

# Redress



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Independent  
Redress  
Mechanism

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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-0018-Colombia**

**22 May 2026**

## Initial Steps Report

The Terms of Reference (TOR)<sup>1</sup> and the Procedures and Guidelines (PGs)<sup>2</sup> 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 12 December 2025<sup>3</sup>, the IRM 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.”<sup>4</sup> The complainant requested confidentiality, and the IRM 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 (AE) 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 brought to the attention of the IRM several concerns related to the labour and working conditions associated with their term of employment with the relevant Executing Entity. As confidentiality has been requested and granted, the IRM is providing a summary of the concerns raised. The complainant alleges the following:

- 1) Instances of inappropriate behaviour in the workplace, amounting to a hostile work environment;
- 2) Ineffective implementation of the Executing Entity’s Protocol for the Prevention of Gender-Based Violence and Sexual Harassment;
- 3) Lack of effective action in response to the filing of a formal complaint with the Executing

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

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

<sup>3</sup> The complaint had been submitted to the IRM in April 2025, but processing of eligibility was deferred pending considerations related to retaliation risks, choice of complaint forum and confidentiality concerns.

<sup>4</sup> More information about the project is accessible here: <https://www.greenclimate.fund/project/fp203>

Entity regarding the aforementioned incidents;

4) Adverse impacts to well-being as a result of workplace-related incidents, including psychological damage, impairment of dignity, revictimization and loss of income; and

5) End of contractual relationship between complainant and the Executing Entity due to inaction and lack of redress with regard to allegations of an unsafe or hostile work environment.

On 2 February 2026, the IRM determined the complaint eligible under its TOR and PGs.<sup>5</sup> Consequently, the IRM started engaging with the complainant in the initial steps phase to better understand the issues in the complaint and to provide further information on the two complaint handling modalities (problem solving and compliance review), 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 problem solving.

During the initial steps phase, the IRM team met with the complainant to better assess their request for confidentiality and any potential risks of retaliation<sup>6</sup> and to consider steps to minimise and mitigate such risks. Confidentiality serves as the primary measure through which the IRM manages risks of retaliation. The IRM recognises that retaliation associated with IRM processes can threaten the integrity and effectiveness of the complaints-handling process. The IRM further clarified with the complainant the provisions of GCF's Policy on the Protection of Whistleblowers and Witnesses (PPWW)<sup>7</sup> that may have relevance to an IRM complaint-handling process. At the conclusion of these engagements, the IRM and the complainant clarified the extent of non-disclosure of case-related information and the handling of confidentiality within the complaints-handling process. Steps taken by the IRM to protect confidential information may include applying a "need to know" standard in disclosing information, documenting access rights of various stakeholders, labelling and storing information appropriately, and planning for scenarios in which the information is accidentally disclosed.

Following clarification on confidentiality, the complainant discussed options for problem solving and/or compliance review to address the concerns in the complaint. Following discussions with the IRM team, and with clarifications from relevant parties, the complainant expressed willingness to engage in problem-solving, with the understanding that a compliance review process may be triggered at any time if a problem-solving process is deemed not feasible or satisfactory by the complainant.

The complainant shared with the IRM their disappointment in the continued lack of individual redress and/or redress for the financial and emotional impacts they say they experienced. The complainant further expressed concern over the perceived failure to implement workplace policies at the Executing Entity meant to protect victims of gender-based violence and/or

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<sup>5</sup> Available at: [C0018 Colombia | Independent Redress Mechanism | Green Climate Fund](#)

<sup>6</sup> The IRM understands retaliation may "include, for example, harassment, threats, violence, damage to property, discriminatory treatment, impairing or harming, or threatening to impair or harm directly or indirectly, any relevant person or the property of the person, the withholding of any entitlement, and dismissal from or deterioration in terms and conditions of employment or any other office." See [module-8-public-version-amended-january-2021\\_0.pdf](#)

<sup>7</sup> See [Policy on the protection of whistleblowers and witnesses | Green Climate Fund](#)

sexual exploitation, abuse and harassment. The IRM engaged with the complainant to explain how compliance review and problem-solving would handle matters related to issues of gender, gender-based violence and sexual exploitation, abuse and harassment. The complainant expressed a willingness to engage in problem solving, with appropriate measures taken to safeguard confidentiality and mitigate risks of retaliation.

The IRM subsequently met with key stakeholders in this process, namely the World Wildlife Fund Inc., and the relevant Executing Entity. The IRM sought to understand the willingness of parties to engage in problem solving and provided information on potential options for the design and structure of an IRM-facilitated problem-solving process. The IRM problem solving team clarified that its role is not to confirm the merits of the allegations or assess the project's performance, but to gather perspectives of key stakeholders and support relevant parties reach agreement on the concerns raised with IRM.

The Accredited Entity and relevant Executing Entity separately indicated their willingness to engage in a problem-solving process, facilitated by the IRM, in order to attempt to resolve concerns raised in the complaint.

At the conclusion of the Initial Steps Phase, the IRM was able to confirm that all parties are willing to engage in a problem-solving process with the aim of arriving at a mutually satisfactory agreement that would address the concerns raised in the complaint. The IRM will continue engaging with the GCF Secretariat, as needed, as the case progresses to the problem-solving stage and will look into options to ensure their participation in the problem-solving stage after consulting with relevant parties. The IRM will work with all relevant parties in designing the problem solving process and agreeing on ground rules for the engagement, , which will further elaborate on timelines, agendas and roles for all parties involved.

Problem-solving is a flexible and participatory process focused on assisting parties in finding and/or developing an effective solution to the concerns raised by the complainants. A problem-solving process focuses on addressing the concerns that gave rise to a grievance or complaint in a way that meets the interests of the complainants and the other potential parties and is mutually satisfactory. A problem-solving process does not seek to determine culpability or assign blame, nor is it a compliance review. The entire problem-solving process is conducted in confidence to enable the complainants and other parties to engage with each other, build trust, and collectively explore solutions in a safe and protected space. All information used in a problem-solving process by the parties is held in confidence by the dispute resolution team and will not be used in any future IRM processes, including any potential compliance review.

## **NEXT STEPS**

For the above-mentioned reasons, the IRM declares the initial steps phase concluded and refers the complaint to problem-solving for further processing.

The IRM will work with all relevant parties in designing the problem solving process and agreeing on ground rules for the engagement , which will further elaborate on timelines, agendas and roles for all parties involved.

The problem-solving process should ordinarily be completed within one year of the parties' agreement to pursue it unless an absolute need for an extension arises and is agreed upon by

the parties and the IRM. The IRM hopes that the parties reach an agreement sooner. Once an agreement is reached, the IRM will inform the GCF Board of the result and will monitor the implementation of the agreement.

[Signed]

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