



ADAPTATION FUND

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Adaptation Fund Board

**A DRAFT POLICY ON SAFEGUARDING AGAINST
SEXUAL EXPLOITATION, ABUSE AND HARASSMENT**

POLICY ON SAFEGUARDING AGAINST SEXUAL EXPLOITATION, ABUSE AND HARASSMENT

Introduction

1. The Adaptation Fund (the Fund) finances projects and programmes that help vulnerable communities in developing countries build resilience and adapt to the impacts of climate change.
2. The Fund has zero tolerance for all forms of Sexual Exploitation, Abuse, and Harassment (SEAH). SEAH is a grave violation of human dignity, rooted in unequal power relations that undermine safe, respectful, and inclusive working environments and interactions. It threatens the integrity of Fund-supported activities and directly conflicts with the Fund's core values of trust, respect, and integrity.
3. Safeguarding against SEAH is essential to the Fund's ability to deliver on its mission. The Fund is therefore committed to preventing and responding to SEAH across all its activities and operations. This includes strengthening institutional safeguards and promoting a culture of dignity and safety.
4. The Fund is also committed to supporting its Implementing Entities in developing and applying robust policies and procedures to prevent, mitigate, and respond to SEAH, particularly in relation to Fund-supported projects and activities.
5. This Policy complements other key policies of the Fund, including the Operational Policies and Guidelines, the Code of Conduct, the Zero Tolerance Policy for the Board, the Environmental and Social Policy, and the Gender Policy and Action Plan, in supporting the Fund's objectives of safeguarding against SEAH.

Definitions

6. For the purposes of this Policy, the following terms are defined as follows:
 - a) "**Covered Actors**" refers to members of Fund's Board, Committees, Accreditation Panel and Technical Evaluation Reference Group (TERG); staff of the Adaptation Fund Board Secretariat and the TERG Secretariat, as well as any individual contracted by the Adaptation Fund to perform official functions on its behalf.
 - b) "**Implementing Entities**" are the national, regional and multilateral institutions accredited by the Adaptation Fund Board to receive direct financial transfers from the Adaptation Fund in order to carry out adaptation projects and programmes in developing countries.
 - c) "**Sexual Abuse**" means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.¹

¹ 2003 UN Secretary-General's Bulletin on Special Measures for Prevention from Sexual Exploitation and abuse (ST/SGB/2003/13) .

- d) **“Sexual Exploitation”** means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another.²
- e) **“Sexual Harassment”** includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature, that interferes with work, or is made a condition of employment, or creates an intimidating, hostile or offensive environment in connection with a Fund-related activity.³
- f) **“Survivor”** refers to the person who is, or has been, sexually exploited, abused, or harassed.
- g) **“Workplace”** refers to any location or setting where Fund-related activities occur. This includes Fund facilities; events or activities funded, sponsored, or supported by the Fund; and any place—physical or virtual—where Covered Individuals are present in connection with their roles, whether during or outside of official working hours.

Scope

- 7. This Policy applies to all Covered Actors, including members of the Board, the Board Secretariat (the Secretariat), Committees, the Accreditation Panel, the Technical Evaluation Reference Group (TERG) and the TERG Secretariat of the Fund, and any other individual contracted or engaged by the Fund to perform official functions.
- 8. Covered Actors are expected to uphold the principles and standards set out in this Policy to the extent consistent with their respective institutional frameworks. Where alignment issues arise, they should be addressed in good faith in consultation with the Secretariat.
- 9. The prohibition against SEAH extends to conduct occurring in the workplace and in any context related to Fund activities, whether during or outside of working hours.
- 10. While this policy references the role of Implementing Entities, their detailed responsibilities for preventing and responding to SEAH in the Fund-supported projects and activities are outlined in the Fund’s Environmental and Social Policy and its guidance document.

Guiding Principles

- 11. **Zero tolerance for SEAH:** The Fund has zero tolerance for all forms of Sexual Exploitation, Abuse, and Harassment (SEAH). SEAH is a grave violation of human dignity and human rights and is incompatible with the Fund’s core values and principles.
- 12. **Shared responsibility:** Preventing and responding to SEAH is a shared responsibility. All Covered Actors are expected to uphold the highest standards of conduct and actively contribute to safe and respectful environments in Fund-related activities.

² Ibid.

³ 2019 Sexual Harassment UN General Assembly’s Resolution A/RES/73/148: Intensification of efforts to prevent and eliminate all forms of violence against women and girls: sexual harassment.

13. **Prevention and risk mitigation:** Prevention and risk mitigation will be integrated into the design and implementation of all Fund-related activities. Where SEAH risks cannot be fully avoided, targeted actions will be taken to reduce and manage those risks appropriately.
14. **Responsible partnerships:** The Fund will not engage in partnerships, funding, or collaboration with individuals or entities that condone, participate or engage in SEAH. All Implementing Entities are expected to uphold safeguarding standards and be transparent about their policies and actions to address SEAH.
15. **Reporting and response:** The Fund is committed to enabling safe, confidential, and accessible reporting of SEAH concerns. All allegations will be taken seriously and addressed promptly and confidentially, with disciplinary or corrective actions taken as appropriate. Individuals or entities who report SEAH in good faith will be protected from retaliation.
16. **Survivor-centered approach:** The Fund will prioritize the rights, dignity, needs, and wishes of survivors in all responses to SEAH. Informed consent will guide all decision-making processes, and the principle of "do no harm" will be upheld.
17. **Continuous learning and review:** The Fund will regularly review and strengthen its SEAH-related policies, prevention measures, and response mechanisms. Lessons learned, evolving international standards, and feedback from survivors, stakeholders, and partners will inform updates.

Responsibilities of Covered Actors

18. Covered Actors have a responsibility to contribute to a safe and respectful working environment that actively prevents SEAH.
19. Covered Actors shall not use their position of power, trust, or influence to sexually exploit, abuse, or harass any person involved in, engaged with, or benefiting from Fund-related activities. They must also refrain from encouraging and condoning acts of SEAH committed by others in connection with Fund-related activities.
20. Covered Actors shall not engage in sexual activity with a child, defined as any person under the age of 18, in accordance with the United Nations Convention on the Rights of the Child (CRC). A mistaken belief about the child's age shall not be accepted as a defense. Any such activity shall be considered Sexual Exploitation and/or Sexual Abuse under this Policy.
21. Subject to the availability of protection against retaliation, Covered Actors are obligated to report any suspected SEAH in Fund-related activities promptly upon becoming aware of it.
22. Covered Actors are required to fully cooperate with any investigation or review process related to SEAH, including providing relevant information and participating in interviews as requested.

23. Covered Actors are required to disclose any prior involvement in SEAH, or pending investigations or disciplinary proceedings, at the time of hiring, appointment, or engagement, or when such information becomes known. Failure to fully and accurately disclose shall be treated as misconduct or a breach of contract, as appropriate.
24. Managers and supervisors have an elevated responsibility to act as role models and foster a safe and respectful working environment. They must report any allegations or suspicions of SEAH without delay and ensure that such reports are managed in accordance with this Policy and all other relevant rules and procedures.

Responsibilities of the Adaptation Fund

25. The Fund will integrate SEAH-related safeguards into its recruitment, procurement, employment, and onboarding processes. This includes conducting reference checks, requiring disclosures, and obtaining declarations regarding prior involvement in SEAH, where appropriate and legally permissible.
26. The Fund will integrate SEAH risk prevention and mitigation measures into the design and implementation of all Fund-related activities. Where SEAH risks cannot be fully avoided, context-specific actions will be taken to reduce and manage those risks effectively. The Fund will also provide guidance to its Implementing Entities to support them in safeguarding against SEAH in relation to Fund-related activities.
27. To the extent possible, the Fund will ensure that Covered Actors receive appropriate training and information on the prevention of and response to SEAH. Awareness-raising efforts shall foster a culture of respect, accountability, and zero tolerance for SEAH.
28. The Fund will ensure that all reported allegations or suspicions of SEAH are addressed in a timely, fair, and appropriate manner. This includes initiating or facilitating investigations and taking corrective, disciplinary, or remedial action as warranted.
29. The Fund will implement measures to protect Covered Actors who report SEAH in good faith from retaliation, intimidation, or other adverse consequences. Safeguards will be in place to preserve confidentiality and promote a safe reporting environment.
30. The Fund will publicly report on an annual basis, anonymized data and summaries of SEAH allegations received, actions taken, and outcomes, in accordance with applicable confidentiality and data protection standards.

Responsibilities of Implementing Entities

31. Implementing Entities are responsible for ensuring they have adequate policies, systems, and capacities in place to prevent and respond to SEAH in all Fund-related activities, including Fund-supported projects. This includes taking proactive steps to identify and mitigate SEAH risks, respond effectively to allegations, and promote a safe and respectful environment for all stakeholders. Details of these responsibilities are outlined in the Fund's Environmental and Social Policy and its Guidance Document.

Reporting

32. Any person or entity may report actual or suspected SEAH, as defined by this Policy. Individuals with information concerning SEAH involving Covered Actors in connection with Fund-related activities are strongly encouraged to report it to the Fund.
33. Reports of SEAH concerning Covered Actors and/or in connection with Fund-related activities, should be submitted via the Fund's [Ad Hoc Complaint Handling Mechanism](#)⁴:
- Email : afcomplaints@adaptation-fund.org; or
 - Mailing address: Adaptation Fund Board Secretariat, 1818 H Street NW, N6-600, Washington, DC 20433, USA
34. Reports of SEAH concerning Implementing Entity but not associated with the Fund-supported projects should be submitted through the grievance mechanism of the respective Implementing Entity and/or any other appropriate channels.
35. Anonymous reports are accepted and will be reviewed to the extent possible. However, providing sufficient detail improves the Fund's ability to conduct a thorough and timely investigation.
36. Reports must be made in good faith. Knowingly submitting false or malicious reports constitutes misconduct and may result in disciplinary action.
37. Individuals reporting SEAH are not required to provide proof or meet evidentiary thresholds. The responsibility to assess and investigate reports lies with the appropriate investigative body.
38. Administrative or disciplinary measures will be applied in accordance with the relevant policies, as warranted by the findings of the investigation.

Policy Implementation, Monitoring and Review

39. The Secretariat is responsible for implementing and monitoring this Policy, and for reporting annually to the Board on compliance. The Secretariat will also develop any necessary guidelines or procedures to support the effective application of the Policy. This Policy will be reviewed in line with the Fund's regular policy review cycle.

⁴ Reports of SEAH concerning AFB Secretariat staff, the Technical Evaluation Reference Group, Secretariat staff, or any individual contracted by the Adaptation Fund, including members of the Accreditation Panel and the Technical Evaluation Reference Group, should be submitted directly to the World Bank Group through its confidential reporting mechanism.