund’s operational performance against the Fund’s design and implicit logic. The first phase of the evaluation confirmed the Fund’s relevance and effectiveness and efficiency. Some recommendations for improving the Fund’s operational functions centered on improved knowledge management and a clearer set of guidelines and practical suggestions for “reaching, understanding, and effectively addressing the needs of especially vulnerable social groups within countries.”

50 It is in this context that the independent evaluation advised the Fund to “[d]evelop and implement a comprehensive gender policy based on a review of other funds’ gender policies.”

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51 Ibid.
Conclusions and Way Forward

48. As this compilation and analysis of the gender-related policies, procedures and accompanying guidance documents and methodologies shows, in the last few years the Fund has taken significant steps to acknowledge and work toward addressing the special vulnerability of women and girls. An integration of gender considerations into the Fund’s policies and procedures is a crucial component for the Fund to reach the desired impact, namely to increase the resiliency at the community, national and regional levels to climate variability and change in developing-country Parties to the Kyoto Protocol that are particularly vulnerable to the adverse effects of climate change.

49. While there are separate gender-related elements integrated to varying degrees in essential Fund policies and procedures, a comprehensive and policy-guided approach is yet to be established. Rather, the efforts have been piece-by-piece over several years, guided frequently by lessons learned during implementation. It is therefore recommended that the Fund develop a separate gender policy. Such a policy will underline the commitment of the Fund at its highest levels of decision-making and management and be an important signal to IEs and partners all over the world as well as to the communities and vulnerable people which the Fund serves. It should be accompanied by a multi-year gender action plan to ensure the systematic implementation of a Fund gender policy and create accountability for Fund results in integrating gender equity considerations into all of its operations.

50. A gender policy will bring the Fund’s practices generally in line with the practice of other leading financial institutions active in environment and development financing, and in particular with the policy approach of the two operating entities of the financial mechanism of the UNFCCC as the Fund’s peer institutions. Both, the Global Environment Facility (GEF) and the Green Climate Fund (GCF) have a gender policy together with a gender action plan.

51. The GEF Council adopted the GEF’s gender mainstreaming policy in May 2011.\textsuperscript{52} The policy mandates the mainstreaming of gender in all the operations of the GEF Secretariat and GEF Partner Agencies, “including efforts to analyze systematically and address the specific needs of both women and men in GEF projects.”\textsuperscript{53} The GEF Secretariat has designated a gender focal point among its staff to coordinate internally and externally with implementation partners on gender mainstreaming issues. GEF Partner Agencies are required to have either an established policy, strategy or action plan on gender equality on their own, which must satisfy minimum requirements.\textsuperscript{54} New GEF accreditation applicants must also demonstrate compliance with those minimum requirements to the GEF Accreditation Panel as part of the GEF accreditation process.

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\textsuperscript{52} GEF (2012), Policy on Gender Mainstreaming, Policy SD/PL/02; https://www.thegef.org/gef/sites/thegef.org/files/Gender_Mainstreaming_Policy.pdf
\textsuperscript{53} Ibid, p.2.
\textsuperscript{54} These include establishment of an agency institutional framework for gender mainstreaming; inclusion of gender considerations and socio-economic aspects in the agency’s criteria for project design and project review; a required social assessment including gender analysis to inform project formulation, implementation and monitoring and evaluation; identified measures to avoid, minimize and/or mitigate adverse gender impacts; system with gender-disaggregated indicators for monitoring progress in gender mainstreaming and support for implementation to executing entities by social/gender experts as necessary. Ibid, p.2f.
In October 2014, the GEF Council approved a multiyear Gender Equality Action Plan (GEAP) covering the sixth replenishment period of the GEF (fiscal year 2015-18) to ensure further progress in GEF gender mainstreaming efforts.\(^{55}\)

52. In March 2015, the GCF Board approved its gender policy and a three year gender action plan at the same time.\(^{56}\) The latter details specific responsibilities assigned to its Board, Secretariat, IEs, executing entities (EEs) and National Designated Authorities (NDAs) and focal points in ensuring the full implementation of the GCF policy. The GCF gender policy is organized along six principles covering commitment, comprehensiveness in scope and coverage, accountability, country ownership, competencies of the GCF and its partners and resource allocation. The accompanying gender action plan focuses on institutional strengthening, including the appointment of a senior social development and gender specialist in the GCF Secretariat, the issuance of gender guidelines and on capacity-building, integration of gender considerations into monitoring and reporting procedures and knowledge management. The GCF demands in its fit-for-purpose accreditation procedures (irrespective of the project size or risk category the applicant entity is seeking GCF accreditation for) in addition to the full compliance with the GCF environmental and social safeguards (which do not integrate gender formally) proof of the gender capacity of the accreditation applicant either demonstrated through the existence of an own gender policy or through related implementation track record as a prerequisite for the entity’s accreditation with the GCF.\(^{57}\)

53. This is also relevant in light of the ongoing strategic discussions in the Adaptation Fund Board and Secretariat regarding a formal linkage between the Fund and the GCF and the Board’s recent decisions on this matter (decision B.24-25/9 and decision B.25/26).\(^{58}\)

54. Annex I outlines the fundamental elements of a potential gender policy for the Fund, based on the review of the gender policies of the GEF and the GCF. In developing and approving a Fund gender policy, the Fund Board and Secretariat should follow the process for the development of the Fund ESP.\(^{59}\) Then a policy draft for an ESP was taken note of by the Board and then following Board decision B.21/23 was published for comments and inputs from the Board and stakeholders for a time frame of several months. Comments and suggestions received were taken into account in a revised policy document, which was then approved by the Board at its following meeting.


\(^{58}\) The Board has discussed different scenarios for linkages between the Fund and the GCF, including the option of the Fund applying for accreditation as a multilateral implementing entity (MIE) with the GCF. These scenarios are fully described in document AFB/B.25/Inf.6.

Recommendation

55. The Ethics and Finance Committee may wish to recommend the Board to:

(a) Recognize the importance of systematizing and strengthening the integration of gender considerations in the policies and procedures of the Adaptation Fund;

(b) Welcome the draft Adaptation Fund gender policy as contained in Annex I of this document;

(c) Decide to:

   (i) Launch a public call for comments on the aforementioned policy with a deadline of December 31, 2015 [other date]; and

   (ii) Request the secretariat to present at the twenty-seventh Board meeting:

       (1) A revised proposal for an Adaptation Fund gender policy incorporating inputs from Board members and interested stakeholders received through the public call for comments;

       (2) A proposal on how to operationalize an Adaptation Fund gender policy, including any necessary changes to the relevant Adaptation Fund policies and procedures;

       (3) A compilation of comments received through the public call for comments; and

       (4) An estimate of the costs related to operationalizing the policy.
Annex I: Proposal for a Gender Policy of the Adaptation Fund

Background

1. Gender equality is increasingly recognized as a crosscutting issue in major multilateral environmental agreements. The 1992 Rio Declaration on Environment and Development acknowledged in Principle 20 women’s “vital role in environmental management and development” with Agenda 21 focusing in its Chapter 24 on women’s considerable knowledge and experience in managing and conserving natural resources. The United Nations Framework Convention on Climate Change (UNFCCC) in its Article 2 recognizes the “anthropogenic interference” – meaning the interference of both men and women -- within the climate system. Over the past 15 year, a number of UNFCCC decisions have addressed the gender dimensions of climate change. In 2010, the Cancun Agreements in decision 1/CP.16 underscored that gender equality and the effective participation of women are important for long-term cooperative action on all aspects of climate change. In 2012, Doha decision 23/CP.18 decreed the promotion of gender balance and improving the participation of women in UNFCCC negotiations and in the representation of Parties in bodies established pursuant to the Convention or the Kyoto Protocol "so that gender-responsive climate policy responds to the differing needs of men and women in national and local contexts."

2. The Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund (OPG) mandate the Fund to finance concrete adaptation projects and programmes in countries that are Parties to the Kyoto Protocol “aimed at addressing the adverse impacts of and risks posed by climate change” and “at producing visible and tangible results on the ground by reducing vulnerability and increasing the adaptive capacity of human and natural systems to respond to the impacts of climate change, including climate variability.” Gender norms and related cultural rules are part of what structures the interactions and reactions to climate threats and opportunities in human systems. By striving for gender equality and supporting gender equitable processes, such as empowering women in its activities, the Fund increases the adaptive capacity of human systems as it actively addresses the disproportionately higher vulnerability of women to climate change impacts due to persisting gender inequalities. These often restrict women’s access to resources, legal rights or political participation and decision-making and undermine their adaptive capabilities. It will thus apply the findings of the Intergovernmental Panel on Climate Change (IPCC) which in 2007 already determined the role

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61 http://unfccc.int/key_documents/the_convention/items/2853.php


63 UNFCCC, Decision 1/CP.16; http://unfccc.int/resource/docs/2010/cop16/eng/07a01.pdf#page=2

64 UNFCCC, Decision 13/CP.18; https://unfccc.int/files/bodies/election_and_membership/application/pdf/cop18_gender_balance.pdf

of gender to be an important consideration for the development of interventions to enhance adaptive capacity and to facilitate adaptation.\textsuperscript{66}

3. The Fund’s gender policy builds on the existing gender policies and gender action plans of other climate funds.\textsuperscript{67} It systematically integrates key principles elaborated in the Fund’s own environmental and social Policy (ESP), especially the principles on \textit{access and equity}, on consideration of \textit{marginalized and vulnerable groups} and of \textit{human rights}. It expands the principle of \textit{gender equity and women’s empowerment}, which is process-oriented and often subjectively contextualized, to the legal mandate of \textit{gender equality} as the goal that the Fund strives to attain through its operations.\textsuperscript{68}

4. The Fund’s gender policy is human rights-based and congruent with international instruments in acknowledging the centrality of women’s rights as universal human rights, in particular with the Universal Declaration of Human Rights (UDHR), the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the International Labor Organization’s (ILO) core conventions\textsuperscript{69}, the Millennium Development Goals (MDGs)\textsuperscript{70}, follow up Sustainable Development Goals (SDGs) and the post 2015 process.\textsuperscript{71} It supports the equal right of men and women to access and benefit from the Fund’s resources in order to increase their adaptive capacity and reduce their vulnerability to climate change impacts.

5. The Fund’s gender policy makes reference to the following key gender concepts\textsuperscript{72}:

(a) \textbf{Gender}: refers to the socially constructed characteristics of women and men (biological sex) – such as the norms, roles and relationships that exist between them. Gender expectations vary between cultures and can change over time and also affect people with transgender or intersex identities that do not fit into the binary male or female sex categories.


\textsuperscript{67} For the elaboration of this draft policy, the Gender Mainstreaming Policy of the Global Environment Facility (GEF) and its Gender Equality Action Plan (GEAP) as well as the Green Climate Fund (GCF) Gender Policy and Gender Action Plan were considered. GEF (2012), Policy on Gender Mainstreaming, Policy SD/PL/02; GEF (2014), Gender Equality Action Plan, GEF/C.47/09; and GCF (2015), Gender Policy and Gender Action Plan, GCF/B.09/23, Annexes XIII and XIV, pp. 84-91

\textsuperscript{68} The Office of the High Commissioner for Human Rights (OHCHR) cautions against a reliance on the term “gender equity,” which can be used in a way that perpetuates stereotypes about women’s roles in society, and advises instead the use of gender equality as the legal term under existing human rights instruments with corresponding obligations for signatory states. OHCHR (2014), Women’s Rights are Human Rights, HR/Pub/14/2, pp. 33-34; http://www.ohchr.org/Documents/Publications/HR-PUB-14-2.pdf.


\textsuperscript{70} http://www.un.org/millenniumgoals/

\textsuperscript{71} https://sustainabledevelopment.un.org/?menu=1300

\textsuperscript{72} If not otherwise indicated, relevant definitions are drawn and adapted from the GCF gender policy or the Annex to the GEF Gender Equality Action Plan (GEAP).
(b) **Gender Balance**: refers to the goal of having the same number of women and men in decision-making bodies and among staff in the different levels of organizational structures.

(c) **Gender Equality**: refers to the equal rights, responsibilities and opportunities of women and men and boys and girls and the equal consideration of their respective interests, needs and priorities. Gender equality is not a women’s issue but should concern and fully engage men as well as women. Equality between women and men is a human rights issue as well as a precondition for, and indicator of, sustainable, people-centered development.\(^73\)

(d) **Gender Equity**: refers to the process of being fair to men and women, boys and girls. It recognizes the need for potential differential treatment that is fair and positively addresses a bias or historical or social disadvantage that is due to gender roles or norms. The process of gender equity leads to gender equality as a legal right and obligation.

(e) **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.

(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 changes within a given social setting through remedial action.

(g) **Gender sensitive**: refers to the 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) **Women’s empowerment**: refers to differential or pro-active support to increase:

(i) women’s sense of self-worth;
(ii) right to have and determine choices;
(iii) right to have access to opportunities and resources;
(iv) right to have power to control own lives both within and outside the home; and
(v) ability to influence the direction of social change to create a more just social and economic order, nationally and internationally.\(^74\)

**Objectives**

6. The Fund and its implementing partners shall strive to uphold women’s rights as universal human rights and to attain the goal of gender equality and the equal treatment of women and men, including the equal opportunities for access to Fund resources and services, in all Fund operations through a gender mainstreaming approach.

\(^73\) See a related definition from the Office of the Special Adviser to the Secretary-General on Gender Issues and Advancement of Women (UN OSAGI).

\(^74\) UNFPA
7. The Fund’s gender policy has the following objectives:

(a) To ensure that the Fund will achieve more effective, sustainable and equitable adaptation outcomes and impacts in a comprehensive manner in both its internal and external procedures;
(b) To provide women and men with an equal opportunity to build resilience, address their differentiated vulnerability, and increase their capability to adapt to climate change impacts;
(c) To address and mitigate against assessed potential project/programme risks for women and men in relation to concrete adaptation actions financed by the Fund; and
(d) To contribute to addressing the knowledge and data gaps on gender-related vulnerabilities and to accelerate learning about effective gender-equal adaptation measures and strategies.

Main Principles

8. The Fund’s gender policy is based on a set of key principles as elaborated below:

Commitment

9. The Fund commits to upholding women’s human rights and to contributing to gender equality in line with international human rights instruments, ensuing applicable international and domestic law. The Fund further commits to:

(a) Adopt methods and tools to promote gender equality and reduce gender discriminations and disparities in its funding operations; and
(b) Measure the outcomes and impacts of its activities on women and men’s resilience to climate change impacts and their ability and agency to address underlying sociocultural factors of gender differentiated vulnerability to climate change.

Comprehensiveness in scope and coverage

10. The Fund applies its gender policy to all its adaptation activities irrespective of project/programme size, whether implemented by international, regional or national entities accredited to the Fund.

11. The policy will be implemented throughout the Fund’s operational processes with guidelines to be issued by the Secretariat for the benefit of the Fund’s external partners, Designated Authorities (DAs) and Implementing Entities (IEs).

12. Fund IEs will be required to undertake an initial gender assessment as per the ESP process, to select gender-responsive indicators and to design gender-responsive implementation and monitoring arrangements.
13. Fund projects and programmes will be screened for gender responsiveness at various stages of the project preparation, appraisal, approval and monitoring process by the relevant Fund bodies and external partners (the Secretariat, the Project and Programme Review Committee, the Ethic and Finance Committee, DAs and IE). Throughout, stakeholders should be meaningfully consulted in a gender equal way.

**Accountability**

14. The Fund accounts to the Board for gender-responsive adaptation results and outcomes, including through regular (annual) reports to the Board in a transparent and comprehensive manner. Qualitative and quantitative gender monitoring for project/programme impact and outcomes is to be integrated into the Fund’s Strategic Results Framework, into its set of core indicators and in its Project Performance Report results tracker. Portfolio-wide the Fund accounts for the number of men and women beneficiaries through efforts to improve gender-disaggregated data collection of Fund activities.

15. The Board, as operating entity of the Fund, is accountable for gender results.

16. Applicant IEs are required to document an institutional capacity and commitment to apply the Fund’s gender policy and to demonstrate their ability to implement it. An applicant IE may demonstrate its ability and commitment to implement the gender policy through:

   (a) An institutional framework for gender mainstreaming, such as designated expert staff and/or a commitment at highest management level to gender equality;

   (b) Own policies, strategies or action plans that address gender equality and gender-responsive activities, or demonstration through related implementation track-records;

   (c) An ability to undertake socioeconomic and gender assessments, or similar methods to assess the potential roles, benefits, impacts and risk for women and men;

   (d) An ability to identify measures to avoid, minimize and/or mitigate adverse gender impacts; and/or

   (e) A monitoring and evaluation process that accounts for gender mainstreaming efforts, including the use of gender-disaggregated indicators, and can provide social and gender expert support during project implementation.

17. A tiered approach will be applied to rolling out the gender policy to already accredited implementing entities.75 The ability of existing IEs to comply with the Fund’s gender policy may be enhanced through the readiness programme and other means in order to meet the requirements of this policy. Already accredited implementing entities will apply the gender policy

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75 The Fund’s ESP was phased in following a tiered approach for different categories of entities, depending on accreditation status such as whether they are already accredited and implementing approved projects/programmes; are accredited without approved projects/programmes; applicant entities under review by the Accreditation Panel; new accreditation applicants; or accredited IEs applying for reaccreditation after five years. Decision AFB/B.22/23 and document AFB/B.22/5/Add.1.
requirements to the project/programme submitted for funding. Moreover, reporting requirements in an amended project performance report (PPR) will apply to projects/programmes currently under implementation.

18. New entities that apply for accreditation as an IE with the Fund shall be assessed by the Accreditation Panel for their capacity and commitment to implement the Fund gender policy. They may demonstrate its capacity through the requirements elaborated above.

19. All Fund IEs shall identify a grievance mechanism, which can be pre-existing, national, local, or institution- or project-specific, able and competent to provide men and women affected by Fund supported projects and programmes with an accessible, transparent, fair and effective process for reviewing and addressing gender-related complaints and grievances.

Competencies

20. The Board is encouraged to consider relevant gender expertise and gender balance in the appointments of its Board members and their designation to serve on the Project and Programme Review Committee (PPRC) and the Ethics and Finance Committee (EFC).

21. The Fund will work with Designated Authorities and Implementing Entities, including through the accreditation process, to enhance their capacity to understand and implement the Fund’s gender policy. Project preparation grant support for IEs and readiness support through the Fund readiness programme for applicant entities may be requested for that purpose. They may also obtain gender training and capacity building through their partnerships with other organizations (such as domestic, bilateral, multilateral and international organizations, including NGOs).

Resource Allocation

22. The Fund’s resource allocation for concrete adaptation projects and programmes contributes to gender equality and supports the empowerment of women. Fund projects and programmes without articulated gender considerations shall not receive Fund resources.

Knowledge generation and communications

23. To accelerate learning on the implementation of gender-responsive adaptation actions and to contribute to addressing existing knowledge and data gaps, the Fund will document the experiences and knowledge gained from the implementation of its gender policy. In particular, it will focus on identifying good practices from recipient countries and implementing entities. The Fund will actively engage in knowledge exchange on gender and adaptation finance with partner and peer organizations, in particular with other existing climate funds, especially the GCF and the GEF.
24. The Fund will communicate its commitment to gender equality, its gender policy and related implementation guidance to its partners and the wider public and seek periodic feedback from stakeholders and partners on the implementation of the Fund’s gender policy, including possible future improvements.

Review and Revisions

25. The gender mainstreaming approach of the Fund’s gender policy is a long-term undertaking demanding a sustained commitment and a regular tracking of its progress. As experience is gained and lessons are learned in the implementation of the gender policy throughout the Fund’s operations, the Fund as a learning institution might adjust its approach. In light of this, the Fund will review its gender policy three years after it becomes operational.