

Redress



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Independent Redress Mechanism

Grievances and Complaints

Initial Steps Report

GCF Project FP203: Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals

Case C-0015-Colombia

18 August 2025



Initial Steps Report

The Terms of Reference (TOR)¹ and the Procedures and Guidelines (PGs)² of the Independent Redress Mechanism (IRM) set out how the IRM deals with grievances or complaints from a person, group of persons, or community who have been, or may be affected by the adverse impacts of a GCF funded project or programme. Once a grievance or complaint has been declared eligible, the IRM, as part of its initial steps, holds discussions with the complainant(s) and potential parties to understand the issues at hand, explain the processes of the IRM, and determine whether the parties wish to proceed with problem solving or compliance review or a combination of both. Under the IRM terminology, this phase is called the “initial steps phase.”

In this phase of the process, the IRM does not gather information to determine faults or make judgments on the merits of the complaint. The objective of this report is to collect parties’ perspectives on the alleged concerns. This report does not intend to substantiate any of the allegations or perspectives.

This report documents the initial steps described above as well as its outcome.

SUMMARY OF OUTCOME

On 7 May 2025, the IRM received and acknowledged a complaint relating to GCF Project FP203 “Heritage Colombia (HECO): Maximizing the Contributions of Sustainably Managed Landscapes in Colombia for Achievement of Climate Goals.”³ The complainant requested confidentiality, and the IRM has granted it in accordance with its TOR and PGs.

GCF Project FP203 aims to introduce a paradigm shift in Colombia’s approach to sustainable management of ecosystems. The project is intended to accomplish this via a public-private partnership model that seeks to secure financing in perpetuity for the management of key ecosystems and large-scale landscapes across the country. FP203 was approved during the 35th meeting of the GCF Board on 16 March 2023. The Accredited Entity of this Project is the World Wildlife Fund, Inc. The Executing Entities for the project are WWF Colombia and Fondo Patrimonio Natural (FPN). The Project is ‘Under Implementation’ with an expected completion date of 14 July 2033.

The complainant has raised several concerns related to labour and working conditions associated with their term of employment within the relevant Executing Entity and with relevance to GCF Project FP203. The issues raised include the following: 1) disparity in pay on the basis of personal characteristics; 2) inadequacies in ensuring proper functioning of grievance redress mechanisms; 3) improper or unauthorised access of confidential materials maintained by complainant; 4) impacts to health and well-being as a result of workplace-related tension; and 5) non-renewal of contract as a retaliatory measure following complainant’s notification to the Executing Entity of several reports of alleged sexual harassment and alleged gender-based violence.

On 6 June 2025, the IRM determined the complaint eligible under its TOR and PGs.⁴

¹ Available at: <https://irm.greenclimate.fund/document/irm-tor>

² Available at: <https://irm.greenclimate.fund/document/2019-procedures-and-guidelines-irm>

³ More information about the project is accessible here: <https://www.greenclimate.fund/project/fp203>

⁴ Available at: <https://irm.greenclimate.fund/sites/default/files/case/eligibility-determination-c0015-colombia.pdf>

Consequently, the IRM started engaging with the complainant and other stakeholders in the initial steps phase to better understand the issues in the complaint and to provide further information on the two complaint handling modalities, as indicated in paragraph 36 of the IRM PGs.

During the initial steps phase, the IRM does not gather information to determine the merits of the complaint or assess any compliance-related matters. Its objective is limited to better understanding parties' perspectives and determining whether the complaint could be processed through dispute resolution.

During the initial steps phase, the IRM team met with a number of stakeholders, including the complainant and key stakeholders such as the World Wildlife Fund Inc., the GCF Secretariat and the relevant Executing Entity. The IRM engaged with both project personnel and grievance redress mechanism personnel to gain a better understanding of the existing mechanisms and policies governing the handling of grievances at both the project-level and institutional-level. In engagements with parties, the IRM team clarified that its role was not to confirm the merits of the allegations or assess the project's performance, but to gather perspectives of key stakeholders.

In conversations with the IRM, the complainant emphasized the importance of ensuring adherence to GCF Policies pertaining to SEAH and Gender. The complainant highlighted that they were specifically recruited to work on GCF Project FP203 for a fixed-term contract of one year. The complainant noted that in addition to their responsibilities vis-à-vis project beneficiaries, they were further requested to develop mechanisms and frameworks internally for the Executing Entity, with an eye towards promoting gender-mainstreaming and awareness of SEAH-related matters via trainings and meetings. The complainant alleged that in the course of carrying out these responsibilities, they received complaints pertaining to sexual harassment in the workplace (involving personnel tasked to work partially or fully within the GCF Project) which were subsequently escalated to relevant management personnel for further action. Following this notification, the complainant alleges that they were told to pause their activities pertaining to gender-mainstreaming and SEAH-related trainings. They further allege improper access to confidential files containing sensitive and identifying information of complainants, by unknown person/persons. The complainant further alleges that their contract was not renewed as a retaliatory measure, following the events described above. Following interactions with the IRM team on choice of process, the complainant indicated their preference to handle the above-mentioned matters via a compliance review process.

The complainant mentioned they had made several attempts to raise the SEAH-related concerns with various stakeholders, including the project steering committee, members of the Executing Entity and Accredited Entity. The IRM takes note that some grievance-handling processes may be ongoing in parallel to the IRM process that could be seeking to address the concerns raised. The IRM is in communication with stakeholders to ensure mutually efficient and proactive communications on key procedural steps.

The IRM's engagement with the GCF Secretariat highlighted the key timelines and expectations in the initial steps phase, as well as offering information on the complaints-handling processes and the two modalities available to address concerns. The IRM team met with the project team responsible for monitoring project implementation and relevant safeguards and legal personnel. The GCF Secretariat expressed their willingness to support the IRM in the next phases of the complaints-handling process.

The IRM's engagements with the Accredited Entity focused on the operations of grievance redress mechanisms at the Accredited Entity level and at the project-level. The Accredited Entity offered clarifications on the processes available via integrity channels and the community-based grievance mechanism to handle complaints, including complaints from person/persons working on GCF Projects. The Accredited Entity sought clarifications on whether IRM processes may incumber ongoing project operations. The IRM clarified that its complaints-handling processes are independent of project implementation, which is overseen and monitored by the GCF Secretariat.

The IRM engaged with the relevant Executing Entity to better understand their perspectives on the complaint and to explain the IRM process. In a meeting with the IRM, the Executing Entity noted this was its first GCF Project and that it was still adapting to GCF Policy requirements. The Executing Entity stated that the allegations outlined in the IRM complaint may not be accurate but that the organisation took the matter seriously.

Prior to the finalization of the Initial Steps Report, the Executing Entity submitted a written statement to the IRM stating that it had acted in accordance with GCF guidelines and policy framework, as well as the terms of reference and plans agreed with the Accredited Entity. The Executing Entity provided additional information and documentation pertaining to issues raised in the complaint, as well as other matters. For the purposes of this report, the IRM is summarizing the parts of the response that intersect with issues identified in the summary of the complaint.

The Executing Entity refuted the claim pertaining to wage disparities on the basis of personal characteristics, stating that salaries at the organization were determined via objective methodologies and were based on various factors including job description and responsibilities. On the allegation of unauthorized access to confidential materials, the Executing Entity detailed the tools available for remote access and stated that there is no evidence of such violation, and that such concerns could be attributed to a possible misunderstanding or technical error.

On alleged deficiencies in the internal complaints and redress mechanisms, the Executing Entity asserted that the complainant did not use the official channels made available. The Executing Entity expanded further on the management approach of the organization and the channels available to process claims and grievances. The Executing Entity noted that the organization has a health and safety work scheme and a workplace wellbeing committee. On the allegation of specific instances of sexual harassment and gender-based violence, the Executing Entity noted that the manner of receipt of the concerns (through an anonymous channel that was confidential and private to the Executing Entity alone) meant that issues could not be processed as specific complaints.

The Executing Entity stated that allegations regarding a stressful working environment were not substantiated. According to the Executing Entity, these concerns were not formally reported to supervisors or human resources personnel. In a feedback meeting before the complainant's contract ended, the Executing Entity reported that the complainant's attitude was interpreted as intimidating and disrespectful towards the project team and management committee.

Regarding the non-renewal of the contract, the Executing Entity indicated that this action was taken in compliance with relevant regulations and procedures. The Executing Entity attributed the decision for non-renewal to the sensitive nature of relationships with various project-affected communities, including rural, indigenous, and Afro-descendant groups. The Executing Entity believed that extending the complainant's contract would create unnecessary tensions within these relationships.

At the conclusion of the Initial Steps Phase, the IRM observed that dispute resolution was not seen as an appropriate channel by some parties for handling the concerns raised in the complaint. Therefore, the IRM is referring this case to compliance review in terms of paragraph 37 of the IRM's PGs.

NEXT STEPS

For the above-mentioned reasons, the IRM declares the initial steps phase concluded and refers the complaint to compliance review for further processing. For the avoidance of doubt, the Compliance Review phase will commence on the date of publication of the Initial Steps Report.

In accordance with paragraph 51 of the PGs, the IRM will, within 14 days, forward the grievance or complaint (duly redacted if necessary) to the Executive Director of the GCF Secretariat with a request for a formal response. The GCF Secretariat will have 21 days from the date of the request to respond to the complaint, after which the IRM will prepare a compliance appraisal report determining whether there is *prima facie* evidence that the complainant has been affected or may be affected by adverse impacts through non-compliance of the GCF-funded project or programme with GCF operational policies and procedures and prepare a compliance appraisal report. For further information, please refer to paragraphs 50-70 of the IRM's Procedures and Guidelines.

[Signed]

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