

Redress

Call for Public Comments: Draft Gender Strategy Note of the IRM
23 October 2020



**GREEN
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FUND**

I. Context

1. The Independent Redress Mechanism (IRM) of the Green Climate Fund (GCF) has developed a draft gender strategy note, which outlines the IRM's commitments to a more gender-responsive approach in all its processes and operations.
2. It documents the background for producing the strategy note and specific strategies to make the IRM more accessible to all genders in terms of its five functions.
3. This call for public comments on the IRM's gender strategy note is part of ongoing efforts of the IRM to consult with stakeholders on its processes and procedures. Comments on this strategy note or any issue related to the IRM's work in relation to gender are called for. Any individual or organization may submit comments.

II. Deadline

The deadline for public comments is 5 January 2021 at 23:59 Korean Standard Time.

III. Comments

Comments, in Microsoft Word format, should be sent via email as one document with the subject line "Draft Gender Strategy Note – Public Comments." Comments should clearly indicate:

Full name of the individual or organization
Contact details including telephone and e-mail address

Comments must indicate whether they are provided on behalf of an individual or a group of individuals or an organization or a group of organizations. In the case where the comments are provided on behalf of a group of individuals or organizations, the list of individuals or organizations must be included in the comments.

IV. Disclaimer

Comments provided may be publicly disclosed, made available on the GCF's website, and/or incorporated in whole or in part in documents presented at consultations and to the Board. If any portion of the comments is to be kept confidential: (a) the confidential text should be clearly indicated, and (b) redaction prior to disclosure should be expressly requested in the comments.

ANNEX 1: The IRM's Gender Strategy Note: How to improve its gender responsiveness

As much as climate change affects men and women differently, GCF's climate change projects and programmes can also have varying impacts on different genders. Thus, it is important for the GCF to pursue a participatory and inclusive gender analysis throughout its entire project cycle, especially from a very early stage. However, although GCF takes gender issues seriously from the initial phase of the project cycle, including through mandatory project/programme-specific gender action plans and gender assessments, the IRM, as an independent unit, has its own mandates and processes that need to be gender-responsive and inclusive. Accordingly, the IRM should develop its own strategies to make itself more approachable to all genders and more gender-responsive and gender-inclusive in all its processes and operations, both internal and external.

This specific need to actively incorporate gender aspects into the IRM's work was triggered by [the Office of the Compliance Advisor/Ombudsman's observation](#) that over the last two years, only 33 per cent of their complainants were women, which suggests that there are potential systematic barriers that women and other marginalised groups face in accessing remedy. In order to address any potential access limitations, it is essential that the IRM prepares its own strategies to do its utmost to be accessible and responsive to all genders. To strengthen the IRM's inclusive approach to its mandate, where all genders are involved and respected, the IRM is committed to taking a gender-responsive approach, which goes "[beyond acknowledging gender gaps \(gender-sensitive approach\) and really doing something about the discrepancies](#)" such as by helping to overcome existing gender biases so that marginalised genders can truly engage and benefit from the IRM procedures. Thus, the IRM prepared this report to briefly document the general to specific and more immediate to long-term approaches that the IRM can adopt to increase its accessibility and responsiveness to all genders.

This task contributes to the GCF's efforts in ensuring that its projects and programmes are more gender-inclusive, particularly by strategizing the ways through which the IRM can be easily accessed by project-affected people of all genders. Through this task, the IRM aims to understand how projects and programmes have varying impacts on different genders, which will allow the IRM to better address complaints from marginalised groups. The IRM also attempts to comprehend the barriers that marginalised genders are facing or may face when accessing the IRM. With an accumulation of ideas provided in the report, the IRM's ultimate goal is to ensure that all genders are able to participate equally in the IRM's processes. However, this report is not an end product; it is rather a living document in which the IRM's new ideas and lessons learned will continue to be incorporated to keep up with its efforts to be gender responsive.

This document is comprised of three sections. It begins with the importance of preparing gender-disaggregated data to reflect on the gender representation of the IRM's stakeholders and allow itself to better respond to complainants' needs. Currently, due to insufficient information about the gender identities of the IRM's stakeholders, the data have not been included in the report and this section instead suggests a way to collect those data for future use. Then, the problem tree analysis tool is used to identify some major accessibility issues that may hinder marginalised gender groups from approaching grievance redress mechanisms, ultimately leading to their heightened vulnerability from GCF projects and programmes. This section offers some practical strategies on how the IRM can tackle the issues that relate to its core functions. It is followed by a table at the end, which suggests specific actions that can be taken within certain timeframes.

I. Gender-disaggregated data

As part of its gender-responsive approach, it is crucial for the IRM to compile data. The data will allow the IRM to reflect on how gender-inclusive it has been and in what potential direction the IRM may be headed

in terms of making it more equally accessible for complainants of all genders. It will first ensure that the IRM has a more diverse and dynamic team (including staff, consultants, subject experts, mediators and interpreters) that is capable of handling different types of complaints. Although having a diverse team does not in itself make the IRM more responsive and apt for handling a variety of issues, the IRM recognises that there is strength in diversity, and that its team should seek to be broadly representative with diverse lived experiences and training. In particular, to offer complainants a variety of options of mediators to choose from, the IRM will continue to recruit mediators from various gender groups and geographic regions, and with gender expertise. From there, the IRM should also obtain information about the genders of all the other stakeholders that engage with the IRM, such as its workshop participants, complainants, mediators involved in cases, etc. For future data collection, the IRM should include a question in all its forms to ask for the respondents' gender identities. An example question may look like the following:

Q. Which gender do you identify with? *

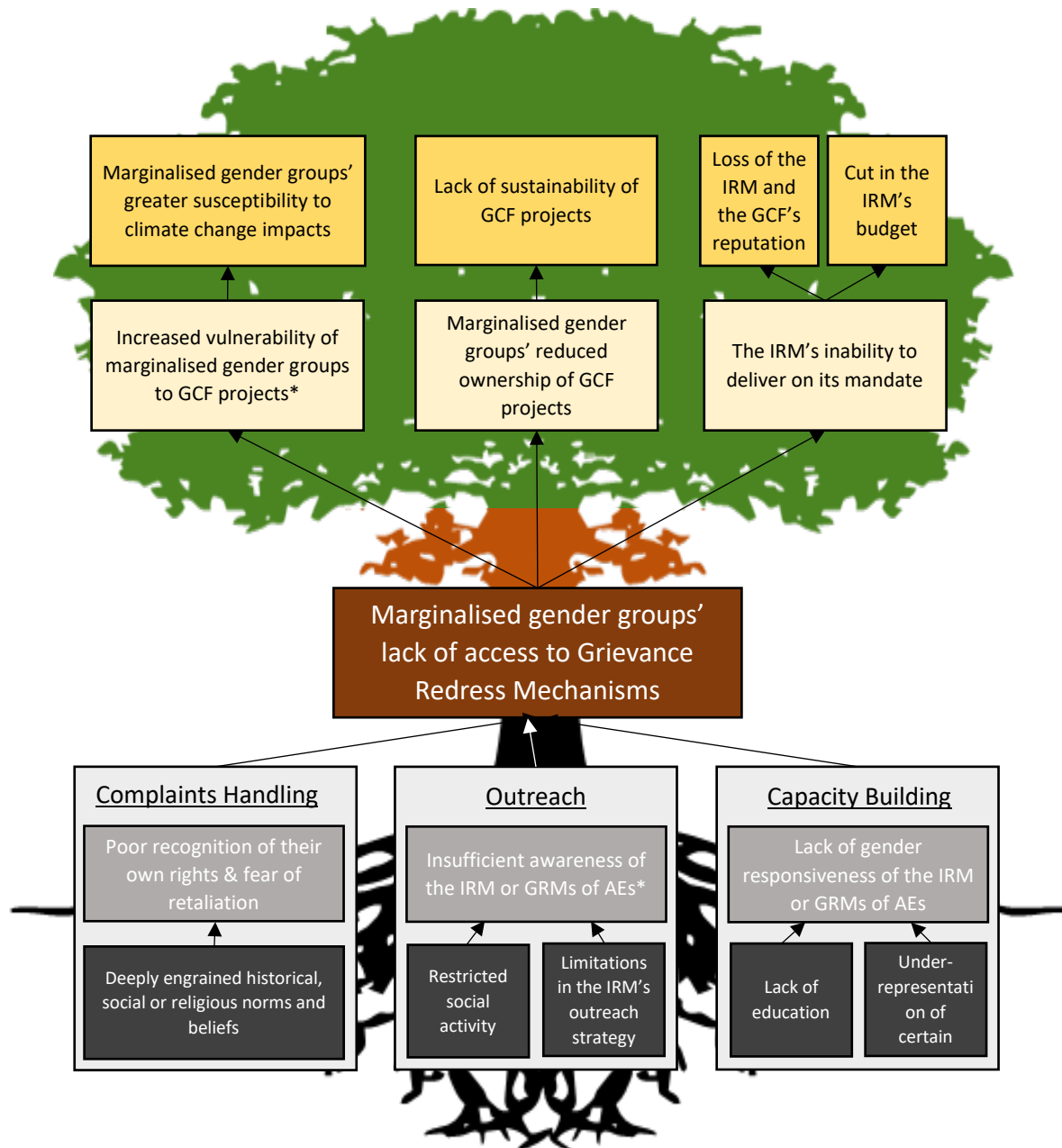
(open field) (e.g. woman, trans-man, gender-fluid, agender)

*The IRM collects information about the participant/applicant's gender identities to improve its responsiveness to all genders. The responses received will be kept strictly confidential by the IRM.

However, the collection of gender-disaggregated data is not to be confused with the idea of putting in place a quota system. In fact, there is no rule as to what percentage of each gender should be represented for each field of expertise. Thus, rather than aiming to reach equal numbers, it is more important to be mindful of the current gender representation and keep track of the IRM's gender inclusiveness. One thing that is clear from the current roster of subject experts, however, is that the IRM needs a gender expert. Considering the sensitivity of the topic and the strategies suggested for the IRM, it is important to keep a gender expert on its roster who can be easily accessed when needed. In addition, the IRM should prepare training materials to educate the IRM personnel to be gender-responsive in all their tasks related to the IRM.

II. Strategies

Since currently the IRM is establishing its foundations and testing out many of its processes, it is also essential to assess the potential gender impacts of its work and strive to avoid any negative impacts in the future. One of the ways to identify where the IRM can start addressing the issue is through a problem tree analysis. A problem tree enables the IRM to identify the major problems that it is facing or may face and the causes and effects of the problems to pinpoint where the IRM can possibly intervene. Just like an actual tree, the bottom layers (*roots*) are the causes and the top layers (*leaves*) are the potential consequences, divided by the major issue (*trunk*) in the middle. An example of a problem tree for the IRM may look like the following:



*AEs refer to the Accredited Entities of the Green Climate Fund

*In this graphic, projects refer to both projects and programmes

This problem tree is a hypothetical one, and the IRM has to continue updating the causal relationship to make it more commensurate with what is actually happening on the ground. Also, this chart can be made up of many more layers with a greater degree of complexity. For example, restricted social activity can be derived from the overload of household chores, and limited outreach of the IRM can be the result of many different factors such as illiteracy, technical challenges and socially inappropriate mechanisms for approaching a certain gender group. However, the current problem tree is still a useful starting point to better equip the IRM with tools to handle future complaints. It illustrates that the main causes that could potentially lead to marginalised gender groups' lack of access to grievance redress mechanisms can be grouped into the IRM's three – out of five – main functions: complaints handling, outreach and capacity building. The two other functions, advisory and processing reconsideration requests, are currently excluded from the tree since they do not have apparent and imminent gender-related accessibility or participatory issues. Once the strategies elaborated on in the document are put into practice, strategies more specific to

these two other functions will be designed. For now, the major considerations relevant to each function are summarised as below.

1) Complaints handling

- Gender assessment

- Acknowledge in the IRM's Supporting Operating Procedure (SOP) on retaliation that gender will be considered during the retaliation risk assessment and that the IRM needs to be cognisant that retaliation risks are likely to present themselves disproportionately and differently for marginalised groups (such as women). People within some particular gender group are likely to be retaliated against by family members or community members of the same or other genders, depending on, amongst other things, the social and/or religious norms of their society. This is something which should be considered in all retaliation risk assessments. The IRM needs to map out its approach in these situations, including its approach in relation to any site visits. With its assessment, the IRM should consider appropriate mitigation measures (and refer people to experts with trusted networks if needed).

- It is important to conduct a gender-responsive conflict assessment through desktop research, conversations with local mediators, conversations with potential parties, and through observing meeting behaviours ([CAO's Gender Guidance Note, 2020](#)). Some key questions that the IRM should consider at this stage are as follows:

1. What are the roles, views, interests and needs of different gender groups in the community? How do different gender groups usually address issues specific to them in that community?
2. What is the impact of the project on different gender groups in the community?
4. What has been the impact of the conflict on different gender groups and their roles within the community, if any?
5. Is there a power imbalance between different gender groups in the community? How does that impact the interests of the weaker gender group?
6. How might gender inequality in the community impact the problem-solving process?
7. Are there any risks in conducting a gender-inclusive process? For example, due to the risks of retaliation?

- One of the assessment tools that can be used in answering these questions is to observe the behaviours of the participants in a meeting in order to understand the gender power dynamics ([CAO, 2020](#)). Such observations include:

1. Are there women in the room? How many compared to men?
2. Where are the women in the room? Are they positioned differently than the men? (e.g. men are seated and women standing?)
3. Have the women spoken? How much compared to the men in the room?
4. Is there a specific reaction from the crowd when women speak that would differ from when men speak?

5. What kind of body language do women use when they speak? For example, are they comfortable speaking, do they limit themselves to small interventions?

6. Are there any other marginalised gender groups in the room (if this is possible to discern)? If this is not possible to discern, can any conclusions be drawn from that?

7. Do men let women speak, or do they interrupt them and try to speak on their behalf?

- It is important to manage expectations while conducting this gender-responsive conflict assessment. Asking gender-specific questions may raise the expectations of marginalised gender groups regarding more transformative outcomes, beyond the scope of the conflict which the IRM is seeking to address. It should be made clear that the IRM can only address issues raised by the complainant(s) in relation to the GCF project/programme ([CAO, 2020](#)).

- General

- When conducting a site visit, it is important to acknowledge the presence of different gender roles. For instance, in some societies, women do the majority of housework in a household occupied by males and females. If this is assessed as being the case in the area where a site visit is conducted, then the IRM should be more flexible in its approach to women, both in terms of time and space, in order to be less burdensome to the women who will have to find time to join the IRM processes. The IRM should take into account limitations, such as daily household chores that need to be done, women lacking their own modes of transportation, and the IRM should work around these challenges, for example, by meeting at times that are more convenient and not during dinner preparation time, or by going to talk to women in their homes, or while they are fetching water (depending on the specific context and the specific gathering sites that are identified as common meeting areas). Consultations with peer groups segregated by gender could potentially be useful. To increase physical accessibility to certain gender groups, the IRM can conduct more studies on the major activities and gathering sites of that group.

- Throughout the complaints handling process, the IRM should be careful when bringing up traumatic experiences of the complainant, especially with issues relating to Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH). The IRM should seek expert advice in these circumstances.

- Especially for complaints filed by a group or community, it is crucial to understand why some groups of people are excluded (working hours, illiteracy, etc.) and what the IRM can do to include them in the complaints handling process. Thus, when organising meetings, the IRM will try to have meetings both with the larger community and separate meetings with different sub-groups within the community, such as elders, youth and women ([CAO, 2020](#)). Meeting separately with individual and excluded groups can promote open dialogue and minimise the fear of retaliation from other groups. Depending on the case, if the social norms of the community dramatically restrict the IRM from convening the excluded groups, the IRM should study and/or seek expert advice to enable a dialogue with them. In some cases, a negotiation with the gender groups in power may be necessary. A clearly stipulated policy that obligates a dialogue with marginalised voices and a communication protocol for complainants to confidentially raise any constraints, fears, barriers and threats to their participation ([CAO, 2020](#)) could be useful.

- Problem-solving

- The IRM will make it clear at the initial stages that it strives to be gender-responsive in all its procedures and that the participants are also expected to respect our gendered approach and to understand the benefits of including all gender groups in the process.

- Explicitly mention in the IRM's SOP on problem-solving that complainants can always choose to work with mediators of a certain gender with context-specific gender expertise so that they feel more comfortable, particularly if there are instances of SEAH involved.

- When engaging in problem-solving, the IRM will promote, to the extent possible, diversity in the mediation team, in a way that is most appropriate to the needs of the parties. Alternatives to having a diverse team of mediators (where more than one mediator is required) could also include hiring an interpreter who is of a different gender to the mediator, or hiring differently gendered consultants to accompany the mediator in key meetings. ([CAO, 2020](#)).

- Compliance review

During compliance review, the compliance review team will similarly seek to understand the gender dynamics which could have an impact on the complaint. The compliance review team will rely on the information gathered during the initial steps phase and the gender-responsive conflict assessment conducted during that phase. Where a problem-solving process has preceded the compliance review, the compliance review team will also engage with the problem-solving team on their insights gained, in a manner which does not divulge any sensitive information obtained during the problem-solving process which cannot be used during compliance review. The compliance review team will, through interviews conducted for the compliance investigation, seek to obtain the views of and evidence from different gender groups in relation to the assessment of whether or not there was non-compliance. Such investigation requires the compliance review team to assess issues with a "gender lens" by looking behind a seemingly obvious issue, to assess whether there is a gender impact that we should be considering.

- Proposed redress

- When a solution is reached as a result of either problem solving or compliance review, it is important to gauge the varying impacts of those solutions to different genders. For instance, monetary compensation for the loss of land and the measures for livelihood restoration should be planned out in a way that is fair for all genders. It should take into account existing legal obstacles or restrictions to equitable compensation. This needs to be carefully monitored in the monitoring phase of the complaint.

- It is also important to be transparent with stakeholders who may be affected by the solutions reached among the parties and to make sure the solutions are easily and equally accessible to marginalised gender groups. In the process of preparing recommendations for the Secretariat, the IRM can encourage the participation of marginalised gender groups to ensure that the proposed redress is equitable for all genders. In some cases, it might be necessary to prepare additional measures to enhance certain genders' capacity that would allow all genders' fair access to the remedies provided or solutions reached.

2) Outreach

- Planning

- The IRM's outreach strategy could be planned in accordance with marginalised gender groups' needs. How do we access women who in certain regions have a lower literacy rate and limited technical capabilities? How do we access other marginalised gender groups who might be able to convene only in hiding and face criminalisation? How do we make sure that our virtual outreach events are accessible to such marginalised gender groups? When possible, it is helpful to use a local contact to make a physical announcement in a local language through signs and billboards at local city halls, local health

centres and clinics or areas where people have easy access or use non-written communication such as radio so that all genders become aware of the event.

- Invite women and women's organisations and where applicable, advocacy organisations for other marginalised gender groups. The IRM can ask local Civil Society Organisations (CSOs) to help find more participants from marginalised gender groups. However, it is important to recognise that there is also value in engaging with gender groups in power about the benefits of adopting a gendered perspective.

- Implementation

- Since often people do not even know that they can bring certain issues to the IRM, it may be necessary to give examples of what kinds of complaints people can make and what kinds of gender impacts or violations of existing gender mandates by the GCF can be registered as complaints. While there is no requirement in IRM processes for the complainant to identify a non-compliance with policy requirements, understanding the rights of stakeholders in GCF projects will give potential complainants a better sense of what they can expect in projects, and this will empower them in identifying where things have gone wrong. During outreach events, the IRM can also make it clear that those who do not own the land can also complain, and the GCF has a gender policy in place and any direct or indirect impact that causes harm to certain genders can be complained about. It will be useful to introduce some examples of marginalised genders filing complaints.

- Before and during outreach in target regions, the IRM can ask questions to the participants to get a better understanding of the gender-related context of the region. The IRM, while asking these questions, should keep in mind that even though GCF projects and programmes target developing countries, not all members within a specific gender group experience the same gender issues. Thus, the IRM, acknowledging that there is a variety of other factors that intersect with the issues of sex or gender, should attempt to understand the wider gender experiences of different people. These experiences include how other identities, such as education level, culture, class, disability, ethnicity, language and sexual orientation, intersect with gender and make some groups particularly vulnerable. Some example questions are adapted from [Mainstreaming Gender in Green Climate Fund Projects](#) (GCF and UN Women, 2017). Although currently only a few of the questions directly address genders other than men and women, it is recommendable to expand the questions to cover other gender identities, if possible.

1. What is the legal status of marginalised gender groups (such as women and transgender)? Is there criminalisation of LGBTQ individuals?
2. What are the levels of income and wages for women and men?
3. What are the levels of educational attainment for girls and boys?
4. What are the gender differences in access to mobile phones, radio, newspapers and TV?
5. What are common beliefs, values, stereotypes related to gender?
6. What is the division of labour between men and women, young and old?
7. How do men and women participate in the formal and informal economy?
8. Who manages the household and takes care of children and/or the elderly?
9. How much time is spent on domestic and care work tasks?

10. Who controls/manages/makes decisions about household resources, assets and finances? Do women have a share in household decision-making?
11. How are men/women involved in community decision-making? What are the local ways through which marginalised genders can voice out?
12. What are some of the views around other gender identities? Are they respected in the community?

3) Capacity building

- Analysis of the current status

- According to the [OHCHR Guiding Principles on Business and Human Rights](#), an under-representation of a certain gender in managerial positions may lead to some gender groups' concerns not being taken seriously. It is thus important to collect gender-disaggregated data of the GRMs of AEs to ensure that their gender compositions enable the handling of complaints filed by complainants of diverse gender identities. The data should focus on the gender representation and the level of gender expertise of people responsible for grievance redress mechanisms, especially the ones in decision-making positions.

- Training

- While the IRM's mandate is directed at DAE (Direct Access Entities) capacity building, we will also build the capacity of AEs as a whole by reaching out to and including other AEs in those efforts to the extent possible (such as by taking our online modules and co-hosting webinars on the gendered approach of the accountability/grievance mechanisms). The IRM should build the capacity of the GRMs of DAEs (and AEs) so that they build internal gender expertise and integrate gender equality throughout their operations. Thus, for its capacity building events, the IRM should consider what aspects of gender the IRM should educate the GRMs of DAEs (and AEs) on, and should consider adding a module on gender to its online training and capacity building sessions. It may be useful for the IRM to share what its plans and activities are to increase its gender responsiveness. The GRMs of DAE and AEs may also already be implementing, or have other ideas, on how to be more gender-responsive, and the IRM should encourage active debate and information sharing on this topic.

4) Advisory

- The IRM will continue to learn from other organisations and from its own experiences on how it can be more gender-responsive. In this process, the IRM will accumulate its learnings on this issue to help improve GCF policies in the form of an advisory. In fact, the IRM has already published an advisory report (with a response from the GCF Secretariat) on the prevention of sexual exploitation, abuse and harassment in GCF projects or programmes.¹

5) Processing reconsideration requests

- The IRM should be equally attentive to potential gender issues throughout this process. It will apply a gender-responsive approach to the extent possible and ensure that all genders are respected.

III. Table of specific actions

The above understandings are organised into more practical guidance for IRM staff through a table below with a clearer set of criteria, strategies, specific actions and timeframes. While some may need more long-

¹ See IRM Advisory Reports, under "Publications" on the IRM website: <https://irm.greenclimate.fund/publications>.

term planning, others can be incorporated into the IRM's activities more immediately to actively pursue its efforts to be gender-responsive. More specifically, 'short' refers to tasks that can be completed within a year, 'medium' means a need for more thinking for an additional year, while 'long' timeframe implies a need for more experience before implementation.

Function	Criterion	Strategy	Specific action	Timeframe
	Data	Incorporate a survey question on gender into all the IRM's forms.	Add the question to application, registration, complaint and reconsideration request forms	Short
	Training	Receive training on how the IRM staff can be more gender-responsive and also conduct training for rostered subject experts, mediators and interpreters to ensure that they operate with gender responsiveness and without discriminatory gender stereotyping when dealing with complaints about adverse impacts.	We will assess the need for additional training after retaliation training (which already includes some training on gender issues) – e.g. UN women	Short - medium
			Prepare training materials for the rostered subject experts, mediators and interpreters.	Medium
	Policy	Articulate the need for participation of marginalised genders in the IRM's procedures.	The IRM can consider adding another module on gender in its SOPs, or otherwise, it could review each of its existing modules to ensure that gender issues are appropriately covered throughout.	Medium
Complaints handling	Gender assessment	Acknowledge in the SOP on retaliation that gender will be considered during the retaliation risk assessment. Map out the IRM's approach and consider appropriate mitigation measures accordingly, if needed. Seek advice from women's organisations, women human rights defenders or LGBTQ advocacy groups.	When conducting a general assessment of the retaliation risks, include a section on the distinct levels of risks for different genders. Conduct a more thorough analysis of the risks if the case concerns gender issues.	Where appropriate
		Conduct gender-sensitive conflict assessment through desktop research, conversations with local mediators, conversations with potential parties, and observing meeting behaviours.	Ask gender-specific questions and observe the parties or stakeholders' behaviours during initial meetings. Make sure to manage expectations in the process.	

	General	Be flexible, both in terms of time and space, in its approach to the complainant and gather information about the activities and major gathering sites of less accessible groups to enable sufficient consultation.	Before a site visit, collect sufficient information about the appropriate times and places and other special considerations needed to ensure safety and to meet the stakeholders' needs.	Where appropriate
		Be cautious when bringing up traumatic experiences of the complainant, especially with SEAH issues. Obtain specialist advice where necessary.	Have a gender expert on our roster of subject experts.	Short
		Conduct separate meetings with excluded groups to include their voices.	Have a clearly stipulated procedure that obligates the IRM to conduct meetings with marginalised groups (which can also be articulated during the initial steps phase). In some cases, the IRM will have to negotiate with the genders in power to obtain access to engage with other genders.	Medium, Where appropriate
	Problem-solving	State in the SOP on problem-solving that complainants can choose to work with mediators of a certain gender and/or gender expertise and consider the diversity of the problem-solving team.	Make it clear during the initial consultation process that the complainants have these options.	Where appropriate
			Make it clear that the IRM strives to be gender-responsive in all its procedures and that the participants are also expected to respect our gendered approach and to understand the benefits of including diverse genders in the process.	Where appropriate

	Compliance review	The compliance review team will refer to the information gathered during the initial steps phase and from the gender-responsive conflict assessment. If relevant, the compliance review team will also engage with the problem-solving team on their insights gained.	The compliance review team will seek to obtain views of and evidence from different gender groups in relation to the assessment of whether or not there was non-compliance.	Where appropriate
	Proposed redress	Gauge the varying impacts of the solutions on different genders and be transparent with stakeholders who may be affected by the solutions.	Ensure that the agreement reached by parties does not have gender-discriminatory impacts. When giving recommendations to the Secretariat, make sure they are gender-responsive.	Where appropriate
Outreach	Planning	Think of ways to include more women (or other marginalised gender groups), who in many cases have lower literacy rates and technical capabilities in developing countries, in the IRM's outreach events.	A physical announcement in a local language, through signs and billboards at local city halls, local health centres and clinics or areas where people have easy access, or non-written communication forms such as radio, with the help of the CSOs at project regions.	Long, where appropriate
			Be attentive to the gender representation and the diversity of women and other marginalised gender groups participating in the IRM's outreach events. Invite more women, women's organisations and other marginalised gender groups in the region of interest and if needed, seek assistance from them or other CSOs to help the IRM invite more women participants from the community.	Short
	Implementation	Make it clear that the GCF has a gender policy in place and any negative impact can be complained about, whether direct or indirect.	Include a session on gender and ask questions to get a better understanding of the gender-related context of the project region.	Short

Capacity building	Analysis	Attain a better understanding of the current status of gender responsiveness	Produce gender-disaggregated data of the GRMs of AEs/DAEs and assess their level of gender expertise through their track record or experience in handling gender-related complaints.	Medium
	Training	Train the GRMs of DAEs (while not excluding AEs) on the importance of being more gender-responsive and how the GRMs could be more gender-responsive.	Include a module on gender in the online training course and a session on gender during training.	Short – medium