

IRM Gender Strategy Note

1. Background and guiding principles

The Green Climate Fund (GCF) is committed to mainstreaming gender perspectives from the outset of its operations as an essential decision-making element for the deployment of its resources. The GCF has placed gender as a key element of its programming architecture, and its commitment to gender equality centres on gender-responsive climate action programmes and projects that benefit women and men.¹ GCF's gender-responsive approach is captured in the GCF Gender Policy, which was adopted by the Fund's Board in 2015 and updated in 2019.² An initial gender and social assessment must be included with the funding proposal, and Accredited Entities (AEs) are also requested to submit a gender and social inclusion action plan at the project preparation stage.

The Independent Redress Mechanism (IRM) provides recourse to those adversely affected or who may be affected by GCF projects or programmes, and also accepts requests for reconsideration of funding proposals that have been denied funding by the GCF's Board. The IRM's processes are triggered by the submission of a complaint or a reconsideration request, and the IRM may also initiate investigation proceedings on its own if certain criteria are met.³

The IRM is committed to taking a gender responsive approach in relation to each of its five functions—processing complaints, processing reconsideration requests, advising the Board based on lessons learnt and good international practice, conducting outreach, and building the capacity of the grievance redress mechanisms (DAEs) of GCF's direct access entities (DAEs). This specific need to actively incorporate gender considerations 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, implying that there are potential systematic barriers that women and other marginalised gender groups face in accessing remedy. In order to address such potential limitations, the IRM has prepared this gender strategy note and is committed to implementing a gender responsive approach consistent with the GCF's Gender Policy. This approach recognises the particular needs, priorities, power structures, status and relationships between different gender groups and seeks to address those in the design, implementation and evaluation of IRM activities. This approach seeks to ensure that everyone is given equal opportunities to participate in and benefit from IRM mandates and proceedings and promotes targeted measures to address inequalities. This note documents the general to specific and more immediate to long-term approaches that the IRM can adopt to implement gender responsiveness in its work.

Having taken into consideration the GCF Gender Policy, the IRM, in order to realise a gender responsive approach in each of its five functions:

Recognises that gender inequality is multidimensional and specifically that gender inequalities intersect and are compounded by other inequalities and discrimination based on, for example, age, race, class, caste, and ability, amongst other things;

¹ See: <https://www.greenclimate.fund/projects/gender>.

² GCF gender policy, at <https://www.greenclimate.fund/sites/default/files/document/gcf-gender-policy.pdf>.

³ See paragraph 12 of the IRM's Updated Terms of Reference - <https://irm.greenclimate.fund/sites/default/files/document/bbm-2017-10-decision-board-updated-terms-reference-independent-redress-mechanism-revised.pdf>.

Recognises that in most societies there are differences and inequalities between women and men in responsibilities assigned, activities undertaken, access to and control over resources, as well as decision-making opportunities;

Recognises the inherent gender-based economic inequality that persists in most countries: out of 143 economies, 90% have at least one law restricting economic equality for women. Globally, social structures limit women's ability to own land, borrow and invest money, or start a business. This gap is largest among lower middle-income economies as well as in South Asia, the Middle East and North Africa⁴;

Acknowledges that women are disproportionately affected by climate change. Climate change and gender inequality are arguably two of the greatest sustainable development challenges of our time, and gender inequalities and limited decision-making power often prevent women and other marginalised genders from fully contributing to climate-related planning, policymaking and implementation⁵;

Acknowledges that women are usually users and caretakers of biological resources for consumption and subsistence needs, including responsibilities in small scale agriculture, and women and men have different and complementary knowledge of their environment⁶;

Is mindful that 75% of people displaced by natural disasters or needing assistance in emergency situations are women and children⁷;

Is cognisant of the fact that at the 21st Conference of the Parties (COP21) to the United Nations Framework Convention on Climate Change (UNFCCC) in Paris in 2015, just 32 per cent of delegates and only 20 per cent of heads of delegation who participated in this negotiation were women, indicative of the degree of underrepresentation in leadership positions⁸;

Is conscious of the fact that in more than 70 countries, discriminatory laws criminalise private, consensual same-sex relationships, exposing millions of individuals to the risk of arrest, prosecution, imprisonment and, in some cases, the death penalty. Criminalisation of consensual same-sex conduct violates rights to

⁴ UNITAR open online course on gender and the environment, available at: <https://www.unitar.org/event/full-catalog/open-online-course-gender-and-environment-1>, last accessed February 2021.

⁵ *Idem*.

⁶ See also: CBD. Gender Perspectives on Biodiversity. Available at <https://www.cbd.int/gender/doc/fs-gender-perspectives-en.pdf>; FAO. No date. FAO Focus: Women and Food Security. (26 November 2007) GEF Website. Available at <https://www.thegef.org/>; IUCN. 2012. Biodiversity: Gender Makes the Difference. Available at https://portals.iucn.org/union/sites/union/files/doc/gender_makes_the_difference_biodiversity.pdf; IUCN. 2008. Gender and Biodiversity Factsheet; IUCN. 2004. Diversity Makes the Difference: Actions to Guarantee Gender Equity in the Application of the Convention on Biological Diversity. Available at <https://www.iucn.org/es/node/23013>; Shanley, S. & Gaia, G.R. 2001. Equitable Ecology: Collaborative Learning for Local Benefit in Amazonia. *Agriculture Systems*, 73: 83-97; Terry Sunderland and Ramadhani Achdiawan. 2014. Challenging Perceptions about Men, Women, and Forest Product Use: A Global Comparative Study. Available at <https://www.sciencedirect.com/science/article/pii/S0305750X14000692>.

⁷ See *supra* note 4.

⁸ See also: IUCN Global Gender Office. 2015. Gender and Climate Finance: New Data on Women in Decision-Making Positions. Available at http://www.wocan.org/sites/default/files/EGI_finance_indicators_fact_sheet_0.pdf; IUCN Global Gender Office. 2018. EGI: Women's Participation in Global Environmental Decision-Making Fact Sheet; Available at <http://genderandenvironment.org/resource/egi-womens-participation-in-global-environmental-decision-making-factsheet/>; IUCN Global Gender Office. 2018. Environment and Gender Information Platform. Available at <http://genderandenvironment.org/egi/>; IUCN Global Gender Office. 2018. Mission and History. Available from <http://genderandenvironment.org/about/mission/>

privacy and to freedom from discrimination and may impede LGBTQ+ people from entering into processes, such as those of the IRM, which may bring attention to their sexual orientation.⁹

Therefore, the IRM promotes gender responsiveness throughout its work, following the principles of:

- *Confidentiality and privacy of information.* The IRM will maintain, if requested to do so, and where circumstances suggest that it would be in the interest of parties concerned, all information received under confidentiality. This applies, but it is not limited to, gender identity and the sexual orientation of stakeholders and complainants;
- *Non-discrimination.* The IRM will strive to avoid and prevent gender-based discrimination in its work. This applies to its internal functioning and amongst members of its staff, and to its external functions and stakeholder relations;
- *Equality and equity.* The IRM dedicates its efforts towards promoting equality and equity of all genders when it comes to granting access to the mechanism and to participating in the IRM's processes and work. The IRM is conscious of the existence of different legal and cultural backgrounds of stakeholders and complainants that might access the mechanism and will therefore always act consciously with regard to such differences. The IRM will grant equitable treatment of all complainants and stakeholders regardless of their gender identity and sexual orientation;
- *Empowerment.* The IRM is committed to dedicating appropriate resources to support complainants and stakeholders in accessing the mechanism and to participating in the IRM's processes and work. The IRM will allocate resources and relevant expertise to ensure effective participation and grievances redress that responds to gender-based inequalities; and
- *Access to justice.* The IRM pledges to remove constraints, to the extent possible, that would prevent potential complainants from accessing the mechanism and to participating in the IRM's processes and work, including physical barriers, language barriers and economic barriers which may be gender-related or which may compound other gender-related constraints.¹⁰

2. Collecting gender disaggregated data

Gender-disaggregated data forms the basis of any gender strategy. It is used to assess the baseline situation, identify current weaknesses, set targets, and track progress and measure improvements. With gender-disaggregated data, the IRM can develop an appropriate action plan to improve accessibility issues that many marginalised gender groups may be facing. The IRM will especially benefit from collecting data of people who access the IRM regarding issues with GCF projects or programmes. These people include participants of the IRM's outreach events, complainants, and anybody who raises concerns with the IRM.

The collection of gender-disaggregated data may take place in many forms. It could be done through desk review, household interviews, focus group interviews/discussions, etc. A portion of the desk-based

⁹ Free and Equal, United Nations for LGBTI Equality, *Criminalization*. Available at <https://www.unfe.org/wp-content/uploads/2018/10/Criminalization-English.pdf> (last accessed 17 May 2021).

¹⁰ Any person or a group of persons, or a community that has been or may be affected negatively by a GCF project or programme (including those being actively considered for funding by the GCF) may file a complaint. The affected person(s) can authorise their government or representative to file and pursue the complaint on their behalf. A complaint with the IRM can be filed by: Sending it by mail or email; Sending a voice or video recording; Filling out the online complaints form. A complaint can be filed in English, or in the local language of the complainant. Where possible, a translation should be provided in English. Otherwise, the IRM will attempt to have the complaint translated and respond in the language of the complainant. The IRM does not charge fees at any stages of the complaint process. For more information, please refer to the IRM website - <https://irm.greenclimate.fund/>.

research can include reviewing the gender assessments pre-conducted for each project/programme by AEs. Gender statistics and situations that constitute gender assessments can be useful for the IRM to establish site-specific strategies for each of its prioritised projects and programmes. Most importantly, however, in addition to collecting data about the gender identities of its stakeholders, the IRM should collect data about intersectionality by attempting to identify how other accessibility barriers intersect with gender. This is to identify which salient local socio-economic barriers limit marginalised gender groups' access to the IRM. For example, the collected data may indicate that women in a community have a higher illiteracy rate, potentially affecting their access to information about the IRM. With that finding, the IRM can devise ways to allow more illiterate people to access information about the IRM which will, in turn, help many women in that community to approach the IRM when they encounter adverse impacts from GCF projects or programmes.

The IRM will start collecting data by including relevant questions in its forms, such as the complaints form and outreach event registration form, to gather information about respondents' gender identities and potential issues they might face when trying to access the IRM. When an IRM staff member is involved in in-person activities, more information can be gathered by engaging in discussions with participants.

The IRM will also ensure that the IRM has a diverse and dynamic team (including staff, consultants and interns) that is capable of handling different types of complaints. 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. This diversity includes not only gender but also race, countries of origin, and other identities and experiences that will allow the IRM to better respond to its different stakeholders. Therefore, during recruitment, the IRM will consider the implications of adding new team members or roster consultants on its overall diversity.

3. Strategies

This gender strategy note considers each of the IRM's five functions and the ways in which gender responsiveness can be mainstreamed into the IRM's activities under each function. This gender strategy note is a living document which will be developed and improved over time as strategies are implemented and experience is gained.

3.1. Complaints handling

Gender assessment

- Once a complaint is received and is found to be eligible for processing, it is important to conduct a gender-responsive conflict assessment through desktop research (including referring to the gender assessment and action plan already prepared for any particular project), conversations with local mediators, conversations with potential parties, and through observing meeting behaviours.¹¹ This gender-responsive conflict assessment will not be done in a siloed fashion but will be integrated with broader conflict assessment processes

¹¹ Compliance Advisor Ombudsman, Guidance Note: How to Adopt a Gender-Inclusive Approach to Dispute Resolution. Available at: <http://www.cao-ombudsman.org/documents/CAODisputeResolutionGenderGuidanceNoteFINAL.pdf> (last accessed 17 May 2021).

that the IRM undertakes. Some key questions that the IRM should consider at this initial-steps 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?
3. What has been the impact of the conflict on different gender groups and their roles within the community, if any?
4. Is there a power imbalance between different gender groups in the community? How does that impact the interests of the weaker gender group?
5. How might gender inequality in the community impact the problem-solving process?
6. 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.¹² 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?
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.¹³ It should be made clear that the IRM can only address issues raised by the complainant(s) in relation to the GCF project/programme.

- 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 particular gender groups

¹² Compliance Advisor Ombudsman, Guidance Note: How to Adopt a Gender-Inclusive Approach to Dispute Resolution, at Page 14. Available at: <http://www.cao-ombudsman.org/documents/CAODisputeResolutionGenderGuidanceNoteFINAL.pdf> (last accessed 17 May 2021).

¹³ Compliance Advisor Ombudsman, Guidance Note: How to Adopt a Gender-Inclusive Approach to Dispute Resolution, at Page 5. Available at: <http://www.cao-ombudsman.org/documents/CAODisputeResolutionGenderGuidanceNoteFINAL.pdf> (last accessed 17 May 2021).

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 within trusted networks if needed).

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.¹⁴ 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 could be useful.¹⁵

¹⁴ Compliance Advisor Ombudsman, Guidance Note: How to Adopt a Gender-Inclusive Approach to Dispute Resolution, at Page 9. Available at: <http://www.cao-ombudsman.org/documents/CAODisputeResolutionGenderGuidanceNoteFINAL.pdf> (last accessed 17 May 2021).

¹⁵ Compliance Advisor Ombudsman, Guidance Note: How to Adopt a Gender-Inclusive Approach to Dispute Resolution, at Page 9. Available at: <http://www.cao-ombudsman.org/documents/CAODisputeResolutionGenderGuidanceNoteFINAL.pdf> (last accessed 17 May 2021).

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 its gendered approach and to understand the benefits of including all gender groups in the process.
- Explicitly mention in the IRM's SOPs 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.¹⁶

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 or confidential 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 or bias that should be considered.

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 on 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 and must also take into account customary/usage rights and needs. Any proposed redress must consider household-level gender dynamics. Redress needs to be carefully monitored in the monitoring phase of the complaint to ensure that rights are not eroded during implementation of the remedial action plan.
- 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

¹⁶ Compliance Advisor Ombudsman, Guidance Note: How to Adopt a Gender-Inclusive Approach to Dispute Resolution, at Page 6. Available at: <http://www.cao-ombudsman.org/documents/CAODisputeResolutionGenderGuidanceNoteFINAL.pdf> (last accessed 17 May 2021).

Secretariat, the IRM will help facilitate meaningful participation of marginalised gender groups to ensure that the proposed redress is equitable for all genders. In some cases, it may also 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.

3.2. Outreach

Planning

- The IRM's outreach strategy should 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 to increase awareness 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 also be useful to introduce some examples of marginalised gender groups 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 gender issues, 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).¹⁷ Currently only a few of the questions directly address genders other than men and women. Over time, these can be expanded with experience to cover other gender identities, if possible.

1. What is the legal status of marginalised gender groups (such as women and transgendered people)? 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 their concerns?
12. What are some of the views around other gender identities? Are they respected in the community?

3.3. 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. GRMs should also have access to gender experts. It is thus important for the IRM to promote diversity within the teams of GRMs of AEs. Where staff do not have specific gender expertise, GRMs should at least have access to gender experts, or ensure the availability of trainings for their staff on gender issues.

Training

While the IRM's mandate is directed at Direct Access Entities (DAEs) 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, good practice notes 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. Best

¹⁷ Mainstreaming Gender in Green Climate Fund Projects: A practical manual to support the integration of gender equality in climate change interventions and climate finance. Available at: https://www.greenclimate.fund/sites/default/files/document/guidelines-gcf-toolkit-mainstreaming-gender_0.pdf (last accessed, 17 May 2021).

practices and approaches from the Global South should be shared, and the IRM will also consider including non-expert voices from marginalised gender groups in any trainings on the topic of gender. The GRMs of DAEs 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.

3.4. 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. 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.¹⁸

The IRM will also promote gender responsiveness in the design, data gathering, research and consultation processes associated with all advisory reports that it prepares. In particular, the IRM will consider whether the information it gathers considers different gendered perspectives, and whether there are any gender biases present in the information that it collects and reviews for the purposes of crafting advice. The IRM will actively seek out different perspectives on any questions that it considers as part of its advisory research. The IRM will also consider how each advisory report that it prepares will or may impact gender differentiated sections of communities, and will seek to anticipate any unintended, negative consequences that its advice may have from a gender perspective.

3.5. Requests for reconsideration

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 similar to the complaints section above and to the extent applicable to reconsideration requests.

4. 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-term planning, others can be incorporated into the IRM's activities more immediately to actively pursue its efforts to being 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. In addition to this table of specific actions, the IRM will consider whether to amend its Supporting Operating Procedures (SOPs) to mainstream gender responsiveness into its work, or introduce a separate SOP on gender.

¹⁸ See IRM Advisory Reports, under "Publications" on the IRM website: <https://irm.greenclimate.fund/publications>.

Function	Criterion	Strategy	Specific action	Timeframe
	Data	Collect gender-disaggregated data of people who access the IRM regarding issues with GCF projects or programmes	Add survey questions on gender and other potential accessibility issues to the IRM's registration, complaint and reconsideration request forms	Short
			Extract gender data and information from the AEs' pre-conducted gender assessments for the IRM's prioritised projects and programmes.	Where appropriate
	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
	IRM Procedures	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

Function	Criterion	Strategy	Specific action	Timeframe
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 and 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.	Where appropriate
	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 gender groups in power to obtain access to engage with other gender groups.	Medium, Where appropriate

Function	Criterion	Strategy	Specific action	Timeframe
	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

Function	Criterion	Strategy	Specific action	Timeframe
			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	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

Function	Criterion	Strategy	Specific action	Timeframe
Advisory	Advisory report – preparatory process	Promote gender responsiveness in the design, data gathering, research and consultation processes associated with all advisory reports.	Gather different gendered perspectives, and consider whether there are any gender biases present in the information collected for advisory work. Actively seek out different perspectives on any questions considered. Consider how each advisory report will or may impact gender differentiated sections of communities, and seek to anticipate any unintended, negative consequences that the advice may have from a gender perspective.	Where appropriate
	Advisory report – subject matter	Draw lessons from the IRM’s implementation of this note and from good international practice	Prepare an advisory report on the topic of gender-responsiveness	Long