



ADAPTATION FUND

POLICY ON SAFEGUARDING AGAINST SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT

¹ The Adaptation Fund Board adopted the Policy on Safeguarding against Sexual Exploitation, Abuse, and Harassment in April 2026 through Decision B.46/7.

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.
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 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.

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.

- c) **“Sexual Abuse”** means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.²
- 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.³
- 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.⁴
- 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 hours.

² 2003 UN Secretary-General's Bulletin on Special Measures for Prevention from Sexual Exploitation and abuse (ST/SGB/2003/13).

³ Ibid.

⁴ 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.

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 multidimensional factors such as gender, age, disability, displacement, and employment status. 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.⁵
 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 authority⁶.
 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.

⁵ 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.

⁶ 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.