Adaptation Fund Board
Forty-first meeting
Bonn, Germany, 10-13 October 2023

Agenda item 10.c) (ii)

OPTIONS FOR A POLICY ON SAFEGUARDING AGAINST SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARASSMENT (SEAH)

I.   **Background**

1.   At the Sharm el-Sheikh Climate Change Conference in November 2022, the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol at its seventeenth session (CMP 17) and the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement at its fourth session (CMA 4) requested the Board to adopt a policy on safeguarding against sexual exploitation and abuse and sexual harassment (SEAH).[1] In response to this mandate, the Adaptation Fund Board (the Board) considered this as part of its meeting agenda on issues arising from the CMP 17, CMA 4, and the twenty-seventh session of the Conference of Parties (COP27) and decided as follows:

> *Having considered Adaptation Fund related decisions taken by the Conference of the Parties serving as meeting of the Parties to the Kyoto Protocol at its seventeenth session and Conference of the Parties serving as the meeting of the Parties to the Paris Agreement at its fourth session, as well as document AFB/B.40/8 and its annex, the Adaptation Fund Board (the Board) decided:*
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> *[. . .]*
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> *(b) To request the secretariat to prepare a document with options for a policy on safeguarding against sexual exploitation and abuse and sexual harassment (SEAH) and present it at its forty-first meeting for the Board's consideration;*
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> *[. . .]*
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> (Decision B.40/81)

2.   In response to decision B.40/80 (b), the secretariat has prepared this document to facilitate the Board's discussion on the matter. To inform its assessment, the secretariat conducted a study to understand contemporary institutional commitments and policies to prevent sexual exploitation, abuse and harassment and to protect victims of the same as well as how such policies and frameworks are implemented, with a view to exploring options for the policy safeguarding against SEAH for the Fund.

3.   The full study is contained in the Annex to this document and a summary of the organizations' policies or frameworks on safeguarding against SEAH is contained in table format as an Appendix therein.

II.   **Summary of the findings of the study on SEAH policies of other organizations**

4.   While SEAH is the abbreviation for Sexual Exploitation, Abuse and Harassment, various definitions of SEAH are illustrated in the study contained in Annex to this document. Current international trend is to add a "P" to the acronym of the "SEAH", to highlight that the focus of any policy should be to "prevent" SEAH from the get-go and "protect" against SEAH. (PSEAH: Prevention of and protection from sexual exploitation, abuse and sexual harassment). SEAH is considered to be a form of gender-based violence, and many organizations including most international financial institutions

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[1] Decision 4/CMP.17 (Report of the Adaptation Fund Board for 2022), para. 13; Decision 18/CMA.4 (Matters relating to the Adaptation Fund), para. 12.

(IFIs) refer to the risks around SEAH in their operations under the umbrella of gender-based violence and harassment. Thus, the terms GBV (Gender Based Violence) and GBVH (GBV and Harassment) are sometimes used interchangeably with SEAH.

5.   The study found that in recent years, organizations ranging from climate funds to international financial institutions, development organizations, humanitarian organizations, the private sector, international non-governmental organizations and many governments/donor agencies have in place comprehensive policies, strategies, and measures to prevent and address sexual exploitation, abuse and harassment (SEAH), protect victims and whistle-blowers, and to ensure that all stakeholders hold one another accountable, recognizing the importance of addressing the issue of concern. In this regard, the seriousness of SEAH complaints, in the international context, is increasingly seen as an organizational, reputational and monetary risk.

6.   While some organizations adopted their standalone PSEAH policies, other organizations incorporated PSEAH elements into their relevant policies and frameworks to prevent and address SEAH without having a standalone PSEAH policy.

7.   Regardless of whether an organization adopted a standalone SEAH policy or had other policies and/or frameworks to prevent and address SEAH, the study observed that these organizations were making efforts in reflecting overall organizational culture through ongoing commitments to all staff and partners, and through upholding the overall reputation and credibility of the institution through stated values. An effective PSEAH policy sends a clear signal across the organization, to present and potential partners, donors, and strategic allies on the values that the organization aligns with and how these permeate through all of its relationships at all levels, both within and outside the organization.

8.   Robust PSEAH policies and frameworks not only set clear standards for behavior within the organization but also reflect commitments to creating a safe, respectful, and accountable organizational culture for all individuals it interacts with. They also include proactive leadership commitment, strong prevention measures and on-going training, robust oversight that ensures accountability and transparency and clear definitions and always, zero tolerance, going beyond policy adoption.

9.   Implementing a PSEAH policy requires integral and coherent policies and processes. The study identified some common elements and trends in implementing a PSEAH policy aimed at ensuring a culture of prevention, as well as an adequate system to address and respond to SEAH, and a summary is as follows:

- *Organizational culture*: A PSEAH policy reflects a zero-tolerance organizational culture through ongoing commitment to all staff and partners that these acts have no place in the organization, and through defining corporate values, such as the promotion of gender equality, the protection of vulnerable groups and the defense of fairness and justice.
- *Holistic framework to brace the SEAH policy*: Typically, the SEAH policy aligns closely with a suit of complementary and supporting policies including gender policy and/or

environmental and social safeguards policy, which contributes to coherence and coordination.

- **_Ensuring that SEAH policies apply to all_**: SEAH policies typically apply to everyone linked with the institution and as best practice this should include all personnel, contractors, consultants, volunteers, board members, and executive. Additionally, some organizations explicitly extend these provisions to other entities who receive their funding, which can be governmental or non-governmental institutions, civil society organizations or international organizations. The broad scope of application requires additional efforts and investing in capacity-building, training and dissemination.

- **_Safeguarding against SEAH through protection and reporting_**: The SEAH policy can only be as effective as its implementation by relevant actors covered by the policy, and this entails a safe reporting mechanism as well as an independent redress mechanism that is less concerned about the risk to the organization and more concerned about a fair and respectful outcome.

- **_Establishing compliance, updates and data records_**: In order to ensure accountability and strengthen a zero-tolerance culture, it is necessary to collect and analyze the information on SEAH. The use of data records and reporting to the Board are some mechanisms implemented by organizations in this regard.

III. Current status of and possible options for the Adaptation Fund in safeguarding against SEAH

10. Currently, the Adaptation Fund does not have a stand-alone PSEAH policy nor other policies directly addressing SEAH issues. Neither the Gender Policy (GP) and Environmental and Social Policy (ESP) or the Fund's other policies mention SEAH nor gender-based violence (GBV). Only its Gender guidance document for implementing entities (revised in 2021) mention both terms.[2]

11. One could argue that this concept and its provisions are embedded under the mandate to promote gender equality within its operations and financed activities, such as the Principle 5 of the ESP (Gender Equality and Women's Empowerment) and/or the Fund's Gender Policy. However, both policies miss the opportunity to explicitly declare SEAH as a critical risk to be identified and addressed not only at the project level, but also at the institutional level which would

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[2] See Gender Guidance Document for Implementing Entities on Compliance with the Adaptation Fund Gender Policy (Updated in 2022). For example, on p.60, SEAH is referenced once: "Are gender-differences in perceptions and realities of public safety considered such as efforts to prevent sexual exploitation, abuse and harassment (SEAH) or gender-based violence (GBV)" ; p.54:" Are there strategies in place to mitigate sexual harassment, e.g. increased female presence in support staff, avoiding overcrowding, strengthening supervision before and during disasters?"; and p.57: "Is gender-based violence (GBV) employed to maintain or exert control over natural resources, such as in times of resource scarcity aggravated by climate change and biodiversity loss (with increased risk faced by environmental defenders who are Indigenous or of underrepresented sexual orientations or gender identities)?".

[2] For example, p.60 of the AF gender guidance document, SEAH is referenced once: "Are gender-differences in

significantly undermine the public reputation of the Fund unless it is prevented and properly addressed.

12.   In addition, although AFB secretariat staff are covered by the World Bank's policies related to safeguarding against SEAH, such as the WB Staff Rule 3.00 as well as the mandatory WBG staff trainings, there is no policy or procedure in the Fund to cover other Fund's key stakeholders such as the Board, its Committees, the Accreditation Panel, Implementing Entities or Adaptation Fund Civil Society Organization Network in terms of preventing and addressing SEAH.

13.   In considering to adopt a PSEAH policy, it would be necessary to consider and assess, on one side, the costs and investment of designing and implementing such a mechanism – which as it has been previously stated comprises different stages, and it should be aligned to the Fund's policies, processes and goals – and on the other, potential risks of not having a SEAH policy – which seems to be against the growing trend in international organizations. It will also be necessary to consider how a PSEAH policy or its elements would be organized in the context of the Fund's broader policy framework.

14.   There could be two ways to embrace SEAH concerns in the Fund:

- (Option 1): Adopting a standalone PSEAH policy of the Adaptation Fund; or

- (Option 2): Without a standalone PSEAH policy, incorporating SEAH elements into the relevant policies such as the Fund's Operational Policies and Guidelines, Code of Conduct of the Board, Risk Framework of the Fund, Environmental and Social Policy, Gender Policy and their respective Guidance Document.

15.   Both options will provide an opportunity for the Fund to reaffirm its commitment to a sustainable climate adaptation that ensures that its supported projects and programmes do not exacerbate existing gender gaps and achieve gender equality and the empowerment of all the vulnerable groups. However, even option (1) is selected, Fund's other relevant policies will need to be updated to be aligned with a standalone PSEAH policy for coherence, accountability, and integrity.

IV.   Key considerations in developing the Fund's PSEAH policy or framework

16.   The study conducted by the secretariat suggested that as a key financial instrument mandated to finance adaptation projects and programmes targeting those particularly vulnerable to the adverse effects of climate change, it would be timely to consider how best to <u>protect</u> these constituencies from all forms of bullying and harassment as well as <u>prevent</u> these behaviors and sense of impunity by those who hold positions of relative power.

17.   A SEAH policy outlines responsibilities, clear procedures for reporting, investigating, and addressing incidents and enables the organization to continually evaluate and improve its practices related to prevention, response, and accountability, fostering a culture of continuous learning and growth. The study outlined key considerations that could be made when considering the design of a policy on SEAH:

- Introducing such a sensitive topic demands sensitivity, tact and skills. A safe and inclusive space is needed to begin the conversations around organizational culture and values.
- Shared terminologies, definitions and responsibilities can be adopted as the organization deems appropriate considering those of the organizations that this review has included.
- Similarly, the scope of the prevention activities, investigation, reporting process, redress mechanism and disciplinary measures can be adapted to the particularities of the organization.
- It can encompass a wide array of topics, including prevention; organizational standards, policies and procedures; leadership and organizational culture; governance and accountability; response; whistleblower protection; reporting mechanisms; survivor-centered services; investigations; case management; training and learning; community outreach and dissemination.

18.   In considering options for an Adaptation Fund's policy on safeguarding against SEAH, the following steps could be considered.

- **Step 1. *Set the Stage*:** Determine which overall standards to adapt to considering other international organizations' practices and experiences.

- **Step 2: *Conduct a gap analysis*:** This entails a review of current and relevant policies, procedures and contracts that address SEAH concerns as well as and determine if a stand-alone PSEAH policy is required. While the Adaptation Fund has a GP and ESP, neither of these policies includes the terminology of SEAH or GBV, explicitly mentions the Fund's zero tolerance on SEAH, nor address SEAH or GBV. .
Should the Fund develop its own PSEAH policy, some operational policies, templates and guidance documents would need to be checked to identify the need of alignment with a new PSEAH policy, such as:

  - Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund
  - The Gender Policy and Action Plan (revised in March 2021) and its Gender Guidance Document for IEs on Compliance with the Adaptation Fund Gender Policy
  - The Environmental and Social Policy (ESP) (Revised in March 2016) and Guidance Document for IEs on compliance with the Adaptation Fund ESP
  - Code of Conduct for the Adaptation Fund Board and Zero Tolerance Policy for the Board which are recommended to include SEAH and express a zero-tolerance towards it
  - Ethics and Finance Committee (EFC) Terms of Reference
  - If any, other policies in place which set out expected standards of staff behavior, forbids sexual exploitation, abuse and harassment and enables all staff access to an accountability / complaints system and link to them
  - Accreditation Application Form (Annex 6 to OPG)
  - Project/Programme Proposal Template (Annex 5 to OPG)
  - Adaptation Fund Risk Management Framework

- Whether PSEAH clauses can be organically integrated into partnership agreements and contracts, and in Secretariat in-house policies
- Whether a whistleblower policy exists that could include PSEAH commitments and complaint mechanisms
- Whether the [Ad Hoc Complaint Handling Mechanism (ACHM)](Oct 2016) which is complementary to the Adaptation Fund's risk management framework includes the grievance mechanism required for accreditation of Implementing Entities, include PSEAH related complaints.
- Determine who oversees development, review, implementation, who is responsible for updates, and when an independent arbitrator's services are required.

- **Step 3: *Design the framework and action plan*:** For an agency like the Fund with many partners in the field, committing the resources necessary for training, for compliance and for reporting will require agreement on an overall action plan.

- ***Step 4: Share learnings:*** The Fund could initially gain insights on the responsibilities and challenges from other organizations such as the Green Climate Fund in terms of the PSEAH policy and framework as well as their implementation and share its own experiences with its stakeholders and partner organizations.

V.   Recommendation for the Board

19.   Having considered document AFB/B.41/8/Rev.1 and the Annex, the Adaptation Fund Board may want to consider and decide:

(a) To take note of the options and suggested considerations for a policy on safeguarding against sexual exploitation, sexual abuse and sexual harassment (SEAH) outlined in document AFB/B.41/8 and the Annex;

(b) To decide to develop an Adaptation Fund policy on safeguarding against sexual exploitation, sexual abuse and sexual harassment (SEAH);

(c) To request the secretariat to;

(i)   Prepare a draft of the Adaptation Fund policy on safeguarding against SEAH in consultation with relevant stakeholders of the Adaptation Fund;

(ii) Present the draft policy on safeguarding against SEAH for the Board's consideration at its forty-third meeting.

Annex: A Study on Options for a Policy on Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH)

This document has been prepared in response to Adaptation Fund Board Decision B.40/80 which requested its secretariat to prepare a document with options for a policy on safeguarding against sexual exploitation and abuse and sexual harassment (SEAH) for the Adaptation Fund. The document contains an overview of contemporary institutional commitments and policies to safeguard against sexual exploitation, abuse and harassment and to protect victims of the same. It provides a sample of relevant illustrations with attention to the Adaptation Fund's Implementing Entities, to comparable financial instruments, and to emerging international practices. The Appendix provides a summary of the organizations' policies safeguarding against SEAH in table format.

> **NOTE:** SEAH is the abbreviation for Sexual Exploitation, Abuse and Harassment. Various definitions of SEAH are illustrated in the text. International currency now adds a "P" to the acronym, to highlight that the focus of any policy should be to "prevent" SEAH from the get-go and "protect" from SEAH. (PSEAH: Prevention of and protection from sexual exploitation, abuse and sexual harassment).
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> SEAH is a form of gender-based violence, most IFIs refer to the risks around SEAH in their operations under the umbrella of gender-based violence and harassment. Thus, the term GBV (Gender Based Violence) or GBVH (GBV and Harassment) is sometimes used interchangeably with SEAH.

Abbreviations

BRC   British Red Cross
CDC Group   Commonwealth Development Corporation, and Colonial Development Corporation (now British International Investment)
COP   Convention on Climate Change
CHS   Core Humanitarian Standard
CSSG   Cross-Sector Safeguarding Steering Group
DAC   Development Assistance Committee
EAC   Ethics and Audit Committee
ES   Environmental and Social
ESS   Environmental and Social Safeguards
FCDO   Foreign, Commonwealth and Development Office
Gavi   Global Vaccines Alliance
GBV   Gender Based Violence
GBVH   Gender Based Violence and Harassment
GEF   Global Environmental Facility
GCF   Green Climate Fund
GRAM   Grievance Redress and Accountability Mechanism
IC   Independent Commission on Sexual Misconduct, Accountability and Culture Change
IRM   Independent Redress Mechanism
IASC   Inter-Agency Standing Committee
IBRD   International Bank for Reconstruction and Development
IFAD   International Fund for Agricultural Development
IFC   International Financial Corporation
IFI   International Finance Institutions
IFRC   International Federation of Red Cross and Red Crescent Societies
IIU   International Integrity Unit
IUCN   International Union for Conservation of Nature and Natural Resources
KCS   Keeping Children Safe
OIG   Office of the Inspector General
OVRA   Office of the Victims' Rights Advocate
OECD   Organization for Economic Cooperation and Development
PASM   Preventing and Addressing Sexual Misconduct (policy)
PRS   Prevention of and Response to Sexual misconduct
PRSEAH   Prevention and Response to Sexual Exploitation, Abuse and Harassment
PSEAH   Prevention of and Protection from Sexual Exploitation, Sexual Abuse and Harassment
SEA   Sexual Exploitation and Abuse
SEAH   Sexual Exploitation and Abuse and Sexual Harassment
SM   Sexual Misconduct
SECAP   Social Environment and Climate Assessment Procedures
WFP   World Food Programme
WHO   World Health Organization

I.   Introduction

1.   In June 2023, a Financial Times article[1] reported that "female delegates at UN climate talks in Bonn allege they were bullied, abused and sexually harassed by male negotiators" casting a shadow over the upcoming COP28 summit. These allegations prompted a letter of protest from two dozen countries concerned about abusive behaviour. On a broader scale, climate change and environmental degradation heighten the risks of gender-based violence and harassment (GBVH) due to a combination of factors including displacement, resource scarcity and food/water insecurity. While gender-justice in the context of climate change is gaining recognition in policies and programmes, the intersections between climate change and GBVH receive less attention. The risk of sexual exploitation, abuse and harassment increases when power imbalances, vulnerabilities of beneficiaries, and external risk factors combine.[2] In the wake of the Me-Too and other social movements, climate change policies and initiatives need to be seen through the lens of 'inclusion' as well as 'consent.'

2.   As a key financial instrument mandated to finance adaptation projects and programmes targeting those particularly vulnerable to the adverse effects of climate change, it is timely to consider how best to <u>protect</u> these constituencies from all forms of bullying and harassment; as well as <u>prevent</u> these behaviours and sense of impunity by those who hold positions of relative power.

3.   While SEAH is the abbreviation for Sexual Exploitation, Abuse and Harassment, various definitions of SEAH are illustrated in this document. Current international trend is to add a "P" to the acronym of SEAH, to highlight that the focus of any policy should be to "prevent" SEAH from the get-go and "protect" from SEAH. (PSEAH: Prevention of and protection from sexual exploitation, abuse and sexual harassment). SEAH is a form of gender-based violence, and many organizations including most IFIs refer to the risks around SEAH in their operations under the umbrella of gender-based violence and harassment. Thus, the term GBV (Gender Based Violence) or GBVH (GBV and Harassment) is sometimes used interchangeably with SEAH.

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[1] Financial Times https://www.ft.com/content/0ff09ae9-276e-4fc7-b90c-df27c5bc975e
[2] Power imbalances enable offenders to commit SEAH and related abuse of power with perceived impunity and create the opportunity for more powerful actors to provide or withhold vital resources (such as medicines, insecticide-treated nets, medical treatment, training, stipends, and per diems) in exchange for sex acts. Power imbalance can be caused by gender norms; social hierarchies that lead to exclusion and vulnerability; beliefs around consent, class, race, ethnicity, gender identity, sexual orientation or misogyny; and early or persistent exposure to sexual violence, exploitation and abuse. (The Global Fund: https://www.theglobalfund.org/media/12159/ethics_protection-sexual-exploitation-abuse-harassment-guidance_note_en.pdf)

4.   In recent years, organizations ranging from climate funds[3], international financial institutions[4], development organizations[5], humanitarian organizations,[6] the private sector,[7] INGOs[8] and governments[9]/donor agencies[10] alike have in place comprehensive policies, strategies, and measures to prevent and address sexual exploitation, abuse and harassment (SEAH), protect victims and whistle-blowers, and to ensure that all stakeholders hold one another accountable, recognizing the importance of addressing this issue of concern. In this regard, the seriousness of SEAH complaints is an organizational, reputational and monetary risk that is gaining international attention.

5.   This document has been prepared in response to Adaptation Fund Board Decision B.40/80 which requested its secretariat to provide options for a policy on safeguarding against SEAH designed for the Adaptation Fund. It provides a summary overview of contemporary institutional commitments and policies to safeguard against sexual exploitation, abuse and harassment and to protect victims of the same, as well as some recommendations for the Fund to consider in developing its policy on safeguarding against SEAH. The Annex supplements an

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[3] See GCF's Revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment. Available in https://www.greenclimate.fund/document/revised-policy-prevention-and-protection-sexual-exploitation-sexual-abuse-and-sexual.

[4] In 2018, ten **International Financial Institutions** (African Development Bank, Asian Development Bank, Asian Infrastructure Investment Bank, European Bank for Reconstruction and Development, European Investment Bank, Inter-American Development Bank, International Finance Corporation, International Fund for Agricultural Development, International Monetary Fund, and the World Bank) reconfirmed their commitment to advance standards to prevent SEAH, strengthen efforts to create an environment where SEAH is not tolerated and take further steps to address and mitigate SEAH. The IFIs agreed to maintain and advance standards to prevent SEAH through seven common principles.

[5] See IFAD's Policy to Preventing and Responding to Sexual Harassment, Sexual Exploitation and Abuse; and WFP's Gender Policy 2022 with explicit reference to SEAH.

[6] Since 2019 the British Red Cross (BRC) and the **International Federation of Red Cross and Red Crescent Societies** (IFRC) Secretariat have adopted several measures to prevent and respond to SEAH. This includes the development and launch of a Safeguarding Hub with tools, resources and case studies, education materials and video animations about safeguarding. Safeguarding in the IFRC specifically refers to Prevention of and Protection against Sexual Exploitation and Abuse and Child Safeguarding.

[7] In July 2020, the IFC, IBRD and CDC Group (now British Investment International) released emerging practices for private sector actors Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector in addressing gender-based violence and harassment (GBVH) in operations and investments.

[8] In 2019 Oxfam developed an "Improving Safeguarding and Culture Plan" based on the recommendations from the Independent Commission (IC) on Sexual Misconduct, Accountability and Culture Change (IC) established in February 2018. The IC was mandated by Oxfam to conduct a confederation-wide review of Oxfam's culture; accountability; and safeguarding policies, procedures, and practices.

[9] In May 2020, fifteen donors (Australia, Belgium, Denmark, France, Germany, Italy, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Spain, Switzerland, UK, USA) delivered a joint letter to the United Nations Chief Executives Board for Coordination, proposing harmonised SEAH language for use in funding agreements between UN System entities and donor Member States. Final agreement, applicable to core and non-core funding, was reached in July 2021, establishing harmonised language that sets out collective expectations of the UN system. Donors continue to work on training and resources, e.g. Sweden focused on training for staff joining missions; Germany initiated new rounds of training to include colleagues from missions in Geneva and New York; and the 30 OECD DAC donors held thematic learning sessions and continued to develop a toolbox with pillars, including on training and survivor-centred approaches, to be published later this year.

[10] Through the open access, Resource & Support Hub (RSH) the UK Government's Foreign, Commonwealth & Development Office (FCDO) supports organisations in the humanitarian and development sectors to strengthen their safeguarding policy and practices against SEAH. It offers a range of free tools, training and advice in over ten languages. In 2023, a Safeguarding Essentials package was developed for public access. See at https://safeguardingsupporthub.org/essentials.

overview of the organizations' policies to prevent and address SEAH with a comparative view in tabulated form.

II.   Overview of contemporary PSEAH Policies

6.   This section provides an overview of contemporary PSEAH policies focuses on a sample of institutions categorised as follows:
- AF partner organizations and AF implementing entities;
- Financial instruments that share similar mandates; and
- Recent policy enhancements from international practitioners that go beyond "zero tolerance".

1. AF Partner Organizations and Implementing Entities

1.1.   The World Bank Group (WBG)

7.   The WBG refers to *Gender-based violence (GBV), sexual exploitation, abuse and harassment (SEA-SH)*, within its Environmental and Social Framework (ESF), and its operational policies and procedures address the issue directly. It announced that the WB's approach is survivor-centred, seeking to ensure safety, confidentiality, and access to services while respecting the agency and wishes of survivors. To support internal and external capacity to address SEA/SH, the Bank has developed and provided training for and with Bank staff and clients.[11]The Bank's standard operational procurement documents include bidding and contractual requirements that spell out GBV-related obligations and remedies and in 2020, was the first multilateral development bank to disqualify contractors for failing to comply with GBV-related obligations.[12]

8.   With regards to staff, the 2022 WBG Directive Staff Rule 3.00- Office of Ethics and Business Conduct (EBC)[13] which applies to all the staff members of IBRD, IDA, IFC, MIGA and ICSID, uses the following definitions;
- **Sexual Harassment** means any unwelcome conduct of a sexual nature that may reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual Harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, Sexual Harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct is considered.

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[11] This includes GBV Service Provider Mapping (May 2023); SEA/SH Risk Assessment and Mitigation (Sep. 2022); SEA/SH Action Plan (Dec.2022); Survivor-centered Grievance Mechanism Responses to SEA/SH Incidents (March 2023); and SEA/SH Risk Assessment Tool Demo.
[12] See: https://www.worldbank.org/en/projects-operations/products-and-services/brief/prevention-of-gender-based-violence-contractor-accountability-and-disqualification
[13] https://ppfdocuments.azureedge.net/2ea59d80-1b8a-42a9-8987-d2676d5ba1ff.pdf

- **Sexual Exploitation** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual Abuse** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

9.   Under Staff Rules, the Anti-Harassment Coordinator (AHC) reviews all allegations of harassment, Sexual Harassment, Sexual Exploitation and Sexual Abuse in the workplace or in connection with work at the WBG involving a WBG Staff Member. Staff members can bring concerns or allegations to EBC anonymously, meaning s/he does not need to reveal his/her name when reporting to EBC. In addition, the information provided by a person who brings allegations to the AHC is confidential and is not disclosed without their consent, and retaliation against any person who provides information regarding suspected misconduct is expressly prohibited and results in proceedings under the staff rule. The AHC reports directly to the WBG Chief Ethics Board Officer of EBC.

10.   In case there is an incident of SEA-SH, the WBG has also set up in place a confidential online platform to report involving WBG staff members.[14] Victims or witness are encouraged to report these cases and can choose to do so anonymously.

1.2.   *International Fund for Agricultural Development (IFAD)*

11.   A different approach has been taken by UN agencies, such as IFAD, which has established a standalone policy on SEAH. IFAD policy to preventing and responding to sexual harassment, sexual exploitation and abuse (2018) has two objectives[15]:
- (i)   define obligations of IFAD staff and those individuals holding a work contract with IFAD with respect to sexual harassment and SEA; and
- (ii)   set out IFAD's rules and procedures and approach in preventing and responding to sexual harassment and SEA.

12.   The policy states that SEA risk assessment is mainstreamed into all project designs funded by IFAD and that SEA obligations are embodied in agreements and related financial documentation. The policy applies to all IFAD staff, independent of their location, grade, type or duration of appointment, including staff members on loan, Junior Professional Officers and Temporary Short-term staff, non-staff contracts such as consultants, interns as well as vendors and suppliers contracted by IFAD. In its spirit and principles, this policy also applies to all recipients of IFAD funding and third parties contracted using IFAD's funding[16.] The policy does not specifically mention the board members.

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[14] https://www.worldbank.org/en/about/unit/reporting-sexual-misconduct
[15] https://www.ifad.org/documents/38711624/42415556/SEA_e_web.pdf/85275c4d-8e3f-4df0-9ed8-cebaacfab128?t=1611326846000
[16] https://www.ifad.org/documents/38711624/42415556/SEA_e_web.pdf/85275c4d-8e3f-4df0-9ed8-cebaacfab128?t=1611326846000

13.   It also states that "SEA" refers to behaviour towards beneficiaries of IFAD-funded or - managed activities and operations which are defined as "persons that IFAD intends to serve through its grants and loans." The policy sets out responsibilities of IFAD staff and individuals holding a work contract with IFAD: (1) obligations to act ethically; (2) obligations to report to IFAD through the reporting appropriate channels- the Ethics Office hotline or email for sexual harassment and SEA reporting, and SEA allegations can also be reported to the Office of Audit and Oversight either through its hotline or email. It also sets out the responsibility of IFAD. External parties, including potential victims of sexual harassment[17] and/or SEA, are encouraged to report their allegations, observations or suspicions through the Ethics Hotline and confidential email address, where they can also receive confidential advice.

14.   IFAD uses similar definitions for SEAH[18], reaffirming that these concepts have gained support and are widely used by different actors. Regarding IFAD's responsibility, the policy differentiates the obligations from individuals working at IFAD and those from the institution itself. In the first case, there is an obligation to act ethically (abstaining from engaging in SEA and sexual activities with beneficiaries, abstaining from condoning or encouraging the commission of these acts, and contributing to creating a work environment that prioritizes prevention of SEA), as well as an obligation to report (in case of witnessing, being aware or suspecting a case of SEA).

15.   IFAD's institutional responsibilities related to preventing and responding to SEAH are summarized as follows:
   1) Establishing and maintaining an immediate and confidential reporting mechanism to report potential acts of sexual harassment associated with the workplace at IFAD and/or SEA in connection with an IFAD-funded or managed activity or operation.
      a) Hotlines and confidential email addresses of Ethics Office and/or Audit and Oversight (available to IFAD staff and individuals holding a work contract as well as external individuals including beneficiaries)
      b) Social Environment and Climate Assessment Procedures (SECAP) complaint mechanism (available to the public)
      c) Reports of sexual harassment and SEA may be filed anonymously (meaning that reporting parties do not provide their names but are encouraged to at least provide an email address or phone number for potential follow-up questions).
      d) All reports of sexual harassment and SEA are treated with strict confidentiality (meaning that the identity of the reporting party will not be disclosed to anybody outside of the Ethics Office and the Office of Audit and Oversight, unless the reporting party consents to disclosure or where allegations were made in bad faith or where disclosure

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[17] IFAD's definition of "sexual harassment" refers to a form of harassment generally associated with the work context that creates an intimidating, hostile or offensive work environment".

[18] According to IFAD's policy, sexual exploitation refers to "any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of others"; whereas sexual abuse refers to "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions". Sexual harassment is defined as 'any unwelcome sexual advance, request for sexual favour or other verbal, non-verbal or physical conduct of a sexual nature that unreasonably interferes with work, alters or is made a condition of employment, or creates an intimidating, hostile or offensive work environment".

is deemed necessary by IFAD to fulfill due process requirements in the investigation process or when there is a clear and imminent danger to the life or health of a person.).

2) Establishing and maintaining an appropriate response mechanism

   a) Investigations. The Office of Audit and Oversight is responsible for reviewing and investigating allegations of sexual harassment and SEA. Cases involving allegations of sexual harassment and SEA are considered high-priority cases. Upon closure of an investigation, the Office of Audit and Oversight issues a final report to the President, explaining its findings and conclusions. If any allegations are substantiated, the matter is referred to the Sanctions Committee for review in accordance with the applicable disciplinary proceedings.

   b) Disciplinary measures against IFAD staff and other individuals holding a work contract with IFAD.

   c) Measures regarding the conduct of project staff and third parties in IFAD-funded operations

   d) Measures regarding the conduct of suppliers in commercial contracts with IFAD.

3) Prevention and monitoring

   a) Outreach and communication

   b) Due diligence and background checks

   c) Trainings and workshops

   d) SEA risk assessment in project design and supervision missions.

1.3.   World Food Program (WFP)

16.   The **World Food Program (WFP)** has a Protection from Sexual Exploitation and Sexual Abuse (PSEA) (June 2020) policy that is embedded in its organizational Ethics Framework. It takes a victim-centered approach to its prevention and protection measures against sexual exploitation and abuse. "We seek to ensure that victims are provided with support, as needed, at the same time as reports are investigated. We rely on protection partners and strong local referral networks for direct assistance for victims of sexual exploitation and abuse." WFP also collaborates with the UN Victims' Rights Advocate.

17.   Similar to previous definitions, their terminology includes:

- Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting financially, socially or politically from the sexual exploitation of another. Engaging prostitution services is also considered a form of sexual exploitation[19].

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[19] https://executiveboard.wfp.org/fr/document_download/WFP-0000119444#:~:text=The%20Policy%20applies%20to%20any,of%20contract%20type%20or%20duration.&text=If%20you%20believe%20you%20have,retaliation%20to%20the%20Ethics%20Office.

18. WFP has a zero-tolerance policy for sexual exploitation and abuse, which applies to all WFP employees (regardless of contract type or duration), and all WFP partners, suppliers, contract workers and external service providers. Additionally, SEA includes behaviors both away from the workplace, and during or outside working hours.

19. WFP's Ethics Office[20] supports prevention measures throughout the organization, and this includes providing guidance to a network of over 300 PSEA Focal Points, located in all Regional Bureaus, Country Offices and field offices with significant staff presence. PSEA Focal Points are tasked with supporting prevention, including raising awareness among employees and partners, and receiving reports of SEA directly from victims. PSEA Focal Points must refer all reports to WFP's internal investigations body (the Office of Inspections and Investigations). A key aspect in the prevention and reporting of SEA is awareness. WFP employees and partners are expected to be able to define, recognize and respond to SEA, including understanding their obligation to report. They are supported through the provision of advice, guidance and tools to do so, and follow a commitment to a victim-centered approach. Employees are required to complete a mandatory e-learning on PSEA as part of performance evaluation.[21]

2. Financial Instruments with similar mandates

2.1. Green Climate Fund (GCF)

20. In 2021, the GCF revised its Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment. This policy underlines the following considerations:
- Definitions of sexual exploitation, sexual abuse and sexual harassment remained aligned to the international trend and are similar to those used by other institutions such the WBG, IFAD, WFP.
- The SEAH Policy is aligned with the objectives and guiding principles of the Governing Instrument.

21. GCF SEAH Policy states that both GCF staff and Board Members or Alternates (defined as Covered Individuals[22]) shall not tolerate, engage, participate, or condone any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment. in Fund-related activities.
- GCF shall take all appropriate measures to prevent, mitigate, investigate, and remedy SEAH in relation to acts perpetrated by Covered Individuals in Fund-related activities.
- GCF shall take all appropriate measures to protect actual or suspected survivors such as ensuring their anonymity, physical safety, and removal from proximity to suspected

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[20] https://www.wfp.org/ethical-culture
[21] https://www.wfp.org/protection-from-sexual-exploitation-and-abuse
[22] According GCF's policy "Covered Individual" means Co-Chairs of the Board, Board Members, Alternate Members, Advisers (each defined in the Rules of Procedure of the Board of the GCF), Board-appointed Officials, External Members, and GCF Personnel.

perpetrators - from retaliation because of a report of actual or suspected SEAH perpetrated by Covered Individuals in relation to a Fund related activity.

22.   The Policy is linked with its Environmental and Social Policy (ESP)[23], reaffirming that GCF recognises the imperative for Accredited Entities and GCF-financed activities to prevent and respond effectively to SEAH in a survivor-centred and gender-responsive way. Additionally, GCF requires that all GCF-financed activities are aligned with the SEAH provisions stated in the policy, including the identification and mitigation of potential cases of SEAH. Similarly, recruitment, procurement, employment, or any other onboarding processes must include SEAH Checks. This includes Board-appointed Officials, External Members, and GCF Personnel completing SEAH Declarations prior to the offer of any appointment, employment, or contract. Reference Checks will be conducted. Persons who are already employed or contracted by the GCF as Board-appointed Officials, External Members, or GCF Personnel at the time of policy adoption were required to submit a SEAH Declaration.

23.   In terms of the reporting process, any person or entity may report to the Independent Integrity Unit (IIU) actual or suspected SEAH as defined by this Policy, using an email or a hotline. An innovative feature of the GCF SEAH Policy is its focus on capacity-building and prevention of SEAH by partners, stating that GCF will support entities it engages with to develop and implement policies and mechanisms that address Sexual Exploitation, Sexual Abuse and Sexual Harassment.

GCF SEAH Policy Implementation, Monitoring, Reporting, and Review[24]

- The Office of Human Resources of the GCF Secretariat shall be responsible for the effective implementation, monitoring, and reporting to the Board annually regarding the Covered Individuals obligations under this Policy. It shall develop guidelines and procedures, in consultation with the IIU, to operationalise and implement this Policy promptly following its adoption.
- The Secretariat and the IIU shall recommend improvements to this Policy and related procedures and controls to mitigate opportunities for SEAH and ensure that Covered Individuals adhere to the Policy. The IIU shall also maintain and publicly disclose a case registry of reports including regarding SEAH, within the limitations of the GCF Policy on the Protection of Whistleblowers and Witnesses in force, and in accordance with relevant GCF policies and standards regarding information disclosure. Revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment
- Every three years, the Ethics and Audit Committee, with the support of the IIU and the Secretariat, will present a report to the Board on issues related to the implementation of this Policy along with any recommendations for changes to it. Such reports will take into account new standards or policies developed and implemented by peer institutions and

[23] GCF Revise ESP available in <https://www.greenclimate.fund/document/revised-environmental-and-social-policy> .
[24] https://www.greenclimate.fund/sites/default/files/document/seah-policy.pdf

> partners regarding the range of their activities and will be aligned with the policy review cycle.

2.2. *Global Environmental Facility (GEF)*

24.   Unlike the GCF, the GEF does not have a standalone policy on SEAH. Its Policy on Environmental and Social Safeguards (ESS)[25] requires that projects and programs screen and reflect in relevant safeguards instruments potential cases of Gender-Based Violence (GBV), and Sexual Exploitation and Abuse. It does not explicitly refer to sexual harassment. Moreover, in the case that GBV or SEA takes place, the GEF establishes that agencies should report these cases and implement response protocols, which should ensure confidential reporting and modalities of response and redress to those affected by SEA.

25.   The ESS policy addresses adverse gender-related impacts, including gender-based violence and sexual exploitation and abuse and refers to the GEF Policy on Gender Equality (2018).[26]   Within the ESS policy the GEF provides the following definitions, in line with the international trend:

- Gender-Based Violence means any harmful act that is perpetrated against a person's will and that is based on socially ascribed differences between male and female individuals, including acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life.
- Sexual Exploitation and Abuse means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another; and, specifically in the case of Sexual Abuse, the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

3. Other institutional examples of PSEAH policies

26.   The following selection of organizations provide important inputs because they have each conducted formal and comprehensive reviews of their PSEAH policies within the past five years. These organizations have emerged with robust policies, frameworks and action plans that not only set clear standards for behavior within the organization but also reflect commitments to creating a safe, respectful, and accountable organizational culture for all individuals it interacts with. These examples focus on ensuring accountability, transparency and zero-tolerance.

3.1. *UN WOMEN*

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[25] https://www.thegef.org/documents/environmental-and-social-safeguard-standards
[26] http://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf

27.   Instead of having in place a stand-alone policy on SEAH per se, UN Women aligned its framework to the UN Secretary General Report on Special measures for protection from sexual exploitation and sexual abuse[27] and the UN System Model Policy on Sexual Harassment[28]. In addition to the UN general framework on SEAH, UN Women has adopted **a Prevention of Harassment, Sexual Harassment, Discrimination and Abuse of Authority Policy** in 2020 - whose scope of application goes beyond SEAH and aims at preventing other pervasive behaviors such as harassment and abuse of authority, recognizing the differences in power dynamics and gender inequality that hinder an environment free of SEAH.

28.   A 2022 progress report states that to measure progress achieved and continuously improve UN Women's prevention of and response to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), a robust monitoring framework is required. Through corporate, regional, and in-country SEA and SH action plans, UN Women outlines the actions needed to achieve the yearly PSEA and SH goals. Through corporate annual management letters on PSEA and SH, which are complemented by local certifications of all regional and country-level representatives that they fulfilled their SEA and SH related duties, UN-Women certifies to the Secretary-General and the UN-Women Executive Board the completion of the required responsibilities for the organisation and provides information of key actions taken during the previous year.[29]

3.2.   *Global Fund to Fight Aids, Tuberculosis and Malaria (Global Fund)*

29.   The Global Fund adopted an Operational Framework on the Protection from Sexual Exploitation and Abuse, Sexual Harassment, and Related Abuse of Power[30], reaffirming the two principles that underpin its approach to PSEAH: (1) a victim/survivor-centered approach and (2) international coordination. The Global Fund, like many organizations, has long declared a "zero tolerance" for sexual exploitation and abuse and sexual harassment in in all aspects of work. In recognizing more must be done to mitigate the risk of SEAH and related abuse of power in all areas and locations, the Fund developed a framework in 2021. In 2022, it issued a **Note 2023-2025 Protection from Sexual Exploitation, Abuse and Harassment.**[31]

30.   The Global Fund recognizes that one of the most effective means of addressing SEAH is to ensure that entities that implement Global Fund grants have adequate capacity for PSEAH, and that programs incorporate PSEAH as a core element to make interventions and programs as "safe" as possible by ensuring adequate focus on how to keep beneficiaries safe and how services are provided and accessed by the beneficiaries.

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[27] https://www.un.org/preventing-sexual-exploitation-and-abuse/content/policies-and-protocols
[28] https://unsceb.org/sites/default/files/imported_files/UN%20System%20Model%20Policy%20on%20Sexual%20Harassment_FINAL.pdf
[29] Background Note: Briefing to the Executive Board of UN-Women First Regular Session 2022 "Protection Against Sexual Exploitation and Abuse and Sexual Harassment – Update on the implementation of recommendations in the independent victim-centred review of UN-Women policies and processes on tackling sexual exploitation and abuse and sexual harassment"
[30] https://www.theglobalfund.org/media/11239/core_pseah-related-abuse-power_framwork_en.pdf
[31] https://www.theglobalfund.org/media/12159/ethics_protection-sexual-exploitation-abuse-harassment-guidance_note_en.pdf

31.   The Guidance Note focuses on the protection of Global Fund beneficiaries from SEAH and provides guidance for how to assess and mitigate potential SEAH risk in Global Fund grant interventions. The Office of the Inspector General (OIG) undertakes SEA investigations that involve Global Fund beneficiaries. When abuse is alleged, a victim and survivor-centered, trauma-informed response is taken in each instance. It also has the investigation process in place which aims to mitigate the risk and reduce the incidence of any such abuse to the degree possible. OIG reports on all its activities in the interests of transparency and accountability. The results of its work are published on the Global Fund website in line with the disclosure policy outlined by the Board tailoring the level and substance of reporting in line with the principle of 'do no further harm'. In 2022, the OIG undertook five SEA investigations and oversaw five implementer-led investigations.

3.3.   *Oxfam International*

32.   In 2021 Oxfam adopted its **Policy on Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)**, following unresolved harassment claims from 2018 which had very serious implications for Oxfam's ongoing NGO status with the UK's Charity Commission and a three-year ban after evidence of sexual exploitation by staff in Haiti came to light.[32] Oxfam responded by improving its PSEAH policies and responses, implementing measures to prevent misconduct, ensuring safe reporting channels, and committing to accountability.

33.   The PSEAH policy sets out Oxfam's approach to preventing and addressing sexual exploitation, abuse and harassment and includes commitments to prevent SEAH and to ensure effective action is taken when problems occur. Oxfam lays out its expectations of all those who work on behalf of Oxfam. It includes principles and commitments, roles and responsibilities, guidelines on how to raise a complaint or concern and related policies and procedures.

34.   In 2019 Oxfam developed an "Improving Safeguarding and Culture Plan" based on the recommendations from the Independent Commission (IC) on Sexual Misconduct, Accountability and Culture Change (IC) established in February 2018. The IC was mandated by Oxfam to conduct a confederation-wide review of Oxfam's culture; accountability; and safeguarding policies, procedures, and practices.   Of note, it concluded that Oxfam had prioritized its program goals over how it realizes its core values and the principle of "do no harm" with communities, partners, and staff. [33]

35.   The report contained a set of 7 recommendations to guide Oxfam in its transformation process:
*   Reinvent the system
*   Support survivors to recover and rebuild their lives
*   Co-create community reporting systems

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[32] The UK has suspended aid funding to Oxfam again after fresh allegations of sexual exploitation and bullying were made against staff in April 2021 https://www.bbc.com/news/health-56670162
[33] https://www.oxfam.org/en/what-we-do/about/safeguarding/independent-commission

- Create a supportive environment
- Make it personal
- Model transparency
- Work together within the sector to realize systemic change.

36.   As part of its commitment to transparency and accountability, Oxfam reports every six months on the progress it makes to improve safeguarding culture and discloses its global case data for that period.[34] This report also includes progress on other areas that are vital to ensure a safe and inclusive workplace for the people they serve, staff, partners, and all other stakeholders.

37.   Oxfam is a member of Accountable Now, a global platform that supports civil society organizations (CSOs) to be transparent, responsive to stakeholders and focused on delivering impact. Oxfam reports publicly on the economic, environmental and social performance in line with Accountable Now's Reporting Guidelines to an Independent Review Panel every two years.[35]

3.4.   World Health Organization (WHO)

38.   In 2021, WHO launched an intense period of prevention and response actions following the harrowing accounts of victims and survivors of SEA during the 10th Ebola outbreak in the Democratic Republic of the Congo.[36] To build on and institutionalize this process, the WHO developed and published a **three-year strategy framework for preventing and responding to sexual misconduct**[37], which includes activities and targets to measure progress.

39.   As of this year, WHO is shifting to the use of the umbrella term, "Sexual Misconduct (SM)" to refer collectively including, but not limited to sexual exploitation and abuse (SEA), sexual harassment (SH) and sexual violence. It makes this shift so that there is no doubt that the policy of zero-tolerance refers to prohibited sexual behavior by its own personnel and implementing partners, regardless of the status of the victim and survivor. The term is fully explained in the WHO Policy on Preventing and Addressing Sexual Misconduct (PASM policy). WHO will use the terms SM and SEAH interchangeably. PRS refers to the Prevention of and Response to Sexual misconduct. It is both an area of work used interchangeably with Prevention and Response to Sexual Exploitation, Abuse and Harassment (PRSEAH) and the name of the Department that coordinates the work in the Office of the Director General (the PRS Department).

40.   To strengthen its policy framework against SEAH, WHO adopted different instruments aligned with international standards and focusing both on prevention and response. These Policies and Codes of Conduct include:
- WHO Policy on Preventing and Addressing Sexual Misconduct
- Code of ethics and professional conduct
- WHO policy on Whistleblowing and protection against retaliation

[34] https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2023-01/Integrity%20Report%202022.pdf
[35] https://www.oxfam.org/en/what-we-do/about/how-we-are-organized#boards
[36] https://www.who.int/initiatives/preventing-and-responding-to-sexual-exploitation-abuse-and-harassment
[37] https://apps.who.int/iris/bitstream/handle/10665/366297/WHO-DGO-PRS-2023.1-eng.pdf

- Policy on Preventing and Addressing Abusive Conduct
- Terms of Reference for the Sexual Misconduct Exploitation and Abuse and Sexual Harassment Prevention and Response Task Team (PRSEAH Task Team

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Key Takeaways

- There is no uniformity in the mechanisms that international organizations use to address SEAH; however, there are some common trends and elements that organizations have embraced and incorporated to prevent and safeguard against SEAH: such as similar definitions for misconducts incorporating SEAH, broad scope of protection to victims and survivors, gender-responsive and victim-approach, focus on prevention and engagement with partners/entities they provide funding to.
- The policy frameworks around SEAH are becoming more sophisticated, the lexicon is still evolving, and embracing terminology like "sexual misconduct" (WHO). Some of these progressive developments arise reactively from complaints which were not respectfully treated or resolved in victim-centered ways. SEAH policies are not just stand-alone instruments but part of a comprehensive organizational culture package.

III.   Implementing a PSEAH Policy

41.   This section builds on the previous section to outline some common elements and trends identified in SEAH policies aimed at ensuring a culture of prevention, as well as an adequate system to address and respond to these cases.

1. Organisational Culture

42.   Ultimately, a PSEAH policy reflects a zero-tolerance organizational culture through ongoing commitments to all staff and partners that these acts have no place in the organization, and through defining corporate values, such as the promotion of gender equality, the protection of vulnerable groups and the defense of fairness and justice. An effective PSEAH policy sends a clear signal into and across the organisation, to present and potential partners donors, and strategic allies on the values that the organization aligns with and how these permeate through all of its relationships at all levels, both within and without the organisation.[38]

43.   **Example GCF:** As it has been addressed in the previous section, at the strategic and institutional level, the GCF is committed to ensuring a culture of zero-tolerance, by adopting explicit policies and aligning its legal and operational framework to its PSEAH policy, such as the

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[38] See for example the Inter-Agency Standard Committee's newly endorsed *IASC Vision and Strategy: Protection from sexual exploitation and abuse and sexual harassment (PSEAH) 2022−2026* which commits to promoting lasting change in organizational culture, behaviour and attitudes towards all forms of sexual misconduct in humanitarian operations.

ESS and Gender Policy. Moreover, SEAH considerations have been included in accreditation and re-accreditation processes, as well as it in relationship with its partners (who should ensure having and maintaining a gender-responsive, participatory and transparent system to manage risks of SEAH), reaffirming that this issue is a key priority for the organization.

44.   **Example WBG:** Despite not having a stand-alone policy on SEAH, the WBG has adopted an Action Plan for Preventing and Addressing Sexual harassment, which underlines the need for and importance of achieving a culture of zero-tolerance where these acts have no place. It states "We must create a culture in which we feel safe to report incidents of sexual harassment and are able to trust that robust systems are in place to address them a culture of zero-tolerance where sexual harassment is being systematically addressed. Creating this culture and ensuring that our systems are as effective as they can be requires us to take a hard look at our behaviours, our values in action, and how effectively our systems are working. It requires us to be open to change".[39] The WBG announced its commitment to an action plan that integrates the prevention of sexual harassment in all aspects of the internal culture, organization and corporate activities. It sets concrete deliverables, including:
- Ensuring that all managers are aware of their responsibility to create team environments free from sexual harassment, as well as offering managers new guidance on addressing cases.
- Complementing the system with new people-centered services.
- Scaling up and broadening the scope of training.
- Transparently and regularly sharing information on the prevalence of sexual harassment and related sanctions inside the WBG.
- Collaborating across departments on enhancing sexual harassment detection and risk assessment.
- Contributing to international efforts to share best practices.

2. Holistic Framework to brace the SEAH policy

45.   Typically, the SEAH policy aligns closely with a suite of complementary and supporting policies including gender policy and/or environmental and social safeguards policy. This is important for coherence and coordination.

46.   **Example GCF**: The Revised Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment [40] forms part of a suite of GCF policies, including the Policy on Prohibited Practices, the Policy on the Protection of Whistle blowers and Witnesses, the Gender Policy (and Action Plan), the Environmental and Social Policy, and the Administrative Guidelines on Human Resources (especially section H on Harassment). Together these policies work towards the shared goal of zero tolerance for SEAH at GCF. The Secretariat works with the Independent Redress Mechanism (IRM), the Independent Integrity Unit (IIU) and

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[39] https://thedocs.worldbank.org/en/doc/895091561658673520-0090022019/original/WBGSexualHarassmentActionPlanFINALPublic.pdf
[40] https://www.greenclimate.fund/document/revised-policy-prevention-and-protection-sexual-exploitation-sexual-abuse-and-sexual

the Ethics and Audit Committee (EAC) to foster collaboration and coherence across the organisation, and to ensure staff understand appropriate roles, divisions of responsibility and redress mechanisms with regards to SEAH.

47.   **Example Global Fund:** Codes of Conduct apply to all stakeholders related to the institution - and approved a Code of Conduct specific to all grant recipients (February 2021) including Principal Recipients, Sub-recipients, Sub-subrecipients, Country Coordinating Mechanisms, and procurement agents. As part of its oversight function, the Country Coordinating Mechanism (CCM) has the responsibility to monitor the implementation of the Program supported by Global Fund Resources, including compliance with this Code by Recipients. In addition, the Global Fund's Whistle-blower Policy encourages anyone with knowledge or information to report misconduct confidentially, or anonymously, to the OIG through a third-party reporting service.[41]

3. Ensuring that SEAH policies apply to all

48.   SEAH policies typically apply to everyone linked with the institution and as best practice this should include all personnel, contractors, consultants, volunteers, board members, and executive. Additionally, some organizations explicitly extend these provisions to other entities who receive their funding, which can be governmental or non-governmental institutions, civil society organizations or international organizations. The broad scope of application requires additional efforts and investing in capacity-building, training and dissemination. Some examples indicate that all staff are required to complete on-boarding and periodic training on SEAH and related policies.

49.   **Example IFAD:** IFADs PSEAH Policy **underlines that "**for the purposes of this Policy, the term "SEA" refers to behaviour towards beneficiaries of IFAD-funded or -managed activities and operations. The term "IFAD activities and operations" refers to all activities and operations financed or managed by the Fund". Therefore, IFAD is covering under the protection of the policy: i) actions of IFAD staff as well as those committed by those implementing or executing IFAD-funded projects; and ii) actions that occur not only in projects/programmes under loans but also grants and other cooperation modalities (i.e., SSTC).

50.   **Example WFP**: WFP has a zero-tolerance policy for sexual exploitation and abuse, committed both at and away from the workplace, and during or outside working hours. This applies to: "all WFP employees, regardless of contract type or duration; and All WFP partners, suppliers, contract workers and external service providers".[42]

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[41] OIG's Reporting Hotline (https://www.theglobalfund.org/en/oig/report-fraud-and-abuse/) and (https://www.ispeakoutnow.org/report-now-en/)
https://www.theglobalfund.org/media/6011/corporate_codeofconductforrecipients_policy_en.pdf
[42] https://executiveboard.wfp.org/fr/document_download/WFP-0000119444#:~:text=The%20Policy%20applies%20to%20any,of%20contract%20type%20or%20duration.&text=If%20you%20believe%20you%20have,retaliation%20to%20the%20Ethics%20Office.

4. Safeguarding against SEAH through protection and reporting

51.   The SEAH policy can only be as effective as its implementation by relevant actors covered by the policy, and this entails a safe reporting mechanism as well as an independent redress mechanism that is less concerned about the risk to the organization and more concerned about a fair and respectful outcome.

52.   **Whistle Blower Protection** is essential to safeguard the public interest and to promote a culture of public accountability and integrity, and this extends beyond SEAH to corruption, fraud, abuse of power and misconduct. A whistleblowing policy is an internal workplace mechanism to protect workers from retaliation when reporting wrongdoing or misconduct. Employees and people on contracts with the organisation are usually covered by the policy. Examples of contracted people are consultants, casual staff, trainees, interns and volunteers. A whistleblowing policy should be accessible to all categories of employee. For a strong whistleblowing protection culture, organisations require:
   - leadership (at both executive and Board level) to model and demonstrate commitment to encouraging and protecting those who disclose wrongdoing;
   - a safe, simple to use and accessible reporting system for workers to raise concerns. The whistleblowing reporting mechanism would be a part of the organisation's wider reporting system for staff to raise concerns;
   - a robust review process that makes connections between the various cases reported and the staff experiences of the reporting process.[43]

53.   **Example:** GCF requires mandatory training for Covered Individuals to ensure compliance with PSEA policy. Additionally, it mandates that it is responsible for ensuring that its Accredited Entities adopt grievance mechanism as appropriate, but later underlines that in relation to SEAH-specific complaints, grievance redress mechanisms need to be survivor-centred and gender-responsive.

5. Establishing compliance, updates and data records

54.   In order to ensure accountability and strengthen a zero-tolerance culture, it is necessary to collect and analyze the information on SEAH. The use of data records and reporting to the Board are some mechanisms implemented by organizations in this regard.

55.   **Example: the UN** maintains a database in real time and with monthly reports on allegations available on line at [Data on Allegations: UN System-wide | Preventing Sexual Exploitation and Abuse](https://www.un.org/preventing-sexual-exploitation-and-abuse/content/data-allegations-un-system-wide)[44]

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[43] WHISTLEBLOWER PROTECTION GUIDANCE How to create an environment that protects and enables reporters of misconduct or wrongdoing (2022) CHS Alliance https://aap-inclusion-psea.alnap.org/system/files/content/resource/files/main/CHS-Alliance-Whistleblower-Protection-Guidance.pdf
[44] https://www.un.org/preventing-sexual-exploitation-and-abuse/content/data-allegations-un-system-wide

56.   **Example GCF:** The Secretariat and the IIU shall recommend improvements to the Policy and related procedures and controls to mitigate opportunities for SEAH and ensure that Covered Individuals adhere to the Policy. The IIU is mandated to maintain and publicly disclose a case registry of reports including regarding SEAH,[45] within the limitations of the GCF Policy on the Protection of Whistleblowers and Witnesses in force, and in accordance with relevant GCF policies and standards regarding information disclosure. Every three years, the Ethics and Audit Committee, with the support of the IIU and the Secretariat, will present a report to the Board on issues related to the implementation of this Policy along with any recommendations for changes to it. Such reports will take into account new standards or policies developed and implemented by peer institutions and partners regarding the range of their activities and will be aligned with the policy review cycle.[46]

Key Takeaways

- Implementing a PSEAH policy requires integral and coherent policies and process. This process involves different elements in the areas of prevention, reporting and response. A PSEAH policy can not be seen as unique or one-moment process, it should evolve and improve through 'learning by doing.'
- There is no right or wrong approach to a PSEAH policy, and it's framing is determined by the scope and nature of the operations and the structure of the organization.
- The policies that frame PSEAH need to be aligned and cover (i) all the different forms of misconduct, harm and abuse; and (ii) the full range of individuals that the organisation interacts with no matter what positions of power they may be in. This is informed by the overall culture that the organization aspires to uphold. Developing a PSEAH policy is not a proforma exercise.

IV.   Summary recommendations for AF's consideration

57.   The Adaptation Fund (the Fund) was established to finance concrete adaptation projects and programmes in developing countries that are particularly vulnerable to the adverse effects of climate change. The Fund is managed by the Adaptation Fund Board and the WB serves as trustee for the AF on an interim basis while the GEF provides interim secretariat services. From 2019, the Fund also serves the Paris Agreement together with GEF and GCF.

58.   Currently, the Adaptation Fund does not have a stand-alone PSEAH policy nor other policies directly addressing SEAH issues. Neither the Gender Policy (GP) and Environmental and

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[45] The case registry is not yet available on the IIU website, but it reports the percentage of SEAH cases out of all cases filed to IIU under 'staff misconduct related cases.' See https://iiu.greenclimate.fund/our-work/case-intake
[46] https://www.greenclimate.fund/sites/default/files/document/seah-policy.pdf

Social Policy (ESP) or other Fund's policies mention SEAH nor gender-based violence (GBV). Only its Gender guidance document for implementing entities (revised in 2021) mention both terms.[47]

59.   One could argue that this concept and its provisions are embedded under the mandate to promote gender equality within its operations and financed activities, such as the Principle 5 of the ESP (Gender Equality and Women's Empowerment)[48] and/or the Fund's Gender Policy.[49] However, both policies miss the opportunity to explicitly declare SEAH as a critical risk to be identified and addressed not only at the project level, but also at the institutional level which would significantly undermine the public reputation of the Fund unless it is prevented and properly addressed.

60.   In addition, although AFB secretariat staff are covered by the World Bank's policies related to safeguarding against SEAH, such as the WB Staff Rule 3.00 as well as the mandatory WBG staff trainings, there is no policy or procedure in the Fund to cover other Fund's key stakeholders such as the Board, its Committees, the Accreditation Panel, Implementing Entities or Adaptation Fund Civil Society Organization Network in terms of preventing and addressing SEAH.

61.   In considering to adopt a PSEAH policy, it would be necessary to consider and assess, on one side, the costs and investment of designing and implementing such a mechanism – which as it has been previously stated comprises different stages, and it should be aligned to the Fund's policies, processes and goals – and on the other, potential risks of not having a SEAH policy – which seems to be against the growing trend in international organizations. It will also be necessary to consider how a PSEAH policy or its elements would be organized in the context of the Fund's broader policy framework.

62.   There may be two ways to embrace SEAH concerns in the Fund: (1) adopting a standalone PSEAH policy of the Adaptation Fund; or (2) without a standalone PSEAH policy, incorporating SEAH elements into the relevant policies such as the Fund's Operational Policies and Guidelines, Code of Conduct of the Board, Risk Framework of the Fund, Environmental and

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[47] See Gender Guidance Document for Implementing Entities on Compliance with the Adaptation Fund Gender Policy (Updated in 2022). For example, on p.60, SEAH is referenced once: "Are gender-differences in perceptions and realities of public safety considered such as efforts to prevent sexual exploitation, abuse and harassment (SEAH) or gender-based violence (GBV)" ; p.54:" Are there strategies in place to mitigate sexual harassment, e.g. increased female presence in support staff, avoiding overcrowding, strengthening supervision before and during disasters?"; and p.57: "Is gender-based violence (GBV) employed to maintain or exert control over natural resources, such as in times of resource scarcity aggravated by climate change and biodiversity loss (with increased risk faced by environmental defenders who are Indigenous or of underrepresented sexual orientations or gender identities)?".
[47] For example, p.60 of the AF gender guidance document, SEAH is referenced once: "Are gender-differences in
[48] ESP Guidance Document mentions in Principle 5 (Gender Equality 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) have equal opportunities to participate as per the Fund gender policy; b) receive comparable social and economic benefits; (b) receive comparable social and economic benefits; and c) do not suffer disproportionate adverse effects during the development process."
[49] Gender Policy refers to the mandate of the Fund that "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, the empowerment of women and girls and the equal treatment of people regardless of gender, including the equal opportunities for access to Fund resources and services, in all Fund operations through a gender mainstreaming approach."

Social Policy, Gender Policy and their respective Guidance Document. Both options will provide an opportunity for the Fund to reaffirm its commitment to a sustainable climate adaptation that ensures that its supported projects and programmes do not exacerbate existing gender gaps and achieve gender equality and the empowerment of all the vulnerable groups. However, even if option (1) is selected, Fund's other relevant policies will need to be updated to be aligned with a standalone PSEAH policy for coherence, accountability, and integrity.

63. A SEAH policy outlines responsibilities, clear procedures for reporting, investigating, and addressing incidents and enables the organization to continually evaluate and improve its practices related to prevention, response, and accountability, fostering a culture of continuous learning and growth. Key considerations that could be made when considering the design of a policy on SEAH:

- Introducing such a sensitive topic demands sensitivity, tact and skills. A safe and inclusive space is needed to begin the conversations around organizational culture and values.
- Shared terminologies, definitions and responsibilities can be adopted as the organization deems appropriate considering those of the organizations that this review has included.
- Similarly, the scope of the prevention activities, investigation, reporting process, redress mechanism and disciplinary measures can be adapted to the particularities of the organization.
- It can encompass a wide array of topics, including prevention; organisational standards, policies and procedures; leadership and organizational culture; governance and accountability; response; whistleblower protection; reporting mechanisms; survivor-centered services; investigations; case management; training and learning; community outreach and dissemination.

64. In considering options for an Adaptation Fund's policy on safeguarding against SEAH, the following steps could be considered.

- **Step 1. *Set the Stage*:** Determine which overall standards to adapt to considering other international organizations' practices and experiences.

- **Step 2: *Conduct a gap analysis*:** This entails a review of current and relevant policies, procedures and contracts that address SEAH concerns as well as and determine if a stand-alone PSEAH policy is required. While the Adaptation Fund has a GP and ESP, neither of these policies includes the terminology of SEAH or GBV, explicitly mentions the Fund's zero tolerance on SEAH, nor address SEAH or GBV.

  Should the Fund develop its own PSEAH policy, some operational policies, templates and guidance documents would need to be checked to identify the need of alignment with a new PSEAH policy, such as:
  - Operational Policies and Guidelines for Parties to Access Resources from the Adaptation Fund

- The Gender Policy and Action Plan (revised in March 2021) and its Gender Guidance Document for IEs on Compliance with the Adaptation Fund Gender Policy
- The Environmental and Social Policy (ESP) (Revised in March 2016) and Guidance Document for IEs on compliance with the Adaptation Fund ESP
- Code of Conduct for the Adaptation Fund Board and Zero Tolerance Policy for the Board which are recommended to include SEAH and express a zero-tolerance towards it
- Ethics and Finance Committee (EFC) Terms of Reference
- If any, other policies in place which set out expected standards of staff behavior, forbids sexual exploitation, abuse and harassment and enables all staff access to an accountability / complaints system and link to them
- Accreditation Application Form (Annex 6 to OPG)
- Project/Programme Proposal Template (Annex 5 to OPG)
- Adaptation Fund Risk Management Framework
- Whether PSEAH clauses can be organically integrated into partnership agreements and contracts, and in Secretariat in-house policies
- Whether a whistleblower policy exists that could include PSEAH commitments and complaint mechanisms
- Whether the Ad Hoc Complaint Handling Mechanism (ACHM) (Oct 2016) which is complementary to the Adaptation Fund's risk management framework includes the grievance mechanism required for accreditation of Implementing Entities, include PSEAH related complaints.
- Determine who oversees development, review, implementation, who is responsible for updates, and when an independent arbitrator's services are required.

- **Step 3: *Design the framework and action plan*:** For an agency like the Fund with many partners in the field, committing the resources necessary for training, for compliance and for reporting will require agreement on an overall action plan.

- ***Step 4: Share learnings:*** The Fund could initially gain insights on the responsibilities and challenges from other organizations such as the Green Climate Fund in terms of the PSEAH policy and framework as well as their implementation and share its own experiences with its stakeholders and partner organizations.

65.   A PSEAH policy is necessary if the AF is to uphold its values, protect vulnerable populations, ensure a safe environment, safeguard a Zero Tolerance culture, and maintain its reputation as a responsible and ethical organization committed to making positive impacts on the communities it serves.

	Legal Entity	Type of Organiza-tion	SEAH policy (year)	Who the policy applies to	Victim/ Survivor centred approach	Which other policies brace the SEAH	Link to resource
1	**Global Environment al Facility**	Financial Instrument	Not a SEAH policy	The ESS Policy applies to the Secretariat and all GEF Agencies. The Policy applies to all new GEF-financed projects and programs (including activities funded through any GEF-managed trust fund, unless decided otherwise by the LDCF/SCCF Council in response to guidance from the Conference of the Parties of the United Nations Framework Convention on Climate Change) submitted on or after the date of effectiveness of July 1, 2019. For GEF-financed projects and programs under implementation, the Policy applies to all mid-term reviews and terminal evaluations submitted after one year of the date of effectiveness.	N/A	N/A	https://www.thegef.org/documents/environmental-and-social-safeguard-standards

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2	**Green Climate Fund**	Financial Instrument	2021	"Covered Individual" means Co-Chairs of the Board, Board Members, Alternate Members, Advisers (each defined in the Rules of Procedure of the Board of the GCF), Board-appointed Officials, External Members, and GCF Personnel;	Yes	Policy on Prohibited Practices, the Policy on the Protection of Whistleblowers and Witnesses, the Gender Policy (and its Action Plan), the Environmental and Social Policy (ES Policy), the Administrative Guidelines on Human Resources (especially section H on Harassment). These policies provide complementarity and work together to achieve the shared goal of zero tolerance for SEAH at GCF. The Secretariat will work with the Independent Redress Mechanism (IRM), the Independent Integrity Unit (IIU) and the Ethics and Audit Committee (EAC) to foster collaboration and coherence across the organisation, and to ensure staff understand appropriate roles, divisions of responsibility and redress mechanisms with regards to SEAH.	https://www.greenclimate.fund/document/revised-policy-prevention-and-protection-sexual-exploitation-sexual-abuse-and-sexual

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3	**International Federation of Red Cross and Red Crescent Societies (IFRC)**	Multilateral implementing agency	2018	The present policy applies to all IFRC Personnel. b) For Third Party-Personnel, a standard PSEA clause is to be included in the relevant agreements between the IFRC and the third-party. A similar clause is to be included in IFRC's grant agreements with implementing partners, including National Societies. c) Complaints concerning National Society staff or volunteers or others are handled as described in 6.3.1. 7 d) This policy does not apply to cases of harassment and sexual misconduct between IFRC Personnel. Such cases are addressed separately in the Staff Regulations, Code of Conduct, and the Antiharassment Guidelines.	Yes	IFRC Strategy 2030; the 2015 International Conference Resolution 3: Sexual and gender-based violence: Joint action on prevention and response; the 2019 International Conference Pledge on Prevention and Response to Sexual Exploitation and Abuse and Sexual Harassment; the IFRC staff Code of Conduct, PSEA Policy, Child Safeguarding Policy, Gender and Diversity Policy, Anti-Harassment Guidelines. Existing internal reporting, investigation, and follow-up systems regarding possible SEA-related violations of the Code of Conduct and Staff Rules and Regulations are being strengthened via this policy and its procedures. The policy's approach aligns with the Red Cross Red Crescent Guide on Community Engagement and Accountability (2017). The policy draws on ideas elaborated in the IASC's Global Standard Operating Procedures on inter-agency	https://ifrcgo.org/africa/img/pgi/doc/IFRC-Secretariat-Policy-on-Prevention-and-Response-to-SEA_final.pdf

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						cooperation in CBCMs (2016), including their approach to complaint referral and survivor assistance. In developing and enforcing our own PSEA policy, the IFRC has drawn on best practices of National Societies and stands ready to support those in need of developing and strengthening their PSEA policy.	

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4	**International Union for the Conservation of Nature (IUCN)**	International Best Practice Example (GEF implementing agency)	2019	This Policy applies to persons covered under the IUCN Code of Conduct and Professional Ethics for the Secretariat, namely all Staff members of the IUCN Secretariat, regardless of location, volunteers working for the Secretariat, individuals subcontracted as consultants, and individuals seconded by other organizations to –or hosted by- the Secretariat	N/A	Code of Conduct and Professional Ethics for the Secretariat, IUCN Ombudsman Terms of Reference; Anti-Harassment Policy for IUCN Events; Gender Mainstreaming Strategy for IUCN Events; Code of Conduct for IUCN Councillors and the Code of Conduct of the Members of the Commissions.	https://www.iucn.org/sites/default/files/2022-05/iucn-policy-on-the-protection-from-sexual-exploitation-sexual-abuse-and-sexual-harassment-seah.pdf
5	**OECD Development Assistance Committee (DAC)**	Inter-government agency	2019	DAC members	Yes	Other DAC agreements can be found here: https://legalinstruments.oecd.org/en/instruments?mode=advanced&committeeIds=869&dateType=adoption	https://www.oecd.org/dac/gender-development/dac-recommendation-on-ending-sexual-exploitation-abuse-and-harassment.htm

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6	**Oxfam International**	Non-governmental agency / Standard Setter	2021	This policy applies globally to all Oxfam Employees and Related Personnel1 both during and outside normal working hours, including Oxfam International, Affiliate HQs, Regional platforms, and Country programs.	Yes	Other related policies include One Oxfam Code of Conduct (2017), One Oxfam Survivor Support Policy (under review) and One Oxfam Child Safeguarding Policy, the One Oxfam Safeguarding Case Management SOP, One Oxfam Youth Safeguarding Policy, and One Oxfam Digital Safeguarding Policy. Oxfam's Safeguarding Policies can be found here: https://www.oxfam.org/en/what-wedo/about/safeguarding	https://oi-files-d8-prod.s3.eu-west-2.amazonaws.com/s3fs-public/2021-06/One%20Oxfam%20PSEAH%20Policy_2021.pdf

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7	**The Global Fund**	International Best Practice Example (Financial Instrument, non-profit foundation)	2021	No dedicated SEAH policy but an Operational Framework	Yes	The Global Fund organization is aligned with the United Nations-created Inter-Agency Standing Committee's (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse. The Global Fund is a member of the IASC Thematic Experts Group on PSEAH, which supports the implementation of PSEAH best practices and standards, supports local PSEA networks, tracks country-level progress on PSEA, and facilitates locally based support systems for victim/survivors. PSEA networks have been established by the United Nations (UN) in most countries where the Global Fund is active.	https://www.theglobalfund.org/media/11239/core_pseah-related-abuse-power_framework_en.pdf

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8	**UN Women**	International Best Practice Example (UN)	2021 - up for renewal in 2024	This policy applies to all UN Women personnel. Other persons working for UN Women, visiting the workplace, or connected to the workplace, such as contract workers, personnel of UN Women vendors and cooperating partners suppliers, or others who are connected to UN Women in a working capacity, may report prohibited conduct under the provisions of this policy.	Yes	Legal Policy for Addressing Non-Compliance with the UN Standards of Conduct ; Protection Against Retaliation for Reporting Misconduct and for Cooperating with Duly Authorized Audits or Investigations Policy Clear Check Framework: Clear Check Database Search Procedure; UN system-wide procedure on managing the Clear Check database; UN system-wide Clear Check procedure related to sexual harassment UN system-wide Clear Check procedure related to sexual exploitation and abuse (SEA); Clear Check Quick Reference Guide for Hiring Managers; Code of Conduct for UN Events Supervisor Guidance: Prevention of, and response to, Sexual Harassment in the Workplace Affected Person Guidance: Sexual Harassment Alleged Perpetrator Guidance: Sexual Harassment	https://www.unwomen.org/sites/default/files/Headquarters/Attachments/Sections/About%20Us/Accountability/UN-Women-Harassment-sexual-harassment-discrimination-and-abuse-of-authority-policy-en.pdf

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9	**UN World Food Programme**	Multilateral Implementing agency (AF Multilateral Implementing Entity)	2021	WFP POLICY WFP has a zero-tolerance policy for sexual exploitation and abuse, committed both at and away from the workplace, and during or outside working hours. This applies to: • All WFP employees, regardless of contract type or duration; • All WFP partners, suppliers, contract workers and external service providers.	Yes	Since 2018, the Ethics Office has also become the organizational focal point for Protection from Sexual Exploitation and Abuse.	https://www.wfp.org/protection-from-sexual-exploitation-and-abuse#:~:text=Any%20acts%20where%20our%20employees,against%20sexual%20exploitation%20and%20abuse

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10	**World Bank/IBRD/IFC**	Multilateral implementing agency (AF Multilateral Implementing Entity)	2017	Staff Rule 3.00 - Office of Ethics and Business Conduct (EBC). This Rule applies to all Staff Members, as defined in Staff Rule 1.01, "General Provisions," and Staff Rule 4.01, "Appointment." This Rule also applies to former Staff Members.	N/A	Environmental and Social Framework (ESF) as well as specific enhancements in operational processes and guidance such as a Good Practice Note on Addressing Gender-Based Violence in Investment Project Financing Involving Major Civil Works	https://policies.worldbank.org/en/policies/all/ppfdetail/2ea59d80-1b8a-42a9-8987-d2676d5ba1ff https://www.worldbank.org/en/projects-operations/products-and-services/brief/prevention-of-gender-based-violence-contractor-accountability-and-disqualification

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11	**World Health Organization WHO**	International Best Practice Example (UN)	2023	Applicable to all staff members and collaborators	Yes	WHO Code of Ethics and Professional Conduct 2017 Preventing and Addressing Abusive Conduct, policy and procedures, March 2021 WHO Whistleblowing and Protection against Retaliation Policy and procedures, 2015 until replaced by the WHO Policy on Preventing and Addressing Retaliation, 2023 (to be issued)	https://www.who.int/publications/m/item/WHO-DGO-PRS-2023.4. https://www.worldbank.org/en/projects-operations/environmental-and-social-policies#safeguards
12	**IFAD**	International Best Practice Example (UN)	2018	This policy applies to all IFAD staff, independent of their location, grade, type, or duration of appointment, including staff members on loan, Junior Professional Officers and Temporary Short-term staff. It also applies to all individuals hired by IFAD under a non-staff contract such as consultants, interns as well as vendors and suppliers contracted by IFAD. In its spirit and principles, this policy also applies to all recipients of IFAD funding and third parties contracted using IFAD's funding	N/A	Implementing Procedures, SECAP complaint mechanisms and other internal processes.	https://www.ifad.org/documents/38711624/42415556/SEA_e_web.pdf/85275c4d-8e3f-4df0-9ed8-cebaacfab128?t=1611326846000

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				such as consultants, contractors, and vendors.			