



INDEPENDENT EVALUATION OF THE GREEN CLIMATE FUND'S APPROACH TO AND PROTECTION OF WHISTLEBLOWERS AND WITNESSES

BACKGROUND

The Board approved the 2024 workplan of the Independent Evaluation Unit (IEU) through decision B.37/09, including an independent evaluation of the GCF's approach to whistleblowers and witnesses.

CONCLUSIONS

Based on the findings of the report, the evaluation groups the conclusions into three areas: (i) relevance and coherence of the policy; (ii) operationalization of the policy; and (iii) capacity and awareness to implement the policy.

1. Policy relevance and coherence

While the PPWW aligns well with the GCF's vision, strategic goals and management direction and, in many respects, is implemented according to best practice, some areas of improvement have been identified. 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 the *GCF Grievance Architecture – A Handbook for GCF Personnel*, 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.

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 has not had any access to individual cases of suspected Wrongdoing and protection of whistleblowers and witnesses, engagement with internal and external interviewees has confirmed the need for improved awareness. Within the GCF, regular training could provide an enabling environment, ensuring confidence and trust in procedures and decision-making. Externally, the



evaluation shows that if capacity-building efforts are provided, entities' confidence in and alignment with the PPWW is greater. As a learning organization, the GCF's capacity-building and learning from other organizations' approaches go hand in hand, to ensure a sustainable approach for the future.

Following the conclusions, the IEU evaluation team has identified five specific areas of recommendations.

KEY RECOMMENDATIONS

Recommendation 1 - 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.

Recommendation 2 - 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.

Recommendation 3 - Policy awareness and communication

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

Recommendation 4 - 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.

Recommendation 5 - Capacity-building

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

Whistleblowers help to safeguard the financial, operational and reputational integrity of the GCF, and by extension help to safeguard the integrity of the global effort to tackle climate change. This evaluation provides evidence-based analysis to strengthen the effectiveness of the PPWW's implementation and its accompanying tools and guidelines.

METHODS

Methods included a desk-based document and literature review, benchmarking against relevant organizations and best practice, and primary data-collection through workshops, interviews and online surveys. The evaluation team has engaged with five broad respondent categories delineated in the policy. Full details of methods can be found in the approach paper.



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