

Georgian Energy Development Fund

Gender Policy

I Background

1. Georgian Energy Development Fund (GEDF) is a joint stock company established by Government of Georgia in order to promote and develop clean energy projects in Georgia. GEDF supports clean energy project development either through early project development investment and/or through an offering of the government's shares in GEDF to potential investors.

II Georgia legal instruments for gender equality

2. The Constitution declares Georgia a “social state” and underlines the principles of social justice, social equality, and social solidarity within society¹. Under Article 11, the Constitution ensures the right to equality of all persons and prohibits discrimination based on sex and gender. It obliges the State to provide equal rights and opportunities for women and men as well as to take special measures to ensure the essential equality of men and women and to eliminate inequality.
3. The Anti-Discrimination Law adopted in 2014 introduced the prohibition of discrimination in Georgia and resulted in important changes in other national laws in Georgia, by including the principles of equality and anti-discrimination in the specific and relevant acts. In 2019, under the amendments of the Anti-Discrimination Law, the law enforcement mechanisms were strengthened by expanding the mandate of the Public Defender's Office of Georgia (PDO).
4. In addition, the Gender Equality Law set the equality principles between men and women in political, economic, social, and cultural life. The Gender Equality Council of the Parliament of Georgia (GEC) is a Standing Body responsible for developing the legislative base in the sphere of gender equality and for providing the respective strategy for consideration and endorsement. The GEC Action Plan for 2023-2025 addresses policy on gender equality including gender equality in the workplace and ending violence against women and girls.
5. Apart from the national legislation, the Government of Georgia adopted the 2014-2020 Human Rights Strategy and the short-term Action Plans (HR NAP) for the periods 2014-2016, 2016-2017 and 2018-2020, each of which includes the main activities and results in the different critical areas of human rights, including gender equality (as a separate chapter). The HR NAP also makes references to the National Action Plan on Combating Violence against Women and Domestic Violence and Measures to be implemented for the Protection of Victims (Survivors) (VAWG/DV NAP).

¹ Georgia, Law of Georgia on the Elimination of All Forms of Discrimination (2014). Available online at <https://matsne.gov.ge/en/document/view/2339687?publication=0> Georgia, Law of Georgia on Gender Equality (2010) available online at <https://matsne.gov.ge/en/document/download/91624/3/en/pdf> . Georgia, Constitution of Georgia (1995), art. 5.2. Available at <https://matsne.gov.ge/en/document/view/30346?publication=35>.

III Gender and climate financing

6. Women in Georgia face barriers to accessing finance generally and have lower labour participation rates than Georgian men². While more likely to be affected by climate change, they are less likely to be leading climate policy³. Women in Georgia are also less likely to have access to education which provides technical expertise in the areas relating to climate activities, being underrepresented in some STEM subjects including engineering and technology⁴. Climate change can worsen existing gender-based inequities.⁵ While addressing this inequality is outside of the scope of this policy, the GEDF commit to targeting the recruitment of women in technical roles as a means of improving gender balance in the sector.
7. Climate finance for green energy can catalyse the much-needed transition to zero-carbon and climate-resilient development while also fostering equitable social policy, including gender equality and women's empowerment.
8. This legislative and contextual framing gives GEDF a clear mandate to enhance a gender-sensitive approach in its processes and operations. The Gender Policy and Gender Action Plan of the GEDF is based on the GCF Gender Policy and Action Plan and were prepared through consultations with GEDF staff and a literature review of relevant Gender Policy including Georgia gender legislation, The EBRD Strategy for the Promotion of Gender Equality 2021/2025 and country-level gender analysis from UNWomen and ADB.

IV Rationale

9. The Gender Policy recognizes that gender relations, roles and responsibilities exercise important influences on women's and men's access to and control over decisions, assets and resources, information, and knowledge.
10. This Gender Policy also recognizes that the impacts of climate change can exacerbate existing gender inequalities. The Gender Policy further acknowledges that climate change initiatives are more sustainable, equitable and more likely to achieve their objectives when gender equality and women's empowerment considerations are integrated into the design and implementation of projects. Further, this Gender Policy recognizes that women and vulnerable communities are also part of the solution to climate change and should, therefore, be effectively engaged in discussions and decisions that affect them.
11. The Gender Policy will be consistent with and linked to the existing relevant frameworks, policies, and standards of GEDF as well as relevant policies that GEDF may develop in the future.

² UNWomen (April 2021) Women Entrepreneurs Georgia Factsheet. Online at https://eca.unwomen.org/sites/default/files/Field%20Office%20ECA/Attachments/Publications/2021/8/Expo%20Report/Georgia_Factsheet-min.pdf

³ Inter-Parliamentary Union Georgia online at > <https://www.ipu.org/parliament/ge>

⁴ National Statistics Office of Georgia, 2019.7 Engineering, manufacturing, and construction: lowest share of female students (12 per cent), graduates (15%), and PhD (38%).

⁵ See UNFCC gender summary online at <https://unfccc.int/gender>

V Objectives

12. The Gender Policy commits GEDF to:
 - a. Enhance gender equality within its governing structure and day-to-day operations; and
 - b. Promote the goals of gender equality and women's empowerment through its work on projects, on the allocation of funds, technical resources, operations, due diligence, and overall impact as outlined in the Gender Action Plan.

13. This Gender Policy moves beyond a narrow understanding of gender to consider, respect and value the contribution of both women and men, recognising that certain groups of women and men face additional barriers to accessing and using climate and green energy finance mechanisms, as well as in the workplace and operations of climate and green energy organisations. The groups include women and men who are LGBT+, women and men from ethnic minorities, and women and men with disability.

14. The Gender Policy has three main objectives:
 - a. To support climate change interventions and innovations through a comprehensive gender approach, applied both within the institution and through its projects.
 - b. To promote projects that advance gender equality through climate change mitigation and adaptation actions; and minimize social, gender-related and climate-related risks; and
 - c. To contribute to reducing the gender gap of climate change-exacerbated social, economic, and environmental vulnerabilities and exclusions through GEDF projects that mainstream gender equality issues.

VI Scope of application

15. The GEDF is implementing through partners. GEDF will apply its Gender Policy throughout its operations and projects, including studies, design tender documents, construction, and operations. This policy applies to those projects which are financed by GCF and/or to those projects as well which would not be financed by GCF but where there is an agreement with the partner to apply this policy to the project.

16. The Gender Policy's objectives apply across three interconnected levels:
 - a. At the GEDF institutional level: to adopt, implement and document the GEDF approach to addressing gender issues in its day-to-day governance, operations and procedures, and its performance measurement frameworks as reflected in the Gender Action Plan while committing the necessary resources, financial and human, to make this approach robust and effective.
 - b. At the project level: to address and reduce gender inequality, deepen stakeholder engagement, and deliver better accountability for gender equitable green energy projects in Georgia.
 - c. At the sector level: to contribute to high-quality, more comprehensive, systematic, and participatory sex-disaggregated data collection, qualitative and quantifiable gender analysis and a local knowledge base that supports gender-related learning outcomes.

17. GEDF will support an institutional culture and enabling environment that integrates gender equality through the course of the project life cycle and investments.

VII Guiding principles

18. Guiding principles underpin the core values and premises of the Gender Policy and are aligned with the objectives of GEDF:
 - a. GEDF's gender policy is aligned with Georgian legislation on gender equality, and in line with relevant UN and regional instruments addressing gender and climate change including UNFCCC's Gender Action Plan and Sustainable Development Goals 5 and 13.
 - b. GEDF will commit to be a gender-equal workplace, where women and men will equitably participate at all levels of the workforce and be equitably recruited, promoted, and remunerated.
 - c. GEDF will ensure a safe and welcoming workplace to all staff members. In line with the Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH policy), Internal Regulations, and the Whistleblower Policy there will be zero tolerance for workplace discrimination, harassment, abuse or exploitation toward any staff member, or person or entity associated with GEDF.
 - d. In line with the Environmental and Social Safeguards Policy (ESS Policy), GEDF will strive to have women and men provided with equal opportunity to take an active part in all GEDF project stakeholder consultations and decision-making during project preparation, implementation, and evaluation.
 - e. For the purposes of this Gender Policy, GEDF requires that where applicable, gender sensitive and culturally aware analysis and activities will be undertaken as a part of all project studies, design, and other activities.

VIII Policy requirements

19. GEDF responsibilities
 - a. GEDF is responsible for dedicating financial, human, and other resources as required to implement the Gender Policy in projects, specifically:
 - i. GEDF will establish a gender specialist /compliance officer who will also cover SEAH policy, nominated by the Ethics committee and appointed by the director of GEDF and be accountable to Director to monitor and support the application of this policy.
 - ii. GEDF will ensure that projects and investors are assessed considering their commitment and capacity to meet the principles and requirements of the GEDF Gender Policy. GEDF consultancies will also be subject to the requirements of this Gender Policy.
 - iii. GEDF will require a project-level gender action plan and monitor implementation.
 - iv. GEDF will ensure that the design and implementation of GEDF-supported activities are informed by the results of gender and cultural assessments undertaken during the preparation of the activities (studies and designs).
 - v. GEDF will require that performance reports submitted on GEDF- funded activities include progress made in implementing project-level gender action plans.
 - vi. GEDF will commit resources as necessary towards independent verification and project reviews and assessments to document and publish the benefits

and considerations of actions and achievements that address gender issues as deemed necessary.

- vii. GEDF will, to the extent feasible, develop specific gender targets and progress indicators and integrate both qualitative and quantitative targets and indicators for projects;
 - viii. GEDF will generate, document, publish and archive experience gained through its actions and project investments to promote learning from the best practice implementation of its partners.
 - ix. GEDF will develop a gender training to be attended by all staff annually and organize gender training or provide technical and material support for gender resources as requested by the Executive and Board.
 - x. GEDF may complement its own technical capacity with gender consultants.
- b. GEDF is responsible for dedicating financial, human, and other resources as required to implement the Gender Policy institutionally, specifically:
- i. All GEDF staff, executive and board members have the right to be treated with respect and treated equally in the workplace. These rights are enshrined in Georgian legislation and in the GEDF SEAH Policy, Internal Regulations, and the Whistleblower Policy.
 - ii. To respond to gender inequality in the workplace, GEDF may take targeted actions to ensure women and men have equality in the GEDF workplace. These measures may include:
 - 1. Undertaking a gender pay gap analysis following the methodology developed by the National Statistics Office of Georgia.
 - 2. Regular Executive and Board reporting on gender staff parity across all levels of GEDF organisational structure and the development and implementation of subsequent actions to ensure gender parity at Execution and senior staff levels.
 - 3. Commitment to flexible workplace options (e.g. flexible hours, part time- and job-sharing arrangements etc)
 - 4. Clear workplace policies on pregnancy, parental leave (for both men and women), care commitments (for example for staff with elderly parents or children with disabilities) and other gender workplace issues as identified by the Gender Specialist, ESS team or Executive.
 - 5. Targeted recruitment practices for women or men where there is inequitable representation in technical or operational areas.
 - 6. Other actions which may include target mentoring programs, the establishment of staff support groups for certain groups of women, men, or other staff groups (e.g. staff with disability) etc.

IX Project-level requirements

20. At the project preparation stage, the GEDF will require partners to:
- a. Ensure that project studies, designs and implementation plans undertaken by or submitted to GEDF meet the principles and requirements of the Gender Policy.
 - b. Submit as a part of all project studies and designs:
 - i. a gender assessment, along with appropriate environmental and social assessments, and
 - ii. a project-level gender action plan; and

- iii. integrate analysis of context and sociocultural factors underlying climate change exacerbated by gender inequality and optimize the potential contributions of women and men to GEDF projects.

21. At the project implementation, monitoring and reporting stage:

- a. GEDF will ensure that partners take necessary measures to implement the project-level gender action plan.
- b. GEDF will require that in implementing the project-level gender action plan, partners will refine, as may be necessary, the gender-related baseline, indicators, and targets.
- c. GEDF will require that partners take the necessary measures to ensure periodic updates on the gender assessments and notify GEDF when there are major changes in the design and execution of projects, or other circumstances that may affect the implementation of the gender action plan. Partners will also notify GEDF of any changes in the project-level gender action plan.
- d. GEDF will require partners to monitor and report on the progress made in implementing the project-level gender action plan.

X Effectiveness and revision

22. This Gender Policy and Gender Action Plan will come into effect following the issuance of the Executive Director decree. The policy will apply to ongoing activities to the extent reasonably possible and those that will be approved after the effective date of this policy.
23. GEDF understands that the promotion of gender equality and the empowerment of women at the institutional and project levels is a long-term undertaking and a sustained commitment, which includes tracking and reporting on progress annually. It also acknowledges that approaches to gender equality and women's empowerment evolve over time. The Gender Policy will be reviewed and updated as appropriate.

Georgian Energy Development Fund

Gender Action Plan

I Introduction

1. The duration of the Gender Action Plan of the GEDF (Gender Action Plan) is three years from August 2023 to August 2025
2. The leadership of the operationalization of the GEDF Gender Policy (Gender Policy) rests with the GEDF Gender Specialist, ESS team, and Executive. However, all GEDF staff will have responsibilities and accountabilities under this policy. GEDF partners also have some commitments under this policy.
3. The Gender Action Plan is structured into five priority areas with accompanying details on the implementation actions required for each priority area.
4. The Gender Action Plan budget will be determined each year by the GEDF Executive, at a minimum it will include dedicated funding for the GESI Specialist, training and project support as needed.

II Priority Areas

5. Priority area 1: Governance
 - a. GEDF will strive to reach gender parity in all key advisory and decision-making bodies, including the Board of Directors.
 - b. The Board will approve and periodically review the Gender Policy and Gender Action Plan and oversee the implementation of the Gender Action Plan and receive periodic monitoring reports from GEDF.
 - c. GEDF will undertake due diligence of the implementation of the Gender Policy and Gender Action Plan through internal gender reviews, and through project approval and monitoring processes. Internal reviews should include performance against the indicators of the Gender Action Plan, as listed below.
 - d. The implementation of this Gender Policy and Gender Action Plan will require gender competencies across the organisational units of the GEDF.
 - e. The overall implementation of the Gender Policy and Gender Action Plan is the responsibility of GEDF. At the project level, GEDF will ensure that the partners meet the project-level requirements of the Gender Policy.
6. Priority area 2: competencies and capacity development
 - a. GEDF will ensure that learning in relation to gender equality and climate change becomes a valuable and required asset available to all staff and that this requirement is integrated into key qualification criteria across the organization. GEDF will ensure that resources are available for internal learning for GEDF personnel and the Board to fully subscribe to principles of the Gender Policy, not just as an operational project impact issue but as a fundamental way to include people in all their diversity to engage with, contribute to and benefit from GEDF policies and investment decisions.
 - b. GEDF is accountable for results on gender equality and the empowerment of women related to its mandate and interventions. This will be reflected in GEDF

administrative policies and procedures, human resource management guidelines that adhere to the principles of equal opportunity, non-discrimination, and respect for individuals regardless of their gender.

- c. GEDF staff will undergo training on gender mainstreaming approaches and be supported to contribute to the development of institutional guidelines to operationalize the Gender Policy and Gender Action Plan.
 - d. In addition to the appointment of a gender specialist, GEDF may consider appointing a senior staff member as the gender focal point or champion reporting to the Executive Director.
 - e. GCF published a gender and climate change toolkit that provides details on how to programme climate change tools to mainstream gender in the overall project life cycle. The gender specialist will work closely with GEDF Executive staff and Board to conduct training sessions on applying/adapting the toolkit.
7. Priority area 3: resource allocation, accessibility, and budgeting
- a. GEDF projects contribute to gender and women's empowerment. When it is necessary to correct for climate change-exacerbated gender inequality, GEDF will target activities, analysis and budget to support gender and green energy initiatives.
 - b. At GEDF, appropriate human, financial and material resources will be allocated through the administrative budget to carry out knowledge management, monitoring, evaluation, learning, capacity development, and implementation support.
 - c. GEDF will support partners to develop project proposals (through studies, design etc) that contain gender assessments and project-level gender action plans, which include implementation budgets.
8. Priority area 4: operational procedures
- a. The Gender Policy and Gender Action Plan will be implemented throughout GEDF project life cycles and operational processes, and this implementation will consist of a set of agreed upon or predetermined activities.
 - b. GEDF will ensure that projects include:
 - i. An initial gender assessment and project-level gender action plan, complementary to the environmental and social safeguards (ESS) requirements. The gender assessment and the project-level gender action plan will: (i) Collect baseline data and determine how the project can respond to the needs and strategic interests of women and men in view of the specific project; (ii) Identify the drivers of change and the gender dynamics to achieve the project goals; (iii) Identify and design the specific gender elements to be included in the project activities; (iv) Estimate the implementation budgets; (v) Select appropriate and measurable output, outcome and impact indicators; and (vi) Design project implementation and monitoring of institutional arrangements; and
 - ii. Gender-equitable and inclusive stakeholder engagement and consultations conducted and documented throughout the design and implementation of the project/programme, as follows: (i) Inclusion of gender perspectives in the application of the mandatory project social and environmental safeguards in line with project-specific requirements (ii) Project screening for the integration of gender issues at various stages of the project

preparation, appraisal, approval and monitoring process by the relevant bodies

- c. To support partners, GEDF may develop sector notes on gender that promote the use of knowledge and lessons learned on gender issues as well as methodologies for assessing impacts, and it may conduct in-house learning to promote gender mainstreaming in climate investments.
 - d. The GEDF proposal approval process will guide partners to select and apply a range of gender indicators to measure progress, outcomes, and impacts.
9. Priority area 5: knowledge generation and communications
- a. As a learning institution, the GEDF communications team will work with the gender specialist and delivery partners to document experience and knowledge gained from applying the Gender Policy and Gender Action Plan to activities. It will seek to identify good practices and tap into the contextual knowledge already available on gender and climate mitigation and adaptation programmes and projects implemented by other partners.
 - b. Communicating the GEDF commitment to gender, its Gender Policy and its Action Plan will be a strategic communications activity and an integral part of the GEDF communications plan. It will be important to communicate to the public not only how GEDF is implementing its updated Gender Policy and Gender Action Plan but also to seek periodic feedback from stakeholders and partners on the implementation of the Gender Policy and on possible improvements in the Gender Action Plan.

Priority areas	Results to be achieved: implementation of the Gender Policy			
	Action	Indicators	Responsibility	Timing
Priority area 1: Governance	Approval of the policy	Policy and Action Plan approved	Director	2023
	Periodic monitoring of reports on the implementation of the Gender Policy and Gender Action Plan	Annual progress reports to the Board on Gender Policy and Action Plan achievements	GEDF Gender Specialist (to be recruited) with support from ESS team and GEDF staff as requested	Ongoing
	Include performance on gender equality in the projects related to the Gender Policy and Gender Action Plan	Percentage of project applications with activities, policies, or procedures on gender equality Percentage of ongoing projects with activities, policy and/or experience in gender equality issues		
Priority area 2: Competencies and capacity development	Increase the knowledge of staff and Executive on gender equality and climate change	Number of staff that received gender training (by level and gender)	ESS team and GEDF Gender Specialist	Ongoing
	Improve the understanding of how to programme for gender equality results by disseminating or adapting the GCF gender and climate change toolkit	GCF gender toolkit disseminated or adapted, and guidance provided GEDF staff, investors, and project partners on how to interpret the information contained in the toolkit		

<p>Priority area 3: resource allocation, accessibility, and budgeting</p>	<p>Funding to support gender issues for GEDF and projects</p>	<p>Approved budget amount for targeted gender support at the project/programme level</p> <p>Percentage of the annual administrative budget earmarked to support gender expertise (staff, consultants), training, communications and monitoring and evaluation</p>	<p>Finance team for reporting</p>	<p>Ongoing</p>
<p>Priority area 4: operational procedures</p>	<p>Gender measures undertaken to ensure gender equality in GEDF workplaces</p>	<p>Review of current human resources policy relating to gender undertaken and report to Executive/Board on targeted gender equality measures</p> <p>Targets set for gender parity at senior and Executive levels</p> <p>Reporting to Executive and board on Gender Policy and Action plan, Whistleblower, Internal Regulations and SEAH policy</p> <p>Staff feedback on gender equality measures and implementation of Whistleblower, Internal Regulations and SEAH policy (disaggregated by gender and level)</p>	<p>Senior Managers, Board with support from Gender Specialist and Legal Unit</p>	<p>Ongoing</p>
	<p>Include gender equality consideration in the GEDF Investor Manual and project guidance</p>	<p>Guidance for projects on the mandatory socioeconomic and gender assessment and gender action plan at the start of each project</p> <p>Guidelines issued and communicated GEDF website and through active outreach</p>	<p>GEDF Gender Specialist with support from ESS team and GEDF staff as requested</p>	<p>January 2024 and thereafter</p>

	Guidance on project design elements, budgets, results, monitoring, and impact indications, preparation, implementation, and the monitoring of institutional arrangements	100% of all approved funding proposals contain some kind of gender assessment and a project-level gender action plan		
	Toolkits and sourcebooks for projects on gender and green energy, including for specific sectors	<p>Number of training sessions on the guidelines provided and qualitative reporting of these training</p> <p>Number of toolkits, sourcebooks and references used in GEDF projects</p> <p>Application of gender equality guidelines in project studies, design, implementation, monitoring and reporting</p> <p>Percentage of projects that apply gender -balanced stakeholder consultations</p> <p>Number of funding proposals whose principal objective is to promote gender equality in climate action</p>		January 2024 and thereafter
Priority area 5: knowledge generation and communications	Assess the implementation of the Gender Policy and Gender Action Plan	<p>Communications and dissemination strategy that address gender issues developed</p> <p>Gender related communications posted on the GEDF website</p> <p>Communication materials developed and disseminated to internal and external stakeholders</p>	ESS team, Gender Specialist, Communications Unit	Ongoing

Georgian Energy Development Fund

Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment

6

I Introduction

1. Georgian Energy Development Fund (GEDF or the Fund) has zero tolerance for all forms of Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH) in Fund-related activities. SEAH violates human dignity and have always been unacceptable behaviour. SEAH is based on unequal relations and power dynamics resulting in a culture of discrimination and privilege. It creates hostile interpersonal relationships and work-related environments, which limit the ability of affected persons to thrive and GEDF to achieve its mission. SEAH in any form is not acceptable at GEDF.
2. GEDF recognises the imperative to prevent and respond effectively to SEAH and to protect persons, especially persons in vulnerable positions and situations, and survivors of SEAH in all GEDF activities. These protections are essential to strengthen integrity and accountability throughout GEDF.
3. This policy forms part the collection of GEDF policies, including the Internal Regulations, the Whistleblower Policy, the Gender Policy (and its Action Plan), the Environmental and Social Safeguards Policy (ESS Policy). These policies are complementarity and work together to achieve the shared goal of zero tolerance for SEAH at GEDF.
4. The Gender Specialist and SEAH Compliance Officer will lead implementation of SEAH policy. They will be nominated by the Ethics committee (but will not be member of ethics committee) and appointed by the director of GEDF and be accountable to Director. They will foster collaboration and coherence across the organisation, and ensure staff understand appropriate roles, divisions of responsibility and redress mechanisms with regards to SEAH through regular training opportunities on this policy. The policy will be the responsibility.
5. SEAH risk mitigation in all GEDF activities will be addressed through the relevant provisions of the ESS Policy.

II. Scope

6. The Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (the Policy) establishes GEDF's zero tolerance of SEAH. It sets clear obligations for GEDF Covered Individuals to prevent and respond to SEAH and to refrain from condoning, encouraging, participating in, or engaging in SEAH. The scope for this policy is focused on Covered Individuals.
7. This Policy is linked with the ESS Policy, the Gender Policy and SEAH risk mitigation requirements in all GEDF activities.

III. Definitions

8. For the purposes of this Policy, the following terms are defined as follows:
 - a. "Board" means Board of the Georgian Energy Development Fund;

⁶ Draft PSEAH Policy based on GCF policy online at :
<https://www.greenclimate.fund/sites/default/files/document/seah-policy.pdf>

- b. “Board-appointed Official” means the Executive Director (“Director”), and others who are appointed by the Board;
- c. “Covered Individual” means other Board Members, Advisers, Board-appointed Officials, and GEDF Personnel;
- d. “External Members” mean an expert serving as an external member on a panel or group established by the Board;
- e. “False or Malicious Report” means an inaccurate or misleading report that is made recklessly, or knowingly or deliberately for the purpose of gaining undue advantage or causing harm to a person or entity;
- f. “Fund-related Activity” means any activity which is financed, administered, or supported by the GEDF, either with its own resources or those of others, or any activity that materially affects or may affect or otherwise be relevant to the GEDF;
- g. “GEDF Personnel” means any GEDF Staff and any other individual contracted and/or engaged by GEDF to perform official functions for GEDF, excluding Board-appointed Officials;
- h. “SEAH” means Sexual Exploitation, Sexual Abuse, and Sexual Harassment;
- i. “SEAH Check” means a recruitment practice whereby job applicants are required to provide a SEAH Declaration and whereby the information contained in the Declaration is checked, as far as possible, through Reference Checks;
- j. “SEAH Declaration” is a sworn-to-be-true, written disclosure of a person’s history of Sexual Exploitation, Sexual Abuse, or Sexual Harassment with regard to lawfully disclosable criminal convictions, or disciplinary measures or sanctions imposed by existing or former employer(s) and/or by disciplinary boards of professional organisations to which the person is or has been subject;
- k. “Sexual Abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
- l. “Sexual Exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another;
- m. “Sexual Harassment” is “unwelcome conduct of a sexual character aiming or resulting in violation of one’s dignity and creating an intimidating, hostile, degrading, or offensive environment”⁷. It can include using words of a sexual nature, showing of one’s genitals, any type of verbal or non-verbal actions of a sexual nature, creating an abusive or hostile environment at work to force someone into a sexual relationship. This will be treated as sexual harassment in connection with a Fund-related activity.
- n. “Staff” means all persons appointed to a post in GEDF under an employment contract (individually, a “Staff Member”). This includes employees and temporarily hired persons as defined under the GEDF Internal Regulations
- o. “Reference Checks” mean the part of a selection and employment process whereby checks are performed to verify the accuracy and authenticity of references, statements, or declarations made by external job applicants on their educational, professional, and other background; and
- p. “Survivor” refers to the person who is, or has been, sexually exploited, abused, or harassed.

⁷ Georgia Sexual Harassment Law

IV. Guiding Principles

9. Guiding principles underpin the core values and premises of the SEAH Policy and are aligned with the objectives and guiding principles of the Governing Instrument.
 - a. GEDF shall not tolerate any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment.
 - b. GEDF and its Covered Individuals shall not enter future engagements with those who condone, encourage, participate in, or engage in SEAH in Fund-related activities.
 - c. GEDF shall take all appropriate measures to prevent, mitigate, investigate, and remedy SEAH in relation to acts perpetrated by Covered Individuals in Fund-related activities.
 - d. GEDF shall take all appropriate measures to protect actual or suspected survivors such as ensuring their anonymity, physical safety and removal from proximity to suspected perpetrators - from retaliation because of a report of actual or suspected SEAH perpetrated by Covered Individuals in relation to a Fund related activity.

V. Obligations of Covered Individuals

10. Covered Individuals shall uphold the guiding principles of this Policy and contribute to creating and maintaining an environment which prevents SEAH.
11. Covered Individuals shall not condone, encourage, participate in, or engage in SEAH to in Fund-related activities. They shall not:
 - a. Use their position to commit Sexual Exploitation, Sexual Abuse, or Sexual Harassment against any person implementing, engaged in, or benefiting from GEDF-related Activities; or
 - b. Engage in sexual activity with a child (as defined in Article 1 of the United Nations Convention on the Rights of the Child). Mistaken belief regarding the age of a child is not a valid legal defence. Any such activity shall be deemed to constitute Sexual Exploitation and/or Sexual Abuse.
12. Subject to the availability of protection against retaliation, Covered Individuals have a duty to report any suspected SEAH in Fund-related Activities as soon as possible after becoming aware of it to the Gender Specialist and SEAH Compliance Officer and/or members of the EC where applicable (as outlined in Section VII), and to cooperate with them in the context of an investigation, or other inquiry in accordance with the Whistleblower Policy. Relevant contacts for reporting are found in Section VII below.
13. Subject to the availability of protection against retaliation, any supervisor, manager, or other such person of GEDF who receives a report of suspected SEAH is obligated to transmit such report without delay to the Director and/or members of the EC.

VI. Prevention and Due Diligence

Covered Individuals

14. GEDF shall ensure, as soon as practicable following the adoption of this Policy, that its recruitment, procurement, employment, or any other onboarding processes include SEAH Checks.
15. In conducting SEAH Checks, GEDF shall ensure that Board-appointed Officials, and GEDF Personnel complete SEAH Declarations prior to the offer of any appointment, employment, or contract.

16. Following the submission of the SEAH Declaration, GEDF shall ensure that the appropriate Reference Checks are carried out for the purpose of verifying, to the extent possible, the accuracy and authenticity of the information provided by the candidate, including the information provided in the SEAH Declaration.
17. Persons who are already employed or contracted by the GEDF as Board-appointed Officials, or GEDF Personnel at the time this Policy is adopted, shall be required to submit a SEAH Declaration without delay.
18. The failure to disclose, and/or the inaccurate or incomplete disclosure of, information with regard to any act of SEAH in the SEAH Declaration shall be treated as misconduct (as in the case of Staff) or breach of contract (as in the case of consultants), as appropriate. GEDF reserves the right to withdraw any offer of appointment, employment, or contract, or to terminate any contractual engagement if the applicant is found to have provided untruthful information concerning any past criminal or disciplinary records regarding acts of SEAH.
19. Covered Individuals are required to disclose to GEDF their intimate personal relationships with other Covered Individuals in the following circumstances: (a) When a management reporting relationship exists between the persons; or (b) When two persons have unequal positions at GEDF, and it could reasonably be perceived that a Conflict of Interest may exist (i.e. that a person in a superior position may be exerting his or her influence to unfairly benefit or disadvantage a person in a subordinate position).

Awareness Raising, Communication, and Training

20. The Secretariat will prepare as soon as practicable policy implementation guidelines in the form of an action plan to support the dissemination and implementation of this Policy and to raise awareness across GEDF of the issue of SEAH and its potential ramifications. The plan will include:
 - a. Making this Policy available on the GEDF website.
 - b. Developing through making available, policy implementation guidelines in the form of an action plan, training, guidance and tools, and communication materials for Covered Individuals to raise awareness and support the implementation of this Policy. This training, tools and guidance will be tailored to the needs and contexts of the target audience.
 - c. Staff will be familiar with the policy and sign that they are aware of it. In case if the policy will be revised, a new version will be distributed.
 - d. Conducting, to the extent possible, awareness raising and training activities for and/or in collaboration with Covered Individuals.
 - e. Developing guidance, training, and procedures for relevant GEDF Personnel responsible for assessing SEAH risks, and for working to ensure that proper safeguard systems are in place.
 - f. Ensuring that all Covered Individuals undertake mandatory training to ensure compliance with this Policy and relevant operating procedures.

VII. Reporting and Investigations

21. Any person or entity may report to the Gender Specialist and SEAH Compliance Officer and EC actual or suspected SEAH as defined by this Policy. Persons with information concerning suspected SEAH, particularly when it involves Covered Individuals in Fund-related Activities, are strongly encouraged to report such information to the Gender Specialist and SEAH Compliance Officer and EC.

22. Reports of actual or suspected SEAH should be made to the relevant authority designated for receiving the relevant report, as set out in the GEDF Whistleblower Policy and shall be dealt with in accordance with that Policy.
23. In accordance with the procedures provided for in the GEDF Policy on the Protection of Whistleblowers and Witnesses:
 - a. Reports of actual or suspected SEAH regarding GEDF Personnel, a Board-appointed Official (excluding the Executive Director and the Gender Specialist and SEAH Compliance Officer) or an External Member of GEDF Panels or Groups, shall be made to the Gender Specialist and SEAH Compliance Officer and/or members of the EC through any of the following points of contact on the proviso that any changes regarding the contact details shall be communicated and disseminated appropriately: Email: info@gedf.com.ge
 - b. Reports of actual or suspected SEAH regarding a Co-Chair, Board Member, Alternate Member, Adviser, the Executive Director, or the Executive Director and the Gender Specialist and SEAH Compliance Officer, shall be submitted to the Ethic Committee who shall bring any such report to the attention of the Board for its consideration in accordance with the procedures which the Gender Specialist and SEAH Compliance Officer and EC shall establish for such cases. Such reports shall be submitted in writing and in confidence to the Chair of the EC through the following contact points: info@gedf.com.ge
24. Persons or entities reporting actual or suspected SEAH shall do so in good faith and provide where possible any information or evidence in their possession that would support a reasonable belief that SEAH may have occurred. Prior to making a report, such persons or entities are not required to evaluate or to determine whether a report that they intend to make meets any threshold of seriousness or gravity. Reporting persons or entities are not required to prove the suspected SEAH or to meet any evidentiary requirements.
25. Reports of actual or suspected SEAH shall be investigated by the Gender Specialist and SEAH Compliance Officer and EC in accordance with the relevant GEDF policies and standards including but not limited to the GEDF Whistleblower Policy. The Gender Specialist and SEAH Compliance Officer and EC shall treat seriously, and thoroughly investigate reports of suspected SEAH in a manner that is gender-responsive, survivor-centred, independent, and objective by conducting investigations, free of control or influence by any person or entity, and with scrupulous adherence to the principles of do-no harm, fairness and due process.
26. Following any investigation, the Gender Specialist and SEAH Compliance Officer and EC shall take measures to monitor the situation regarding the status of any survivors and alleged perpetrators of SEAH, to protect against retaliation as a consequence of the investigation, its findings or its outcome. Furthermore, the GEDF Secretariat shall implement any administrative or disciplinary measures to be taken by the GEDF because of the investigation.
27. The Gender Specialist and SEAH Compliance Officer and EC shall cooperate and coordinate with the Director to maximise the effectiveness of this Policy. In the event that a report of SEAH is submitted to the Gender Specialist and SEAH Compliance Officer and EC and also filed as a complaint with the Director, or if a report of SEAH is submitted to the Gender Specialist and SEAH Compliance Officer and EC that relates to both a Covered Individual and a GEDF funded project or programme, the Gender Specialist and SEAH Compliance Officer and EC and Director shall consult

with each other and with the person reporting/complainant and determine how best to address the report or complaint so as to avoid parallel proceedings and/or investigations.

VIII. Protection and Remedies

28. Any Survivor who reports, attempts to report or is believed to have reported suspected or actual SEAH (including concerns of suspected SEAH) by a Covered individual in relation to a Fund related activity shall be entitled to all the protection (which includes anonymity and confidentiality, and protection from retaliation) and remedies, afforded to 'whistleblowers' as set out in the GEDF Policy on the Protection of Whistleblowers and Witnesses.
29. Any other person who reports, attempts to report or is believed to have reported actual or suspected SEAH, or cooperates, attempts to cooperate, is believed to be about to cooperate, or is believed to have cooperated with a GEDF investigation concerning a report of suspected SEAH by a Covered Individual in relation to a Fund-related activity, shall be deemed a 'whistleblower' or as a 'witness', as appropriate, and shall be entitled to all the related protection (which includes anonymity and confidentiality, and protection from retaliation) and remedies, as set out in the GEDF Policy on the Protection of Whistleblowers and Witnesses.
30. Any Covered Individual who is a Survivor of an act of SEAH perpetrated by another Covered Individual in connection with a Fund-related activity, may request that GEDF provide the following guidance and support:
 - a. Information and advice on the informal and formal reporting options, emails, and helplines which are available within and outside the GEDF.
 - b. Information on available medical services and support.
 - c. Information on counselling, including psycho-social and stress counselling.
 - d. Advice from the Ethics Officer.
 - e. Information on available, low-cost health insurance options and services.
 - f. Information and referral to internal and external local services specialising in sexual harassment, violence against women, violence against LGBTIQ+ individuals, including gender non-conforming individuals, or support for men who experience violence, to the extent available, and
 - g. Support and guidance on how to report to and what to expect from the local authorities, particularly if the alleged behaviour constitutes a crime.
31. In emergency situations, any Covered Individual who is a Survivor of SEAH perpetrated by another Covered Individual in connection with a Fund related activity may request that GEDF provide interim medical relief or other support services as required to address the immediate harm.
32. Any person who is a survivor of SEAH perpetrated by a Covered Individual on GEDF premises or during an activity or event hosted by GEDF, regarding whom a report of SEAH has been made in accordance with section VII of this Policy, may request that GEDF provide the protection provided for in paragraphs 30 and 31 above.
33. Acts of SEAH, or retaliation against an actual or suspected SEAH survivor, committed by Covered Individuals shall amount to misconduct or breach of contract and shall be subject to disciplinary or other remedial measures as appropriate, in accordance with the relevant GEDF policies, rules, and procedures.

34. Any person or entity who makes a False or Malicious Report may be subject to administrative remedies or disciplinary action in accordance with relevant GEDF policies and guidelines, and the provisions of any contractual agreements existing between GEDF and the person or entity.
35. In connection with a Fund-related activity, where an act of SEAH is perpetrated by a Covered Individual, or retaliation against an actual or suspected Survivor, is perpetrated by a Covered Individual has been substantiated through an investigation conducted by GEDF, and corrective or disciplinary measures have been imposed against a Covered Individual, the Gender Specialist and SEAH Compliance Officer and EC may recommend that GEDF take appropriate remedies, such as the provision of referral contacts and services and counselling for the benefit of the survivor. The GEDF Secretariat shall endeavour to implement such remedies without undue delay. However, in the event that the GEDF Secretariat does not implement the recommended remedies, the Gender Specialist and SEAH Compliance Officer and EC shall promptly seek guidance from the EC in order for the EC to determine the appropriate course of action.

IX. Policy Implementation, Monitoring, Reporting, and Review

36. The Office of Human Resources of the GEDF Secretariat shall be responsible for the effective implementation, monitoring, and reporting to the Board annually regarding the Covered Individuals obligations under this Policy. It shall develop guidelines and procedures, in consultation with the Gender Specialist and SEAH Compliance Officer and EC, to operationalise and implement this Policy promptly following its adoption.
37. The Secretariat and the Gender Specialist and SEAH Compliance Officer and EC shall recommend improvements to this Policy and related procedures and controls to mitigate opportunities for SEAH and ensure that Covered Individuals adhere to the Policy. The Gender Specialist and SEAH Compliance Officer and EC shall also maintain and publicly disclose a case registry of reports including regarding SEAH, within the limitations of the GEDF Whistleblower Policy in force, and in accordance with relevant GEDF policies and standards regarding information disclosure.
38. Every three years, the Ethics Commission, with the support of the Gender Specialist and SEAH Compliance Officer, will present a report to the Board on issues related to the implementation of this Policy along with any recommendations for changes to it. Such reports will take into account new standards or policies developed and implemented by peer institutions and partners regarding the range of their activities and will be aligned with the policy review cycle.

X. Effective Date

38. This Policy shall come into effect following the decree of the Executive Director.

Georgian Energy Development Fund

Action Plan for Addressing Sexual Exploitation, Sexual Abuse, and Sexual Harassment

September 2023

Introduction

1. The Action Plan for Addressing Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH) (hereinafter “SEAH Action Plan”) operationalizes the SEAH policy. The implementation of the SEAH Action Plan by the GEDF will ensure that the policy is applied to all GEDF activities.
2. The SEAH Action Plan will be implemented as part of the GEDF programming-cycle to strengthen integrity and accountability. The implementation of the SEAH Action Plan will consist of a set of activities, as outlined in the Annex. 1. The PSEAH action plan will align with the Gender Policy, and the ESS governance, policy and action plan.
3. The SEAH Action Plan may be updated periodically if needed by the GEDF, to ensure that it remains relevant within the policy landscape, and to ensure that good practice and lessons learned can be incorporated into the way that the objectives are addressed.

Objectives

4. The objectives of the SEAH Action Plan are to:
 - a. Ensure the GEDF, in carrying out its mandate, will effectively and equitably manage SEAH risks, and improve outcomes of all GEDF-financed activities.
 - b. Elaborate how GEDF integrates SEAH issues into its processes and activities where the policy applies, and with respect to projects and programmes.
 - c. Support the environmental and social management system (ESMS) that incorporates a systematic gender-sensitive and intersectional approach to integrating environmental and social performance and risk management on SEAH into the operations of GEDF.
 - d. Increase institutional capacity within the GEDF to ensure relevant corporate processes are put into place to address SEAH risks; and
 - e. Provide guidance to GEDF staff them to undertake their responsibilities under the policy.

Definitions

5. The relevant terms for this action plan are defined in the Georgian Energy Development Fund Policy on the Prevention and Protection from Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH Policy).

Priority areas of action

Priority area 1: Governance and responsibilities

6. A culture of “zero tolerance” for all forms of SEAH in GEDF activities must be actively promoted throughout the GEDF. In this regard, GEDF will
 - a. Increase awareness of SEAH prevention and response regarding GEDF-financed activities, and in particular on how it can be effectively addressed in a survivor-centred and gender-responsive way.
 - b. Sensitize GEDF staff on their respective roles and responsibilities for translating the commitment to zero-tolerance of SEAH into the operations and decision-making of GEDF,
 - c. Ensure SEAH safeguarding is undertaken and promoted, as an important pathway for going beyond “do no harm”, to improve social outcomes and generating co-benefits for the

communities affected or potentially affected by GEDF-financed activities; and to strengthen the integrity of the GEDF-financed activities.

7. The action plan will also address activity-level compliance, i.e. all GEDF-financed activities, including subprojects financed from GEDF-funded programmes or through financial intermediaries, regardless of the financial instruments used or whether these are solely supported by GEDF or co-financed by other institutions.
8. The Secretariat will review the implementation of the SEAH provisions through project design, approval and monitoring processes, and will require partners to ensure that the measures to manage SEAH risks and impacts, including, as relevant, information disclosure, stakeholder engagement, and grievance redress, are incorporated in the agreements with partners including tendering documents and contracts.

Priority area 2: Capacity development and tools

9. To facilitate an understanding of the SEAH provisions in the revised ESP and enhance competencies and capacity of relevant entities, GEDF will adapt the GCF SEAH Risk Assessment Tool to be released in January 2024 (hereinafter “the Tool”) to be used in the assessment of SEAH risk in all GEDF-financed activities to which the policy applies. Training on the Tool will be provided for GEDF staff.
10. The Tool will also be made available to partners to assist in their own assessment of SEAH risks.
11. Due diligence will still be undertaken prior to the Tool being finalized. However once adapted the Tool can assist in improving and structuring the approach to SEAH due diligence.
12. GEDF will periodically improve the Tool to incorporate good practice and lessons learned,
13. GEDF will use communication materials and other activities to raise awareness of, and disseminate good practice on, SEAH safeguarding

Priority area 3: Resource allocation, accessibility, and budgeting

14. Appropriate human, financial and material resources will be allocated initially through the budget for SEAH, to carry out this action plan.
15. GEDF will require projects to address SEAH risk, which will be reviewed as a part of GEDF project proposal processes.

Priority area 4: Operational procedures

16. GEDF when reviewing and approving proposals, will require partners to undertake measures to ensure that activities financed by the GEDF are developed and implemented in a manner that aligns with the SEAH of this policy. This includes
 - a. Identify any SEAH risks or potential adverse impacts on women, men, girls and boys as early as possible as part of GEDF-financed activities screening and reflect such risks or impacts in relevant safeguards instruments
 - i. Include measures (including pre-project implementation awareness raising for host communities and project workforces) to enhance gender equality, and to prevent, address and eliminate SEAH in the relevant projects or programmes and safeguards instruments
 - ii. Monitor and report progress and performance on SEAH to GEDF throughout implementation of the GEDF-financed activities.
 - b. In case incidences of SEAH occur, GEDF will require partners put into place:
 - i. Established and operate accessible and inclusive survivor-centred and gender responsive grievance redress mechanisms with procedures for SEAH including confidential reporting with safe and ethical documenting of such cases, that indicate when and where to report incidents, and what follow-up actions will be undertaken.
 - ii. Modalities to provide timely services and redress to survivors, including as appropriate, medical care, psychosocial support, legal support, community driven protection measures, and reintegration.
17. Screening and risk categories
 - a. As general requirements for environmental and social risk management, in screening activities, GEDF will require that SEAH risks and impacts are considered,
 - b. The risk category, aligned with the fit-for-purpose approach, will be proportional to the nature, scale, and location of the activity in relation to SEAH, and the vulnerability of the receiving environments and communities.
18. First- and second-level due diligence
 - a. GEDF will require partners to undertake SEAH due diligence, on all the activities proposed for GEDF financing. pursuant to the ESS standards and the revised ESP of GEDF.
 - b. GEDF will require partners to undertake assessments of SEAH risks and impacts to ensure that the activities proposed for GEDF financing meet the ESS standards and contain measures to manage and mitigate the identified risks and impacts.
 - c. GEDF will also require partners to ensure that stakeholder engagement is gender-sensitive, inclusive, and participatory.
19. The Secretariat will carry out monitoring, review and reporting in relation to the environmental and social performance (including SEAH) of GEDF-financed activities, as may be required pursuant to the ESS standards.
20. Grievance redress mechanisms (GRM)
 - a. requires partners to ensure that the institutional level and project/activity specific GRM be established.

- b. Furthermore, GEDF requires such GRM established by the partners should be scaled to the risks and impacts of the activities. The mechanism will be survivor-centred and gender-responsive in the case of SEAH with specific procedures, including confidential reporting and modalities to provide timely services and redress to survivors.
- c. GEDF requires partners to bring to the attention of people and beneficiaries affected, or likely to be affected, by the GEDF projects and the availability of and ways to access the relevant institutional level GRMs, for redressing grievances, including those related to SEAH, providing them with information through brochures, website references, meetings or workshops and other culturally appropriate and gender-responsive means.
- d. GEDF will ensure that measures to manage environmental and social (including SEAH) risks and impacts, including grievance redress related to SEAH, are incorporated into agreements with including tendering documents and contracts.

Priority area 5: Knowledge generation and communications

- 21. GEDF will work with partners, as well as other international financial institutions operating in the climate financing space, to document lessons, experience and knowledge gained in relation to SEAH prevention and response as appropriate and in proportion to GEDF budgets.
- 22. Communicating the GEDF commitment to addressing SEAH will be a strategic communications objective. GEDF will communicate SEAH safeguarding as an important pathway for going beyond “do no harm”, to improving social outcomes and generating co-benefits.
- 23. GEDF will seek periodic feedback from stakeholders and partners on the implementation of the SEAH policy and use of the SEAH Risk Assessment Tool (once adapted).

Priority Areas	Key actions	Indicators and details	Responsibility	Timeline
1. Governance and responsibilities	1.1. Support cultural change and organisational accountability in relation to SEAH by undertaking sensitization activities on SEAH	1.1.1 At least 1 information session on SEAH due diligence provided to the Secretariat per year	Gender Specialist and SEAH Compliance Officer /EC	Annually
	1.2. Undertake SEAH due diligence	1.2.1 All funding proposals reviewed 1.2.2 FPs benefit from the SEAH Risk Assessment Tool once it is available	Gender Specialist and SEAH Compliance Officer /EC	On a continuous basis
	1.3. Provide inputs to project processes to ensure coherence regarding SEAH	1.3.1 Meetings held with the Accreditation Panel, where requested, to discuss SEAH in relation to accreditation and reaccreditation 1.3.2 Written inputs provided to the Accreditation and Entity Relations Unit and Accreditation Panel to clarify SEAH issues as needed	Gender Specialist and SEAH Compliance Officer /EC	In January 2024 and thereafter on a needs basis
	1.4. Ensure reporting on SEAH is undertaken	1.4.1 Information on the implementation of the SEAH provisions of the revised ESP, and the SEAH Action Plan is included in the Report on the activities of the Secretariat for each Board meeting and	Gender Specialist and SEAH Compliance Officer and relevant report owners	As reports developed

		other relevant reports as needed		
2. Competencies and capacity development	2.1. Undertake rapid assessment of GEDF. This is in relation to the level of understanding on SEAH risk and risk-management. The assessment would inform the development of capacity building and training activities	2.1.1 Online survey undertaken	Consultant to deliver all staff survey in combination with gender training plan	June 2022
	2.2. Training on prevention of, and response to, SEAH	2.2.1 Training and information sessions on SEAH prevention and response in GCF-financed activities	Consultant then Gender Specialist and SEAH Compliance Officer /EC All staff	First session July 2022; one per year thereafter
	2.3. Adapt GCF SEAH Risk Assessment Tool to be used by the Gender Specialist and SEAH Compliance Officer and EC in the assessment of SEAH risks in all GEDF financed activities, and provide training to Gender Specialist and SEAH Compliance Officer and EC staff	2.3.1 Tool adapted (including guidance on application) 2.3.2 Trainings provided to the Gender Specialist and SEAH Compliance Officer and EC and Senior Executives on the SEAH Risk Assessment Tool	Gender Specialist and SEAH Compliance Officer and EC using GCF tool (to be published January 2024)	November 2022 First training session; then annually
	2.4. Disseminate the Tool with guidance to the AEs to assist in their own assessment of SEAH risks	2.4.1 Tool published 2.4.2 Ensure that staff are made aware, and have	Gender Specialist and SEAH Compliance Officer using GCF tool (to be published January 2024)	January 2024 - Tool integrated into ongoing training process

		access to the Tool if they wish to use it 2.4.3 Undertake awareness-raising events		
	2.5. Develop a list of examples of potential co-benefits related to SEAH safeguarding to inform project development	5.1 A list of examples of SEAH safeguarding co-benefits developed and shared within the Secretariat	Gender Specialist and SEAH Compliance Officer and EC	December 2023
	2.6. Conduct additional outreach and capacity development events and activities to raise awareness, build capacity, and share knowledge about SEAH	2.6.1 Number of activities conducted	Gender Specialist and SEAH Compliance Officer and EC	July 2023 onwards, and at relevant events e.g. COPs
3. Resource allocation, accessibility, and budgeting	3.1. Allocate appropriate human, financial and material resources through the Board agreed budget	3.1.1 Budget is allocated from 2022 onwards	Finance Team	June 2022 and onwards
4. Operational procedures	4.1. Provide advice to the Accreditation Panel on specific aspects to look for in relation to SEAH (as part the existing ESS criteria)	4.1.1 Informal checklist sent to AP	Gender Specialist and SEAH Compliance Officer with assistance from the Head, ESS and EC	December 2023
	4.2. Develop guidance on GRMs for AEs as to required elements to be included to ensure an effective survivor-centered and gender-	4.2.1 Guidance finalized and approved	Gender Specialist and SEAH Compliance Officer and EC with assistance from the Head, ESS	December 2023

	responsive approach to SEAH complaints			
5. Knowledge generation and communications	5.1. Document experience and knowledge gained in relation to the SEAH prevention	5.1.1 A list of case studies is compiled (respecting confidentiality) including benefits from SEAH safeguarding	PR team with EC	Annually if possible
	5.2. Develop a communications strategy and continue refining it on SEAH safeguarding in projects and programmes	5.2.1 SEAH safeguarding becomes an integral part of the communications plan.	PR team with EC	Annually
	5.3. Seek periodical feedback from stakeholders on the implementation of SEAH provisions and use of Tool	5.3.1 Feedback collected through the outreach and capacity development activities	Gender Specialist and SEAH Compliance Officer and EC	Biannually, reaching out to different stakeholders as needed