

Self-Assessment Report of the Independent Redress Mechanism



March 2022



GREEN
CLIMATE
FUND

Independent
Redress
Mechanism



I. Introduction

The Office of the United Nations High Commissioner for Human Rights (OHCHR), in their recently released report entitled “Remedy in Development Finance,” recommend that Independent Accountability Mechanisms (IAMs) assess themselves against the effectiveness criteria of the UN Guiding Principles on Business and Human Rights (UNGPs).¹ The eight effectiveness criteria are: 1) Legitimacy; 2) Accessibility; 3) Predictability; 4) Equitability; 5) Transparency; 6) Rights compatibility; 7) Continuous learning; and 8) Engagement and dialogue.² The Independent Redress Mechanism (IRM) agrees that self-assessment would serve as a useful tool for the IRM to assess its current status and for the GCF Board to consider making necessary changes to improve its effectiveness. In this report, the IRM first sets out some key principles and the methodology of its self-assessment scoring system. Then, using these principles, the IRM presents eight self-assessment score sheets for the eight effectiveness criteria.

This is the first time any Independent Accountability Mechanism (IAM) is undertaking this Self-Assessment using the OHCHR tool. We also caution that this assessment did not include surveying stakeholders beyond the annual survey that the IRM undertook. As such, we recognize that there will be many improvements that can be made to this assessment, the method and to the results. We welcome suggestions as to how improvements can be made.

II. Key principles of the IRM’s self-assessment scoring system

1. All eight effectiveness criteria are weighted equally since the IRM recognises that all eight criteria are equally important. Given that there are eight effectiveness criteria, each criterion is given a weight of 12.5 to add up to a total weighted score of 100.
2. All indicators within a criterion are weighted equally. For instance, an indicator that falls under a criterion with a total of ten indicators is given a weight of 1.25, adding up to a total weighted score of 12.5.
3. Some effectiveness criteria have more indicators than others. In this case, an indicator of a criterion may have a different weighting to an indicator of another criterion, depending on the total number of indicators within a criterion. For example, an indicator of a criterion with ten indicators is given a weight of 1.25, and an indicator of a criterion with five indicators is given a weight of 2.5. For this reason, the weighting of an indicator in one criterion cannot be treated as evidence of the importance or value of that indicator, in comparison to other indicators within another criterion which might have a different weighting. The weighting of an indicator is indicative of the importance of that indicator within that criterion only.
4. When an indicator is duplicated in two or more criteria, this indicator will only be counted and scored once for the most relevant criterion and will be excluded towards the scoring of other criteria so as to avoid double-counting towards the total score. Although not counted towards the score, the duplicated indicators will still be noted (unscored) in the less relevant criteria so that readers could make their own assessments of the degree to which the weighted score is reflective of the criterion.

¹ Released on 23 Feb 2022 and available at: <https://www.ohchr.org/sites/default/files/2022-03/Remedy-in-Development.pdf>

² Available at: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf



5. The perfect score for this exercise is 100. This total score is divided by 8, the total number of criteria, to give a total weight of 12.5 per criterion. This score is further divided by the total number of indicators per criterion, and this value varies from one criterion to another criterion since the criteria are made up of different numbers of indicators. This weight-per-indicator is then multiplied by the score of each indicator, which is either 1 (fully met), 0.5 (partially met) or 0 (not met). This multiplied value is the total weighted score of each indicator, and all the total weighted scores of the indicators are added up to calculate the total weighted score of a criterion. If an indicator is partially fulfilled, this indicator is given half the full value (0.5) and therefore less weight, without regard to the degree of fulfilment. It is acknowledged that a more nuanced scoring system with a range of partial scores (such as from 0-1) could give a more accurate picture of compliance with the UNGPs.
6. Suggestions for improving this simple and rudimentary scoring system are more than welcome.

III. Methodology

Each indicator was assessed through desk research using the Terms of Reference³, Procedures and Guidelines⁴ and Supporting Operating Procedures⁵ of the IRM. When required, additional desk research was done using the GCF's policies, website and other publicly available documentation. As part of the research, stakeholder survey⁶ and other outreach material produced by the IRM as well as complainant feedback provided was also used. Based on this research, a judgement call was made on the score to be allocated to each indicator. Justification and evidence for the score were provided against each indicator so that others could verify the score.

IV. Summary

Criterion	Score
C. Predictability	12.50
B. Accessibility	11.93
A. Legitimacy	11.46
F. Rights-compatibility	11.06
D. Equitability	10.10
E. Transparency	9.38
H. Engagement and dialogue	8.75
G. Continuous learning	5.56
Total	80.74

From our assessment, the total score of the IRM's performance is 80.74 out of 100. Predictability scored the highest, receiving a full mark, followed by accessibility and legitimacy. Continuous learning and engagement and dialogue scored the lowest.

³ Available at: <https://irm.greenclimate.fund/document/irm-tor>

⁴ Available at: <https://irm.greenclimate.fund/document/2019-procedures-and-guidelines-irm>

⁵ Supporting Operating Procedures (SOPs) are the internal procedural documents of the IRM that are intended to facilitate the implementation of the IRM's Terms of Reference and Procedures and Guidelines and to ensure the effective and efficient operation of the IRM.

⁶ Available at: <https://irm.greenclimate.fund/document/2021-stakeholder-survey>



V. Conclusion

Our self assessment of the IRM against the UNGP's eight effectiveness criteria indicates that the IRM performs well in some criteria while it needs to do more in some other criteria. The IRM should continue to communicate effectively with its stakeholders and consider the potential barriers that complainants may face when accessing the IRM. It should conduct more frequent self-reflection and more active learning from its own experiences and from other mechanisms so as to expand its institutional knowledge. In addition, since a grievance mechanism's operations and effectiveness go hand in hand with those of the management, the IRM should collaborate with the GCF management to ensure that project and programme information is available to potential complainants during the design stages and to ensure that project affected people are made aware of the IRM and the Accredited Entities' GRMs.

However, it is also important to note that this self assessment tool is made to assist the IAMs to easily identify areas for improvement and thus, this simple quantification of complex qualitative information can have its own limitations. A full mark in a criterion does not necessarily mean that an IAM's performance is perfect in delivering that criterion. There is always room for improvement in all eight criteria, and all IAMs should add their own indicators to keep striving for more. This is also where the sharing of experiences between IAMs can serve an extremely important role.



VI. Assessment Scoresheet

A. Indicators of “Legitimacy” (Total weighted score: 11.46 / 12.50)



The key to a legitimate mechanism is independence, fairness and trustworthiness. A mechanism should ideally be independent of the management and be reporting directly to the board. A mechanism should also be trusted by its stakeholders, especially by complainants who are the principal users of the mechanism.



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Is the mechanism independent of management?</i>	The IRM is independent of the GCF Secretariat and reports directly to the Board.	TOR – para. 1	Yes	1	1.04	1.04
2	<i>Is the mechanism authorized to initiate investigations without board approval?</i>	The IRM conducts self-initiated investigations which do not require Board approval.	TOR - para. 12 & PGs - para. 61	Yes	1	1.04	1.04
3	<i>Does the mechanism have a direct reporting line to the board?</i>	The Head/IRM is appointed by and reports directly to the Board. The IRM reports to the Executive Director only for limited administrative purposes; all substantive work is reported to the Board. The IRM consults with the Ethics and Audit Committee (EAC) of the Board with regard to its work plan and budget and with regard to advisories and other matters that the Head/IRM thinks useful to consult on.	TOR - para. 4 and 20	Yes	1	1.04	1.04
4	<i>Does the mechanism control its own budget, staffing and contracting?</i>	The financial independence of the IRM is guaranteed through the Head of the IRM's proposal of a work plan and budget for the Board's approval. Staffing and contracting are also controlled by the IRM.	TOR - para. 19 and 21	Yes	1	1.04	1.04



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
5	<i>Are hiring procedures transparent and are external stakeholders involved in the process of selection of senior IAM staff?</i>	The Head of the IRM is recruited by the Board through a Selection Committee appointed by the Board. Management and other external stakeholders are not involved in the selection process. The position is advertised widely. The Head of the IRM decides on the appointment and termination of the IRM's staff and consultants. The selection committee for the hiring process of IRM staff and consultants is composed of senior IRM staff, staff from another independent unit, and from recently an external stakeholder, under the overall guidance of GCF's Human Resources in accordance with GCF's Administrative Guidelines. Staff from the GCF's management do not participate in IRM staff and consultant recruitments in order to maintain the IRM's independence.	TOR - para. 21	Yes	1	1.04	1.04
6	<i>Are IAM managers and staff held to high standards of ethical conduct?</i>	The IRM's staff and consultants are held to the policies and guidelines of the GCF and its Code of Conduct.	TOR - para. 4 and 22	Yes	1	1.04	1.04
7	<i>Are performance reviews of senior IAM staff carried out by the board rather than management?</i>	The performance review of the Head of the IRM is conducted by the Performance Oversight Committee (POC), and the IRM staff by the Head of the IRM. Performance reviews of IRM staff are conducted by the Head/IRM or senior IRM staff. Management is not involved in the performance reviews of the Head//IRM or any IRM staff.	GCF/B.23/Inf.08 - para. 40 and 42	Yes	1	1.04	1.04
8	<i>Is the mechanism trusted by complainants?</i>	The IRM received largely positive feedback from its stakeholders through the stakeholder survey distributed in April 2021.	Stakeholder Survey Report 2021	Partial	0.5	1.04	0.52



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
9	<i>Does the board have procedures to ensure due process in responding to IAM recommendations and to eliminate conflicts of interest?</i>	The Board Guidelines adopted recently address some due process issues. Conflicts of interest of Board members are governed by the Policy on ethics and conflicts of interest for the Board of the Green Climate Fund.	Guidelines for Board Consideration of IRM Case Reports GCF B.27/10	Yes	1	1.04	1.04
10	<i>Are IAM staff members precluded from seeking employment in the parent DFI, and vice versa, for a reasonable "cooling off" period (such as two years)?</i>	The Head of the IRM is prevented from joining the GCF for 18 months after the end of his/her term. However, there is no such rule against GCF staff joining the IRM or vice-versa nor is there a mandatory "cooling-off" period in respect of them.	TOR - para. 7	Partial	0.5	1.04	0.52
11	<i>Are IAM staff suitably qualified in relation to the requisite language skills, experience working with victims, understanding of local contexts and relevant expertise (including, ideally, human rights, and/or business and human rights)?</i>	The IRM has an in-house capacity to communicate in at least six languages other than English (as of February 2022). The Head, the Compliance and Dispute Resolution Specialist and the Registrar and Case Officer of the IRM have the required understanding and expertise in human rights, the environment, and working with vulnerable communities. Additionally, the IRM has a roster of translators covering Spanish, French, Arabic, Russian, Chinese, Turkish, Persian and Portuguese, who can be contracted when needed. In 2022, the IRM will hire a translation and interpretation firm.	IRM website - Meet the team page	Yes	1	1.04	1.04



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
12	<i>Does the mechanism carry out regular trainings for personnel in order to keep pace with relevant standards and practices?</i>	The IRM funds the trainings of its staff. All staff, consultants and interns received trainings on retaliation and public speaking in 2020, and on Sexual Exploitation, Abuse and Harassment (SEAH) and mediation in 2021. The IRM will undertake a training in gender-responsiveness in 2022. Individual staff members also take part in trainings of their interest, such as the managerial trainings and conflict resolution trainings.	GCF HR Guidelines	Yes	1	1.04	1.04
	<i>Total score</i>				<u>11</u> (Perfect score: 12)	<u>12.50</u> (Weight per criterion)	<u>11.46</u> (Perfect weighted score: 12.50)

The IRM received full marks in most indicators that make it a legitimate mechanism. With regard to the degree of trust by the IRM's stakeholders, the IRM observed a generally positive response to its [stakeholder survey](#) circulated in April 2021 and has committed to generating more trust from its stakeholders.

B. Indicators of “Accessibility” (Total weighted score: 11.93 / 12.50)



Accessibility is very often referred to as one of the key indicators of a well-functioning grievance mechanism since a grievance mechanism should be made easily accessible to all potential complainants. For a mechanism to be accessible, potential users of the mechanism must be aware of it, and the IAM should be able to perform outreach activities or require its clients to publicise the existence and availability of the mechanism. The eligibility requirement for a complaint to be formally filed as a complaint can be another barrier to accessibility. Furthermore, representation and timeframes are also common factors that lead to reduced accessibility of potential complainants to mechanisms.



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Are both the DFI and clients required to publicize the existence of IAMs among project-affected people in a manner understandable to the communities concerned (taking into account language, disability and other relevant factors), and is this requirement included in contractual agreements?</i>	GCF requires that accredited entities inform communities affected or likely to be affected about grievance redress mechanisms at all levels, at the earliest opportunity of the stakeholder engagement process, in an understandable format and in all relevant languages. Clause 4.14 of the template Accreditation Master Agreement (AMA) specifies that the GCF will review and assess Funding Proposals in accordance with the requirements of, amongst other things, the Environmental and Social Policy (ESP). The Environmental and Social Safeguards team in the Secretariat checks that the document sets out measures to inform all stakeholders of, and provide access to, the IRM. There is a legal requirement for the GCF to publicise the IRM. This legal requirement is set out as a mandate to the IRM in its TOR, to provide outreach to the public. In the result, the IRM conducts outreach through targeted workshops and social media. Additionally, the GCF has done so through, for example, the provision of a connected website (reference to the IRM on every single project/programme), reports to UNFCCC COP, and livestreamed Board meetings.	ESP - para. 76 and 12(c) & Clause 4.14 of the Accreditation Master Agreement (AMA)	Yes	1	1.14	1.14
2	<i>Are access barriers for women, children, persons with disabilities, indigenous people and other population groups identified and addressed, in addition to barriers arising from multiple and intersecting forms of</i>	The IRM identifies various challenges that people of marginalised genders and groups may face, and has come up with various ways to address them. The GCF's Indigenous Peoples Policy and Gender Policy address the special needs of women and indigenous people, and highlights what the IRM can do with respect to the violation of the policy. However, the GCF and the IRM do not yet have specific policies addressing children,	IRM's Gender Strategy Note & GCF Indigenous People's Policy	Partial	0.5	1.14	0.57



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
	<i>discrimination (e.g. women with disabilities and indigenous girls)?</i>	differently-abled people and other marginalised populations and groups.					
3	<i>Are complainants free from any categorical requirement to exhaust remedial avenues with the client, GRM and/or DFI?</i>	There was such a clause in some of the early AMAs, but they are being removed from 2021 during re-accreditation. Otherwise, there is no such requirement. Complainants are not required to exhaust remedial avenues with the GCF Secretariat, the AEs, or the GRMs of AEs before bringing a complaint to the IRM.	PGs - para. 84	Yes	1	1.14	1.14
4	<i>Are complainants free to pursue complaints through IAMs irrespective of parallel proceedings (judicial or otherwise), in principle?</i>	The complainants can file complaints with a mechanism of their choice, and if they want, they can file parallel complaints to both the IRM and the GRM of an AE.	PGs - para. 84	Yes	1	1.14	1.14
5	<i>Are complainants free to choose between compliance review and dispute resolution processes, or both simultaneously, and are they empowered to make informed choices in this regard?</i>	During the initial steps phase after a complaint has been declared eligible, the Case Lead explains problem solving and compliance review, after which the complainant is free to choose between the two or request both. Generally, however, problem solving precedes compliance review.	PGs - para. 36	Yes	1	1.14	1.14
6	<i>Are complainants free to choose who to represent them, be they local or international organizations?</i>	Complainants can choose who to represent them, as long as they are authorised by the complainant to act in that capacity.	PGs - para. 21	Yes	1	1.14	1.14



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
7	<i>Can complaints be admitted prior to board approval, thereby enabling preventive actions?</i>	In addition to complaints filed after Board approval, complainants can bring complaints about a project or programme being actively considered for funding by the GCF.	PGs – para. 20 (footnote)	Yes	1	1.14	1.14
8	<i>Can complaints be admitted for a reasonable period of time (such as two years) after project closure, and are time limits for accessing IAMs flexible enough to take into account the time needed for abuses to become apparent?</i>	The IRM processes complaints on or after the later of the following two dates: within two years from the date the complainant became aware of the adverse impacts, or within two years from the closure of the GCF funded project or programme.	PGs – para. 23	Yes	1	1.14	1.14
9	<i>Are evidentiary requirements reasonable, taking into account complainants' capacity constraints?</i>	The IRM determines eligibility of a complaint based on <i>prima facie</i> evidence. During compliance review, the IRM uses a balance of probability evidentiary standard. The burden of finding the necessary evidence is not placed on complainants but on the IRM, and as such, a complainant's capacity to produce evidence will be taken into account by the IRM in determining the effort it needs to put in gathering evidence.	SOP	Yes	1	1.14	1.14
10	<i>Are complainants free from any requirement to provide a link between project harms and the DFI safeguard compliance?</i>	During compliance review, the burden of proving non-compliance is on the IRM, not the complainant. Complainants are not required but encouraged to provide linkages, if any, between harm and non-compliance when they file a complaint.	SOP on compliance review	Yes	1	1.14	1.14



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
11	<i>In situations in which complaints do not meet eligibility criteria, are clear reasons provided within a reasonable time?</i>	The IRM should make an eligibility determination within thirty days from the date of acknowledgement, and the IRM must communicate to the request its determination, including reasons.	TOR - para. 32	Yes	1	1.14	1.14
	<i>Total score</i>				<u>10.5</u> (Perfect score: 11)	<u>12.50</u> (Weight per criterion)	<u>11.93</u> (Perfect weighted score: 12.50)

While the IRM got full marks on 10 out of 11 indicators, indicating a relatively high level of accessibility of the IRM, it received a partial point on one indicator. While the IRM has continuously strived to improve its access to vulnerable groups such as to marginalised gender groups and indigenous peoples, there are some other groups such as differently-abled people that the IRM should still try to identify and set up procedures to address their difficulties in accessing the IRM.



C. Indicators of “Predictability” (Total weighted score: 12.50 / 12.50)



Grievance mechanisms must make an utmost effort to ensure that the processes and outcomes are predictable by reference to standards, processes and procedures and are clearly explained to complainants and they should also strive to expedite the process to make sure that harms are addressed at the earliest possible stage. Complainants should be able to make an informed choice about which mechanism to file a complaint with when a project is co-financed by a few different financial institutions, and they should also be able to choose between the different procedures of complaint handling offered by a mechanism.



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Are IAM processes and time frames made clearly known to complainants in advance?</i>	During initial engagement with complainants, the Registrar and Case Officer explains the IRM processes and timeframes, and throughout the entire process of the IRM's handling of complaints, the IRM continuously explains the relevant timeframes in advance.	SOP	Yes	1	1.25	1.25
2	<i>Are IAMs clear about which harms they can address and which remedies/outcomes are realistically available?</i>	The IRM may declare a complaint ineligible if it falls into one or more of the exclusion criteria. Following compliance review, the IRM can give recommendations to bring the project/programme into compliance, develop a remediation plan, provide financial compensation, etc.	TOR – para. 14 & PGs - para. 24	Yes	1	1.25	1.25
<i>Do IAMs provide information in relation to their ability to:</i>							
3	<i>monitor the implementation of actions agreed in compliance and dispute resolution?</i>	The IRM monitors the implementation of agreements reached through problem solving, final remedial action plans, and decisions of the Board taken in compliance review.	PGs - para. 73	Yes	1	1.25	1.25
4	<i>monitor the effectiveness of actions taken to address harms and to require updates/corrections if the initial action identified are not addressing the issues?</i>	The IRM's report to the Board will include its observations and/or findings on the progress in bringing the GCF funded project or programme into compliance with the GCF operational policies and procedures. In addition, the IRM can recommend improvements to the final remedial action plan during its implementation, if necessary.	PGs - para. 70 and 77	Yes	1	1.25	1.25



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
5	<i>carry out monitoring missions on the ground, including with original complainants, other stakeholders, clients and local government?</i>	The methods for monitoring include consultations with the complainant, GCF Secretariat, NDA or Focal Point, AE, EE and other stakeholders, and this can also include site visits.	PGs - para. 75 and 76	Yes	1	1.25	1.25
6	<i>report to the board on implementation?</i>	The IRM monitors the implementation of agreements and submits monitoring reports to the Board annually.	PGs - para. 76	Yes	1	1.25	1.25
7	<i>continue monitoring until harms are remedied?</i>	The monitoring should ideally be completed within three years from reaching an agreement or agreeing on a remedial action plan, but if not all remedial actions have been implemented to the satisfaction of the IRM, the IRM may extend the monitoring period.	PGs - para. 74	Yes	1	1.25	1.25
<i>In projects involving multiple DFIs (or IAMs):</i>							
8	<i>Is there a memorandum of understanding in place between IAMs, or case-specific memorandums of understanding/agreements, that simplify processes for complainants and specify how collaboration between IAMs will work?</i>	Clause 13.04 of all the Accreditation Master Agreements (AMAs) signed between the GCF and an accredited entity specifies how a GRM of an AE and the IRM will collaborate, once a complaint is filed. The practice of the IRM is to enter into an MOU when parallel complaints are filed, and to follow the general guidelines of the IAMnet with regard to such collaboration.	PGs – para. 84 & IAMnet "Principles for Cooperation among Independent Accountability Mechanisms (IAMs)"	Yes	1	1.25	1.25



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
9	<i>are complainants consulted on efforts to streamline complaint processes?</i>	Through the complaints filing process, the IRM keeps in touch so that the process is understood and streamlined. The IRM also conducts an annual stakeholder survey so they can make suggestions on the IRM's system reforms. Additionally, revisions of the TOR and PGs are publicly consulted.	SOP	Yes	1	1.25	1.25
10	<i>In situations in which the safeguard standards of the participating banks differ in strength and scope, is there a requirement that the most stringent applicable standards be applied?</i>	The GCF ESP allows the highest level of environmental and social protection required among the parties, with at least the level of protection by GCF being required. This is also mentioned in Clause 13.01 of the AMA, where it stipulates that if the AE's rule, policy or procedure is less stringent than the GCF's, they should directly apply the GCF's standards.	ESP - para. 8 & Clause 13.01 of the AMA	Yes	1	1.25	1.25
<i>Total score</i>					<u>10</u> (Perfect score: 10)	<u>12.50</u> (Weight per criterion)	<u>12.50</u> (Perfect weighted score: 12.50)

The IRM scored very high on this criterion. This means that the IRM effectively communicates its procedures with complainants, conducts monitoring, and collaborates with other grievance mechanisms of the GCF's accredited entities. The IRM prioritises communication with its stakeholders, which allows them to have a good understanding of their interactions with the IRM. The IRM's processes, procedures and practices are transparent and readily accessible by anyone and as such, its actions and recommendations and outcomes are, to that extent, predictable.

D. Indicators of “Equitability” (Total weighted score: 10.10 / 12.50)



The equitability criterion reflects how project-affected people are actively and equitably involved in a mechanism’s process and how a mechanism addresses power imbalances between parties. To allow for equitability, grievance mechanisms should provide capacity building and technical support if necessary, and parties should be able to challenge the responses of the mechanism. In addition, grievance mechanisms should acknowledge that strict evidentiary requirements can restrict parties with less capacity to equally access the mechanisms for redress.



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Are complainants provided with the necessary advisory, technical or financial support?</i>	The IRM bears the costs of problem solving, compliance review and monitoring. If necessary, it also pays the costs of ensuring meaningful participation of stakeholders in the IRM processes.	PGs – para. 91	Yes	1	0.96	0.96
2	<i>Do IAMs take into account stakeholders' different needs, abilities, vulnerabilities, languages, cultures, and personal circumstances, including exposure to trauma?</i>	The IRM maintains a roster of subject experts who can help the IRM to better inform the problem solving and compliance reviews it undertakes and respond to stakeholder needs. However, the roster needs to be more robust and include experts on trauma and differently-abled people. In terms of the language, the IRM allows complainants to submit their complaints in any language that they use. In that case, the IRM will use a translator on its roster or a translation firm. The IRM is required to act in a culturally sensitive manner when communicating with stakeholders.	PGs - para. 28	Partial	0.5	0.96	0.48
3	<i>Do compliance procedures permit both the IAMs themselves and complainants to review and provide comments on management action plans before they are finalized?</i>	The draft remedial action plan is developed by the GCF Secretariat through consultations with the IRM (through which the complainant is also consulted), AE and/or EE.	PGs - para. 66 and 67	Yes	1	0.96	0.96



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
4	<i>Is DFI management required to consider such comments and provide a reasoned explanation in situations in which such comments are not taken into account?</i>	The GCF Secretariat considers comments received to prepare a final remedial action plan, but they are not required to give an explanation for comments not taken on board.	PGs - para. 67	Partial	0.5	0.96	0.48
5	<i>In addition to management action plans, are complainants able to obtain and comment on other relevant information (e.g. the evidence submitted, investigation reports and any personal reports, such as medical evaluations) before material decisions are made?</i>	Following compliance investigation, the draft compliance report is shared with the complainants for their comments. General due process requirements are followed by the IRM with regard to evidence gathered, allowing opposing parties an opportunity to contradict or contest evidence against them. More can be done to codify these procedures.	PGs - para. 58	Partial	0.5	0.96	0.48
6	<i>Are there any formal avenues to appeal IAM compliance review decisions or DFI management responses?</i>	The complainant and/or other person cannot appeal the IRM's final compliance report. Management responses during compliance review are provided to the complainant and taken into account by the IRM as part of its compliance review investigation and report. Management responses in the form of remedial action plans post compliance review are also consulted with the complainant and the IRM has to agree with them before they are adopted and implemented.	PGs - para. 65	Partial	0.5	0.96	0.48



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
7	<i>Do IAMs have capacity-building programs and budgets to help equalize the power relations between the parties?</i>	In Problem Solving and Compliance Review, and during monitoring, the IRM can provide capacity building and bears the cost of making stakeholder participation a meaningful process. As a result, where capacity building is required, the IRM can provide, at its cost, capacity building programs to communities/groups/individuals. Additionally, the IRM conducts outreach activities for CSOs and for project beneficiaries, and for project affected people.	PGs - para. 91 and 105 & TOR - para 16	Yes	1	0.96	0.96
8	<i>Do DFIs and/or IAMs actively engage with stakeholders to make them aware of their rights and safeguard protections and, as needed, facilitate access to external experts and advisers to address power imbalances within the complaints handling process?</i>	The IRM, in its engagement with stakeholders, emphasizes the rights that the stakeholders hold and listens to their concerns to make sure they are protected from any adverse impacts from engaging with the IRM. The IRM also keeps a roster of experts in diverse subject areas, from whom the complainants and stakeholders can seek expert advice.	PGs – para.80-83 & SOP	Yes	1	0.96	0.96
9	<i>Are standards of evidence sufficiently flexible and informal from the complainant's perspective?</i>	The IRM follows a standard of <i>prima facie</i> evidence at eligibility stage and a standard of balance of probability in investigations.	SOP & PGs – para. 93	Yes	1	0.96	0.96
10	<i>Are IAMs required to proactively seek information relevant to admissibility as needed?</i>	The burden of gathering and analysing evidence is on the IRM and as such, it will seek evidence, test admissibility and credibility on its own. The IRM will make findings based on the best available evidence.	SOP & PGs – para. 93	Yes	1	0.96	0.96



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
<i>At the conclusion of an IAM process do complainants receive:</i>							
11	<i>a record of the process, outcomes and reasons for decisions?</i>	The IRM communicates its processes, outcomes and reasons for decisions to the complainant through draft and final compliance reports and eligibility reports and compliance appraisal reports, but the Board is not obligated to provide reasons to the complainants for their decisions.	SOP & PGs – para. 60, 54 and 32	Partial	0.5	0.96	0.48
12	<i>a record of any agreement?</i>	The outcome of successful problem solving will be reflected in a written agreement. The parties to the agreement, including the complainant(s), receive the agreement and are expected to implement the agreed actions, as appropriate.	PGs - para. 43	Yes	1	0.96	0.96
13	<i>information about how to challenge or follow up?</i>	Challenges to draft compliance reports and to draft monitoring reports are entertained through sending these reports to both the complainant and the GCF Secretariat, and where appropriate, to AEs for their feedback.	PGs - para. 60, 76 and 77	Yes	1	0.96	0.96
<i>Total score</i>					<u>10.5</u> (Perfect score: 13)	<u>12.50</u> (Weight per criterion)	<u>10.10</u> (Perfect weighted score: 12.50)

The IRM has continuously endeavoured to make its processes and operations equitable for all. However, there is still much room for improvement. The IRM provides sufficient advisory, technical and financial support if deemed necessary, and takes into account the different situations and needs of complainants who need support. Currently, there are ways that complainants can submit their views on the remedial action plan and other relevant information, but both the IRM and the GCF can make this process more rigorous by providing responses to complainants' comments that were not taken into account.



E. Indicators of “Transparency” (Total weighted score: 9.38 / 12.50)



Transparency serves as the basis for all eight UNGP effectiveness criteria. Grievance mechanisms should make information about their progress and their performances easily accessible on their websites. Especially with regard to their cases, they should make a clear and easy track record of both their eligible and ineligible cases on their websites.



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Are there clearly defined procedures on how IAMS process complaints with clear lines of responsibility and accountability, which are fully documented and publicly available?</i>	The PGs and the TOR of the IRM make it clear that the IRM processes complaints with full responsibility and accountability. These documents are publicly available on the IRM's website. Simplified brochures of the IRM's processes are also available in 14 languages on its website.	PGs & TOR	Yes	1	1.56	1.56
2	<i>Do IAMS remain continuously, proactively engaged with parties regarding the status of cases?</i>	The IRM continuously communicates with parties involved about any plans or progress made in relation to the case.	PGs & SOP	Yes	1	1.56	1.56
3	<i>Do IAMS have clear rules on handling and disclosing information among the parties, with clear, limited exceptions for commercially confidential documents?</i>	The IRM is guided by the provisions of the GCF's Information Disclosure Policy (IDP) and the Procedures and Guidelines (PGs). However, part V of the IDP provides exceptions to disclosure. These include an exception on the provision on financial information about commercial interests of the GCF and its activities. Commercial information provided to the GCF by stakeholders is retained on the basis of confidentiality. These rules are reasonably clear and there is an Information Appeals Panel that can rule on disputes. The Head of the IRM is one of the three members of the IAP and its current Chairperson.	IDP - part V & PGs - para. 96	Yes	1	1.56	1.56



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
4	<i>Do DFI information policies include a public interest override to mandate disclosure in situations in which human rights violations are concerned?</i>	The public interest override is available when information may fall under an exception but may still be provided "in extraordinary circumstances" if the benefit of the publication outweighs the potential harm and where confidentiality requirements do not apply. However, the IDP also provides a negative override which allows otherwise publicly disclosable information to be withheld if the potential harm outweighs the benefit. It does not specify human rights violations as a ground for disclosure on the basis of the public interest override. Because of the availability of a negative override, this indicator is scored as "partial."	IDP – para. 12 and 13	Partial	0.5	1.56	0.78
5	<i>Do IAMs regularly publish a full list of cases, including those deemed ineligible, and key performance metrics, such as the number of complaints, summary outcomes and satisfaction rates?</i>	All cases, regardless of their eligibility, are made publicly available on the register page of the IRM website. Since the IRM, as a young institution, has not had a significant number of cases, it has not produced an analysis of the key performance metrics. This will be made available once it deems meaningful for the IRM's history of cases handled.	IRM website - Case Register	Partial	0.5	1.56	0.78
6	<i>For individual cases, do IAMs publish in a user-friendly manner the full record of a case as well as a summary, an easy way to understand the status of the case and the documentation of the case (complaint submitted, IAM decision, management response, interim and final</i>	The IRM maintains a searchable, user-friendly, publicly accessible, web-based register of cases on the register page of its website. All key procedural steps relating to each case is promptly publicly disclosed.	IRM website - Case Register	Yes	1	1.56	1.56



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
	<i>outcomes, and any monitoring reports)?</i>						
7	<i>Does the DFI project document website include reference to any IAM complaints and associated documentation such as management action plans and dispute resolution agreements?</i>	The project pages of the GCF website include a link to the IRM website, where information about IRM cases and relevant documents can be found. However, this does not satisfy the intent of this criterion.	Example: FP001	No	0	1.56	0.00
8	<i>Do IAMs publish annual reports and regular newsletters?</i>	The IRM submits to the Board its Annual Report and to all its stakeholders its triannual newsletters. They are also published on its website .	TOR - para. 22	Yes	1	1.56	1.56
	<i>Total score</i>				<u>6</u> (Perfect score: 8)	<u>12.50</u> (Weight per criterion)	<u>9.38</u> (Perfect weighted score:12.50)

The IRM procedures are overall transparent. As with the predictability criterion, the IRM constantly communicates with parties involved in its cases and makes most information available on its website unless otherwise agreed with parties that certain information should be kept confidential. This effort includes the IRM's user-friendly website that discloses major information about all its eligible and ineligible cases, and its annual report and triannual newsletters. More can be done on the GCF management's website, however, by disclosing any information about IRM cases on the project information pages.

F. Indicators of “Rights-compatibility” (Total weighted score: 11.06 / 12.50)



This criterion refers to a grievance redress mechanism’s ability to put relevant international human rights standards at the centre of its activities. OHCHR alludes to the importance of integrating such standards within the safeguard policies of DFIs. In addition, by having a rights-compatible process, grievance redress mechanisms can proactively guide parties to lead processes and elicit outcomes that are aligned with the basic human rights principles. This criterion also looks at a grievance mechanism's ability to protect its parties and stakeholders from retaliation risks.



	Indicator	Explanations	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Are IAM processes respectful, culturally sensitive and empowering from complainants' perspectives?</i>	The IRM's PGs requires the IRM to act in a gender responsive and culturally appropriate manner when working with stakeholders, including complainants. The IRM has taken a number of steps to convert this mandate to practice. These include language translations in webinars and outreach events and being respectful and sensitive to cultures. However, more can be done.	PGs - para. 104	Partial	0.5	0.96	0.48
2	<i>Are the affected stakeholders consulted about available remedies and the manner in which they should be delivered?</i>	In problem solving, all stakeholders are consulted with regard to remedies and their delivery. In compliance review, stakeholders are interviewed during the investigations, including on remedies and their delivery and the final draft compliance report, as well as any remedial action plans, are sent to the complainants, Accredited Entity and GCF Secretariat for feedback, before finalisation and presentation to the Board.	PGs - para. 60, 61 and 67	Yes	1	0.96	0.96
3	<i>Do DFI safeguards and IAM procedures specifically integrate international human rights standards, including with respect to the Guiding Principles on Business and Human Rights, human rights due diligence and remedy?</i>	The GCF has adopted the IFC's performance standards as interim standards. It is developing its own standards in the meantime. The IFC standards do not specifically refer to human rights, though many of the standards are rooted in human rights. The GCF does have an Environmental and Social Policy (ESP), which does include a human rights standard and a requirement for due diligence on it. Additionally, the UNGPs are specifically made applicable to the GRMs of Accredited Entities by the GCF's ESP.	ESP – para. 8(r), 50 and 81	Yes	1	0.96	0.96



	Indicator	Explanations	Evidence	Yes / No / Partial	Score	Weight	Weighted score
4	<i>In cases in which there is a conflict between national norms and international norms on human rights, do DFIs and/or IAMS always adopt the higher standard in their deliberations?</i>	Paragraph 3 of the IRM's TOR clearly states that one of the objectives of the IRM shall be to "(f)ollow international best practices, consistent with these terms of reference and the detailed guidelines and procedures of the IRM." As such, international human rights standards will guide the IRM in the event of a conflict with national human rights standards. Additionally, the GCF's Environmental and Social Policy (ESP) states, "All activities supported by GCF will be designed and implemented in a manner that will promote, protect and fulfil universal respect for, and observance of, human rights for all recognized by the United Nations. GCF will require the application of robust environmental and social due diligence so that the supported activities do not cause, promote, contribute to, perpetuate, or exacerbate adverse human rights impacts" (Para 8(r)). Additionally, para 78 of the ESP obligates the GRMs of GCF's accredited entities to "take into account the "effectiveness criteria" for non-judicial grievance mechanisms outlined in the United Nations Guiding Principles on Business and Human Rights in order to maximize effectiveness."	TOR – para.3 & ESP – para. 8(r), 81	Yes	1	0.96	0.96



	Indicator	Explanations	Evidence	Yes / No / Partial	Score	Weight	Weighted score
5	<i>Do IAMs specify that compliance reviews and dispute resolution processes and outcomes should be non-discriminatory, gender sensitive and compatible with international human rights law?</i>	The IRM's TOR and PGs require the IRM to be fair and equitable to all stakeholders. Additionally, the PGs sets out due diligence requirements in conducting problem solving and compliance reviews. The IRM has published a gender strategy note which sets out how the IRM will act in a gender sensitive manner in performing its various functions.	TOR - Para. 2(c), PGs - Para. 3(c) & The IRM's Gender Strategy Note	Yes	1	0.96	0.96
6	<i>Do IAMs take international human rights law into account in compliance reviews, as relevant to the country, project and issues involved?</i>	Since the GCF's environmental and social policy establishes an international human rights standard, the IRM will consider international human rights law when such issues are raised in a compliance review, and as relevant to that country, project or programme.	ESP - para. 8(r), 50 and 81	Yes	1	0.96	0.96
7	<i>Do IAMs assess possible human rights implications of dispute resolution processes, consult with and advise the parties accordingly?</i>	When reaching an agreement pursuant to problem solving, the parties to the agreement shall ensure that the agreement does not violate GCF policies or domestic laws of the parties, or international commitments of the country concerned under bilateral or international treaties or agreements to which the country is a party (including human rights treaties and agreements). Accordingly, the IRM will consult with and advice the parties accordingly.	PGs – para. 47	Yes	1	0.96	0.96



	Indicator	Explanations	Evidence	Yes / No / Partial	Score	Weight	Weighted score
8	<i>Do IAMs have a plan to address non-implementation of outcomes, such as through referral to another mechanism?</i>	Non-implementation of outcomes of problem solving agreements is dealt with through measures provided for in the agreement itself or in the absence of such measures, through revival of the case from the point of agreement. In the case of compliance reviews, non-implementation of outcomes is dealt with through monitoring reports to the Board and through requests by the IRM for upgrades to the remedial action plan. There is no provision beyond this for the IRM to refer the matter to another mechanism or body (other than the GCF Board).	N/A	No	0	0.96	0.00
9	<i>Do IAMs evaluate the effectiveness of remedies, address deficiencies, and assess and address the implications of remedies to avoid contributing to further harm?</i>	Effectiveness of remedies will be evaluated by the IRM when the Secretariat submits a remedial action plan for approval. Deficiencies will be identified and a request made by the IRM to the Secretariat to upgrade the plan either before finalisation or during implementation. The latter can happen if the plan is producing unexpected or unforeseen harm. If the IRM and Secretariat cannot agree on any of these matters, the IRM can refer the same to the Board for a decision.	PGs - para. 66-70	Yes	1	0.96	0.96



	Indicator	Explanations	Evidence	Yes / No / Partial	Score	Weight	Weighted score
10	<i>Do DFIs and IAMs have clear published commitments, operational policies and procedures to prevent and address the risks of reprisals?</i>	The GCF does not countenance retaliation against a complainant or any other person involved in an IRM process. Preventive and protective measures can be taken by the IRM and if need be, by the Independent Integrity Unit as well. The IRM also has a detailed supporting operating procedure that sets out how retaliation is prevented and protective measures are put in place. These are all publicly available.	PGs - para. 80–83 & SOP on Retaliation	Yes	1	0.96	0.96
11	<i>Do IAMs provide for the confidentiality of complainants and permit anonymous complaints in situations in which there are reasonable grounds to believe that there would be a genuine threat to the safety of the complainant if their identities were disclosed?</i>	The IRM provides confidentiality to complainants and their representatives when requested or where there is a threat of safety. The IRM does not accept anonymous complaints, but an anonymous communication might furnish the information required to trigger a suo moto investigation, especially if there exists a threat that prevents the complainants from coming forward without fear.	TOR - para. 11 and 12, PGs – para. 25(c), 29, 34, 51, 71, 72, 89, 96, 97, 98, 103, 106 & SOP on Retaliation	Yes	1	0.96	0.96
12	<i>Do DFIs and IAMs collect data and publicly report on the risks of reprisals, taking due account of confidentiality concerns?</i>	The IRM collects reprisals data through its Case Management System. The Independent Integrity Unit also collects reprisals data. This data is publicly reported through annual reports by both units and also by special reports, including activity reports presented to the Board at each meeting. These are all publicly available. In publishing such data, the IRM will take into account confidentiality concerns.	IRM's Case management system, activity reports and annual reports of the IRM and IIU.	Yes	1	0.96	0.96



	Indicator	Explanations	Evidence	Yes / No / Partial	Score	Weight	Weighted score
13	<i>Are requirements to avoid and address the risks of reprisals included in the contractual agreements of DFIs with the clients and are there sanctions for non-compliance?</i>	There are provisions in the Accreditation Master Agreements and in Funded Activity Agreements which obligate the Accredited Entity (client) of the GCF to respect and comply with the provisions of the GCF's prohibited practices and Whistle Blowing policies. The GCF has zero tolerance for reprisals against a complainant (who is also treated in the GCF as a whistleblower) and such acts are also treated as prohibited practices that can attract remedial action, including sanctions against organisations.	Whistleblower Protection Policy, Prohibited Practices Policy , relevant paras in AMAs.	Yes	1	0.96	0.96
	Total Score				<u>11.5</u> (Perfect score: 13)	<u>12.50</u> (Weight per criterion)	<u>11.06</u> (Perfect weighted score: 12.50)

The IRM also scored high on this criterion. The IRM puts human rights and non-discrimination at the forefront, and it carefully assesses the kinds of remedies that can be given to complainants and what further impacts those remedies can have to direct and indirect beneficiaries of the remedies. The IRM also understands the possibilities of retaliation risks that complainants may face, and after sufficient initial assessment, the IRM provides measures to protect its stakeholders from any risks that may result from engagement with the IRM. The IRM is also constantly improving its operations to enhance its stakeholders' right to know about the IRM and access the IRM.



G. Indicators of “Continuous Learning” (Total weighted score: 5.56 / 12.50)



A grievance redress mechanism should serve as a source for continuous learning by providing sufficient data and public reporting on outcomes. Such information should be available in a more systematic way, and public dialogue on access issues can be useful in improving the mechanism and preventing future grievances.



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Do DFIs carry out and publish evaluations, retrospectives and lessons-learned studies?</i>	Yes. The IRM undertakes and publishes Advisories on issues relevant to the GCF including lessons learned from cases handled by it but also from good international practice. Also, the IRM provides articles and blogs on evaluations, retrospectives and lessons learned on its website on pertinent matters. Additionally, the Independent Evaluation Unit (IEU) does regular thematic and other evaluations of the GCF, which are published, and the Office of Portfolio Management (OPM of the Secretariat) also regularly monitors projects/programmes through Annual Performance Reports (APRs), which are also published online. There are also other studies on the GCF's work, which are conducted through external consultancy firms.	IRM Advisory of Preventing Sexual Exploitation, Abuse and Harassment at the Project and Programme levels (2020) , Evaluation of the IRM's carbon footprint , Evaluations with comparisons with IAM recent reforms etc. All these are found on the IRM's website.	Yes	1	1.39	1.39
2	<i>Do DFIs and IAMs seek regular feedback on the experiences of parties and keep a systematic record of the frequency, patterns and causes of grievances?</i>	The IRM has a Case Management System (CMS) and data analysis tool that allows it to systematically gather data on frequency, patterns and causes of grievances. Additionally, the IRM regularly undertakes research on its own into such issues, including via an annual stakeholder survey that is also sent to complainants. However, the GCF at present is not keeping track of grievances directly received by it or by the AEs. The IRM also seeks to track complaints by AEs' GRMs.	Annual Stakeholder Survey - results of which are shared with the Ethics and Audit Committee of the GCF Board, and also with those responding to the survey. Corrective action on areas for improvement is taken by the IRM in response. Research on grievances from mitigation and adaptation projects.	Partial	0.5	1.39	0.70



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
			Research on GRMs of Accredited Entities in 2017/18 led to capacity building mandate and programmes.				
3	<i>Do DFIs and IAMs collect and regularly publish data on remedial outcomes?</i>	Yes. The monitoring function of the IRM is broad and requires monitoring reports to be published with regard to problem solving outcomes and remedial actions after compliance review. The GCF Secretariat at present does not collect and regularly publish data on remedial outcomes.	PGs - para. 2(d), 73-78, 91 and 92	Partial	0.5	1.39	0.70
4	<i>Are new DFI project proposals required to be accompanied by a disclosure to the board of prior IAM proceedings involving the proposed client and the outcomes thereof?</i>	New project proposals do not have to be accompanied by prior IRM proceedings involving the proposed client and the outcomes thereof at the time of Board approval.	N/A	No	0	1.39	0.00
5	<i>Are evaluations and lessons learned studies critical in orientation and are they consulted on publicly?</i>	So far, the IRM's advisories have not been publicly consulted. Monitoring reports will be consulted with complainants but not with public. The advisory and monitoring reports are critical in orientation, where the same is justified. From 2021, IRM advisories will be consulted with stakeholders and where appropriate with the public as well.	SOP on Advisories. Public consultation is not a requirement for advisories or monitoring reports.	No	0	1.39	0.00



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
6	<i>Do lessons learned explicitly feedback into DFI strategies, policies and procedures?</i>	Yes. The Advisories of the IRM issued are consulted with the Secretariat to ensure maximum buy-in and reformatory actions. This will also be the case for monitoring reports. Additionally, evaluations published by the IEU receive management responses, and once approved by the Board, are implemented by the Secretariat.	Secretariat response to the IRM Advisory on preventing SEAH at the project and programme level and the Board comments.	Yes	1	1.39	1.39
<i>Do evaluations and lessons learned studies analyze:</i>							
7	<i>key access constraints from complainants' perspectives?</i>	The IRM being a young institution has not done so yet. It plans to do so in 2022.	N/A	No	0	1.39	0.00
8	<i>the nature and patterns of grievances in a way that may reveal sector-specific or systemic issues?</i>	The IRM being a young institution has not done so yet. It plans to do so in 2022.	N/A	No	0	1.39	0.00
9	<i>examples of good practices, which can be adopted by DFIs and their clients to enhance human rights due diligence processes?</i>	The IRM's SEAH Advisory as well as several of its blogs and articles address human rights due diligence issues.	News and Articles page on the IRM	Yes	1	1.39	1.39
	<i>Total score</i>				<u>4</u> (Perfect score: 9)	<u>12.50</u> (Weight per criterion)	<u>5.56</u> (Perfect weighted score: 12.50)

This criterion scored lower on the IRM's scoresheet. It is mainly because the IRM (and the GCF) is a young institution and not many formal evaluations have been conducted yet. The IRM has, however, shared its experiences and lessons learned through various channels such as its blogs, newsletters and advisories. It has also led the community of practice of grievance redress and accountability mechanisms, where such mechanisms come together to share their experiences. The GCF has been conducting more evaluations of itself through hiring external evaluation firms or through the Independent Evaluation Unit. As the IRM (and the GCF) builds more institutional experience, it will learn new lessons and share them with its stakeholders.

H. Indicators of “Engagement and Dialogue” (Total weighted score: 8.75 / 12.50)



This criterion highlights the importance of public consultation to improve grievance redress mechanism's procedures. It also emphasizes the value of having complainants involved in the processes of preparing, implementing and monitoring Management Action Plans (MAPs).

	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
1	<i>Are external stakeholders consulted in the design of the mechanism, the development and revision of internal policies and IAM procedures and in the ongoing performance review of the mechanism?</i>	Yes. External stakeholders were consulted in the revision of the IRM's Terms of Reference and the development of its Procedures and Guidelines as well the Supporting Operating Procedures on retaliation, and Gender Strategy Note. The first five-year review of the IRM will be conducted in 2022, but the IRM has sent out annual stakeholder surveys to receive feedback on its performance from external stakeholders.	Updated TOR of the IRM was developed through a public call for proposals, followed by consultations on the draft with stakeholders, including civil society, Board members, Accredited Entities and National Designated Authorities. A similar process was followed for the Procedures and Guidelines of the IRM and for the retaliation and gender documents. Future revisions to these documents will follow a similar process.	Yes	1	2.5	2.5
2	<i>Do IAMs have robust dispute resolution capacities and internal training and advisory support to ensure that personnel keep pace with developments in mediation best practice?</i>	In addition to the Dispute Resolution Specialist, two other staff members on the IRM team have been trained in mediation (with GCF funds). The IRM also keeps a roster of 22 highly skilled mediators. The IRM regularly holds knowledge and experience sharing sessions with its rostered mediators and shares experiences with other IAMnet members.	N/A	Yes	1	2.5	2.5
3	<i>Do IAMs have procedures for compliance review that allow for dialogue and engagement</i>	During compliance investigation, the IRM gathers information from all relevant stakeholders, including	PGs – para. 56 and 67	Yes	1	2.5	2.5



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
	<i>with complainants and other affected stakeholders as part of the investigative and remedy development processes and are IAM staff adequately trained in interview and dialogue techniques that are culturally appropriate and reflect a gender perspective?</i>	the complainants. The GCF Secretariat's development of a remedial action plan involves a consultation with the IRM, through which the complainants are consulted. A draft remedial action plan is shared with the complainants for comments before finalization. The IRM staff were trained in conducting interviews in relation to cases involving Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH) and those involving high risks of retaliation. The IRM has allocated a budget for training staff on building such skills in 2022, including on gender responsiveness.					
4	<i>Are IAMs and DFI management required to consider external stakeholders' inputs and provide a reasoned explanation of the extent to which comments were taken into account?</i>	No. Generally, however, as a matter of practice, the GCF does consult external stakeholders through a variety of means, including permitting accredited observers (civil society) to be present at Board meetings and comment on proceedings and consulting through targeted requests for inputs. However, there is no obligation to provide reasoned explanations on the outcome of comments received.	N/A	No	0	2.5	0.00



	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
		The IRM does make a practice of doing so whenever it consults stakeholders.					
5	Are communities fully supported to participate in the respects outlined above, through robust and proactive information disclosure in relevant languages and accessible formats, and capacity-building support as needed?	The IRM can reimburse costs of meaningful participation of complainants, witnesses etc, and in problem solving capacity building of communities is part of the matters that the IRM does consider and provide when needed. Complainants can communicate with the IRM in the language of their choice and the IRM would reciprocate. The IRM provides information on functions and procedures through multiple languages (brochures) and has added translation functions to its website. More can be done in this regard.	PGs – para. 28, 79, 91 and 104 & IRM website.	Partial	0.5	2.5	1.25
	Total score				3.5 (Perfect score: 5)	12.50 (Weight per criterion)	8.75 (Perfect weighted score: 12.50)
Duplicated Indicator (not counted towards the total score)							
6	Are complainants actively involved in shaping remedies and commenting on the formulation, implementation	The IRM's PGs provide for consulting complainants of draft MAPs and during the monitoring of	PGs – para. 60, 61 and 67	Yes	This indicator is scored in 'D. Equitability' criterion as indicator #3.		

	Indicator	Explanation	Evidence	Yes / No / Partial	Score	Weight	Weighted score
	and monitoring of management action plans?	MAPs and the preparation of monitoring reports.					

This last criterion also received a lower score. This criterion only comprises six indicators, one of which is duplicated in other criteria and is not scored in this criterion. The IRM has been engaging external stakeholders in developing its procedures and is continuously incorporating different measures to make itself more available to its stakeholders and people who need information about the IRM. The GCF management can do more to engage its stakeholders and include them in major conversations to improve its operations and allow for more transparency.