

Adaptation Fund Board
Forty-fifth meeting
Bonn, Germany

A Policy on Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment of the Adaptation Fund

Strategic Issues

- a) The Adaptation Fund serves the Paris Agreement by accelerating effective adaptation action and efficient access to finance, including through direct access, to respond to the needs and priorities of developing countries.
- a) The complexities and challenges of implementing adaptation projects and programmes with Adaptation Fund financing requires intentional efforts to be aware of and mitigate risks to the successful outcome of adaptation financing
- b) At the Climate Change Conference in Sharm el-Sheikh in November 2022, the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol at its 17th 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) decided to request the Board to adopt a policy on safeguarding against sexual exploitation and abuse and sexual harassment (SEAH) (Decision 4/CMP.17, paragraph 13 and Decision 18/CMA.4, paragraph 12).

Purpose

1. This Board document presents for the Adaptation Fund Board's consideration and approval a policy on safeguarding against sexual exploitation and abuse and harassment (SEAH) of the Adaptation Fund.

Recommended Decision

2. The Adaptation Fund Board, having considered document AFB/B.45/13 and recalling its decision B.42/57 requesting the Secretariat to prepare a draft of the Adaptation Fund policy on safeguarding against sexual exploitation and abuse and harassment (SEAH), taking into account the discussion at the forty-second meeting of the Board and in consultation with relevant stakeholders of the Adaptation Fund, decides:
 - a) To approve the Adaptation Fund policy on safeguarding against SEAH;
 - b) To request the Secretariat to amend other policies in alignment with the Adaptation Fund policy on safeguarding against SEAH.

Background

3. At the 41st meeting in October 2023, the Board considered a document which contains an overview of international organizations' policies and frameworks to prevent and protect from SEAH and proposed options for a Fund's policy safeguarding against SEAH. The Board decided to continue its consideration of options for responding to the mandate from CMP17 and CMA 4 to adopt a policy on safeguarding against SEAH and requested the Secretariat to prepare a background note including elaboration of definitions and their application as well as potential approach and process to respond to the mandate from the Parties, taking into account the Board's discussions at the 41st meeting (Decision B.41/37).

4. At its 42nd meeting in April 2024, the Board considered document AFB/B.41/8/Rev.1 and its annex which contained common definitions of SEAH and their application and options for the Board to respond to the mandate from the CMP17 and CMA4 to adopt a policy on safeguarding SEAH. The Board decided as follows:

Having considered document AFB/B.42/12 and its annex, the Adaptation Fund Board (the Board) decided:

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

(b) To request the secretariat:

(i) To prepare a draft of the Adaptation Fund policy on safeguarding against SEAH, taking into account the discussion at the forty-second meeting of the Board and in consultation with relevant stakeholders of the Adaptation Fund;

(ii) To present the outcome of the work referred to in subparagraph (b) (i) to the Board for consideration at its forty-fourth meeting;

(iii) To consider amending the Fund's other policies in alignment with the Adaptation Fund policy on safeguarding against SEAH once that policy is adopted by the Board.

(Decision B.42/57)

Update on Work to Develop a Policy on Safeguarding Against SEAH

5. Following decision B.42/57, a [draft of the AF SEAH policy](#) was developed during the intersessional period and shared for consultations with key stakeholders of the Adaptation Fund, including the Fund's implementing entities, Designated Authorities, the Adaptation Fund Board, and the Adaptation Fund CSO Network. A call for public input was also launched to allow a broad scope of stakeholders to provide comments on the draft SEAH policy.

6. Following the close of the consultation period, stakeholders' feedback was considered in finalizing the draft of the AF SEAH policy, attached as Annex A.

7. Should the Board decide to approve this policy, as a next step the Secretariat would operationalize the policy through communication to implementing entities and other relevant stakeholders, as well as provide webinars and other briefing opportunities to support operationalization by implementing entities. In addition, the secretariat would develop updates to the relevant policies of the Adaptation Fund in alignment with the approved SEAH policy.

8. The draft SEAH policy is presented in Annex A, and the verbatim stakeholder feedback is contained in Annex B. Additionally, a note which outlines the implementation plan for the draft SEAH policy is presented in Annex C.

Annex A: 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 violation of human dignity,¹ 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 appropriate policies and procedures to prevent, mitigate, and respond to SEAH, particularly in relation to Fund-supported projects and activities. The Fund may also encourage broader institutional strengthening in safeguarding against SEAH where feasible.
5. Non-compliance with this Policy may result in administrative or disciplinary measures in line with applicable rules and procedures, reflecting the Fund’s commitment to accountability and effective enforcement.
6. This policy is grounded in internationally recognized legal and normative frameworks for addressing SEAH globally, emphasizing the protection of human rights and the elimination of discrimination and exploitation.²
7. 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. The Fund will also explore how this Policy could be further integrated into other relevant policies and frameworks in the future.

Definitions

8. 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

¹ Committee on the Elimination of Discrimination against Women (CEDAW), General Recommendation No. 19: Violence against Women, UN Doc. A/47/38 (1992), para. 6.

² These include, among others, the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW, 1979), the UN Convention on the Rights of the Child (1989), the ILO Convention No. 190 and Recommendation No.26 (2019), the Optional Protocol to the CRC on the Sale of Children, Child Prostitution and Child Pornography (2000), the UN Declaration on the Elimination of Violence Against Women (1993), and UN Security Council Resolution 1325 on Women, Peace and Security (2000).

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.³
- 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.⁴
- e) **“Sexual Harassment”** refers to any unwelcome conduct of a sexual nature that might reasonably be expected or perceived to cause offense or humiliation, interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive environment in connection with a Fund-related activity.⁵
- 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 Actors are present in connection with their roles, whether during or outside of official working hours. This includes Fund-related communications, whether in person or enabled by information and communication technologies.

Scope

9. 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, as well as any other individual contracted or engaged by the Fund to perform official functions. It also applies to all Implementing Entities in relation to Fund-supported activities, projects and programmes. The specific requirements and modalities of application differ for Covered Actors and for Implementing Entities, reflecting their respective roles and responsibilities.
10. Covered Actors are expected to uphold the principles and standards set out in this Policy, regardless of their institutional affiliation. Where Covered Actors are also subject to the policies of their home institutions, any alignment issues should be addressed in good faith and in consultation with the Secretariat, with the aim of upholding the standards of the Fund. This provision does not limit the applicability of this Policy or the relevant World Bank policies to Secretariat staff and individuals contracted by the Secretariat to perform official duties on its behalf; these persons remain subject to all applicable requirements.
11. The prohibition against SEAH extends to conduct occurring in the workplace and in any context related to Fund activities, whether in person or virtual, and whether during or outside of working

³ 2003 UN Secretary-General’s Bulletin on Special Measures for Prevention from Sexual Exploitation and abuse (ST/SGB/2003/13).

⁴ Ibid.

⁵ 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.

hours.

Guiding Principles

12. The Guiding Principles outlined below apply to both Covered Actors and Implementing Entities in relation to Fund-supported activities, projects and programmes, unless otherwise specified.

- a) **Zero tolerance for SEAH:** The Fund has zero tolerance for all forms of Sexual Exploitation, Abuse, and Harassment (SEAH). This includes zero tolerance for inaction, mishandling, or cover-up of SEAH allegations. SEAH is a violation of human dignity and human rights and is incompatible with the Fund's core values and principles.
- b) **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. This applies to the Implementing Entities in relation to Fund-supported activities, projects and programmes.
- c) **Attention to at-risk groups:** The Fund acknowledges that some individuals and groups are disproportionately vulnerable to SEAH due to intersecting factors such as gender, age, disability, displacement, employment status, and social marginalization. Safeguarding measures and responses will take these heightened risks into account.
- d) **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.
- e) **Responsible partnerships:** All Implementing Entities are expected to uphold safeguarding standards and be transparent about their policies and actions to address SEAH. The Fund will not engage in partnerships, funding, or collaboration with individuals or entities that condone, participate or engage in SEAH.
- f) **Reporting and response:** The Fund is committed to enabling safe, confidential, accessible, survivor-centered, and gender-responsive reporting of SEAH concerns. All allegations will be taken seriously and addressed promptly with due regard for confidentiality and the rights of all parties involved. Where appropriate, allegations will be subject to thorough, impartial, and timely investigation processes. Disciplinary or corrective actions will be taken based on the outcomes of such investigations. Individuals or entities who report SEAH in good faith will be protected from retaliation.
- g) **Survivor-centered approach:** The Fund will prioritize the rights, dignity, needs, and wishes of survivors in all responses to SEAH. All actions will be guided by informed consent, with reasonable measures taken to ensure safety and confidentiality. Survivors will be promptly and safely provided with information on available support, regardless of their decision to participate in a formal investigation.
- h) **Continuous learning, transparent reporting and review:** The Fund will regularly review and strengthen its SEAH-related policies, prevention measures, and response mechanisms. Transparent reporting will be ensured by sharing information on actions taken and lessons learned, while safeguarding confidentiality and protecting survivors. Updates will also be informed by evolving international standards and feedback from survivors, stakeholders, and partners, including any necessary revisions to other Fund policies.

Responsibilities of Covered Actors

13. Covered Actors have a responsibility to contribute to a safe and respectful working environment that actively prevents SEAH.
14. 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.
15. 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.
16. Subject to the availability of protection against retaliation, Covered Actors are obligated to report any actual, threatened, attempted, or suspected SEAH in Fund-related activities promptly upon becoming aware of it.
17. 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 or remedial actions as required.
18. 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.
19. 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

20. 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.
21. 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.
22. 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.
23. The Fund will ensure that all reported allegations or suspicions of SEAH are addressed in a timely, fair, impartial, equitable, and objective manner. This includes initiating or facilitating investigations and taking corrective, disciplinary, or remedial action as warranted.

24. 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 throughout the duration of the process.
25. 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

26. 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 and programmes. This includes taking proactive steps to identify and mitigate SEAH risks, establish accessible, localized and culturally appropriate reporting pathways, respond timely and effectively to allegations, provide access to survivor support services, and promote a safe and respectful environment for all stakeholders, including project staff, beneficiaries and community members. Details of these responsibilities will be outlined in the Fund's Environmental and Social Policy and its Guidance Document, as well as other relevant policies.

Reporting

27. Any person or entity may report actual, threatened, attempted 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. There is no specified time frame for submitting a report; all allegations will be reviewed regardless of when the incident is reported to have occurred.
28. Reports of SEAH concerning Covered Actors and/or in connection with Fund-related activities, should be submitted via the following:
 - Email: afcomplaints@adaptation-fund.org
 - Mailing address: Adaptation Fund Board Secretariat, 1818 H Street NW, N6-600, Washington, DC 20433, USA
29. Reports of SEAH concerning AFB Secretariat staff, the Technical Evaluation Reference Group Secretariat staff, or any individual contracted by the Adaptation Fund, including independent expert 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:
 - Reporting online: click [here](#).
 - Calling in to the Helpline:
 - From the United States (TTY/TDD): 1-877-576-2569
 - From outside the United States: Use AT&T direct access code for the country, then 1-800-261-7497
 - If an AT&T direct access code is not available, use a World Bank Group office phone and dial 5220.9 followed by 1-800-261-7497 or 1-877-576-2569

- Other Ways to Contact Ethics and Business Conduct Department (EBC) (not anonymous):
 - Phone: + 1 202-473-0279
 - Email: ethics_helpline@worldbank.org
30. Reports of SEAH concerning an 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.
 31. 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.
 32. Reports must be made in good faith. Knowingly submitting false or malicious reports constitutes misconduct and may result in disciplinary action.⁶
 33. Individuals reporting SEAH are not required to provide proof or meet evidentiary thresholds. The responsibility to assess and investigate reports lies with the appropriate authority⁷.
 34. 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

35. The implementation of this Policy is a shared responsibility between Covered Actors, Implementing Entities and the Secretariat. The Secretariat is responsible for overseeing and monitoring compliance and will report annually to the Board. The annual report will include anonymized data on SEAH reports received (where applicable), actions taken, implementation progress, and any challenges or lessons learned.
36. The Secretariat will develop the necessary guidelines and procedures to support the effective implementation of this Policy. This will include tools for prevention, response, victim assistance, and oversight, as well as onboarding materials for all Covered Actors.
37. Implementing Entities, as key partners in delivering AF-funded projects, are expected to implement this Policy in line with their roles and responsibilities.
38. The Fund will periodically review and update this Policy to incorporate evolving standards, stakeholder feedback, and lessons learned from its implementation, ensuring its continued relevance and effectiveness.

Annex B: Compilation of Comments on the Proposed Draft of Safeguarding Against Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH) Policy

⁶ The Fund acknowledges that false reporting is rare. Most individuals who come forward do so with genuine concerns, and the risk of misuse should not deter efforts to create a safe and supportive reporting environment.

⁷ Depending on the contractual modality of the alleged perpetrator, the appropriate authority will be such as, the Fund Secretariat, the Office of Ethics and Business Conduct of the World Bank Group, or, in the case of Implementing Entities, the investigative body of the respective Implementing Entity.

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Feedback

1. Introduction section. Should include section citing international conventions that explicitly or implicitly address SEAH, forming the legal and normative backbone for safeguarding policies:

- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW, 1979)
- UN Convention on the Rights of the Child (CRC, 1989)
- ILO Convention No. 190 on Violence and Harassment in the World of Work (2019)
- Optional Protocol to the CRC on the Sale of Children, Child Prostitution and Child Pornography (2000)
- UN Declaration on the Elimination of Violence Against Women (1993)

2. Recommend to refer to specific groups who are particularly vulnerable to or affected by harassment, i.e.:

- Women and girls
- Single women with family responsibilities
- Young women in their first job
- Women working in male-dominated sectors (e.g., construction, security, logistics)
- Women with disabilities
- Women from ethnic or linguistic minorities
- Women on temporary or part-time contracts
- Women in subcontracted or outsourced roles
- Migrant women or those with diverse sexual orientations and gender identities
- Children and adolescents
- Especially girls, unaccompanied minors, and children in institutions or displaced settings.
- Men and boys – note: SEAH against men is underreported due to stigma and gender norms.
- Young men in early employment or informal work
- Men with disabilities
- Migrant men or men from marginalized communities
- Men with caregiving responsibilities
- Other high-risk groups
- Refugees, IDPs, and migrants
- LGBTQIA+ individuals
- People in poverty
- People in institutions
- Domestic and informal workers
- People in conflict or disaster-affected areas

3. Under “Definitions” section, recommend edits to highlight that SEAH can be physical or psychological (suggested additions in bold and underlined):

Definitions

For the purposes of this Policy, the following terms are defined as follows:

a) “Covered Actors” refers to members of the 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 **or psychological** intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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. **Sexual exploitation may involve both physical and psychological harm.**

e) “Sexual Harassment” includes unwelcome sexual advances, requests for sexual favours, and other verbal, physical, or psychological conduct of a sexual nature that interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive environment in connection with a Fund-related activity.

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.

4. Under Definitions section, recommend examples of what constitutes SEAH, i.e.:

Examples of conduct that may constitute SEAH:

- Unfavorable treatment based on pregnancy or caregiving responsibilities, such as discrimination related to maternity or parental duties, including when these impact job access, conditions, or advancement.
- Organizational decisions based on sex or gender that subject individuals to degrading conditions, such as isolation, exclusion, unequal task distribution, or assignments unrelated to their professional skills or role.
- Behaviors or practices based on sex or gender - whether explicit or implicit - that negatively affect a person's working conditions, opportunities, or sense of safety and inclusion.

- Mocking or ridiculing individuals for performing tasks that do not conform to stereotypical gender roles, or for rejecting socially imposed gender norms.
- Sexual or gender-based jokes, comments, or remarks that demean or belittle someone’s sex, sexual orientation, gender identity, or personal circumstances.
- Devaluing an individual's work or intellectual capacity on the basis of their sex, gender identity, caregiving role, or other protected characteristic.

5. Scope: Should say when the policy takes effect and for how long

6. Also under Scope - under point 9, should add a point to highlight that SEAH can take place digitally/online, i.e.:

“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. This includes behavior occurring in virtual or digital environments such as emails, video conferences, messaging platforms, or social media, when used in connection with Fund-related activities.”

7. Under the “Reporting” section, it says:

36. Reports must be made in good faith. Knowingly submitting false or malicious reports constitutes misconduct and may result in disciplinary action.

While it’s difficult to get universally accepted figures on SEAH – primarily because there is pervasive underreporting - rigorous research generally indicates that the rate of factually false reports of SEAH (i.e. incidents that never happened) is between 2% and 10%. "Factually false" reports are different from "unfounded" cases, which may simply lack sufficient evidence for prosecution and often have higher rates. Despite this, the perception of false reports being common is often inflated. This section should therefore consider that most people reading this are not those who wish to make a false or malicious report, but rather those who are scared and/or unable to make a true report. Recommend wording this instead for example as:

36. While the Fund acknowledges that underreporting of SEAH remains a significant concern, all reports of sexual exploitation and abuse that are made are expected to be made in good faith. Knowingly submitting a false or malicious report constitutes misconduct and may result in disciplinary action.

8. Under “Responsibilities of the Adaptation Fund”, recommend to enhance the following sections (as indicated in bold and underlined):

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, ***and in ensuring that they provide appropriate support, referrals, and legal guidance.***

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. **Individuals will have the option to report concerns through a variety of accessible and confidential channels - verbally or in writing, in person or virtually - based on what is most comfortable, safe, and appropriate for them. These channels will be clearly communicated, and support will be available to assist individuals in navigating the reporting process.**

As it is currently drafted, reporting can only be done in writing and via email. This means that people who are less literate and/or do not have access to the Internet and/or do not know how to use email will not be able to easily report. Reporting should also be able to be made in-person, via phone, via WhatsApp, and in writing

In addition, it should be added that reporting can be made in any language

9. After a report is made:
 - What are the immediate steps taken to ensure the safety and well-being of the survivor, and how are they informed of these actions?
 - What is the established timeline for initial contact, assessment, and the commencement of any formal investigation, and what are the specific roles and responsibilities of the individuals or departments involved at each stage?
 - How will the survivor be kept informed about the progress of their complaint, what avenues are available for them to ask questions or seek support throughout the process, and what are the potential outcomes and available remedies should the complaint be substantiated?
 - What happens if the reported incident is deemed to have happened/not have happened?

(CSO 2)

Feedback

Does the draft SEAH policy address the key issues and risks that should be mandated? Are there any elements which are not covered in the draft of the draft SEAH policy?

10. *Comment: The following crucial issues are missing or underdeveloped in the draft policy:*
 - *Absence of Detailed Investigation Protocols*
 - *Specific Survivor Support Measures or Referral Pathways*
 - *Limited Engagement with Intersectionality*
 - *Lack of Partner and Grantee Capacity-Building Provisions*
 - *No Proactive Safeguarding Measures at the Community Level*
 - *Whistleblower Protection Framework is Basic*
 - *No Specific Provisions for High-Risk Contexts*
 - *No Independent Oversight Mechanism'*

Comprehensiveness and clarity: Does the Policy clearly and comprehensively define the scope and types of misconduct it covers (i.e. sexual exploitation, abuse, and harassment)?

11. Comment: *Examples or case illustrations of misconduct scenarios could improve understanding, especially for training and implementation.*

Explicit inclusion of related misconduct such as grooming, transactional sex, or abuse of digital platforms for harassment, which are increasingly relevant.

Implementation feasibility: Are the roles and responsibilities of Covered Actors and Implementing Entities clearly outlined and feasible to implement? Is further clarification or support needed?

12. Comment: *There should be concrete minimum standards or benchmarks for implementing entities including GRM steps and protocols*

Survivor-centered approach: Does the policy effectively reflect a survivor-centered approach to addressing SEAH, and what enhancements could strengthen this focus?

13. Comment: *While the policy articulates a strong commitment to survivor-centered values, it should be clear on the following operational mechanisms and survivor support systems, which are crucial to implementing this approach effectively: Clear Survivor Assistance or Referral Mechanisms; Case Management or Safeguarding Focal Point System; Trauma-Informed or Culturally Sensitive Framework; No Survivor Feedback or Accountability Loops*

Accessibility and Reporting Mechanism: Are there ways to improve these to ensure accessibility and safety, particularly for individuals in vulnerable or remote contexts?

14. Comment: *The reporting system through email and postal reporting excludes those without internet access, literacy, or digital skills, especially in rural or conflict-affected areas. It also excludes those with communication disabilities and language barrier; reporting channels are centralized (Washington, DC), making them detached from project implementation sites; there are no Safe In-Person or Third-Party Options; and no proactive Outreach or Awareness-Raising*

(AF Board 1)

Feedback

15. In paragraph 5, the AF should also explore how the SEAH policy could be integrated in other policies of the Fund, in the future. For example, the SEAH policy should be integrated in the upcoming ESP review and this should be clearly stated.

16. On the definition of sexual harassment, it feels like this particular definition does not cover harassment via electronic means, which is relevant for modern workplaces. The AF should consider including this more clearly, by directly referencing these means, and/or providing examples. Also, should the definition restrict the impacts of sexual harassment only to interfering with work? This feels a bit too narrow. Additionally, sexual harassment by covered actors is relevant even when it happens outside of work and the workplace, and to individuals who are not covered actors, and the Fund should take this into account.

17. More generally, the definitions of sexual exploitation, abuse and harassment could benefit from concrete examples.

18. On scope, paragraph 8: who will interpret alignment with other institutional frameworks? Will this not potentially restrict the AF, if other institutional frameworks do not have or have weak SEAH policies? Is this even relevant for the AF Secretariat?

Some textual suggestions for paragraphs 15, 17 and 22:

19. 15. Reporting and response: The Fund is committed to enabling safe, confidential, **survivor-centered, gender-responsive** and accessible reporting of SEAH concerns.

20. 17. Continuous learning, **transparent reporting** 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, **including necessary updates to other Fund policies.**

21. 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 **or remedial actions as required.**

22. On the responsibilities of the Adaptation Fund, it would be important to understand why the Fund feels the need to add “where appropriate and legally permissible” on paragraph 25 and “To the extent possible...” in paragraph 27. Both phrases seem unnecessary and should be taken out completely, unless there are actual legal limitations to the reference checks, disclosures and declarations, in which case an explanation to the Board would be useful.

23. In the reporting, the use of the World Bank Group confidential reporting mechanism for reporting related to AF Secretariat Staff, TERG, etc. should not be a footnote but the main part of this section and should be explained in much more detail than it currently is, considering these are the covered actors of this policy and not the implementing entities. As it stands, it is totally unclear what this World Bank mechanism is, how it functions and how appropriate it is for SEAH related issues. A quick look online using the words “World Bank Group confidential reporting mechanism” yields a collection of different things, and it is unclear which one is being referred to here. For example, it includes the GRS and Accountability Mechanism (AM), which are not relevant to this policy. It also includes the Ombuds Services (OMB), which seems wholly inadequate for SEAH issues as this service does not seem to provide the possibility for disciplinary measures or protection for those that report. It is also unlikely that any of these services will cover the Board. This whole section needs to be re-worked to focus on reporting for covered actors. The AF should also explore whether developing its own mechanism for SEAH is feasible and appropriate and present potential options to the Board.

24. I would suggest revising the language on paragraph 36, which may discourage people from reporting. I believe there is enough literature saying that underreporting is more prevalent than false reporting. Maybe the false reporting part can be added somewhere else in the text, and/or as a definition.

25. In general, the whole policy lacks clarity on how the process is managed after reporting, especially how reporting individuals and whistleblowers are protected against retaliation, what kind of support they, and survivors, are offered and how the process will be handled (timelines, process, potential outcomes and expected administrative and disciplinary measures etc.). Without such information, it is unlikely that individuals will feel protected enough to report, especially within the Secretariat. This goes against the stated principle of “survivor-centered approach”. It is not enough to state that the Fund will implement protective measures (para 29).

26. The policy should be more specific about which policies are relevant when deciding on disciplinary measures to be applied. As it stands, it is unclear what the AF can and will do in cases where reports are confirmed.

27. The section on policy implementation, monitoring and review needs to be expanded. The reporting requirements should be clearly stated and outline what will be reported. Then a second, separate paragraph is needed on how and when the guidelines and processes will be developed, including a timeline for ultimate implementation, which should include a planned roll-out of onboarding materials for all covered actors. Then a third separate para on review and update.

28. The policy needs a clear implementation starting point and a clearer review cycle.

29. Finally, the policy should provide more detail about what type of guidance and training the Fund will provide to covered individuals and implementing entities. The training should be mandatory for all AF Secretariat employees, new and existing.

(AF Board 2)

Feedback

I see the policy as a good starting point.

(AF Board 3)

Feedback

The policy encompasses all aspects related to the concept of SEAH .

Good start.

(AF Board 4)

Feedback

30. Including the term Whistleblowing: when a person passes on information concerning potential or actual breach of PSEAH policy which they feel is in the public interest. It appears at the World Bank Staff Rule 8.02 - Protections and Procedures for Reporting Misconduct (Whistleblowing) clause 4.02 on External Reporting of Suspected Misconduct, which specifies conditions under which Staff are extended protection against retaliation when reporting suspected misconduct to an entity or individual outside of the established internal mechanisms, and in my view it should apply to all AF Staff.

Among the principles of the policy, I miss:

31. Objectivity, that is, that every complaint is addressed in an impartial, equitable and objective manner.

32. Safety and Welfare, that is, consider the safety of the complainant, alleged victim or survivor, witnesses, alleged subject of concern and staff of paramount importance.

(AF Board 5)

Feedback

33. Another general comment that it is unclear how the fund would (if it would) interact with judicial authorities (and in what country etc). Might be worth to understand at the outset, rather than when it actually occurs. Not sure it needs to be in the policy though, but just so that is sorted before policy is enacted.

34. Comment made in Introduction, paragraph 2: don't know what the reference is, if no reference consider if "grave" should be here. Is it recognized as a human rights violation under CEDAW, see general recommendation 19? if so, consider using that instead

35. Comment made in Introduction, paragraph 4: Broad purpose. Fund only responsible for the management of its funds, ie IE only need robust policies etc for the fund's supported projects and activities. Outside of that is "nice to have", but policies safeguarding AF support is "need to have". But also for board members who are part of NIE's to express themselves on (ie support to develop policy to cover broader than fund projects). Also. What does robust mean here? It is subjective? Consider instead what a policy need to have to be ok and then specify that later.

36. Comment made in Definitions, paragraph 6 ("Covered Actors"): Should active observers also be considered here?

37. Comment made in Definitions, paragraph 6 ("Survivor"): Victim? A better "legal" term for a policy?

38. Comment made in Definitions, paragraph 6 ("Workplace" and term "Fund-related" and "covered individuals"): A bit vague when applied? Actors (as per the above?)

39. Comment made in Scope, paragraph 7: redundant take out.

40. Comment made in Scope, paragraph 8: take out? given that a chapter on responsibility comes later.

41. Comment made in Guiding Principles, paragraph 14: Change order of sentences

42. Comment made in Guiding Principles, paragraph 16: Consider victim - survivor might have a connotation of psychological support etc.

43. Comment made in Responsibilities of Covered Actors, paragraph 21: Hmm. Maybe too broad and/or too easy to use as an excuse? Can it be rephrased?

44. Comment made in Responsibilities of Covered Actors, paragraph 23: In principle ok but in practice, what does this mean in a hiring process, appointment or engagement: "prior involvement in SEAH"

45. Comment made in Responsibilities of the Adaptation Fund, paragraph 28: Who will investigate and who is ultimately responsible for upholding the policy, incl ensuring addressing SEAH concerns- Fund Chair or ES?

46. Comment made in reporting, paragraph 37: Is the Fund considered an investigate body? perhaps use another term?

47. Comment made in Policy Implementation, Monitoring and Review, paragraph 39: Executive Secretary?

(Designated Authority 1)

Feedback

48. Comprehensiveness and Clarity. The policy clearly explains what SEAH (Sexual Exploitation, Abuse, and Harassment) means and who is responsible. The roles of "Covered Actors" and "Implementing Entities" are described well.

49. Implementation Feasibility. The roles and duties of those involved are clearly stated, especially the need to report, cooperate, and share information.

Suggestion: Providing tools like training materials or simple self-assessment checklists can help smaller organizations apply the policy more effectively.

50. Survivor-Centered Approach. The policy rightly focuses on protecting and supporting survivors, with principles like informed consent and “do no harm.” It follows best practices used in aid and development work.

51. Accessibility and Reporting Mechanism

The policy offers easy ways to report SEAH, including anonymous options and protection from retaliation, which builds trust. Suggestion: Considering options like SMS reporting, support in local languages, and awareness campaigns to make reporting easier in remote or vulnerable communities

52. Prevention and Accountability Measures. The policy includes steps to prevent SEAH (in hiring, procurement, and partnerships) and outlines what happens if rules are broken.

53. Alignment with Other Fund Policies. The policy fits well with the Fund’s Environmental and Social Policy and Gender Policy. The links between them are clear.

(Designated Authority 2)

Feedback

54. Enhancing Clarity on Reporting Channels

Observation: We noted a potential ambiguity in the 'Reporting' section. Paragraph 33 directs reports concerning "Covered Actors" to the Fund's Ad Hoc Complaint Handling Mechanism (afcomplaints@adaptation-fund.org), while Footnote 4 specifies that a subset of these actors (including Secretariat staff) falls under the World Bank Group's mechanism. This could create confusion for a person wishing to make a report. Furthermore, SEAH related complaints related to the AF Manager should be reported to the Board as the head of the Secretariat is accountable to the Board as per the Fund’s governance. Given that the complaints mechanism falls under the EFC, it would be more appropriate to have complaints related to Board members and head of secretariat directed to the Chair of EFC directly, to ensure confidentiality is respected. It is unclear who the generic AF complaints email is addressed to and how it is managed.

Suggestion: To eliminate this ambiguity, we suggest restructuring Paragraph 33 to clearly delineate the correct reporting channel for each group. We propose the following wording:

"Reports of SEAH concerning individuals covered by this policy should be submitted through the appropriate channel as follows:

- For allegations involving members of the Fund's Board or Committees, head of the Fund’s Secretariat: Reports should be submitted to the Chair of EFC (provide email) who should bring any such report to the EFC. Further procedures for managing these complaints, especially carrying out investigations where necessary should be developed by the EFC.
- For allegations involving staff of the Adaptation Fund Board Secretariat, the TERG Secretariat, or any individual contracted by the Fund: Reports should be submitted directly

through the World Bank Group's confidential reporting mechanism [insert contact details], as these individuals are subject to its investigative framework.

55. Strengthening the Survivor-Centered Approach with Tangible Support

Observation: The policy rightfully commits to a "survivor-centered approach" as a guiding principle. However, to make this commitment fully operational, we believe the policy would benefit from outlining the specific, tangible support that will be made available to survivors.

Suggestion: We recommend adding a new section dedicated to this topic. We propose the following:

"Support for Survivors"

The Fund is committed to a survivor-centered approach that prioritizes the well-being, rights, and dignity of the survivor. In response to any SEAH allegation, the Fund will, in accordance with the survivor's wishes and consent:

- *Ensure the survivor is promptly and safely informed of available support services, including medical care, psychosocial counseling, and legal assistance.*
- *Take all reasonable measures to ensure the survivor's safety and confidentiality throughout the process.*
- *Ensure that access to support is not conditional on the survivor's willingness to participate in a formal investigation.*

56. Detailing Accountability Measures

Observation: The policy states that disciplinary measures will be applied where warranted but does not provide examples of these measures. Specifying potential consequences can significantly strengthen the deterrent effect of a policy.

Suggestion: We suggest adding a non-exhaustive list of potential sanctions, either within the "Policy Implementation, Monitoring and Review" section or in a new "Accountability" section. We propose the following text:

"Following a substantiated allegation of SEAH, the Fund will take appropriate and decisive action. Such actions, in accordance with relevant institutional frameworks, may include, but are not limited to:

- *Mandatory counseling or training.*
- *A formal letter of reprimand.*
- *Suspension or termination of contract or employment.*
- *Debarment from future engagement with the Fund.*
- *Referral of the matter to relevant national law enforcement authorities."*

57. Clarity on impacts of Policy

The Policy document outlines that "The Fund will integrate SEAH risk prevention and mitigation measures into the design and implementation of all Fund-related activities."

While we understand that further guidance will be provided, an initial note from the Secretariat is needed to outline on how this policy will be implemented with regards to the

fund related activities and project, and in particular the timeline for this policy to enter effect vis-à-vis project, and to enable the IEs to integrate it. In addition, the Secretariat should provide an initial evaluation of the impact of the policy on project reviews and implementation (e.g. extent of additional screening criteria and reporting) and on accreditation and reaccreditation of IEs. We recommend including a non-exhaustive list of SEAH-related indicators — such as number of staff trained, number of reports received, and percentage of projects with SEAH risk assessments — in future reporting frameworks.”

58. Local Accessibility & Inclusion in Vulnerable or Remote Contexts

Observation: The current policy relies heavily on email and high-tech reporting. It risks excluding rural communities, survivors with limited literacy, or populations in conflict/post-disaster settings where many Adaptation Fund projects operate.

Suggestion:

We recommend that the Fund consider requiring Implementing Entities to establish localized and culturally appropriate reporting pathways — including toll-free hotlines, in-person trusted focal points, or safe physical spaces — particularly in remote, low-literacy, or humanitarian contexts. These mechanisms should ensure confidentiality, be gender-sensitive, and accessible in local languages.

59. Capacity Support for Implementing Entities in Developing Countries

Observation: Many IEs, especially national or subnational entities in developing countries, may lack the internal systems, training, or human resources to immediately operationalize SEAH standards.

Suggestion:

We recommend that the Fund develop a capacity-building program to support Implementing Entities in integrating SEAH safeguards — including training toolkits, model policies, and funding support. This is especially important for Direct Access Entities with limited institutional resources.

60. Data Protection and Confidentiality Protocols

Observation: While confidentiality is mentioned, the policy does not articulate how survivor data or reports will be stored, protected, or used in reporting.

Suggestion:

We suggest adding guidance on secure data handling, retention limits, access controls, and anonymization standards in line with international best practices. These protections are essential to maintain survivor trust and legal compliance.

(IE 1)

Feedback

General feedback for the guiding questions

Comprehensiveness and clarity the main questions are around the definition of zero tolerance, who can report and if any statute of limitation applies from when the policy comes into effect. Kindly refer to the details below.

Implementation feasibility referring to the expanded definition of ‘zero tolerance’ we propose, implementation is feasible with the separate reporting mechanism recommended. Implementation for children, persons with disabilities and others with limited capacity to report including witnesses and bystanders is more complex for AF and IEs. However, options are suggested below.

61. *Survivor-centered approach* there are questions around what kind and type of support will be provided to survivors and witnesses that should be included in the policy that could be expanded in a definition of ‘corrective actions’ or like, see below.

62. This policy must have a standalone Reporting Mechanism for survivors and witnesses or third parties. Should the policy, perhaps under the reporting section, include a requirement, where practical, to ensure/encourage that a complaint is also lodged within the country/state laws/regulations/policies where the incident occurred? This could, in turn, facilitate the due diligence required for SEAH screening etc. for actors referred to in the policy.

63. With regards to prevention and accountability measures the policy could be more specific, particularly regarding prevention. Prevention seems to be based on the presumption of sufficiency of other related policies and requirements as well as screening. This could be more specific. The policy refers to ‘zero tolerance for SEAH’ throughout. Does ‘zero tolerance’ include zero-tolerance to inaction or mishandling SEAH? Perhaps zero tolerance for SEAH could be added to definitions and zero-tolerance to inaction or mishandling SEAH could be added to the definition to strengthen prevention measures?

64. Should there be a definition of what constitutes ‘corrective actions’? What kind and level of support does AF require or recommend for survivors? Witnesses of SEAH suffer trauma and require specialised support. Is it appropriate for this to be incorporated in the policy?
Feedback on the sections of the draft policy follows.

65. Definitions: Are the definitions of sexual abuse, harassment and exploitation broad enough to include technology assisted incidents and reporting?

66. Guiding principles: The policy is clear that all covered actors are expected to take all reasonable and adequate steps to prevent SEAH and to take swift and appropriate action when it does occur. However, does the principle of zero tolerance for SEAH (para 11) include zero-tolerance to inaction or mishandling SEAH? This could be clearer in the policy; see also related paragraphs eg Para 21.

67. Reporting and response (para 15): does this policy take precedence over all other AF policies, directives and like, including that any grounds for appeal can only be related to this policy? Should there be a definition of what constitutes ‘corrective actions’? Is there a ‘statute of limitations’ on reporting (could possibly be part of the *Scope* of the policy)?

68. Should “Policy complements” refer to associated requirements such as social, cultural (indigenous people) and environmental impact assessments?

69. Covered Actors: The policy is clear that all covered actors are expected to take all reasonable and adequate steps to prevent SEAH and to take swift and appropriate action when it does occur. One area that is very difficult to address is SEAH involving persons with disability, notably short- and long-term intellectual disability, including PTSD, as well as that involving older persons. Could additional language around ensuring the rights of these ‘vulnerable people’ be added in addition to children and CRC?

70. Responsibilities of the Adaptation Fund: Should this section include provisions for ‘special measures’ to be taken in the instances where children or other vulnerable people are involved? For example, the validity of their selected representative(s) in the process?

71. Para 26 “The Fund will also provide guidance to its Implementing Entities to support them in safeguarding against SEAH in relation to Fund-related activities.” Could this be more explicit in terms of requiring specific PSEAH components in safety or safeguarding plans as part of ESMS for example?

72. Para 29 “Safeguards will be in place to preserve confidentiality and promote a safe reporting environment.” Could ‘throughout the duration of the process’ (or ‘until the complaint is resolved’) be added to end this sentence? This also implies that psychosocial support or other counselling is assured by the AF.

73. Responsibilities of Implementing Entities Its not clear if psychosocial support or other counselling for survivors (where applicable) is the responsibility of the AF or IEs.

74. Reporting: Respecting survivors’ rights regarding reporting, or not, is complex, and some PSEAH policies allow for reporting by witnesses or third parties. Is this something to consider including?

75. Para 33: It is strongly recommended having a separate, specific reporting mechanism for SEAH in Fund-related activities. SEAH is not the same as an ad hoc complaint and appropriate referral pathways to service providers is essential for survivors and witnesses to assist them immediately and through the ‘reporting’ or complaint process.

76. Para 38: Administrative or disciplinary measures should be applied in accordance with this policy only as per feedback above: this policy takes precedence over all others.

(IE 2)

Feedback

77. Comprehensiveness and clarity: Does the Policy clearly and comprehensively define the scope and types of misconduct it covers (i.e. sexual exploitation, abuse, and harassment)? The Policy clearly defined the scope and type of misconduct. These are in line with internationally accepted definitions. These also currently align CCCCC's SEAH Policy definitions and scope.

78. Implementation feasibility: Are the roles and responsibilities of Covered Actors and Implementing Entities clearly outlined and feasible to implement? Is further clarification or support needed? Further clarification on the role of the IE would be useful. The need for SEAH assessments and mitigation planning is not clearly coming through in this Policy. While the draft SEAH Policy makes reference to the responsibilities of the IE under the Environmental and Social Policy, the Environmental and Social Policy does not cross reference SEAH which may render knowledge of responsibility vague.

79. *Survivor-centered approach: Does the policy effectively reflect a survivor-centered approach to addressing SEAH, and what enhancements could strengthen this focus? The Policy reflects a survivor-centred approach.*

80. *Accessibility and Reporting Mechanism: Are there ways to improve these to ensure accessibility and safety, particularly for individuals in vulnerable or remote contexts? The Policy is not clear on the role of the IE's reporting mechanisms for receipt and response to SEAH reports. It also is not clear on disclosure of reports that is received by an IE to the Fund.*

81. *Prevention and Accountability Measures: Is there sufficient attention to prevention including integration of SEAH safeguards in recruitment, project design, and partner engagement? Does the policy include adequate measures to ensure compliance and deter misconduct? The Policy statements in these matters are clear. However, the policy should closely be accompanied by guidance notes, either as part of the AF gender guidance or stand alone.*

82. *Does the policy align well with related Fund policies such as the Environmental and Social Policy and the Gender Policy and Action Plan? Are there areas where further integration or cross-referencing is needed? There is need for cross reference of SEAH with Environmental and Social Policy and Gender Policy. SEAH violations are a breach of safeguards under many AF E&S principles. For example, E&S Principle on Core Labour Rights can benefit from SEAH insertions, similarly E&S principle Gender Equity and Women's Empower can benefit from SEAH Insertions. Alternatively, SEAH guidance notes can make the link to support these cross references.*

Do you have any additional comments, concerns, or suggestions that could improve the clarity, effectiveness, or inclusiveness of the SEAH Policy? None at this time.

(IE 3)

Feedback

83. Reference to "Introduction". Comment: *General feedback on the introduction: Suggest adding a point linking this policy to accountability and stating clearly AF's commitment to its enforcement. For example: Violations of this policy may result in disciplinary actions...etc*

84. Reference to "Introduction" paragraph 5. Comment: *Suggest where feasible, providing links to the policies.*

85. Reference to "Scope" paragraph 10. Comment: *Suggest linking this policy document so reader can have deep dive into it and better understand how it applies to these Implementing entities.*

86. Reference to "Guiding Principles" paragraph 11. Comment: *Inter-Agency Standing Committee (IASC) has adopted the principle of "zero tolerance for inaction" on Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH). This shift is part of the IASC's broader strategy to move beyond simply aiming for zero incidents which may not be realistic in all contexts to instead ensuring that all actors take timely, appropriate, and accountable action when SEAH risks or incidents arise. Suggest rephrasing to zero tolerance for inaction.*

87. Reference to "Guiding Principles" paragraph 15. Comment: *Within the UN, reporting of SEA allegations is mandatory, whereas reporting of SH allegations may follow different procedures and is not always subject to the same mandatory reporting requirements. Suggest to rephrase and say "all allegations will be taken seriously and addressed promptly with due regard for confidentiality and the rights of all parties involved. Where appropriate, allegations will be subject to thorough,*

impartial, and timely investigation processes. Disciplinary or corrective actions will be taken based on the outcomes of such investigations.

88. Reference to “Guiding Principles paragraph 17. Comment: *The wording: implementing entities, partners and covered actors was used in the document. This may be confusing so suggest each term is well defined and lists of stakeholders under each is well defined.*

89. Reference to “Responsibilities of Covered Actors”. Comment: *General comment: we usually follow the six IASC PSEA Principles found here: <https://psea.interagencystandingcommittee.org/update/iasc-six-core-principles>*

90. Reference to “Responsibilities of Covered Actors” paragraph 24. Comment: *Suggest adding a sentence here: Preventing and responding to Sexual Exploitation, Abuse, and Harassment (SEAH) is a shared responsibility of all individuals engaged in Adaptation Fund-supported activities, regardless of contract type, role, or seniority. Everyone is expected to uphold the highest standards of conduct and contribute to a safe, respectful, and inclusive environment.*

91. Reference to “Responsibilities of the Adaptation Fund” paragraph 27. Comment: *Same comment as above: zero tolerance for inaction.*

92. Reference to “Responsibilities of Implementing Entities” paragraph 31. Comment:

Suggest listing the responsibilities clearly in bullet points. This responsibility includes:

- *Proactively identifying and mitigating SEAH risks throughout the project lifecycle;*
- *Ensuring timely, survivor-centered responses to allegations;*
- *Promoting a safe and respectful environment for all stakeholders, including project staff, beneficiaries, and community members.*
- *These responsibilities must be embedded in the Implementing Entity’s operational frameworks and are further detailed in the Fund’s Environmental and Social Policy and its Guidance Document.*

93. Reference to “Policy Implementation, Monitoring and Review” paragraph 39. Comment: *Suggest adding: This Policy will be reviewed in accordance with the Fund’s regular policy review cycle, or earlier if required by significant changes in operational context, legal frameworks, or best practices in safeguarding against SEAH.*

(IE 4)

Feedback

94. Our overarching comment is that in line with what we indicated in the attached TLMS as part of our re-accreditation, when implementing AF-supported projects and activities, we will be applying our own policies and procedures, and won’t be expected to apply those of the AF. Could you please confirm that this is the case with the SEAH policy?

95. The definition of the term “Workplace” includes “*events or activities funded by the Fund*” and section 9 states “*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.*” We assume the intention here was to cover AF’s workplace, however, the drafting can also be interpreted to include funded activities implemented by Implementing Entities. Please consider finetuning the definition of the term “Workplace” to avoid misinterpretation.

96. Further, Sections 10 and 31 make references to AF’s Environmental and Social Policy and its Guidance Document and state that responsibilities of Implementing Entities in relation to SEAH are

reflected in these documents. Two points to note here: firstly, the AF Environmental and Social Policy and its Guidance Document seem to only include brief references to grievance mechanism but not to SEAH specifically. Secondly, as mentioned above, we can only apply our own policies, and in the case of AF's Environmental and Social Policy, in the TLMS we confirmed that it's aligned with our respective policy. Please consider removing references to these two documents, or alternatively provide a clarification that Entities' own policies, which are aligned with those of the Adaptation Fund, are to be followed.

97. Additionally, we find that the language in paragraphs 33 and 34 limits the role of the EBRD Independent Project Accountability Mechanism (IPAM). IPAM's mandate allows it to cover EBRD project activities that include investments from the Adaptation Fund, and within their remit is SEAH in the projects we fund. We would therefore propose establishing IPAM (or equivalent mechanisms of other entities) as a first recourse for SEAH in projects to avoid the parallel submission.

(IE 5)

Feedback

We have consulted with FAO's Inspector General Office (OIG). Please find below a summary of their inputs. Kindly note that the review was mainly focused on the definitions of sexual exploitation, sexual abuse and sexual harassment, and the reporting mechanisms:

98. Definition of Sexual Harassment (Paragraph 6 (e)): we recommend replacing the current wording "*includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature*" with "*is any unwelcome conduct of a sexual nature that might reasonably be expected or perceived to cause offense or humiliation*". This would provide a broader framing and aligns with FAO's policies.

99. Reporting Mechanism (Paragraph 33): To ensure clarity regarding investigative responsibilities, it may be helpful to revise the paragraph to include language relating to UN Implementing Entities. This would ensure that UN-specific matters are investigated exclusively by UN entities, including FAO. A suggested revision could be: "*Reports of SEAH concerning Covered Actors and/or in connection with Fund-related activities but not involving any UN Implementing Entity, should be submitted via the Fund's Ad Hoc Complaint Handling Mechanism*". Additionally, we would also suggest including a sentence requesting that the Fund submits to the UN Implementing Entity involved any matter brought to the attention of the Fund, whether associated with the Fund-supported projects or not, involving a member of personnel or activity of the UN Implementing Entity.

(IE 6)

Feedback

Our comments are just focusing on the implementing entities responsibilities:

100. *Does the draft SEAH policy address the key issues and risks that should be mandated? Are there any elements which are not covered in the draft of the draft SEAH policy? Comprehensiveness and clarity: Does the Policy clearly and comprehensively define the scope and types of misconduct it covers (i.e. sexual exploitation, abuse, and harassment)? Yes*

101. *Implementation feasibility: Are the roles and responsibilities of Covered Actors and Implementing Entities clearly outlined and feasible to implement? Is further clarification or support needed?* In relation to the responsibilities of Implementing Entities, we kindly suggest cross-referencing the specific sections of the AF’s Environmental and Social Policy related to SEAH prevention and response.

102. *Survivor-centered approach: Does the policy effectively reflect a survivor-centered approach to addressing SEAH, and what enhancements could strengthen this focus? Accessibility and Reporting Mechanism: Are there ways to improve these to ensure accessibility and safety, particularly for individuals in vulnerable or remote contexts?* According to the Policy, reports of SEAH concerning Covered Actors and/or in connection with Fund-related activities should be submitted via the Fund’s Ad Hoc Complain Handling Mechanism. We kindly suggest clarifying whether this Mechanism will also handle complaints involving non-Covered Actors, such as contractors engaged by an Implementing Partner. In such cases, how would the AF’s Complain Handling Mechanism interact with the Implementing Partner’s grievance mechanism and project’s grievance mechanism? it would be helpful to explain how the Fund’s Complaint Handling Mechanism coordinates with the grievance mechanisms of the Implementing Partner, the Executing Agency, and the specific project.

103. *Prevention and Accountability Measures: Is there sufficient attention to prevention including integration of SEAH safeguards in recruitment, project design, and partner engagement? Does the policy include adequate measures to ensure compliance and deter misconduct? Does the policy align well with related Fund policies such as the Environmental and Social Policy and the Gender Policy and Action Plan? Are there areas where further integration or cross-referencing is needed?* Currently, SEAH/GBV risks are not explicitly addressed in the AF’s Environmental and Social Policy or Gender Policy. We suggest considering cross-referencing the Policy on Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment in future revisions of these policies, as well as clearly outlining the obligations of Implementation Entities regarding SEAH prevention and response. In the interim, the development of a technical note or guidelines on the addressing of SEAH risks in AF-funded operations could provide valuable guidance and promote consistency across projects.

(IE 7)

Feedback

104. Reference to “Introduction” paragraph 4. Comment: *What happens if the Fund's and IE's policies and procedures have conflicting or contradictory provisions? May need to clarify how this will be mitigated.*

105. Reference to “Definitions” paragraph 6.b. Comment: *Each IE needs to have a SEAH focal person who will be the first point of contact for the Fund on SEAH matters.*

106. Reference to “Definitions” paragraph 6.f. Comment: *Suggest to include the term complainant as well, who may or may not be the survivor. They may just be a witness to an incident and file a report.*

107. Reference to “Responsibilities of Covered Actors” paragraph 20 (“Covered actors”). Comment: *What about IE staff? they should also be prohibited.*

108. Reference to “Responsibilities of Covered Actors” paragraph 20 (“sexual activity with a child”). Comment 1: *May need to elaborate a bit more to include points such as not taking or*

using nude pictures/videos of children in the Fund's activities. Taking consent from the child's parents/guardians before taking their pictures or collecting information. Comment 2: Agreed and not just sexual abuse but all child rights violations under CRC.

109. Reference to “Responsibilities of Covered Actors” paragraph 24. Comment: *Proper orientation of the policy to all actors engaged with understanding of reporting, as well as need to mention there is no time limits within the course of the project to report- and even after the project ends?How to reflect in policy.*

110. Reference to “Reporting” paragraph 32. Comment: *If they witness an incident, they MUST report. suggest reviewing whether the terms 'may' and 'strongly encouraged' should be replaced by must.*

111. Reference to “Reporting” paragraph 35. Comment: *Anonymous reports or whistleblowing.*

112. Reference to “Reporting” paragraph 36 (“may”): Comment: *will result in disciplinary action, if proven.*

113. Reference to “Reporting” paragraph 37. Comment: *Given the challenges in obtaining direct evidence in PSEAH cases, the investigation will consider all available information- testimonies, documents, digital records, and circumstantial evidence and triangulate these to establish findings on a balance of probabilities, ensuring a fair and survivor-centered approach.*

(IE 8)

Feedback

Introduction

The Sahara and Sahel Observatory (OSS) welcomes the opportunity to comment on the draft Policy on Safeguarding Against Sexual Exploitation, Abuse and Harassment (SEAH). We commend the Adaptation Fund’s strong stance on zero tolerance and its alignment with international safeguarding norms.

This note presents OSS’s feedback, structured around the guiding questions provided, highlighting both strengths and areas where further clarification or reinforcement would strengthen implementation. As an accredited Implementing Entity (IE) with operational engagement in complex and high-risk contexts, OSS underscores the importance of a SEAH policy that is not only principled but also implementable, inclusive, and sensitive to institutional diversity and field realities.

114. *Does the draft SEAH policy address the key issues and risks that should be mandated? Are there any elements which are not covered in the draft?* The draft SEAH policy addresses several critical risks—particularly abuse of power, whistleblower retaliation, and the vulnerability of affected populations—through a well-defined zero-tolerance framework and clear institutional obligations. It aligns with international definitions (UN SGB/2003/13; GA A/RES/73/148) and lays out important principles for conduct and accountability. However, the policy would be further strengthened by: Explicit integration of intersectional vulnerabilities (e.g., gender identity, disability, socio-economic status), especially in the introductory and guiding principles sections.

115. Recognition of SEAH risks in digital and hybrid environments, which are only implicitly mentioned in the definition of “Workplace” (Section 6g).

116. Inclusion of a standalone summary or annex outlining Implementing Entities’ (IEs) core SEAH responsibilities, distinct from the Environmental and Social Policy, to ensure clarity and consistency across diverse capacities.

117. *Comprehensiveness and clarity: Does the Policy clearly and comprehensively define the scope and types of misconduct it covers (i.e. sexual exploitation, abuse, and harassment)?* Yes. The policy provides comprehensive definitions using internationally agreed language and clearly distinguishes SEAH components. It also includes the definition of “Survivor,” which is essential for a rights-based, victim-centered approach. Nonetheless, some enhancements are suggested: Add reference to **trauma-informed approaches** when describing survivor support (Section 6).

118. Improve consistency in terminology (e.g., capitalization of “Covered Actors”).

119. Clarify **jurisdictional interfaces with national laws**, especially for IEs operating in multiple legal contexts.

120. *Implementation feasibility: Are the roles and responsibilities of Covered Actors and Implementing Entities clearly outlined and feasible to implement? Is further clarification or support needed?* While the roles of Covered Actors are clearly defined and operationally sound (Sections 18–24), including mandatory disclosures, reporting, and cooperation in investigations, the expectations for Implementing Entities are more general and would benefit from greater specificity and support mechanisms:

- Responsibilities are presented in general terms but would benefit from clearer guidance on **compliance assurance** (e.g., requiring submission of SEAH policies, periodic audits, or compliance attestations).
- Accessibility standards for grievance mechanisms are not detailed—recommend requiring **survivor-sensitive, gender-responsive, and locally adapted channels**.
- Suggest including **capacity-building support**, such as SEAH training modules or adaptable policy templates for IEs in resource-constrained contexts.

121. *Survivor-centered approach: Does the policy effectively reflect a survivor-centered approach to addressing SEAH, and what enhancements could strengthen this focus?* The policy rightly emphasizes informed consent, confidentiality, and the “do no harm” principle. However, it lacks operational clarity in key areas:

- The policy does not mention **referral pathways or services** (e.g., psychosocial, legal, medical) available to survivors.
- Recommend specifying **minimum expectations for survivor support**, including whether responsibilities lie with the Fund or the IE.
- Recommend including **survivor feedback mechanisms**, such as anonymous surveys or consultation loops, in the review cycle (Section 39).

122. *Accessibility and reporting mechanism: Are there ways to improve these to ensure accessibility and safety, particularly for individuals in vulnerable or remote contexts?* Sections 32–38 lay out multiple reporting avenues, including anonymous reports and protections against

retaliation. However: Accessibility in practice is not addressed: no mention of language, literacy, mobile access, or support for persons with disabilities.

123. Recommend mandating that IEs ensure reporting mechanisms are accessible and culturally appropriate across contexts.

124. Encourage adding expectations for **community-level or field-based entry points** for reporting SEAH in remote or informal environments.

125. *Prevention and accountability measures: Is there sufficient attention to prevention including integration of SEAH safeguards in recruitment, project design, and partner engagement? Does the policy include adequate measures to ensure compliance and deter misconduct?* Prevention is well embedded in recruitment and project design (Sections 25–27), and the Fund’s refusal to engage with SEAH-tolerant partners is commendable. To strengthen accountability: **Clarify the consequences for IEs and contractors** in case of non-compliance.

126. Recommend incorporating **SEAH risk screening** in project appraisal processes.

127. Include **standardized compliance reporting templates** to support consistent monitoring across Fund operations.

128. *Alignment with other Fund policies: Does the policy align well with related Fund policies such as the Environmental and Social Policy and the Gender Policy and Action Plan? Are there areas where further integration or cross-referencing is needed?* The policy affirms alignment with ESP and the Gender Policy in Sections 5 and 31. However: There is limited operational guidance on how SEAH risks should be embedded into project-level tools (e.g., risk assessments, monitoring plans).

129. Recommend including **explicit cross-references** to ESP guidance documents, Code of Conduct, and Operational Policies in an annex or implementation note.

130. A **procedural annex** for IEs would also enhance coherence and implementation quality.

131. *Additional comments, concerns, or suggestions that could improve the clarity, effectiveness, or inclusiveness of the SEAH Policy?* Recommend **disaggregated reporting** of SEAH cases in annual summaries (Section 30), while preserving anonymity.

132. Clarify the **types of disciplinary or corrective measures** (Section 28) and their applicable legal or institutional frameworks (Section 38).

133. Include **principles for assessing credibility** of allegations (Section 37) to balance survivor protection with safeguards against malicious reporting.

134. Emphasize **contextual SEAH risk variation** (e.g., fragile states, displacement settings), and encourage flexible, proportional responses by IEs.

135. Suggest including a dedicated **‘Acronyms and Abbreviations’** section at the beginning or end of the policy for quick reference and enhanced clarity, particularly given the technical nature of some terms and external references.

Conclusion

The OSS acknowledges the strength and ambition of the draft SEAH policy, which lays a critical foundation for institutional integrity, survivor protection, and responsible implementation. We believe that with a few targeted refinements—particularly around accessibility, survivor support, practical guidance for Implementing Entities, and contextual adaptation—the policy can become a leading example of safeguarding practice in climate finance.

We thank the Secretariat for the opportunity to contribute to this process and remain available for continued dialogue on the operationalization of the SEAH framework within the Fund’s ecosystem.

(IE 9)

Feedback

136. Clarify accessibility pathways and adaptation for affected communities. The policy may benefit from additional detail on how it will ensure accessibility to affected communities and beneficiaries, including but not limited to: translation into local languages; culturally appropriate awareness-raising; and information dissemination through preferred community channels. These considerations may be reflected more comprehensively in paras 4, 7, or 31, to facilitate more inclusive implementation.

137. Acknowledge and integrate sociocultural and regional contexts. The current draft could more clearly recognise that different regions have diverse cultures; that sociocultural or legal contexts influence SEAH programming; and that context-specific nuances or norms must sufficiently be reflected in implementation. The policy may also acknowledge that risks of SEAH are heightened for persons at the intersection of multiple identities or vulnerabilities, including gender, age, disability, among others. For instance, it may integrate the engagement of cultural experts or alignment with social cohesion frameworks within the guiding principles (paras 11–17), and training expectations (para 27) could include a requirement for sociocultural competency.

138. Review integration and potential overlaps with existing Fund policies. Elements of SEAH prevention are already embedded in the Fund’s ESP and Gender Policy. To avoid duplication of monitoring, reporting, and grievance structures, it may be useful to clarify how this SEAH Policy complements or integrates with those frameworks (particularly in paras 5, 26, and 31) – as an example through the provision of a concordance matrix outlining SEAH integration into the ESMS screening framework and/or SEAH safeguards inclusion in the gender assessment and action plan templates.

139. Strengthen language on survivor-centred approach and anti-retaliation mechanisms. While para 29 refers to protection for individuals reporting SEAH in good faith, clearer language could be included on how retaliation will be prevented, what confidentiality safeguards apply, and how sensitive disclosures will be managed ethically. Additional clauses articulating these protections may support trust in reporting systems and ensure a survivor-centred approach and trauma-informed response (para 16).

140. Offer implementation guidance and tools for IE-level operationalisation. Para 31 outlines the responsibility of IEs to have adequate SEAH safeguards in place. Consider providing supplementary guidance or a toolkit to accompany the policy – particularly addressing SEAH risk assessments across the project cycle, focal point training, culturally-grounded community engagement, and how existing grievance structures under the ESP and Gender Policy can be leveraged or adapted. This would support IEs in contextualising and operationalising SEAH measures, including during early project design.

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(IE 10)

Feedback

141. Reference to “Guiding Principles” paragraph 12. Comment: *Amendment Recommendation (including in the shared responsibility active participation): "Preventing and responding to SEAH is a shared responsibility. All Covered Actors are expected not only to uphold the highest standards of conduct but also to actively intervene, report and support efforts to create and maintain safe and respectful environments in Fund-related activities. "*

142. Reference to “Guiding Principles” paragraph 15. Comment: *Amendment recommendation: including "diligently investigate and promptly address" within the Reporting and Response Clause as "addressed promptly "does not adequately indicate the actions that must be taken to investigate the allegations. Timeline for investigation has not been inserted within this Policy, is this deliberate, so that the implementing entities jurisdictional legislative framework can take precedence?*

143. Reference to “Guiding Principles” paragraph 16. Comment: *Expounding on the mechanisms of how this will be done (example: ensuring access to appropriate support services such as medical, psychological etc. where feasible and appropriate to the survivors).*

144. Reference to “Responsibilities of Covered Actors” paragraph 19. Comment: *Recommendation: rephrasing the 2nd sentence to read: "They must also actively work to prevent and object acts of SEAH committed by others in connection with Fund-related activities, rather than encouraging or condoning them".*

145. Reference to “Responsibilities of Covered Actors” paragraph 21. Comment: *Recommendation: expanding and or including within the definition of terms "suspected SEAH", presently the SEAH terms refer to (actual, threatened and attempted actions). How to reflect in policy.*

146. Reference to “Responsibilities of Covered Actors” paragraph 21 (“suspected SEA”). Comment: *this term is used several times, should there be some definition especially since the document makes reference to "actual or suspected SEAH, as defined by this Policy"?*

147. Reference to “Responsibilities of Covered Actors” paragraph 22. Comment: *Recommendation: expounding the clause to include instances where the Covered Actors are (the suspects, witnesses and victims) as their role of cooperation in the investigation is not clear.*

148. Reference to “Responsibilities of Covered Actors” paragraph 22. Comment: *Is it understood that 22 relates only to where a CA is accused or is aware of an incident?*

149. Reference to “Responsibilities of Covered Actors” paragraph 23 (“involvement in SEA”). Comment: *Recommendation: expounding on the word "involvement".*

150. Reference to “Responsibilities of the Adaptation Fund” paragraph 28. Comment: *Recommendation: pertaining to the "natural justice principle": the reported allegations must be addressed in a just, impartial and thorough manner (the right to be heard and the rule against bias).*

151. Reference to “Reporting” paragraph 32 (“entity”). Comment: *Recommendation: expanding the word "entity" to include (project beneficiaries, Fund personnel etc).*

152. Reference to “Reporting” paragraph 32 (“actual or suspected SEA”). Comment: *Recommendation clearly defining "suspected SEAH" within the definitions as stated in a previous comment.*

153. Reference to “Reporting” paragraph 35 (“sufficient detail”). Comment: *Recommendation to be placed within the clause: “While anonymity is respected in these reports, the provision of specific and verifiable detail will significantly improve the thorough and timely investigation.”*

154. Reference to “Reporting” paragraph 36. Comment: *What if the complainant is outside the control, how will the accused get redress?*

155. Reference to “Policy Implementation, Monitoring and Review” paragraph 39. Comment: *Recommendation including: “The Policy will be reviewed in line with the Fund’s regular policy review cycle (which may be stated, so there is no ambiguity in this statement of fact), incorporating lessons learned, emerging best practices, and feedback from survivors and stakeholders to ensure its continued effectiveness and relevance.” Aligned with clauses 15, 16 and 17 of the Policy.*

(IE 11)

Feedback

156. Reference to “Responsibilities of Covered Actors” paragraph 20. Comment: *Can also include that sexual activity with children is prohibited regardless of the “age of consent” as per local laws.*

157. Reference to “Responsibilities of the Adaptation Fund” paragraph 26 (“provide guidance”). Comment: *This is a bit vague and may need clarity. Will this take the form of guidance documents or another specific type of support?*

158. Reference to “Reporting” paragraph 37 (“investigative body”). Comment: *Appropriate investigative body within the AF organization or the country? Will AF refer any reports to the local law enforcements?*

(IE 12)

Feedback

159. *Prevention and Accountability Measures:* Whilst the policy deals with reporting, and to some extent the response (Paragraph 15, 28 and 32-38) the policy does not specify the investigation process. It is unclear if there established structures are in place to manage the investigative process, or if this will be conducted internally or by an independent body outside the Fund. This policy could be strengthened by adding this information.

160. *Survivor-centered approach:* The policy could be further strengthened through the addition of a guiding principle on gender responsiveness and intersectionality, thereby acknowledging that the experience of SEAH is shaped by multi-faceted things, e.g. gender, race, disability, and other intersecting factors. This approach will support actions that are inclusive and responsive to the diverse needs and realities of all individuals.

161. *Survivor-centered approach:* In addition to protection through anonymity, will survivors have access to other forms of support, e.g. any additional measures to ensure safety, access to counselling or psychological support if needed. These measures often form part of such policies.

(IE 13)

Feedback

We have read the policy and have no particular comments to make.

(IE 14)

Feedback

162. *Implementing entities will use appropriate organisations to provide culturally sensitive awareness or support services related to GBV and SEAH*

163. *For SEAH-specific complaints, grievance redress mechanisms should be survivor-centred and gender-responsive.*

164. In #36 **Reports must be made in good faith** and provide where possible any information or evidence in their possession that would support a reasonable belief that SEAH may have occurred.

(Public 1)

Feedback

165. Clarity and coverage of definitions: The policy provides clear and internationally aligned definitions of sexual exploitation, abuse, and harassment, establishing a shared language for all stakeholders. This is a solid foundation for policy implementation and communication.

166. Role of Implementing Entities additional clarity needed: While the policy references the role of Implementing Entities (IEs), it defers all specific responsibilities to the Fund's Environmental and Social Policy (ESP) and related guidance documents. However, given the critical frontline role that IEs play in project implementation, we strongly recommend that this SEAH policy include:

- A concise list of core obligations for IEs within the main text;
- Clear expectations regarding the development and operationalization of SEAH-specific policies and procedures;
- Requirements for SEAH integration into project design, risk assessments, and stakeholder engagement plans;
- Minimum standards for training, screening, and contractual obligations of partners and subcontractors.

Without this, the operational implications for IEs may remain ambiguous and subject to uneven interpretation across projects and contexts.

167. We encourage the Fund to consider referencing established good practices from other climate funds, such as the Green Climate Fund (GCF).

168. Risk assessment and integration: The draft policy does not explicitly require the identification or assessment of SEAH risks at the project level.

169. Complaints and reporting mechanisms: While the policy outlines reporting channels at the Fund level, it does not elaborate on requirements for local-level or project-specific complaints mechanisms.

170. Coherence and Cross-Referencing with Other Fund Policies: Although the policy refers to the ESP and Gender Policy, it lacks operational cross-referencing. We suggest developing a short annex or reference table to show how SEAH obligations align with and complement:

- The Fund’s Environmental and Social Policy and its safeguard areas;
- The Gender Policy and Action Plan;
- The accreditation standards for Implementing Entities.

Such an annex would promote policy coherence and aid in implementation.

171. Monitoring, reporting and accountability questions. We recommend further clarity on how the Fund will monitor compliance by Implementing Entities. For example:

- Will reporting on SEAH be required in annual project performance reports?
- Will SEAH-related capacity and systems be considered during reaccreditation?

Clarifying these questions would enhance accountability and enable continuous learning

Annex C: Draft Implementation Note on Strengthening Safeguards Against SEAH

Actions	Timeline	Responsibility
Training/Guidance Materials		
<ul style="list-style-type: none"> Develop or use a partner’s e-training course on SEAH 	FY27	Secretariat
Policy Alignment		
<ul style="list-style-type: none"> Review and update (as needed) the relevant policies of the Adaptation Fund, including the Operational Policies and Guidelines, the Risk Management Framework, Code of Conduct, Zero Tolerance Gender Policy and Action Plan, and (re) Accreditation Standards for IEs, to ensure alignment with SEAH safeguards. 	FY26-27, after Board’s approval of SEAH policy	Secretariat
Complaints Handling		
<ul style="list-style-type: none"> Review and update the Ad-hoc Complaints Mechanism to better reflect SEAH allegations and their handling. 	FY27	Secretariat
Internal Safeguarding		
<ul style="list-style-type: none"> Review and update AF’s recruitment procedures/SOPs to include PSEAH reference checking. 	FY26-27	Secretariat
Working with Implementing Entities (IEs)		
<ul style="list-style-type: none"> Develop detailed guidance for IEs on their responsibilities to safeguard against SEAH. 	FY26-27	Secretariat
<ul style="list-style-type: none"> Review and update the template project agreements with IEs to include SEAH safeguarding responsibilities, 	FY27	Secretariat
<ul style="list-style-type: none"> Develop and roll out capacity-building efforts to support IEs in implementing SEAH safeguards. 	FY27	Secretariat

