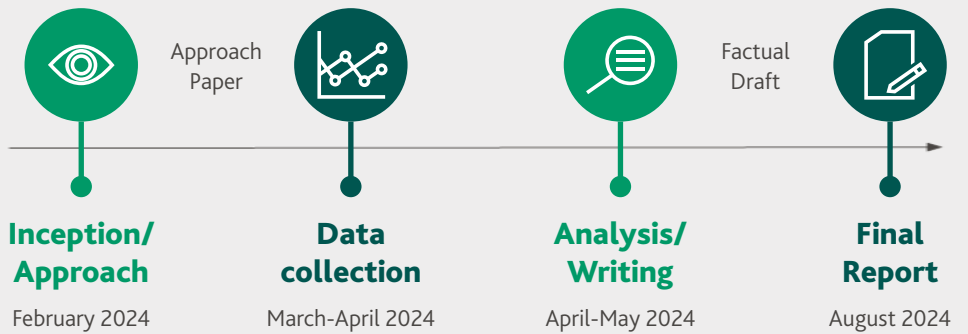


Independent evaluation of the Green Climate Fund's Approach to and Protection of Whistleblowers and Witnesses



Context

The GCF Independent Evaluation Unit (IEU) carried out an independent evaluation of the GCF's approach to and protection of whistleblowers and witnesses, with a particular focus on the Policy on the Protection of Whistleblowers and Witnesses (PPWW).



Methods

The evaluation used methods including primary data collection through key informant interviews, three online surveys, two workshops, a desk-based document and literature review, as well as benchmarking against relevant organizations and best practice. The evaluation team engaged with respondents from all categories of stakeholders covered by the policy. Workshops were organized at the start of the data collection stage, to inform the design of survey questions and identify emerging themes to probe further during the interviews. Findings from online surveys were used to refine interview questions.

Observations from all sources were triangulated, verified, validated and categorized into themes using a tailored analytical framework. Engagement with stakeholders included the socialization of preliminary findings in a factual draft report. All feedback from the Secretariat and the Independent Units were considered and reflected as appropriate in the final report. The key findings and recommendations from the report were presented to key stakeholders and socialized via face-to-face meetings and workshops and webinars.



Conclusions

The evaluation report presents conclusions in three areas:

(i) relevance and coherence of the policy; (ii) operationalization of the policy; and (iii) capacity and awareness to implement the policy.

48%

of GCF personnel responding to our survey believe that the current policy to some extent encourages a culture of accountability and ethical behaviour within the GCF

1. Policy relevance and coherence

The PPWW aligns well with the GCF's vision, strategic goals and management direction and, in many respects, is implemented according to best practice. However, there are some areas for potential improvement. As an institutional policy of the GCF, the PPWW interacts with a wide range of policies and standards, such as the GCF's integrity policies, ethics framework and grievance architecture, to name a few. The findings from this evaluation highlight opportunities to refine and harmonize these linkages, to address the need for clear definitions and improved communication in order to support a coherent integrity and HR framework. Processes around the protection of whistleblowers and witnesses need to be fully integrated into the broader GCF policy landscape.

93%

of accredited entity respondents believe that their whistleblowing policies and procedures encourage executing entities to report suspected Wrongdoing without fear of retaliation

76%

of accredited entity respondents believe that the key provisions of the PPWW are 'very clear' or 'fairly clear'

100%

of accredited entity respondents who received support from the Independent Integrity Unit (IIU) say they have a clear understanding of the PPWW's key provisions

2. Operationalization of the policy

The harmonization and integration of this policy landscape will support the clarity and understanding of – and trust in – the PPWW. Policy tools for operationalization are vital for its effective and efficient use and uptake. Since the adoption of the PPWW, relevant guidance, standards and manuals have been established, addressing, among other things, the process of an investigation. However, such guidance needs to be complete and consistent to ensure trust, confidence and predictability in institution-wide arrangements, both internally and externally. Iterative institutional learning supported through timely and effective reporting to the Board is also critical for successful implementation and use.

3. Policy awareness and communication

Although the evaluation did not have access to individual cases of suspected Wrongdoing and protection of whistleblowers and witnesses, engagement with internal and external interviewees confirmed the need for improved awareness. Within the GCF, regular trainings could provide an enabling environment, ensuring confidence and trust in procedures and decision-making. Externally, the evaluation shows that providing capacity-building increases entities' confidence in, and alignment with, the PPWW. As a continuously learning organization, the GCF's capacity-building should go hand in hand with learning from other organizations' approaches, to ensure a sustainable approach for the future.

73%

of GCF personnel responding to our survey are aware of the PPWW

57%

of GCF personnel responding to our survey are not confident the PPWW would be effective in protecting whistleblowers and their identities

48%

of GCF personnel responding to our survey would be 'very unlikely' or 'fairly unlikely' to report concerns

Recommendations

The IEU evaluation team identified five specific areas for recommendations.



Policy coherence

The GCF could consider increasing the effectiveness of the implementation of the PPWW by (i) aligning coherence across related GCF policies, and (ii) aligning interpretation via coherent guidance, standards and manuals.

67% of GCF personnel responding to our survey feel they do not understand the key provisions of the PPWW very well, or do not understand them at all



Operationalization

When updating the PPWW, the GCF should review the issues experienced in implementation of the PPWW, including aspects of the policy, guidance, standards and manuals that could help strengthen the policy's effective operationalization.

US\$30bn

By 2030, the PPWW will need to be operationalized across a GCF portfolio worth US\$30bn - resulting in greater geographical, cultural and linguistic diversity, where PPWW requirements will need to function



Policy awareness and communication

The GCF should consider strengthening all potential users' awareness of the PPWW, reporting channels and classification.

85% of GCF personnel responding to our survey feel that the PPWW is not adequately advertised and promoted to everybody who might need to use it

67% of GCF personnel responding to our survey stated they had not attended any training on the PPWW since joining GCF



Learning

The GCF should ensure periodic reporting on the implementation of the PPWW to the Board, including reviews of the PPWW. The GCF should leverage learning opportunities to integrate experience and expertise into the GCF's approach to the protection of whistleblowers and witnesses.

1-2 years

Good practice is for organizations to review their whistleblowing policies every 1-2 years



Capacity-building

The GCF should increase tailored capacity enhancement for internal and external potential users to strengthen the effective implementation of the PPWW.

55% of accredited entity respondents would like more support from IIU in integrating whistleblowing and associated protections in their organization and the executing entities they work with

44% of accredited entities who reported receiving no IIU support found the key provisions of the PPWW 'not very clear'

