

MOPAN Insights

Protection from Sexual Exploitation, Abuse and Harassment in International Financial Institutions: Progress, Gaps, and the Road Ahead

Annexes

2025

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Annex A - Methodology: How this study was conducted

This report builds on the MOPAN 3.1 methodology employed for the seven IFI assessments that make up the scope of this report. A mixed-methods approach is employed.

Lines of evidence

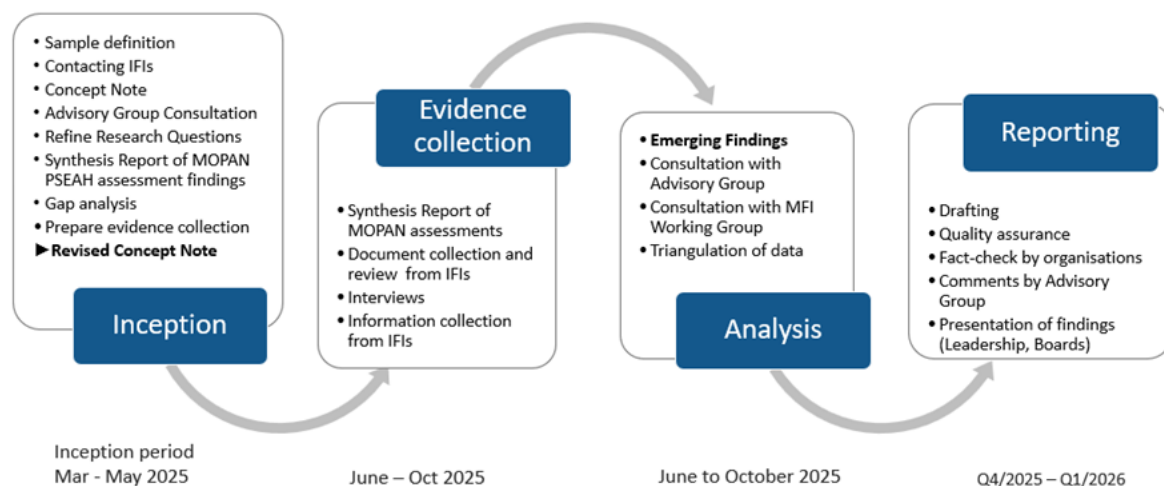
The study drew on the following lines of evidence:

- **MOPAN assessments:** Each of the IFI assessments brought together data from a document review, key informant interviews with managers and technical experts in the organisation dealing with PSEAH/GBV, risk, ethics and integrity, and others. This was complimented with an external, online partner survey. Finally, these were triangulated to build a description and judgment on each element contained in MOPAN's methodology 3.1. Specifically, the evidence used for this study were the 16 elements touching on PSEAH (MI 4.7 and its 8 constituent elements, and 4.8 with its 7 elements, as well as element 5.4.5). The assessments also formed the basis for the synthesis presented in Annex 6, which was further updated with relevant insights from the structured interview conducted for this study. References to Annex 6 are made throughout the report to guide the reader to the underlying assessment findings that support the analysis.
- The study was based upon an analysis of the assessment ratings received by the cohort. The cohort of 7 MDBs were assessed by teams from 4 different suppliers/companies. For four of the seven assessments, additional external quality assurance (QA) was applied throughout the four stages of the assessment from inception to final report. This external QA was all undertaken by the same consultant and supported by the MOPAN Secretariat SEAH focal point. **This process allowed patterns across the indicators and elements to be identified.** In several cases the MOPAN Secretariat also supplemented the efforts of the assessment teams including conducting additional interviews and holding validation meetings with the cohort. **This learning has also fed into this paper.**
- **Quality Assurance (QA) process** of the 7 IFI assessments: MOPAN integrated PSEAH into its framework in 2020. Assessments conducted since then have undergone an independent PSEAH QA process which has generated important insights on MOPAN's application of the PSEAH indicators. Insights taken from this QA process for the first 7 IFIs assessed using the MOPAN PSEAH indicators, which also make up the sample of this study, were used to inform this report. These insights helped clarify the interpretation of assessment narratives by adding context, highlighting limitations in applying indicators, and indicating where analyses could be further nuanced in future MOPAN IFI assessments. These lessons were applied in the development of this report and the analysis of external data sources. The QA process also included follow-up interviews with some of the IFIs after their assessments on MOPAN's PSEAH indicator application (AfDB and IDB) which provided supplementary evidence that fed into this report.

- **Structured interviews with IFIs:** At the outset of the study, in March-May 2025, MOPAN asked VPs to identify focal points in their organisations who could support the study. Those then determined interviewees. The MOPAN Secretariat developed interview questionnaires, which were shared with IFIs and broken down into different interviews with focal points working on PSEAH in projects/operations and those working on internal misconduct. Between May and September 2025, MOPAN undertook individual and group interviews with a total of 37 individuals from the seven IFIs. It should be noted that each MOPAN assessment had also involved interviews of about 10 individuals about PSEAH.
- **Consultations with external partners** to understand IFIs' comparative advantage, involvement in work beyond IFIs and opportunities for better aligning prevention efforts with other actors in the international sphere. Such consultations were held with seven individuals from the UN and with three independent experts on IFIs and PSEAH.

Process

Figure A.A.1. Process and Methodology of this study



Source: MOPAN Secretariat

The inception phase began in March of 2025 where the IFIs were contacted, and a concept note was developed to frame the study and reflect the adjusted sample of IFIs. The concept note was informed by a consultation with the study's Advisory Group in April 2025. The Advisory Group, comprising MOPAN Member state delegates, IFI representatives, and independent experts on PSEAH who also acted as peer reviewers, was established to ensure the study was anchored in practical expertise, diverse institutional perspectives, and evidence-based insights. Along the course of the study's development, the Advisory Group met two more times in June and October of 2025).

The evidence collection phase (June – October 2025) built on a synthesis of MOPAN assessments and their quality assurance, combined with document reviews, and information collection from IFIs. Short questionnaires were completed by the representatives of the assessed MDB as well as the representatives of assessment teams. The questionnaires were focused upon the experience of applying the SEAH micro indicators. Follow-up interviews were then conducted with three out of five of the focal points in the relevant Multilateral Organisations (MOs); and consultations were held with the MOPAN assessment managers who oversaw the five assessment processes. **The questionnaires and interviews validated the**

conclusions drawn in this paper. Evidence analysis was then conducted, focusing on synthesising findings, triangulating across data sources, and developing emerging findings. These were reviewed with the Advisory Group, peer reviewed by the independent experts, and presented the same month for the MFI Working Group on SEAH for input and feedback in June 2025.

The reporting phase (Last Quarter of 2025 – First Quarter of 2026) centred on drafting the report, incorporating peer review feedback, and fact-checking. Comments provided by the Advisory Group in October and November 2025 were also integrated. Alongside the report, a brief was developed to present key findings. The study's findings will be presented in Q1 of 2026.

Limitations

This report is in the first place a stocktake of evidence contained in the MOPAN assessments of IFIs. It was complemented by additional research, within boundaries. It is not an evaluation and thus the following limitations should be noted:

Period covered: The assessments were conducted over 2021- late 2024 and thus represent a snapshot of the organisation at the closure of the respective assessment period. For some of the earlier assessments, travel to country offices was constrained due to COVID-19 restrictions, which may have limited opportunities for in-person engagement and data collection.

Depth / scope: MOPAN assessments cover over 60 micro-indicators, of which the SEA and SH indicators are but two. Thus, depth and detail of the MOPAN assessments are limited and do not contain all the information needed to conduct an in-depth, detailed study. Several of the SEAH indicators received a “low evidence confidence” rating in the assessments, meaning that assessment teams did not have sufficient evidence to make a conclusion with confidence. The information collected from assessments has therefore been complemented with up-to-date documentation and interviews to the extent possible. However, the number and range of interviews conducted varied across IFIs, reflecting differences in the contacts provided by IFIs, staff availability (both for IFI staff to participate in interviews and MOPAN Secretariat staff to conduct interviews), and response times to interview requests. In addition, the scope and depth of documentation differed across institutions as this was subject to IFI staff availability to respond to requests or what was available in the public domain. Clients of IFIs, civil society organisations or survivors of SEAH were not consulted as part of the research for the paper. Additionally, interviews with project-based personnel (i.e. those who would benefit from this work) and with the private sector were not conducted. Information provided is mostly based on the views of those who manage PSEAH work.

Lack of baselines: For most IFIs the first documented commitments on policy and practice were made in 2018. The absence of longitudinal data, combined with the absence of a baseline from past assessments, was a challenge in assessing progress. This challenge should resolve itself over time, but until then, it will be an area where most MDBs differ from UN entities.

Varied evidence confidence: Assessments found that often, evidence of risk assessment and mitigation was held at the country level and not aggregated. This made it challenging for Multilateral Organizations (MOs) to discuss patterns of risk, their perception of the SEAH risk carried by the organisation, and related mitigation.

Varying SEAH risk profiles: Like other multilateral or bilateral organisations, IFIs operate in a variety of contexts including those that are fragile or ‘high risk’ for sexual misconduct. Some IFIs have more established country presence, some contexts have access challenges for monitoring, while other contexts offer more choice of partners or contractors. IFAD differs from other IFIs in its focus on smallholder farmers rather than larger sovereign borrowers. Private sector IFIs differ from public sector IFIs. Additionally different forms of interventions or programmes hold different risks for abuses of power and SEA.

Framing of SEAH: This report does not examine SEAH or violence more broadly against children, even though children are more vulnerable to many forms of GBV than adults. It also does not examine violence against LGBTQ2S+ groups, and persons with disabilities (PWD) as a separate category. Despite IFIs' long-standing commitments to addressing child labour and growing recognition of child rights, child abuse linked to development finance delivery has typically been treated as part of, or alongside, GBV with some IFIs only referencing child abuse in the context of child labour in their E&S frameworks. This is a striking gap that became apparent when high-profile IFI cases arose in the early 2010s (e.g. IFC in Kenya, World Bank in Uganda)¹ that involved alleged sexual abuse of children and that, according to the Harmonised Reporting Scheme (HRS), 2 in every 5 incidents reported involved a child below the age of 18 (CHS Alliance, 2025^[1]). LGBTQ2S+ populations additionally face increased risks of SEAH, often compounded by stigma, discrimination, and criminalisation in certain contexts. These dynamics create unique vulnerabilities that this report does not examine but that are important to recognise. It is also important to emphasise that because of the inherent power differentials on which SEAH is predicated and well-known lack of reporting and data, it will rarely appear as the most prominent GBV issue. In addition, this report does not examine the accessibility and inclusion dimensions of SEAH risk. Evidence shows that persons with disabilities, who make up 15 percent of the world's population, face heightened vulnerability to SEAH (Department of Economic and Social Affairs, n.d.^[2]) but are rarely considered in IFI risk management, project design, or delivery. It is recognised that these gaps are an important limitation and emphasise that further integration on child, LGBTQ2S+, and protection of persons with disabilities in IFI operations merits dedicated consideration.

MOPAN Methodology 3.1

The MOPAN indicators were designed to align with the six pillars of the DAC recommendation and are in accordance with the IASC PSEA Core Standards. This section will briefly document this process reflecting on the implications for applying these indicators to the MDBs.

The MOPAN 3.1 methodology examines organizational effectiveness through four key performance areas (i) strategic management, (ii) operational management, (iii) relationship management, and (iv) performance management. It should be noted that the MOPAN 3.1 Methodology was launched when many COVID 19 restrictions still applied, which in some cases may have limited the opportunity for assessment teams to validate findings at country level. This may have been a more significant limitation for the new SEAH indicators as there was no baseline information and judgements set by past assessment rounds.

MOPAN's SEAH indicators draw on previously established international norms and good practice including the UN Principles and Standards described above and the OECD Development Assistance Committee's (DAC) Recommendation on Ending Sexual Exploitation and Abuse, and Harassment in Development Cooperation and Humanitarian Assistance. They also draw upon the commitments made at a 2018 Safeguarding Summit in London^[3] by delegates who represented victim/survivors, donors, the United Nations, the World Bank Group, MDBs, VFs, international financial institutions, research organizations, the private sector, and NGOs. This Summit was the first time MDBs had made such specific commitments.

The process of designing the SEA and SH indicators for MOPAN 3.1 led to three public versions of the indicators. The first set was in the final Case Study document, a second set comprising 25-indicators appeared in a published *Note for Practitioners* in 2021, and a refined set of 16 indicators finally appeared in MOPAN 3.1. Unless stated otherwise, this paper references the MOPAN 3.1 indicators.

¹ See: ¹ See: [Kenya Bridge 04 Management Response and MAP 03142024](#) (CAO, 2024 and [Uganda: Bujagali Energy-06/Bujagali](#) (CAO, 2013

Interviewees

The study drew two different rounds of interviews – the first was held during the MOPAN assessment of each Bank, the second between May and September 2025. MOPAN is grateful for having been able to hold interviews and group discussions with the following practitioners / experts in mid-2025:

ADB

1. James Lang, Senior Specialist (Gender- Based Violence), Gender Equality Division
2. Edwina Kotoisuva, Gender Specialist (Gender-based Violence), Gender Equality Division
3. Samantha Hung, Director, Gender Equality Division
4. Felix Nii Tettey Oku, Principal Safeguards Specialist, Office of Safeguards
5. Bruce Dunn, Director, Office of Safeguards
6. Lewis Briggs, Conduct and Ethics Specialist, OPEC
7. Carlo Mendoza, Lead Ethics Officer, OPEC

AfDB

8. Maman-Sani Issa, Director, Department of Environmental and Social Safeguards and Compliance
9. Edith Birungi Kahubire, Principal Social Safeguard and Compliance Officer, SNSC
10. Gertrude Attiogbey, Chief Ethics and Compliance Officer, PETH

EBRD

11. Debbie Cousins, EBRD Director Operations Environment and Sustainability Department
12. Sarah Ruck, Associate Director, Environment and Sustainability Department
13. Sukran Caglayan Mumcu, Associate Director, Environment and Sustainability Department
14. Nurzhan Dzhumabaev, Associate Director, Environment and Sustainability Department
15. Miguel Santana, Associate Social Advisor, Environment and Sustainability Department
16. Jonathan Sutch, Acting Director for Investigations, Office of the Chief Compliance Officer, OCCO
17. Bandini Chhichhia, Head of Policy and Ethics, OCCO

IDB

18. Serge Troch, Division Chief, Environmental and Social Solutions Division
19. Maria Amelia Viteri Burbano, Focal Point GVB, Senior Social – and for Gender Specialist
20. Agustina Ferrer– Oversight Audit and Compliance Ethics
21. Alberto Rafael, Rivera-Fournier – Ethics Division Chief
22. Gloria Corzo Ochoa – Ethics Office, Consultant
23. Suzanne Duryea, Principal Research Economist, Gender and Diversity Division
24. Cristiane Ronza, Operation Leads Specialist, Office of Risk Management

IFAD

25. Berkis Patricia Perez, Chief of Ethics
26. Maria Fernanda Miranda Munoz, Ethics Officer
27. Arundhati Willetts, Lead Advisor, SECAP
28. Virginie Dega, Senior Investigation Officer

IFC

29. Andrea Cullinan, Global Thematic Lead, Gender and GBV
30. Meron Genene, GBV Lead for Africa, ESG Advice and Solutions
31. Maria Carolina (Carol) Ferracini, GBV lead for Latin America and the Caribbean
32. Stephanie Helen Delaney, Child Protection Specialist
33. Isabel Santagostino, GBV Focal Point for Middle East, Central Asia and Europe

World Bank

34. Anne Marie Burns, Manager, Anti-Harassment and Anti-Discrimination, World Bank
35. Daniela Greco, GBV Focal Point and Senior Social Development Specialist, Operations Policy and Country Services
36. Niyati Shah, GBV Focal Point and Senior Social Development Specialist, MENA Region
37. Verena Phipps, GBV Focal Point and Senior Social Development Specialist, South Asia Region
38. Valentina Iacovelli, Child Protection and PSEA Consultant, Operations Policy and Country Services

United Nations

39. Christian Saunders, Special Coordinator on Improving the UN Response to Sexual Exploitation and Abuse, United Nations
40. Ann Makome, Senior Policial Affairs Officer, Office of the Special Coordinator on Improving the UN Response to Sexual Exploitation and Abuse, UN Secretariat
41. Macalstairs Darrow, Chief Advisor, Development Finance Institutions, Office of the United Nations High Commissioner for Human Rights, OHCHR
42. Matthew Sanidas, Chief, Conduct and Discipline Service, Administrative Law Division, UN Secretariat
43. Eric Rouleau, Human Resources Associate, Conduct and Discipline Service, Administrative Law Division, UN Secretariat
44. Esra Gardner, Conduct and Discipline Service, Administrative Law Division, UN Secretariat
45. Jan Willem Van Den Broek, Team Leader, Financing and Multilateral Partnerships, UNFPA
46. Elizabeth Pender, Global Coordinator, PSEA/SH, Office of the Executive Director, UNFPA

Interpol General Secretariat

47. Andrea Brouwer, Assistant Policy Analyst, Soteria Project, VCO/Organized and Emerging Crime Directorate, Interpol General Secretariat
48. Daniel Coelho, Coordinator, Soteria Project, VCO/Organized and Emerging Crime Directorate, Interpol General Secretariat

Others

49. Anna Gawn, Head of Safeguarding Portfolio, Social Development Direct
50. Dean Laplonge, Independent Expert
51. Moira Reddick, Independent Expert

Annex B - Detailed synthesis of performance

Performance against SEA Benchmarks

This section looks more closely at the assessment content for each SEAH benchmark in the MOPAN 3.1 methodology. It sets out key findings by benchmark, as well as a fuller analysis. To develop the table, MOPAN assessments were reviewed to identify general practice, any examples of notable good practice, and challenges for each benchmark. When average ratings for elements are referred to in the text, they are taken from scoring in MOPAN assessments and does not take into account information used to update the overview. These findings were then refined and updated based on insights gathered through interviews conducted for this study. The analysis shows that agencies vary in their ability to meet the different benchmarks and that some prove more challenging than others.

Table A.B.1. MOPAN's micro-indicator 4.7 on sexual exploitation and abuse

Element 1: Organisation-specific dedicated policy statement(s), action plan and/or code of conduct that address SEA are available, aligned to international standards, and applicable to all categories of personnel.

In MOPAN assessments, this element is one of the higher rated elements related to SEA. All assessments deemed that the seven IFIs had met the basic requirements of a policy statement and that they included definitions aligned to international standards, although these vary in definition, reach and maturity. Only IFAD demonstrated a dedicated institution-wide PSEAH policy. All seven of the IFIs have committed to the Joint Statement of 2018.

On the International Day for the Elimination of Violence Against Women 2024, 6 of the IFIs (IFAD excluded) released the Joint Statement: Multilateral Development Banks United to End Violence Against Women, where they committed to individually and collectively expanding programs to eliminate violence in all aspects of their work with other international organisations, governments, civil society and the private sector.

All of the cohort require borrowers to assess, mitigate, and respond to SEAH and/or GBV. The E&S frameworks act as a framework that contain the Bank's policies and requirements for borrowers. Most of the IFIs prohibit SEAH and GBV in their policy sections, with the exception of the IFC and the World Bank.

SEAH risk prevention is operationalised in ESF standards and requirements. Only IFAD demonstrated a specific institutional SEAH action plan, while the ADB and AfDB have divisional safeguarding action plans.

All of the IFIs reference SEAH and GBVH in their gender strategies; the IDB, World Bank, IFC, and IFAD have action plans in place for implementing their gender strategies.

- **ADB:** SEAH is defined in ADB's new ESF that was approved in November 2024 and will become effective in 2026, following a four-year consultation and development process. SEAH risk is to be identified and mitigated under standards 1, 2, 4, and 10. The MOPAN assessment notes that the update comes after a Safeguards Policy Review that was implemented after a 2020 evaluation report that noted the 2009 Safeguards Policy and Social Protection Policy did not address SEAH. The ADB implemented a response to the evaluation to update its approach to safeguards that included a comparative paper on approaches to SEAH in May 2022. The ESF builds on lessons from the earlier SEAH Good Practice Note, which was transitioned into mandatory requirements under the new policy. As noted by the assessment, there is no evidence of a centralised institutional action plan for assessing and strengthening ADB's institutional capacity to prevent and respond to SEAH risks in operations. However, for the new ESF to become effective, interviewees for this study noted that training, recruiting, and updates to the IT architecture were underway. Accelerating progress on gender equality is an operation priority outlined in the ADB Strategy 2030. The

ADB's Policy on Gender and Development (GAD) recognises harassment and exploitation as a development obstacle and includes gender sensitivity and analyses for projects as key elements of the policy.

- **AfDB:** AfDB defines and prohibits SEA in its 2021 presidential directive that is accessible to staff internally in the bank's document repository. AfDB also defines SEA in its newly updated ISS which came into force 2023-24 and applies to Bank staff and stakeholders including PIUs and contractors. The updated ISS is the overarching system guiding PSEAH in projects and includes an includes strengthened language on SEAH and a standard on vulnerable people. Obligations for identification and mitigation of SEAH risk are set out in standards 1, 2, 4, and 10. AfDB's Business Standards also include guidance on the management of SEAH risk. SEAH is also covered in the Corporate Procurement Department's Code of Conduct for the Bank, Service Providers, Suppliers, and Contractors and in the Standard Bidding Document for Works and Design, Supply, and Install projects, which require bidders to adopt a Code of Conduct aligned with Bank standards. Consultants are similarly bound to the Bank's Code of Conduct by signing on to its expectations and requirements. A good practice example is noted in the assessment through AfDB benchmarking itself against other IFIs in the preparation of its directives. The Gender Strategy 2021-25 integrates SEAH in linking it to broader goals like women's empowerment. Implementation gaps exist, notably limited applicability of CoCs across project types, lack of examples of prohibited conduct, and absence of guidance tools and resources to support policy application according to a 2022 Independent Recourse Mechanism report. The same report also notes that interviews conducted for the report revealed lack of clarity on operational scope.
- **EBRD:** In its updated ESP, effective since January 2025, the EBRD strengthened its umbrella terminology around GBVH, explicitly including child protection and child sexual abuse for the first time, and added definitions for all key terms (including gender as a non-binary, social construct and explicit reference to sexual and gender minorities). The ESP also commits to working with clients to align with the CAPSEAH, though this alignment does not yet extend internally. Under the ESP, clients must adopt measures to identify and mitigate SEAH risk under requirements 1, 2, 4, and 10 with the updates that took place for requirement 4 placing greater emphasis on GBVH and child safeguarding, requiring risk assessments, external expertise and training, and reporting to the Bank. The update represents a shift from earlier reliance on non-binding guidance notes towards clearer, mandatory obligations for clients. The MOPAN assessment notes that EBRD was the first IFI to include explicit language regarding the need for public and private sector clients to assess SEAH risks and implement policies where risks were identified. The 2021-2025 Strategy for the Promotion of Gender Equality specifically addresses SEAH through cooperation with other MDBs/IFIs to harmonise and coordinate approaches, particularly through the MFI Working Group for SEAH. However, EBRD does not have a specific GBVH implementation plan or strategy which carries some trade-offs in terms of being able to ensure sufficient expertise, resources and accountabilities are in place for preventing and responding to SEAH risks in operations. EBRD is currently putting together a new Gender strategy.
- **IDB:** SGBV is prohibited in the IDBs ESPF, that came into effect in 2021. The ESPF applies to borrowers, project workers, and contractors. IDB is the only IFI to have a standard in its ESPF on gender equality (9) that requires the borrower to manage SGBV risk throughout the project cycle. The ESPF also outlines obligations for the identification and mitigation of SGBV risks in standards 1, 2, 4 and 10. The MOPAN assessment notes that the IDB introduced language in the loan agreement template that requires all applicable projects to develop and implement a code of conduct for addressing SGBV and discrimination and an obligation to report to the Bank any allegation of SGBV. In April 2019, IDB expanded guidance for executing agencies or governments bidding for IDB projects regarding gender violence in accordance with the practices of IFIs. The IDB provides a definition for SGBV in its ESPF and defines SEAH in its guidelines for Standard 9 on Gender Equality. The IDB Group Gender and Diversity Action Plan 2022-2025 places SGBV under the priority area focusing on creating an enabling environment for gender and diversity (conducting two calls for proposals per year to support studies in the area) and under the area of action centred on improving agency and voice (through supporting prevention, response and prosecution of SGBV and violence against Diverse Peoples and Population Groups (DPG), in both domestic and public spaces such as transport systems, as well as exploitation of local or migrant women and girls linked to sexual tourism and precarious working conditions. A good practice demonstrated by the IDB is found in linking its gender and diversity action plan to the UN System-wide Action Plan on Gender Equality and the Empowerment of Women (UN-SWAP), which includes standards on PSEAH. IDB also noted in written exchanges on this study that information collected in the context of applying gender safeguards for a specific project can serve as an input for operations focusing on policy reforms, institutional strengthening, or other programmatic, country level support
- **IFAD:** IFAD is currently undertaking an update to its policy. If approved by the Board, it will become one of the organisation's highest-ranking documents, binding both staff and member states, and cascading into every other IFAD framework. IFAD's current PSEAH policy (2018) has been translated into three joint organisation-wide SH/SEA action plans (2018-19, 2020-21, 2022-23) that are annexed to IFAD's Updates to the Board and thus publicly available. IFAD is the only IFI in the cohort with such a policy. The MOPAN assessment noted that its policy would benefit from spelling out what 'zero tolerance' means as evidence indicated that this potentially deterring victims/survivors in projects from reporting, out of fear that this would lead to a suspension of funding to the entire community. The Accountability Framework includes a dedicated section on PSEAH, confirming IFAD's commitment to a working environment free of harassment and exploitation, including SH/SEA, and clarifying reporting and investigation responsibilities for staff. The 2021 SECAP affirm that IFAD projects must comply with the PSEAH policy. SEAH risk is required to be mitigated under standards 5 and 6 if identified through the risk assessment process embedded in the SECAP. IFAD currently operates under the 2012 Gender Equality and Women's Empowerment Policy. It identifies violence against women as a significant structural barrier.
- **IFC:** The IFC [is currently working to update its Sustainability Framework](#), which will come into effect in 2028. IFC has made Board commitment to explicitly address SEAH and child protection in the update (IFC, 2025^[3]). Its current Framework (IFC, 2012b^[4]) has Performance Standards on Environmental and Social Sustainability in place that require clients to identify and mitigate risks and impacts. The IFC's framework, however, does not yet include clear language on the assessment of GBV/SEAH risk. Exposure to SEAH is identified under Standard 2 as a potential element of hazardous work prohibited for children under 18. While IFC's ESAP expects its clients to minimise gender-related risks from business activities and unintended gender-differentiated impacts, its Sustainability Policy applies internally. Recognising that women are often prevented

from realizing their economic potential because of gender inequity, IFC commits to creating opportunities for women through its investment and advisory activities. The MOPAN assessment noted that IFC has a Global Gender-Based Violence and Harassment (GBVH) Roadmap to ensure GBVH risks are managed in operations. The extent to which this roadmap is still in place could not be determined. A March 2024 presentation on addressing Gender-based violence and harassment risks in FI portfolio demonstrates that IFC, since its last MOPAN assessment, has adopted a definition of GVBH that includes SEA and SH. IFC demonstrates good practice through its Codes of conduct and numerous guidance materials for the prevention of SEA and harassment: An overall guide, many sector briefs as well as case studies and tip sheets on grievance mechanisms. As with the World Bank below, the IFC is currently operating under the 2024-2030 Gender Strategy and accompanying implementation plan.

- **World Bank:** The 2018 ESF notes that the World Bank uses its convening ability, financial instruments, and intellectual resources to embed gender equality, among other themes, into environmental and social aspects of sector strategies, operational policies, and country dialogues. While SEAH and GBV are not explicitly mentioned in the ESF, the World Bank requires the identification and mitigation of social risks and impacts to project workers and affected communities. A Directive on 'Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups' lays out Bank due diligence obligations relating to the identification of, and mitigation of risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. This includes individuals or groups who, by virtue of, for example, their age, gender, race, ethnicity, social, civic or health status, sexual orientation, gender identity, or economic disadvantages or indigenous status, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. The SEAH GPNs for Bank staff on IPF involving major civil works and for Human Development Operations note however that all World Bank-financed IPF involving major civil works and education, social protection and health and nutrition should assess risks related to SEAH and identify and implement proportional prevention and mitigation measures to address those risks. Guidance Notes for Borrowers on ESS4 refer to risks of GBV Sexual Exploitation and Abuse of children as risks that may be identified and addressed as part of community health and safety, while ESS2 and its relevant Guidance Note prohibit harassment and exploitation, and sexual abuse of children. Since its last MOPAN assessment, the World Bank has begun to implement its 2024-30 Gender Strategy. Its Gender Thematic Policy Notes from the year 2024 further update on the Bank's approach by demonstrating that SEAH concerns are embedded within the broader goals of the 2024-30 Gender Strategy. The strategy integrates SEAH by recognising it as a manifestation of gender inequality and includes ending GBV as a strategic objective. The corresponding implementation plan integrates SEAH prevention into education, social protection, and health projects and emphasises stronger measurement and reporting of GBV-related results.

Element 2: Mechanisms are in place to track the status of implementation of the SEA policy regularly at HQ and at field levels.

Element 4.7.2 is a satisfactory rated element for indicator 4.7 on average across the seven IFIs in MOPAN assessments. Most of the IFIs track the implementation of their ESFs by borrowers through a dashboard and project visits. Evidence of a functioning monitoring approach to implementation of a plan was absent but this is central to the indicator.

All of the cohort require regular progress reporting by the borrower although levels of completeness and detail vary. This is a critical element as it is seven years since initial commitments were made by the MDBs. It is now reasonable to expect that evidence of implementation of policy frameworks would be available.

- **ADB:** Annual performance reporting on the implementation of the safeguards system is provided at least annually to the Board of Directors. However, it is not clear how this reporting currently addresses SEAH specifically. Under the new ESF that will take effect in 2026, reporting will be consolidated through a safeguard information management system that will be supported by both HQ and country office staff. The safeguard information management system interface currently includes visibility of SEAH risk ratings at the project classification stage, enabling management to generate reports on the number of projects with high, substantial, or moderate SEAH risk for internal use and for development partners. The new ESF is accompanied by a Safeguards Knowledge Management Action Plan. The MOPAN assessment notes that Safeguards advisors in resident missions play a role in reporting complaints back to the ADB's central safeguards team (OSFG) for problem resolution. Without a specific SEAH policy or action plan, it is difficult to determine the extent to which the tracking of progress on PSEAH can be done within the context of the ADB. The ADB demonstrates good practice through a self-assessment in which ADB implemented a benchmarking study with the objective of comparing the existing safeguarding policy, strategy and practices for addressing SEAH with the approaches of five other MDBs. The ADB's Gender and Development policy notes the need for an accompanying action. Whether one has been implemented could not be determined.
 - **AfDB:** Interviews for this study note that AfDB tracks E&S incidents through a Safeguards and Compliance Department (SNSC) E&S dashboard that classifies SEAH/GBV as a serious incident. For high-risk projects, borrowers are required to report monthly. Although the ISS requires PIUs to report back to the Bank on stakeholder engagement, the IRM's 2022 SEAH report states that "interviews and focus groups revealed...most policy provisions related to SEAH are not accompanied by evidence-based, user-friendly guidance and tools, or by the necessary financial and/or human resources." Management prepares a detailed report for the Board on the E&S risk status of ongoing projects in line with the Environmental and Social Safeguards Strengthening Action Plan 2022-25. These reports highlight projects with critical non-compliance issues or incidents that could pose reputational, financial, or safeguarding risks, including SEAH. However, the action plan remains only partly implemented, with staffing and budgetary measures lagging, and practitioners acknowledging that the Bank is not yet where it should be.
 - **EBRD:** The MOPAN assessment notes that reporting on efforts to address GBVH in operations are discussed through reporting on the implementation of the Strategy for Promotion of Gender Equality. Reporting on GBVH risks, complaints, and mitigation actions is also included in a very high-level format in the EBRD Investor Reports on Sustainability. The extent to which monitoring feeds into any progress tracking on the implementation of the ESP or the gender equality strategy could not be determined. Operational reporting to the Board on a quarterly and annual basis identifies GBVH issues that have arisen in operations. However, stakeholders report that cases have not yet been reported for sexual abuse and only for sexual harassment. This is regarded internally as evidence that monitoring and review processes require further
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strengthening. Reporting on ESG performance was formerly reported on in Operations Performance Assessments, which were previously mandatory for all mature operations; however, information on performance and compliance has not been aggregated at the institutional level. Furthermore, monitoring of Environmental and Social Assessment Procedure implementation occurs as part of regular project supervision, with clients reporting activities on at least an annual basis. The MOPAN assessment notes that there is limited information available on how GBVH risks have been addressed specifically. Nor is a retrospective analysis available that examines how GBVH risks have been addressed in previous projects and any lessons that can be drawn. The assessment also notes that EBRD does not have a GBVH-specific action plan or strategy which could support such compliance monitoring and support robust resourcing to address GBVH.

- **IDB:** The IDB does not report specifically on SEAH to the governing body on an annual basis. While the Bank captures this information internally and is able to share it upon request, its main public reporting tool is the Project Monitoring Report, disclosed every six months, which includes E&S performance indicators. This is the only publicly available mechanism that reports its progress in responding to or preventing SEAH across its interventions. The assessment notes that IDB provides regular reporting on the Gender Action Plan for Operations which includes a number of strategic lines of action focused on addressing vulnerability to physical and sexual abuse within key sector areas. In 2020-21, 6 out of 16 VPS divisions included sexual and gender-based-violence within their key thematic areas. The IDB Group Gender and Diversity Action Plan 2022-2025 places SGBV under the priority area focusing on creating an enabling environment for gender and diversity (conducting two calls for proposals per year to support studies in the area) and under the area of action centred on improving agency and voice (through supporting prevention, response and prosecution of SGBV and violence against Diverse Peoples and Population Groups (DPG), in both domestic and public spaces such as transport systems, as well as exploitation of local or migrant women and girls linked to sexual tourism and precarious working conditions.
- **IFAD:** IFAD tracks the status of implementation of the SEAH policy at HQ and field levels and provides a progress updates every quarter to the Executive Board. The action plan sets specific targets for activities. ICOs interviewed for the MOPAN assessment confirmed that they feed into progress reports. Evidence from the assessment interviews showed that considerable efforts are made to translate corporate policies in the field. The assessment further noted a challenge faced by IFAD in that there is no clear role for ICOs in supporting reporting on the implementation of the SEA policy and the corresponding action plan. IFAD demonstrates good practice through its requirement to appointing SEA focal points in all ICOs. Information shared with the Board on projects is framed through broader development effectiveness reports on institutional performance that are not specific on SEAH issues, while annual environmental and social safeguard reports are kept internal, though available to lenders on request. The 2019-2025 Gender Action Plan aims to address GBV broadly through emphasis on changing discriminatory social norms and practices and enhancing access to information, services, and support networks.
- **IFC:** Monitoring of operations is conducted by the ESG Sustainability Advice and Solutions department in the context of IFC's Sustainability Framework, which includes under it the Performance Standards on Environmental and Social Sustainability. Quarterly Portfolio and Risk Reports identify operations that are high risk, where environmental and social risk ratings are below satisfactory and where impacts have been recorded or grievances have been raised, bringing these to the attention of senior management. However, the extent to which the IFC follows the progress reporting mechanisms of the World Bank could not be determined. IFC operates under the World Bank's 2024-30 Gender Strategy implementation plan.
- **World Bank:** The MOPAN assessment noted that reporting on SEAH incidents is integrated into the World Bank's systems for ongoing implementation monitoring. Furthermore, the Bank noted as part of this study that the Board is provided with updates on the implementation of the ESF including SEAH, as applicable, as part of Quarterly Operations Updates and Quarterly Business and Risk Reviews, which include insights on performance and identifies potential issues. Interviewees also noted that the Bank deliberately limits reporting to aggregate incidents for confidentiality reasons but has put in place protocols that mandate teams to escalate incidents reported to borrowers in a timely manner to senior management and Regional Sustainable Development Planet Directors receive monthly updates on SEAH risk distribution and reported cases. The World Bank implemented a GBV action plan in 2017 to set out measures to identify and mitigate SEAH risks as integral elements of the Bank's ESF, as well as specific enhancements in operational processes and guidance such as the GPNs mentioned in element 4.7.1, alongside significant financial commitments. Interviewees noted that the action plan helped transition PSEAH work into the Bank's regular systems. While the GBV action plan was being implemented, the MOPAN assessment notes that updates were given to the Board as well as quarterly reports to the Regional Directors on Environmental and Social Lending and Portfolio indicators. The action plan has not been updated, as interviewees for the study noted that the Board and management deemed that its purpose as a transitional framework was fulfilled once core processes were embedded. The World Bank is currently implementing the 2024-2030 Gender Strategy implementation plan.

Element 3: Dedicated resources and structures are in place to support policy implementation and/or action plan at HQ and in programmes (covering safe reporting channels and procedures for access to sexual and gender-based violence services)

Element 4.7.3 is another satisfactory rated element on average from the MOPAN assessments. All the IFIs have provided some information about how they have attempted bolstered capacity support to borrowers. The World Bank and IFAD assessments provided information on financial resources available for PSEAH. However, interviews for this study indicated that all IFIs struggle with having adequate institutional capacity to perform their duties.

All organisations state that they have safe and confidential reporting systems in place, although a local grievance mechanism is always encouraged as the first point of entry for complainants. GMs are required to be safe, confidential, and proportional to risk. Unlike other IFIs that mandate grievance mechanisms for medium- and high-risk projects, the World Bank and IFAD requires them for every project, regardless of its risk classification.

All of the cohort have positions or units that include PSEAH in their role functions to some extent, with the World Bank, IFC, ADB, EBRD and IDB requiring either GBVH/SEA focal points or gender specialists in their safeguarding teams while the AfDB requires all safeguarding staff to be able to handle SEAH cases.

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- **ADB:** OSFG includes three regional safeguards directors who manage dedicated safeguards experts placed at HQ and in resident missions. In this restructuring, 12 new safeguards positions have been created and two positions for GBV/SEAH were established in the Gender Equality Division. Since April 2024 there is an SEAH Technical Working Group for experts across the Bank to share lessons and good practice. In readiness for the new ESF that will become effective 2026, ADB is recruiting additional staff and providing borrower and client training. Project-level grievance redress mechanisms remain the primary entry point, but under the new policy ADB is developing and strengthening these to recognise the distinct handling needs of SEAH cases. In parallel, ADB is establishing a Grievance Redress Service (GRS) within the Integrated Safeguards Management System (ISMS) to centralise complaint tracking, reporting and case management, with enhanced business processes and IT architecture to manage SEAH-related cases. This will complement ADB's Accountability Mechanism. However, the MOPAN assessment noted certain limitations regarding the usefulness of this mechanism relating to accessibility and the known gaps in the safeguarding policy that affect compliance. Nonetheless, complaints are received through a dedicated Compliant Receiving Officer and must be in writing, submitted by mail, e-mail or hand-delivered through the CRO and ADB field office. Complainants and their representatives must provide their names and contact details. Anonymous complaints are not accepted. If requested, the identity of complainants is kept confidential.
 - **AfDB:** Interviewees for this study note that safeguards staffing has increased from 19 to 35 in the past five years with an almost USD 9 million increase for the operation budget. However, it is noted that institutional capacity for PSEAH remains under-resourced relative to demand. In practice, grievance redress systems are costed into loan or grant agreements, and borrowers are responsible for ensuring that training, victim care, and remedies are in place under AfDB supervision. In fragile states, specific PSEAH risk mitigation measures can be embedded in environmental and social management plans, with provisions included in borrower budgets. On AfDB's side, limited operational budget lines cover field missions and, in exceptional circumstances, the hiring of external GBV specialists to provide independent assessments. All safeguard staff are expected to be able to manage or oversee implementation of SEAH incidents. To support implementation at country level, the Bank invests in training for PIUs. While the Board is broadly supportive of environmental and social safeguards, including PSEAH, gaps persist in management's allocation of resources and prioritisation, with interviewees emphasising that the Bank could further strengthen its institutional arrangements, training systems, and monitoring to ensure full and sustainable implementation of its PSEAH commitments.
 - **EBRD:** Within the organisation, the Office of the Chief Compliance Officer (OCCO) is responsible for receiving reports through the GBVH focal points. This function is an independent oversight function headed by the Bank's Chief Compliance Officer. For projects, work on GBVH is led by five senior social, health and safety advisors (GBVH Focal Points) located within the E&S team. SEA and GBVH risks are managed by E&S staff as part of overall E&S risk management and compliance with the ESP. Interviews for this study note that these focal points have an oversight role in projects identified as a higher risk for GBVH and have responsibility for receiving and managing reports on projects. Additionally, the MOPAN assessment notes that GBVH focal points serve as a coordination function between clients, E&S staff and other internal stakeholders across Headquarters and within Countries of Operation. The OCCO and E&S functions are funded through specific allocations in EBRD's administrative budget and are funded independently of other teams and operations. The MOPAN assessment noted that EBRD stakeholders felt that the absence of dedicated staff is a challenge in addressing GBVH risks in operations as there is constant pressure to deliver more with limited funds. Interviewees for this study also highlighted this point. While a modest increase in headcount was secured during the ESP review to support grievance management, this was not a significant expansion of resources for GBVH given the broad E&S responsibilities. The forthcoming revision of the Gender Strategy is seen by stakeholders as an opportunity to strengthen prioritisation of PSEAH and ensure that resources are more clearly allocated. Clients are required to establish confidential mechanisms for receiving complaints as part of the environmental and social assessment process and compliance with the ESP. Beyond these, various direct reporting channels are available, including an online confidential reporting mechanism, a whistleblower complaints intake platform and the Independent Project Accountability Mechanism (IPAM). IPAM is the independent accountability mechanism of the EBRD which reviews environmental, social and transparency-related concerns raised by project-affected people and CSOs about Bank-financed projects. However, in practice, grievance reports can sometimes be received through informal channels, such as site visits or direct contact with project workers, and interviewees for this study noted that these reports are more time consuming as they are outside of the formal reporting system.
 - **IDB:** The MOPAN assessment notes that resources for addressing SEA are assigned at the HQ level by the Vice Presidency for Sectors and Knowledge. Resources are indicated at a project level, determined based on the nature of a project and associated risks. With over 330 projects and a limited team of around 50 specialists, including only a small number of gender/GBV experts, interviewees for this study noted that resources are stretched and often insufficient to meet all demands, particularly as SEAH/GBV risks can be difficult to ascertain up front. While the Bank has some capacity in place at HQ to support PSEA implementation, including staff with partial responsibility for gender and GBV, there are no roles dedicated specifically to SEAH prevention and response, or focal points at country or regional level. IDB noted in written exchanges for this study that it undertakes programmatic operational work with government actors such as financing for loan operations and technical co-operations aimed at improving national and subnational systems (e.g. one-stop centres and other integrated service delivery models, as well as support for mainstreaming gender considerations across sectors). The 2024 Guide on Discrimination Based on Gender and Sexual Orientation and the 2024 Blog Guide to Prevent and Address Gender Based Violence in Projects reinforce that projects should establish inclusive grievance channels. The MOPAN assessment further notes that IDB obligates borrowers to provide grievance mechanisms for workers and communities with 'special protection' for reporting of SGBV. IDB notes that since November 2021, following the entry into force of the ESPF, the IDB has addressed social and environmental complaints through its Environmental and Social Grievance Protocol, which applies to eligible grievances related to IDB-financed public sector projects. Most cases handled under the Protocol concern labour issues, including workplace harassment among other issues.
 - **IFAD:** The most senior lead on SEAH matters is the Chief of the Ethics Office, who leads the SEAH task force and reports directly to the President. IFAD started rolling out a system of (part-time) focal points and alternates in all ICOs in 2018. In 2022, IFAD expanded the SH/SEA focal points programme to all IFAD country offices. Complaints of SEAH can be made via an email address and an Italian phone number that IFAD says can receive calls, text and WhatsApp messages and that are channelled to the Ethics Office and AUO in Rome. Complaints can also be received by the CD through the project, or the UN Country Team (RC's office). Complaints made to national governments and Implementing Partners are subject to the jurisdictions in each of these countries. SEAH complaints at project level, when received through the
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SECAP complaints process, are channelled directly to Ethics for processing. If this is substantiated Ethics refers the case to AUO for investigation. However, evidence from interviews for the MOPAN assessment confirmed that while current mechanisms are advertised as being safe and confidential, several were not sure they would trust them fully. Importantly for SEAH, several country-based staff expressed concern that these mechanisms were not easily accessible to communities and that they had been put in place assuming that it would not be the community members, women, minors or sex workers themselves coming forward, but rather, a bystander or someone from the project office. At HQ level, the Ethics Office was small during the assessment (three staff members), but in 2024 management increased the team to four full-time staff with a dedicated non-staff budget of USD 93,650. Beyond this, IFAD continues to face resource constraints, as all staff with PSEAH responsibilities cover these duties alongside other roles, and no specific budget line exists at project level. To strengthen victim-centred response, IFAD has adopted a new case management system to keep survivors informed of case progress, is adopting the IASC-developed Investigators' Manual for SEA complaints and is providing specialised training to investigators (e.g. Gendarmerie Nationale, CHS Alliance). IFAD demonstrates good practice the IFI that obligates grievance redress mechanisms for all projects, regardless of risk categorisation.

- **IFC:** The MOPAN assessment noted a new Policy for CAO, the independent accountability mechanism of the IFC, and MIGA was approved by the Board. IFC has also established a Stakeholder Grievance Response team to provide guidance and support on effective complaints handling to IFC staff managing responses to CAO cases or project E&S complaints received directly to IFC. Additionally, IFC commissioned an independent study of grievance mechanisms and external communication mechanisms in IFC's portfolio of direct investment projects and financial intermediary clients aimed at understanding how grievance mechanisms were working at the project level, what contributes to their effectiveness, and the impact that IFC support and supervision had on them. Interviewees for this study note that in the last year, the ESG team has increased its own dedicated GBV expert capacity, growing from one to six staff, including four regional GBV advisers covering nine regions, a child protection specialist working portfolio-wide, and a GBV specialist member on a special project. This team undertook an extensive review of around 500 projects from IFC's 5,000-project portfolio, identifying unassessed GBV/child protection risks and developing 55 corrective action plans, many for projects of which pre-dated the presence of GBV specialists and had not had any assessment of PSEAH. The workload of regional advisers is high, with demand from colleagues and clients exceeding available capacity. At the country and regional level, IFC relies on these advisers to prioritise high-risk cases, but staffing constraints mean that broader coverage is limited compared to other institutions. Grievance reporting structures are in place through CAO and IFC's grievance channels.
- **World Bank:** Since the MOPAN assessment, the GBV action plan has allowed the World Bank to invest in recruiting GBV specialists, which has been critical for building internal expertise and sustaining capacity despite staff turnover. Financing for PSEA comes primarily through project budgets, at times supplemented by volatile trust funds. While dedicated GBV trust funds have been replenished in the past, reliance on such funding is seen as unsustainable. Stakeholders highlighted that sustaining PSEAH efforts requires continuous capacity building, coordination across departments, and consistent budget allocation, with particular attention to strengthening in-country capacity through portfolio approaches where political and operational contexts vary widely. The FY2024 Grievance Redress Service Annual Report highlights the Bank's commitment to supporting Borrowers to address project workplace harassment through training, strengthened grievance systems, and third-party facilitation, including a case where PIU leadership engaged an external consultancy to improve workplace relations under the behest of the World Bank. All projects must have accessible GMs for concerns and grievances (ESS10 on Stakeholder Engagement) and communities can further submit complaints directly to the World Bank via the Grievance Redress Service (GRS) which release an annual report on trends. The Bank also noted for this study that communities can also submit complaints to the independent Inspection Panel. The MOPAN assessment noted that there is an implicit need for continuous improvement on trust and access in reporting systems. Interviewees noted the increased use of project grievance mechanisms where communities are using them to raise SEA-related concerns, which is considered an indicator of trust and effectiveness.

Element 4: Quality training of personnel/awareness-raising on SEA policies is conducted with adequate frequency.

Element 4.7.4 is one of the higher rated elements based on the evidence of existence of training however, only limited information was available on the suitability, targeting, and frequency of training for prevention efforts.

All of the IFIs demonstrated some evidence of providing training to implementing partners though only IFAD specifically provided information about the training of government officials.

- **ADB:** While mandatory training is delivered to all staff on the SPS/ESF and the Code of Conduct, the delivery of specialised safeguards training remains to be strengthened. The ADB has initiated a pilot project to strengthen capacity among Developing Member Countries Implementing Agencies and Contractors to prevent and respond to SEAH in civil works projects, with broader roll-out planned in future. However, a gap analysis has been conducted without yet yielding an institutional plan to provide more systematic training to ADB partners, reflecting the early stages of ADB's reform journey. Despite the challenges, good practices include the launch of a four-day intensive training for independent investigators to investigate alleged SEAH incidents in civil works projects, and clause requirements in procurement contracts mandating SEA-related training and recordkeeping of employees and sub-contractors who have attended and completed training programs.
- **AfDB:** The MOPAN assessment noted that since 2021, PIAC has mainstreamed anti-SEAH messaging in new staff induction. In line with PETH (Ethics Office) requirements, training on SEAH is mandatory for all Bank personnel, including consultants and interns, through the online Code of Ethics training, which includes a dedicated SEAH module. Training is complemented by regular sensitisation and awareness campaigns conducted by PETH and PIAC (Integrity and Anti-corruption Office), including scenario-based elements such as podcasts, video materials, and cartoon strips, as well as dedicated sessions on the Whistleblowing Policy. Externally, training is also extended to service providers and contractors, particularly through Fiduciary Workshops coordinated by the African Development Institute, with participants drawn from PIUs and Executing Agencies, and awareness-raising sessions are organised for vendors and third parties in Regional Member Countries.

The MOPAN assessment noted that stakeholders at headquarters and in the field confirm that SEAH-related sensitisation is integrated into both internal and external integrity sessions, though consistent systems for tracking effectiveness remain limited.

- **EBRD:** Mandatory training to staff on the prevention and response to GBVH is delivered via the mandatory Code of Conduct training course (Integrity Matters!) that must be refreshed every 3 years or staff are subject to a financial penalty. The training is also extended to Board Officials and the assessment notes that staff compliance exceeds 95%. The training is scenario-based, reflecting aspects of actual situations and cases and supplemented with six internal training sessions since 2019 on GBVH and Prevention. While the policy design is strong, the assessment notes that staff interviewed at the country level reported that they had never received training on addressing GBVH complaints, suggesting gaps in field-level implementation. The assessment notes that training for clients is only given for projects above low risk.
- **IDB:** IDB has embedded SEAH training into its ESPF. The MOPAN assessment noted that IDB innovated its training formats by developing a series of scenario-based complementary YouTube videos (launched in October 2021) to demonstrate how to access channels for reporting and remediation. The 2024 Guide to Working Places Free of Harassment recommends to implementers inclusive, recurring training on gender and SEAH topics, noting that lack of regular training undermines the ability to prevent and respond to SEAH. Interviews for this study note that stakeholders confirmed the importance of strengthening training provision and visibility, noting that while the ESPF gender standard has boosted the appearance of PSEAH training in codes of conduct, continued reinforcement is needed. The IDB demonstrates good practice in that training on the Grievance Protocol for project beneficiaries is provided to all employees.
- **IFAD:** The MOPAN assessment noted limitations, particularly around training for vendors and contractors, as IFAD does not require proof that vendors and contractors conduct any training or other awareness raising measures with respect to SEAH. Field-level personnel also indicated challenges in raising awareness of SEA among employees, contractors, and in the communities IFAD serves, partly due to communications being disseminated only in official IFAD languages. In the 2024 Annual Report on the activities of the Ethics Office, IFAD states that in response to the assessment, intensification of its SEAH outreach efforts through targeted training took place, including in-person missions to all IFAD regions, along with regular virtual training. These sessions focused on frontline implementing teams and offered information on victims' rights and SEAH responsibilities when engaged in IFAD-supported activities. Q&A sessions were also undertaken. Guidance materials for third parties includes a guide on best practices, a "no excuse" card, FAQs clarifying IFAD's zero-tolerance stance on grey areas relating to SEAH such as local customs and consent, and a children's book on bodily autonomy. A challenge remains in that training completion rates at project level are difficult to monitor, as the Ethics Office depends on proactive requests from IFAD Country Offices to deliver sessions, which limits the ability to systematically monitor training delivery and report completion rates. IFAD notes that there is opportunity to fill this gap through including Ethics and AUO trainings in project start-up events. The Ethics office is currently developing automated tools to support project start-up workshops in scheduling PSEAH training.
- **IFC:** The MOPAN assessment notes that IFC has developed and delivered dedicated training, tools and guidance to build staff capacity in providing guidance and working with clients to undertake SEAH risk identification, management and monitoring operations throughout the project life cycle. Staff training is built into IFC's core curriculum and includes webinars and specialist modules. A webinar in 2020 addressing GBV and Harassment attracted over 400 staff participants. Specialised training events for financial intermediaries and other sectors is also provided. The IFC demonstrates good practice through the development of a toolkit titled Supporting Companies to Develop and Manage Community-Based Grievance and Feedback Mechanisms Regarding Sexual Exploitation, Abuse and Harassment, which provides specific SEAH guidance, including approaches to child SEAH. As stated for the World Bank, the Ethics and Internal Justice Services Annual Report 2023 revealed that the Anti-harassment Coordinator participated in 49 training and outreach sessions that reached 1,839 staff at HQ and in country offices, including focus groups with vulnerable populations such as short-term staff and contractors. The report also notes an increase in reports from several country-office-based staff and contractors. Since the assessment, IFC has made a formal commitment to its Board to establish a comprehensive, multi-level institutional SEAH training programme. This will roll out from June to July 2026 and ranges from an introductory module for project teams, managerial training all the way to advanced professional development for GBV experts, including train-the-trainer sessions to ensure regional roll-out and sustainability. The programme will be complemented by a mandatory corporate e-learning package for all staff, to be refreshed on a regularly.
- **World Bank:** The MOPAN assessment noted that training of social development specialists on SEAH Risk Management. The Bank also noted for this study that SEAH risk management training happens on a rolling basis, with SEAH dedicated clinics both at global and regional level and a SEAH session integrated in ESF accreditation for specialists and that during FY25 (July 2024-June 2025), a total of 482 participants joined dedicated training sessions on SEAH risk management targeting ESF and sector specialists. Training is also provided to borrower country PIUs to build their capacity as part of regional ESF capacity building efforts. Moreover, interviews with country team staff for the MOPAN assessment confirmed that staff have received training and are aware of the Bank's policies, interprocesses and reporting requirements related to SEAH. The World Bank also has a collection of resources designed to promote a systematic approach to incorporating GBV prevention and risk mitigation in social protection operations. The Ethics and Internal Justice Services Annual Report 2023 revealed that the Anti-harassment Coordinator participated in 49 training and outreach sessions that reached 1,839 staff at HQ and in country offices, including focus groups with vulnerable populations such as short-term staff and contractors. The report also notes an increase in reports from several country-office-based staff and contractors. While the assessment did not cite specific implementation challenges, the breadth and consistency of training efforts demonstrate promising good practice.

Element 5: The organisation has clear standards and due diligence processes in place to ensure that implementing partners prevent and respond to SEA.

Element 5 was one of the higher rated elements for the cohort. This indicator sits at the core of MDBs efforts on PSEAH, given the business model and accountability chain.

All MDBs in our sample use their E&S frameworks to ensure that SEA standards/requirements are followed throughout their operations (see also Element 5.4.5). Those standards for partner accountability are found in contractual clauses for financing and codes of conduct signed by implementing partners. Due diligence is conducted within the E&S frameworks requiring projects to abide by SEA safeguards found in E&S management/commitment plans for the cohort and these extend to sub-contractors in all the IFIs.

- **ADB:** Interviewees for this study noted that for higher risk projects, SEAH obligations are built into loan and bidding documents to hold borrowers accountable, and under the new ESF these requirements are mandated for all projects as binding policy rather than optional guidance. Under the new ESF, contractors must also establish SEA response mechanisms, including project-level grievance mechanisms with survivor-centred reporting channels, investigative capacity, and regular training. The ADB has developed some guidance to improve partner performance on SEA, including two GPNs that lay out principles such as zero tolerance for inaction, early intervention, survivor-centred approaches, and the importance of tailoring SEA responses to context. These GPNs are being piloted in five countries, with related training and support underway. Contractors are required to adhere to a Code of Conduct that prohibits harassment and misconduct. However, challenges remain. The MOPAN assessment noted that ADB lacks a standardised and enforceable approach for including SEA clauses in contracts, and there is currently no track record of holding contractors accountable for SEAH-related breaches. The full implementation of the new ESF is not expected until 2026, and until then, enforcement mechanisms remain weak.
 - **AfDB:** The MOPAN assessment notes that the AfDB has included language on SEA-related requirements in its Standard Bidding Documents for large works and the promulgation of a code of conduct for service providers, suppliers, and contractors since 2018. These clauses stipulate obligations for contractors to establish SEAH prevention and response mechanisms, including functioning complaints systems, investigative capacity, and regular training for staff. Contractors are also required to ensure that all subcontractors comply with the same obligations, and sanctions—including suspension of financing—are applied in cases of non-compliance. Monitoring of implementation takes place through several mechanisms: monthly reports from borrowers, virtual meetings between AfDB environmental and social (E&S) experts and project implementation units, aide-mémoire reports following missions, and biannual Implementation Progress Reports that are mandatorily disclosed. Since 2023, AfDB has also operated a central dashboard that tracks periodic reporting across projects. Projects failing to submit reports must provide justification and corrective action plans, and repeated failures may trigger suspension of funding. While these systems provide oversight, challenges remain. The 2022 IRM report found that sample ESMPs did not adequately identify actions or indicators to reduce SEAH risks, and the MOPAN assessment noted limited evidence of regular, thorough training for vendors and contractors. Furthermore, gaps persist among financial intermediaries in their ESMS, with inconsistent incident reporting and unclear thresholds for reportable SEA cases. AfDB notes that improvements will require clearer organisational roles, greater transparency in staffing and funding, regular and detailed PSEAH reporting, stronger stakeholder engagement and grievance mechanisms, and ongoing policy reviews.
 - **EBRD:** The EBRD's ESP mandates the assessment of GBVH risks and requires projects to adopt appropriate mitigation measures. The assessment notes that GBVH risk screening and assessments of client capacity are conducted systematically across operations. Legal agreements specify client responsibilities for managing GBVH risks, including client responsibilities to mitigate and monitor GBVH-related risks in accordance with ESAPs and report incidents promptly to EBRD. Contractors and sub-contractors must comply with GBVH policies, and clients are expected to provide training, disclose policies, and monitor implementation. Sanctions for non-compliance are specified in agreements. Ongoing monitoring is conducted through technical assistance, enhanced site-based supervision, or third-party verification. E&S reporting requirements (including GBVH) vary by project risk, with high-risk Category A and B projects often requiring quarterly or bi-annual reporting and regular independent E&S monitoring to provide EBRD with objective assurance on GBVH implementation. While EBRD applies a risk-based, survivor-centred internal framework across appraisal, monitoring, and incident reporting, as noted in 4.7.2 it does not have a dedicated GBVH implementation plan, which presents trade-offs in ensuring sufficient specialised expertise. Monitoring challenges persist in the context of FIs. Interviews for this study noted that while EBRD requires FIs to have environmental and social management systems, the direct applicability of GBVH-related requirements under standards 2 and 4 is limited to FIs' own staff and does not automatically extend to their on-lending portfolios. In practice, FIs are expected to adhere to national law rather than fully implement EBRD's GBVH standards, and monitoring of grievance mechanisms and safeguards in their portfolios is weaker. Another limitation arises from grievance reporting. Although immediate reporting of GBVH incidents by clients is required in legal agreements, and in practice the majority of cases have been reported directly through clients. Reports also reach EBRD informally through monitoring site visits and direct worker contact, rather than through the formal channels. Interviews noted that while the level of immediate reporting by clients is considered to remain low, EBRD is working to improve reporting through the new digitalisation programme, which aims to systematise E&S reporting, and through project-level ESAP implementation, providing specialised training and capacity-building support to clients.
 - **IDB:** The MOPAN assessment of the IDB notes that the bank has recently strengthened its standards to ensure that implementing partners can prevent and respond to SEA. Since the 2019 updates to procurement guidelines, contractual clauses explicitly prohibit SEA and require contractors to prepare GBV/SEA prevention and response action plans, allocate funding for awareness training, and commit to applying a code of conduct, the implementation of which is monitored. Contractors are also required to establish SEA response mechanisms, including complaints procedures, investigative capacity, and regular training, and to ensure that all subcontractors comply with these obligations. Sanctions for non-compliance are included in contracts. IDB has also issued guidance to borrowing member countries to reinforce these requirements. IDB captures SEAH indicators through ESPS 9, which obliges clients to adopt codes of conduct prohibiting and penalising GBV and gender discrimination, and to report on indicators such as the number of allegations, complaints opened and closed, and participation of women in consultations. Since tracking began, IDB has registered only a small number of SEA/SH cases, most of which were reported through executing agencies during supervision missions. The 2023 Environmental and Social Grievance Protocol Annual Report details IDB's efforts to improve the grievance protocol through a workshop with civil society organisations and setting objectives for focus in 2024 that encompass expanding awareness of the protocol. In 2025, IDB introduced an internal dashboard that designates GBV cases as "critical situations." However, while clauses contain obligations and sanctions, evidence on systematic monitoring of compliance or consistent enforcement is limited, SEAH is not classified as a prohibited practice by the Office of Institutional Integrity.
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- **IFAD:** IFAD has embedded standards for preventing SEAH into its contracts and agreements with implementing partners, requiring them to execute projects in line with IFAD's PSEAH Policy. These clauses stipulate obligations for prevention and response, including adoption of a code of conduct, provision of SEA/SH training, establishment of functional grievance redress and reporting mechanisms, and ensuring investigative and survivor referral capacity. Contractors are also obliged to extend these requirements downstream to subcontractors and third parties, and sanctions for non-compliance are included. Prior to loan signing and disbursement, borrowers must demonstrate that these requirements are in place through the Environmental and Social Action Plan and satisfactory supervision, with compliance monitored during project implementation through SECAP procedures and supervision missions. The assessment notes that interviews confirmed that these clauses have been implemented in contracts since 2019, and that SEAH is raised during biannual supervision visits. However, the assessment noted that challenges remain in verifying compliance. IFAD does not currently assess the SEAH capacity of its partners, nor does it require proof of training, awareness-raising activities, or operational complaints mechanisms. Monitoring of contractual obligations is limited, and while contractors are asked to take appropriate measures, there is no requirement to demonstrate these measures are in place. Interviews for the assessment suggested IFAD often relies on joint PSEAH working groups at the country level rather than its own oversight systems. A significant concern is the lack of awareness among external partners about these requirements, raising questions about whether implementing entities fully understand or comply with SEA clauses.
- **IFC:** Interviewees for this study noted that the IFC has introduced SEAH safeguards directly into its legal agreements with borrowers, service providers, suppliers, and contractors. These covenants require all clients to adopt a sexual harassment policy or to integrate PSEAH provisions within their HR systems, and in some cases, include a child safeguarding clause where project risks to children are identified. Clients are also required to establish and maintain referral pathways, codes of conduct, and SEA response mechanisms, including grievance systems, investigative processes, and regular training for staff and subcontractors. Implementation of these obligations is monitored through supervision, follow-up with staff, and IFC's new SEAH risk dashboards. Mandatory reporting requirements were added in 2025, closing a prior loophole that allowed companies to avoid disclosure of SEAH incidents. Clients must now notify IFC of incidents within three days and provide a root cause analysis within 20 days. Sanctions for non-compliance are embedded in these agreements, and subcontractors are obliged to adhere to the same standards. The IFC has issued several Good Practice Notes for borrowers, including guidance on addressing GBV and harassment across six high-risk sectors and a Child Safeguarding GPN. However, challenges remain. The institution continues to grapple with how to coordinate responses with co-investors, as highlighted by the Bridge case, where IFC's minority stake limited its leverage but revealed critical gaps in joint due diligence and information-sharing. While IFC's new clauses and monitoring systems represent a significant strengthening of its PSEAH framework, implementation still depends heavily on sustained capacity building and technical assistance for clients the is under resourced.
- **World Bank:** Implementing partners are required to embed SEAH risk identification and mitigation in projects proportionally to the risk level and in projects with moderate (for civil works), substantial or high risk, they must be required to prepare a dedicated SEA Prevention and Response Plan that includes stakeholder engagement, awareness-raising, grievance mechanisms, and survivor referral pathways. These requirements are included in contract clauses and agreements that prohibit SEA. Contractors are required to adopt and enforce codes of conduct, establish SEAH response mechanisms (including complaints channels, investigative capacity, and regular worker training), and ensure subcontractors also comply with SEAH prevention and response obligations. Guidance has since expanded since the MOPAN assessment with a beginners' guide to borrowing, updates to contract clauses and requests for proposals and bidding documents, all of which maintain SEAH prevention and response obligations. Recent updates to procurement documents include the introduction of rating criteria, though the extent to which SEAH considerations are factored into these ratings is not clear. Obligations are monitored as part of project supervision, with continued non-compliance flagged during mid-term reviews. Legal remedies may also be available where appropriate. The Bank noted for this study that it also has an internal toolkit for reporting and monitoring incidents, including SEAH, with dedicated anonymised reporting tools and guidance. It also notes that minimal information for due diligence and trend analysis is received. The Bank's guidance calls for the inclusion of GBV specialists and other qualified personnel in project teams, and where capacity is limited, third-party monitors may be engaged. While overall practices are robust, the MOPAN assessment noted a lack of detail about systematic monitoring and the frequency of enforcement actions that suggests an area for further transparency and improvement.

Element 6: The organisation can demonstrate its contribution to inter-agency efforts to prevent and respond to SEA at country level, and SEA policy/best practice co-ordination for at HQ.

All IFIs in the cohort have committed to the Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation in 2018 and contributed to FCDO's Cross-Sector Safeguarding Groups progress reports.

There is more evidence of engagement at HQ level than at field level though none of the assessments contained detail about the objectives or progress of HQ level inter-agency fora. All of the IFIs are part of the Multilateral Financial Institutions Working Group on Addressing Sexual Exploitation and Abuse and Sexual Harassment, set up in 2020 and currently chaired by the World Bank although only the EBRD and ADB provided details on the activities of the Working Group given their recent 2024 and 2025 assessments. Most assessments also recorded that the IFIs participated in other joint mechanisms to improve prevention of and response to SEAH such as mutual reliance frameworks. The World Bank, IFC, IFAD, and EBRD fed into the Common Approach to PSEAH (CAPSEAH). The World Bank is the only member of the cohort that is part of IASC PSEA technical advisory group.

As mentioned in 4.7.1, on the International Day for the Elimination of Violence Against Women 2024, 6 of the IFIs committed in a Joint Statement to individually and collectively expanding programs to eliminate violence in all aspects of their work with other international organisations, governments, civil society and the private sector.

- **ADB:** The MOPAN assessment notes that ADB led coordination of a 2023 joint IFI report² and participated in a 2020 follow-up report on the 2018 Joint Statement. Interviewees for this study noted that ADB has agreed a mutual reliance framework with the World Bank and participates in IFI heads-initiated working groups on (i) shared borrower-system assessments and a continuously updated digital knowledge base, (ii) common E&S indicators across institutions, and (iii) pooling and sharing resources to reduce duplication of guidance and tools. In the field, ADB is piloting implementation of the SEAH GPN in five developing member countries and undertaking joint actions such as a joint ADB-WB briefing and technical training for agencies in Nepal and a first joint training with the UN (through the Resident Coordinator's Office and UNICEF) in Tajikistan. The MOPAN assessment noted that ADB faces challenges at the country level, where awareness and engagement in interagency SEAH prevention among resident missions are limited. The assessment notes that action is often absent unless complaints arise, pointing to a reactive rather than proactive approach in the field.
- **AfDB:** The MOPAN assessment notes that PETH coordinated efforts of nine IFIs in the FCDO Cross-Sector Safeguarding Group to prepare a report on progress in safeguarding against SEAH in 2018³, with follow-up activities including a similar event in 2021⁴ and an annual ethics conference drawing 142 global participants. The AfDB is also a member of the MFI Working Group on Addressing SEA/SH. Challenges remain, particularly at the field level, where the assessment noted that there is little evidence of interagency coordination. The assessment noted that 46% of respondents selected "don't know / no opinion" when asked about AfDB's participation in interagency field-level efforts in MOPAN's partner survey, indicating low visibility of its work in this area.
- **EBRD:** As part of its participation in the MFI Working Group on SEAH, EBRD contributed to the development of a knowledge sharing platform and joint pilot initiatives. The MOPAN assessment note that EBRD is part of the Steering Committee for this group and participated as a comparator for a 2022 comparison of approaches across IFIs, for which it states that it was found to have among the most robust approaches in place for representation of SEAH in policy documents, guidelines and good practice notes, risk assessments, procurement requirements and requirements for grievance mechanisms. EBRD also participates in the FCDO Cross-Sector Safeguarding Group. EBRD aligns project-level GBVH/SEAH measures with the CAPSEAH framework and encourages clients to participate in industry-wide or human rights platforms, such as the Institute for Human Rights platform. However, limitations remain. Unlike the UN partner portal, for example, EBRD cannot externally share client information gathered during due diligence without consent, and information-sharing across IFIs is still constrained by confidentiality rules.
- **IDB:** IDB engages in joint mechanisms with other MDBs and IFIs, including collaboration with IDB Invest and through IFI safeguard heads' meetings. Interviewees for this study noted that while collaboration with IDB Invest and other IFIs exists, it remains limited and not as close as it could be. Interviews for this study noted some differences in institutional frameworks, such as IDB's standalone gender policy, which were viewed as enabling a more integral approach, while alignment across boards on common standards was seen as politically challenging. The MOPAN assessment noted that only 2 out of 17 donors and peer organisations surveyed by MOPAN for the IDB assessment were aware of IDB's involvement in joint efforts to address SEA at the time of assessment, with only one affirming such participation.
- **IFAD:** IFAD states in its policy that it may liaise with international organisations, think tanks, and government agencies on SEA and is engaged in several interagency fora, including the UN SEA Working Group and IASC Task Team on Accountability to Affected Populations. It contributes to consultations on updates to the UN Secretary-General's Bulletin and is part of UNRIS, where it is helping finalise a manual on SEAH complaints and victim-centred approaches. IFAD has also provided input to the CAPSEAH steering committee and working groups, using CAPSEAH principles to inform staff training and policy language, and it participates in the CAPSEAH/IFI survey on SEAH prevention and response. Since the MOPAN assessment, IFAD has also provided input to reaccreditation requirements with the Green Climate Fund and the Adaptation Fund. IFAD is currently assessing participation in the Misconduct Disclosure Scheme to support responsible inter-agency data sharing. However, the assessment found limited evidence of tangible contributions to interagency efforts at the field level. Interviewees for the assessment reported no exchanges with other IFIs on SEAH issues.
- **IFC:** IFC participates in a range of working groups, such as the CAPSEAH Global Steering Committee and Resourcing WG, the OECD PSEA Reference Group, the UK's 2018 Safeguarding Summit, In collaboration with EBRD and CDC, IFC has produced guidance materials such as a good practice note on addressing gender-based violence and harassment, and a suite of tools including tip sheets, codes of conduct, and grievance mechanism guides. At the field level, IFC has supported inter-agency initiatives more selectively, such as its involvement in the design of the gender country program for Mexico with the World Bank and the government, which incorporates GBV prevention objectives in public transport and childcare, with IFC ensuring alignment to its child protection guidance. Engagement with UN agencies has also included discussions on integrating a private sector lens into assessment methodologies and providing technical input to UNICEF materials. Key challenges noted include the lack of formal mechanisms for joint programming with IBRD, resource constraints that limit IFC's ability to expand

² DFID (2024), *Safeguarding against sexual exploitation, abuse and harassment: cross-sector progress report 2022 to 2023*, <https://www.gov.uk/government/publications/safeguarding-against-sexual-exploitation-abuse-and-harassment-cross-sector-progress-report-2022-to-2023/safeguarding-against-sexual-exploitation-abuse-and-harassment-cross-sector-progress-report-2022-to-2023#int>

³ DFID (2019), *Progress Report – One year on from the October 2018 London Safeguarding Summit*, https://assets.publishing.service.gov.uk/media/5da743d2e5274a5ca42cef98/Cross-sector-Safeguarding-Progress-Report-Oct_19.pdf

⁴ DFID (2021), *Cross-Sector Progress Report on Safeguarding Against Sexual Exploitation, Abuse, and Harassment (SEAH) 2020-21*, <https://reliefweb.int/sites/reliefweb.int/files/resources/Cross-Sector-Progress-Report-on-Safeguarding-Against-Sexual-Exploitation-Abuse-and-Harassment-2020-2021.pdf>

beyond its own portfolio, and a perceived gap in the World Bank Group's new Gender Strategy, which largely excludes PSEAH and remains primarily public-sector focused and offers limited entry points for private sector engagement.

- **World Bank:** The World Bank also participates in a range of working groups, such as the Interagency Standing Committee Working Group on SEAH, the OECD PSEA Reference Group, the Cross-Sectoral Safeguarding Steering Group, and coordinates the MFI Working Group on Addressing SEAH. However, interviews highlighted that collaboration in the field has been more challenging. At country level, the Bank engages in joint structures such as PSEA Networks and task forces. Differences with UN agencies have required extensive negotiation, particularly in fragile settings, over accountability for case reporting and the role of governments in SEA response. While UN agencies' preference in fragile settings is to avoid reporting grievances directly to government-supported institutions, the Bank's accountability framework sees local grievance mechanisms as the first entry point and SEAH as part of the borrower's accountability. This created tension in contexts where survivor safety could be compromised by government involvement, but joint solutions were ultimately found. Broader coordination challenges include fragmentation between humanitarian and development approaches, lack of common minimum standards across MFIs, and heavy workloads limiting staff capacity to pursue deeper collaboration. The MOPAN assessment noted that stakeholders have expressed a need for stronger joint action at the country level. MOPAN survey data show that nearly 50% of respondents were unsure about the Bank's participation in joint efforts at HQ. Interviewees for this study noted that despite resources devoted to coordination, translating headquarters-level commitments into consistent, effective joint action at country level remains an area for improvement.

Element 7: Actions taken on SEA allegations are timely and their number related to basic information and actions taken are reported publicly.

Element 4.7.7 is rated unsatisfactory on average across the seven IFIs in MOPAN assessments. IDB, IFAD, World Bank, and IFC provided information on timeliness to complaint response in their MOPAN assessments. IDB, the World Bank, and EBRD provided details regarding processes to achieve timelines of investigations.

AfDB, IFAD, World Bank, IFC, and EBRD publicly report on SEAH allegations handled stemming out of projects. World Bank, IFC, and IFAD demonstrate evidence of reporting information on its SEA allegations to their governing body.

Only the World Bank, IFC, and IFAD provided evidence of joining mechanisms for the sharing of information on perpetrators to prevent re-hiring through participation in ClearCheck. Although the current use of this mechanism for the World Bank and IFC could not be ascertained given that the World Bank Group did not become a participating entity of ClearCheck until 2024.

- **ADB:** The MOPAN assessment noted that the ADB faces a challenge in this element as it lacks a dedicated institutional reporting or case management system for SEAH-related complaints, apart from the Integrated Safeguards Management System. However, the system includes a SEAH risk rating function which allows ADB to classify projects according to SEAH risk and generate internal reports for senior management and development partners. At the project level, complaints are expected to be managed primarily through borrower-established grievance mechanisms, but ADB acknowledges these mechanisms are often not trusted or equipped to handle SEAH cases. In such situations, ADB forms core teams to manage complaints, and under its new operating model, is consolidating safeguards functions to systematise the Grievance Redress Service and ensure more consistent handling. ADB does not provide public reporting on SEAH allegations nor on the actions taken to address them, and does not participate in interagency mechanisms. However, it does apply internal safeguards that restrict the re-hiring internally of staff and consultants who have been found to engage in misconduct, including SEAH.
 - **AfDB:** The MOPAN assessment noted that while the AfDB has articulated its commitment to supporting victims and witnesses of SEA, challenges remained in demonstrating the timeliness and quality of its response. Interviewees for this study noted that the bank requires Borrowers to notify the Bank of any SEAH allegation within 48 hours and to provide a root cause analysis, victim care report, and corrective action plan. These are followed up through monthly project meetings, periodic compliance checks, and a corporate dashboard introduced in 2023. At the corporate level, SEA and GBV are among nine criteria used in the Bank's reputational risk framework, with aggregated data reported through Implementation Progress Reports (disclosed every six months online), aide-mémoires from missions, and annual E&S risk reports to the Board. While complaints data are not yet publicly available in disaggregated form, management prepares detailed reports for the Board on projects with safeguarding concerns, including SEAH, and the Bank has committed to progressively enhancing disclosure through its Environmental and Social Safeguards Strengthening Action Plan (2022–2025). Staff members terminated for misconduct are ineligible for rehire, though the Bank does not currently participate in a joint disclosure mechanism with other IFIs or humanitarian actors such as the Inter-Agency Scheme for the Disclosure of Safeguarding-related Misconduct. Interview data indicate that fears of reprisal remain a barrier to reporting, but AfDB demonstrates good practice through its monthly reporting requirement on high-risk projects and progress reporting every six months that is publicly available.
 - **EBRD:** EBRD has reporting protocols in place for incidents of SEAH, with quarterly and annual reporting by the OCCO. While quarterly reports are internal, the OCCO Integrity and Anti-Corruption Annual Report is publicly available and includes the number of cases referred for disciplinary action, including termination of employments and subsequent resignations. In operations, the institution follows a three-step process for project-level reporting, led by a GBVH Focal Point responsible for ethical handling, regular follow-up, and secure information management. Clients are contractually required to report complaints immediately, though stakeholders note a challenge in that clients are not notifying reported complaints within the timeline requirement which is "immediately upon occurrence". Interview data for this study suggest that EBRD is considering rebalancing this requirement by focusing more narrowly on SEAH cases and complementing reporting with stronger upfront capacity building for clients, so that systems are in place to handle cases effectively. EBRD has internal procedures to prevent the rehiring of individuals dismissed for misconduct but is not yet part of networks like ClearCheck. In line with most of the IFIs in this study, sharing data externally could further strengthen the system.
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- **IDB:** The MOPAN assessment notes that IDB has established a fast-track process under its ESPF to address SEAH allegations, which it categorises as situations of “imminent risk.” According to the assessment, fast-track risks are addressed within five days of confirmation of receipt of the complaint and under these conditions, the assessment and initial response stage should be completed within 15 business days. This system reflects a significant strength in timely handling of SEAH complaints. The 2023 Environmental and Social Grievance Annual Report, which is publicly available, further acknowledges that resolving grievances promptly and building trust requires early engagement and is one of the report’s lessons learned. While these targets reflect a strong institutional commitment, the Bank acknowledges that timeliness may vary given the complexity and sensitivity of individual cases. Since introducing systematic tracking five to six years ago, the IDB has recorded three cases in the last three to four years. The IDB maintains a dashboard that captures SEAH and GBV-related indicators, such as the number of complaints, status of investigations, and contractor compliance with Codes of Conduct prohibiting GBV. However, a key challenge that remains is the lack of public reporting. At the project level, the only publicly disclosed information is through the semi-annual Project Monitoring Report, which includes environmental and social performance ratings and brief justifications. However, this reporting is aggregated and does not include SEA-specific data. More detailed information, including project-level complaints, contractor performance, and Project Completion Reports, is available internally but not systematically disclosed.
- **IFAD:** Although its SEAH policy does not specify a response timeline, the Ethics Office and the AUO give priority to all SEAH cases and internally have a performance goal of concluding any case within 6 months of receipt of an allegation. IFAD’s multi-channel reporting approach includes the Member States Interactive Platform, annual Ethics and AOU reports, and the UN System-Wide Data on Allegations. Since 2022, IFAD’s Annual Ethics reports have been public, and while its Investigation and Anticorruption Activities Report provides disaggregated data on allegations and outcomes, it is not possible to track what the outcomes of SEAH allegations were. The organisation is also exploring participation in other data sharing platforms like the Misconduct Disclosure Scheme. At the project level, grievance mechanisms exist, and cases may be escalated through the SECAP redress service. Unresolved cases can be referred independently to AUO and onward to the Audit Committee and the Board, though interviewees for this study noted that no case has reached this stage yet.
- **IFC:** IFC stakeholders report that there is a grievance tracking system in place, with an average response time of two days which represents a considerable strength in terms of responsiveness. SEAH and child protection incidents are now explicitly classified as “Significant Events” under IFC’s Environmental and Social incident reporting programme and legal requirements, with clear timelines: clients must notify IFC within three days to confirm survivor support measures and provide a root cause analysis within 20 days. Each client is required to maintain a grievance mechanism that includes referral pathways proportionate to the level of risk, and IFC monitors whether these systems are functional and known to staff and communities, even in resource-poor areas where creative solutions such as telehealth or public clinic partnerships are necessary. IFC has begun building capacity for trend analysis and systematic data aggregation, though this will take time before results are visible. The extent to which the IFC reports publicly is an area to be clarified.
- **World Bank:** The World Bank has developed a structured internal reporting protocol for SEAH allegations arising from operations, incorporating guidance and timelines across different levels of severity. It uses the Environmental and Social Incident Response Toolkit which was updated in 2023 to integrate stronger guidance on SEAH and dedicated reporting tools. The toolkit mandates teams to report SEAH incidents reported by borrowers and other parties as linked to operations to a defined distribution list of senior management in a timely manner and using pre-established data sharing tools. The Bank reports publicly on SEAH allegations against its personnel and contracted partners in aggregate form, including information drawn from both formal and informal channels, but maintains that detailed case-level information is not appropriate given confidentiality concerns. The 2023 Ethics and Internal Justice Services Annual Report (which covers both WB and IFC) provides insight into the nature and context of SEAH cases reported to the Bank. It states that two allegations involving SEAH extended beyond the workplace boundaries through vulnerable individuals. However, this report does not provide information on the timeliness of the institutional response to these allegations which, as noted in the MOPAN assessment, is an area that could be further clarified.

Element 8: The organisation adopts a victim-centred approach to SEA and has a victim support function in place (stand-alone or part of existing structures) in line with its SEA exposure/risk.

This was the lowest-rated element across MOPAN’s SEAH indicators. Currently the World Bank, IFC, EBRD, ADB, and IFAD have a written commitment to a survivor-victim-centred approach. The World Bank, IFC, EBRD, and ADB have provided a definition, and the World Bank provided evidence of implementation and monitoring of its victim-centred approach.

The World Bank, IFAD, ADB, and EBRD were able to demonstrate a mapping of resources for victim assistance and supervision of pathways for referral to qualified service providers. Overall, there was limited evidence of partnership arrangements that provide evidence of victim assistance agreements or confirmation that well-defined referral pathways are in place.

- **ADB:** Although ADB has recently committed to applying a survivor-centred approach through its 2023 Good Practice Note and the new ESF, this commitment currently remains more aspirational than enforceable. The GPNs clearly define what a survivor-centred approach entails, placing the rights, needs, and wishes of survivors at the core of responses, ensuring informed consent, confidentiality, dignity, and timely access to support, yet these remain advisory until the ESF becomes mandatory in 2026. At present, ADB cannot demonstrate systematic implementation or monitoring of survivor-centred practices across its portfolio, though pilot technical assistance projects in five DMCs are being used to test and strengthen approaches. Progress has also been constrained by limited trust and reluctance among implementing agencies to report cases due to reputational concerns, as well as the weak enforcement capacity of some borrowers, particularly in contexts where national laws on age of consent diverge from international standards. While grievance redress mechanisms are being adapted to accommodate SEA/SH reporting, and guidance is provided on case handling and referral, the availability of qualified investigators and essential service providers, especially in remote areas, remains a major gap. Service mapping is conducted for new projects and corrective action plans, and ADB has articulated referral pathways to local, vetted providers where possible, with budgets expected to support these services through contractors’ GRMs. ADB also contributes to strengthening national GBV service systems through standalone loans, grants, and TA (e.g., Cambodia’s GBV

system strengthening project) and is engaging development partners to improve coverage and avoid duplication. Despite these positive steps, challenges persist in ensuring timely, survivor-centred assistance and building an environment of trust where survivors feel safe to come forward, given the variability and scarcity of services and uneven capacity among executing agencies.

- **AfDB:** At the time of the MOPAN assessment, there was little concrete evidence that a VCA was being implemented, despite commitments made in various evidence documents. However, in interviews for this study, the Bank noted that a VCA's effective implementation depends on borrowers having clear investigation protocols and views it as an opportunity for ongoing capacity building and collaboration to strengthen implementation. Borrowers are expected to provide referrals for counselling, legal support, and other victim services, and to keep complainants informed. Collaboration with governments, NGOs, and community-based organisations has been reported as strengthening victim protection efforts. While the ISS prioritises prevention and stakeholder safety, there is no specific reference to survivor support services tailored for SEAH survivors, nor explicit mention of victim assistance infrastructure.
- **EBRD:** The EBRD demonstrates a commitment to a survivor-centred approach which is embedded in ESR2 and ESR4 of its recently implemented ESP, and requires clients to prioritise the rights, needs and wishes of the survivor, as well as their immediate and ongoing safety (including from further harm and retaliation), and ensure confidentiality. The approach is also set out in its Good Practice Note which emphasises the importance of treating survivors with dignity and respect, ensuring safety, enabling informed decision-making, and protecting and guaranteeing confidentiality at all times. This approach is operationalised through policy requirements that, as the MOPAN assessment notes, oblige clients to establish grievance mechanisms, provide multiple and confidential reporting channels (including female contact points), train staff in survivor-centred practices, and maintain referral pathways to medical, psycho-social, or legal support services. Specialist capacity is ensured through trained GBVH Focal Points within the E&S Department and the requirement for clients in high-risk projects to work with GBV experts, NGOs, and government actors. However, experience shows that client reporting still requires improvement. As noted in element 4.7.3, interviews for this study highlighted challenges in that grievances are, in a small number of cases, raised informally (e.g. during site visits or through direct worker contact) and fall outside formal reporting protocols.
- **IDB:** The IDB requires borrowers contractually to notify it of any SEAH-related issues, though compliance is reportedly uneven with issues reaching IDB through the executing agency. IDB has a grievance portal in place that enables anyone to report SEAH incidents related to its financed operations. The 2023 Grievance Protocol Annual Report does not mention SEAH related grievances submitted. Corporate reporting on how complaints received through the portal are addressed could not be found. However, the Grievance Protocol Annual report notes a lesson learned on using more human interaction and less automation. While this was due to confusion caused by automated responses among complainants who had already engaged with IDB project teams, it demonstrates lesson-learning in reinforcing safety and agency among victims.
- **IFAD:** While IFAD's policy, does not yet reflect a fully articulated victim-centred approach, the organisation has acknowledged this gap and taken steps toward improvement through its 2022–2023 Action Plan. The revised PSEAH policy currently under consultation, includes a dedicated section on the VCA, explicitly committing IFAD to applying VCA principles drawn from the IASC framework and the UN OVRA statement. IFAD SEA focal points are tasked with identifying and promoting the mapping of available victim support services and directing survivors to them. However, the MOPAN assessment notes that there is currently no clear definition of what constitutes a victim-centred approach within IFAD, and guidance lacks clarity on roles and responsibilities, especially once allegations are referred beyond the Ethics Office. There is no evidence that the mapping of services is systematically tracked or linked to broader organisational efforts. While some interim measures may be recommended for IFAD personnel under investigation, equivalent procedures do not exist for implementing partners. The 2024 Annual Report on the Activities of the IFAD Ethics Office noted that a behavioural audit took place to identify factors affecting the use and effectiveness of IFAD's reporting systems. The results were used to improve the overall reporting experience for survivors and bystanders and to enhance trust in IFAD's mechanisms, demonstrating promising good practice.
- **IFC:** The assessment of the IFC notes that project-level grievance redress mechanisms are designed to protect the rights and safety of survivors, emphasising informed consent, confidentiality, and non-retaliation. These principles are operationalised through a series of Good Practice Notes and toolkits that provide detailed guidance to IFC staff and clients. Notably, the Good Practice Note on addressing gender-based violence in private sector operations, authored jointly with other development finance institutions, stresses the importance of a survivor-centred response. IFC requires every client to establish a functioning referral pathway for survivors, even in resource-poor settings. Clients are also required to map public services and articulate a clear referral "flow" to minimise re-victimisation. Survivors are generally encouraged to report through client systems, though IFC also provides a direct online reporting channel that routes SEAH cases to its GBV team. While IFC does not maintain its own victim support function in the field, its model relies on clients' referral systems, which it supervises and helps strengthen. Interviews for this study suggest that IFC does not face resistance from clients on this requirement, but instead that clients seek technical support to comply.
- **World Bank:** The MOPAN assessment noted that the Bank evaluates solutions and procedures through a survivor-centred lens, emphasising confidentiality, dignity, choice, and safety for survivors. All investment project financing operations are required to identify grievance mechanism and map GBV service providers during project design, regardless of assessed risk levels. Furthermore, high-risk projects are advised to establish dedicated SEAH grievance mechanisms and allocate funds for gap-filling service provision. Evidence from interviews indicates that the bank has undergone a shift from primary emphasis on prevention and risk minimisation toward also strengthening how cases are managed once reported, with particular focus on building client capacity to respond in a survivor-centred manner. However, while these systems are increasingly in place, the Bank still faces challenges in demonstrating consistent effectiveness across projects, and there is limited publicly available evidence showing how survivor-centred approaches are being monitored and implemented in practice by borrowers.

Element 5.4.5: Intervention design is based on contextual analysis, including potential risks of sexual abuse and other misconduct with respect to host populations.

The World Bank, IFC, AfDB, IFAD, EBRD, and ADB demonstrate the use of risk assessment and screening tools, although levels of maturity vary.

All IFIs have an E&S framework intended to address risk in project design and require complementary dialogue with projected affected communities in the development of risk mitigation measures. All IFIs in the cohort also demonstrate a GBVH risk screening tool with the World Bank having a dedicated tool for SEA/SH and the ADB piloting a specific SEAH tool.

Only the EBRD and IFAD describe how they determine risk classifications in their MOPAN assessments.

- **ADB:** ADB's existing Safeguards Policy Statement and Operational Risk Framework do not explicitly reflect SEAH, and the new ESF incorporating SEAH will only come into effect in 2026. In the meantime, ADB has piloted a new approach in five countries, testing a risk assessment tool that considers contextual and operational factors, including levels of GBV, child marriage, and labour influx, as well as vulnerabilities within project-affected communities. The ESF requires all transactions, including technical assistance, to undergo risk screening and classification, with SEAH assigned its own risk rating that influences the overall project categorisation. At the institutional level, ADB is strengthening its own Grievance Redress Service with enhanced protocols for SEAH cases and building borrower and client capacity through knowledge products and training. Interviewees for this study noted challenges in that measures are not yet system-wide, the effectiveness of grievance mechanisms will depend on adequate resourcing and trust, and the piloting phase has so far been concentrated in civil works sectors.
 - **AfDB:** The 2022 IRM report recommended a mandatory SEAH risk rating and the integration of SEAH considerations into the draft ISS, as there appeared to be no support available for Borrowers and Contractors to understand the appropriate mitigation strategies depending on project SEAH risk. It also highlighted the absence of context-specific risk assessments, tools to rate project-level SEAH risk, and systematic integration into ESMPs. The 2023 ISS now explicitly requires SEAH to be identified as a contextual risk in ESAs, with intervention designs addressing different sources of risk, including SEAH. Risks are determined during the environmental and social assessment. In fragile settings such as DRC or Mozambique, contextual analysis of vulnerabilities such as child marriage triggers closer monitoring, referral arrangements, and prevention measures. SEAH-related incidents are monitored through a dashboard that classifies SEAH/GBV as serious incidents. Monitoring is supported by Bank supervision missions, which also scan for emerging risks. The AfDB also provides guidance notes to borrowers on the application of the ISS.
 - **EBRD:** The MOPAN assessment notes that EBRD screens projects for GBVH risks and evaluates clients' capacity to manage them. The ESP require clients to assess SEAH risk to project-affected populations and adopt prevention and response measures as part of the ESMS and report incidents to the bank. Risks are also monitored during implementation, including through supervision, audits of high-risk projects, and scanning for emerging risks as project contexts evolve. Interviewees for the study noted that challenges remain with FIs in that the framework applies less directly and where GBVH requirements are not as consistently applied to on-lending portfolios. However, EBRD has recently published a technical briefing note dedicated to addressing SEAH in FI projects, including guidance on applying requirements consistently to on-lending portfolios, to strengthen identification and management of SEAH risks in FI subprojects (EBRD, 2025^[5]). Interviews noted that "ESG+", EBRD's new data handling system, will be live by 2026, and will include more .x capabilities and tailored questions on both on-lending capabilities in the ESMS and PFI operations. Monitoring and grievance handling are also constrained by reliance on the bank's systems, which are not fully digitalised. While audits are useful for risk identification, stakeholders highlighted the need to rebalance toward upfront capacity-building and more effective reporting systems, with ongoing digitalisation efforts expected to strengthen tracking and analysis. EBRD demonstrates good practice through its risk screening for projects that first takes into account the country risk based on the Women's Peace and Security Index. Other factors considered include the location (urban, peri-urban, rural), labour influx risk, duration of construction work, use of security forces, and due diligence on the company for past GBVH issues.
 - **IDB:** The ESPF includes social risk screening for misconduct and SEAH risks, though this applies primarily to high-risk projects. However, if a project is not deemed high risk, SEAH and related risks are not systematically monitored during implementation. This year, IDB introduced four critical situations categorisations for projects, one of which is dedicated to occurrences of GBV. This is tracked in IDB's project dashboard. Under ESPS 9, IDB requires clients to adopt a Code of Conduct prohibiting GBV, with related indicators tracked during preparation such as the percentage of women participating in consultations, the number of GBV allegations and complaints opened and closed, and the number of contractors with compliant Codes of Conduct. The IDB Group Gender and Diversity Action Plan 2022-2025 notes that the Bank conducts annual pre-screening of 100% of its project pipeline to identify opportunities for gender and diversity inclusion. The results of this screening are used to inform project preparation, including those projects that may not qualify for formal gender alignment. This screening process is an example of good practice, ensuring early-stage identification of gender-based risks and promoting technical support where needed. The Bank is also piloting a Gender and Diversity lens in project design through its Operational Excellence Agenda, meant to ensure that country-specific needs and risks are embedded at design stage.
 - **IFAD:** At the project level, the SECAP require borrowers to assess SEAH risks when GBV risk is flagged during project design. Interviewees for this study noted a challenge in that risk assessments can have varying standards and depth. SEAH-related risks are monitored throughout the project cycle, drawing on the recently implemented SECAP dashboard, which displays information from screening and supervision processes and flag risks when performance scores fall below agreed thresholds. However, the MOPAN assessment noted a challenge in that the corporate risk dashboard relies on the number of allegations received to assess misconduct risk, a measure that is likely to underestimate SEA risk due to widespread underreporting. Furthermore, the MOPAN assessment notes that evidence could not be found that the capacity of implementing partners (typically governments) is assessed before entering into a contractual relationship. The screening tool also uses the history of SEAH incidents at IFAD or similar institutions to judge probability, which may further underestimate risk. IFAD staff must also record
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any identified heightened risk of SEA at the outset of a project in the IPRM, country strategy risk matrix, or SECAP, but these tools are publicly available and require government sign-off.

- **IFC:** The IFC's Environmental and Social Performance Standards broadly define social risks and require clients to address issues such as harassment, intimidation, and exploitation. Clients are expected to incorporate appropriate measures into their environmental and social action plans, and IFC works with them to implement these measures effectively. IFC has developed a suite of tools to support borrowers in assessing and mitigating SEAH risk. SEAH risk screening is now digital and a compulsory part of new investments. The IFC has also developed a GBV dashboard that project teams use to monitor client's progress on PSEAH actions identified in risk assessments. One important good practice is IFC's Grievance Mechanism Toolkit, which includes confidential, survivor-centered mechanisms and provides guidance for setting up community-based grievance systems. In response to an external review that noted underutilisation in grievance mechanisms due to lack of trust and fear of retaliation, IFC established a Stakeholder Grievance Response team and has since strengthened institutional capacity through additional guidance, training, and supervision protocols. IFC has also developed tip sheets and have begun to work on the intersection between SEAH and climate actions by the private sector.
- **World Bank:** The World Bank has mainstreamed SEAH risk considerations into its Systematic Operations Risk-Rating Tool (SORT), ESF, and procurement mechanisms. The Bank also integrates SEAH considerations into stakeholder engagement, procurement procedures, and environmental and social commitments, including mandatory contractor codes of conduct and disqualification remedies. The procurement team has also implemented targeted awareness-raising and training for contractors. SEAH risks are identified during project preparation and monitored through implementation, with guidance provided to support the borrower in the assessment of SEAH risks. All social risk management requirements, regardless of risk level, are meant to be supervised over the life of the project with dedicated implementation support missions. For substantial and high-risk projects, borrowers are encouraged to engage GBV specialists to provide regular oversight, monitoring, and reporting, with third-party monitoring. World Bank staff also have access to both GPNs that provide them additional information to support the borrower. One area of good practice is the development and use of a dedicated SEA/SH Risk Screening Tool, which helps teams score projects based on a set of contextual and project-specific questions to determine their risk levels. However, Bank staff also emphasise that the tool should be complemented by broader borrower-led proportional social assessments to ensure a holistic view of risks.

Performance against SH Benchmarks

Table A B.2. MOPAN's micro-indicator 4.8 on sexual harassment

Element 1: Organisation-specific dedicated policy statements and/or codes of conduct that address SH are available, aligned with international standards, and applicable to all categories of personnel.

This was, on average, a satisfactory rated element in MOPAN assessments. All IFIs provide definitions for SH. The World Bank, IFC, and IFAD evidenced action plans, and IDB, the World Bank, AfDB, IFC, ADB, and EBRD explicitly include SH in their codes of conduct that prohibit SH. As with Indicator 4.7 SEA, where SEA had often been integrated into broader ESFs, SH prevention is anchored in institutional codes of conduct for most of the IFIs rather than a dedicated policy. However, IFAD, EBRD, and the World Bank Group evidence more general staff misconduct policies through a SEA/SH policy (IFAD), Respectful Workplace Policy (EBRD), and the Staff Rules (World Bank Group).

While all of the IFIs state that they take a zero-tolerance approach to SH, zero-tolerance is not defined.

As mentioned in 4.7.1, all the cohort have signed the Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation; although assessments do not evidence the extent to which their SH related policy commitments correspond to the 7 principles of the Joint Statement.

- **ADB:** The ADB has a Code of Conduct and governance framework for addressing SH. The Code of Conduct applies to all staff and contractors and includes a dedicated Code of Conduct for Board Officials. SH is defined and explicitly prohibited. The organisation has taken notable steps to implement the commitments of the 2018 Joint Statement, including launching a mediation service, strengthening whistleblower protections, updating its Code to embed a survivor-centred approach, and providing targeted anti-harassment training. However, one challenge is the lack of an institutional action plan for SH.
- **AfDB:** The Bank articulated its zero-tolerance for all forms of harassment in relation to all staff through its code of conduct and a presidential directive that outlines rules and procedures for dealing with harassment. The directive defines the different types of harassment and available reporting channels and assigns responsibilities to specific Bank organs for complaint handling and disciplinary processes, according to the MOPAN assessment. While the Directive functions in practice as an institutional policy, it was not submitted to the Board and therefore lacks shareholder input. The Bank prepared a communication document on SEAH with input from the Ombudsperson's Office, various departments and the Staff Council, which proposed an action plan including joint sensitisation sessions and open days on harassment. Staff rules and the Code of Conduct, which consultants are also required to sign, reinforce the prohibition of SH, although the Code refers only to SH and not SEA. Contractual clauses also extend expectations to contractors and procurement processes. The MOPAN assessment noted that the integrated approach to SEA and SH that the Bank takes can also present challenges when it comes demonstrating that appropriate, distinct approaches, capacities, and resources have been adopted for external SEA and internal SH cases, particularly in terms of procedures tailored to each context.

- **EBRD:** The MOPAN assessment notes that while EBRD does not have a standalone policy or action plan on SH, it is addressed within broader policies on staff misconduct, including the Codes of Conduct, the Whistleblowing policy, and the Conduct and Disciplinary Rules and Procedures. These apply to all staff and Board Officials and are supported by the Harassment-Free and Respectful Workplace Directive. Although consultants and temporary personnel are not covered under these codes, their contracts include binding anti-harassment clauses, with breaches leading to contract termination. The Code of Conduct explicitly rules out SH, requires staff to avoid behaviour that could be perceived as harassment, and is mandatorily signed by personnel. The Bank's Guidance Note to Rule 2 currently provides the operative definitions of SH and abuse of authority, though interviews noted that these are almost a decade old. Following the approval of the updated Codes in 2025, interviews noted however that EBRD has begun a review of these definitions against a cohort of comparator institutions like the IMF and OECD, among others. While the Bank has not yet operationalised an organisation-wide SH action plan, the Respectful Workplace Directive and related disciplinary rules set out the framework for prevention and response, with enforcement mechanisms overseen by the OCCO.
- **IDB:** The Code of Ethics and Professional Conduct serves as the primary vehicle for addressing SH. It includes a definition of SH that aligns with international standards and is explicitly applicable to all categories of personnel, including the complementary workforce. The code of conduct, in place since 2012, calls for a work environment free of all forms of harassment and assigns the Office of Ethics responsibility for implementation, promotion, and advisory functions related to the code of conduct. There is no evidence of an institutional action plan for internal SEAH prevention, and the code of conduct does not apply to contractors.
- **IFAD:** IFAD's SEAH policy applies to all categories of staff and contractors, including those working under non-staff contracts, borrowers, and third parties engaged through IFAD funding. It is implemented through a biennial action plan that includes strategic actions across prevention, response, mainstreaming, and coordination. However, the MOPAN assessment noted that IFAD's policy and action plan do not sufficiently distinguish between SEA and SH. Of the 16 listed action items, only a few are specific to either SEA or SH, while the majority treat the two issues collectively that may create a risk of conflation between internal and external abuse dynamics, which was echoed by staff during interviews. Another challenge is that IFAD's 2021 Code of Conduct for staff does not reference SH or the UN Secretary-General's 2019 bulletin, although its 2023 Code of Conduct for Project Parties does require adherence to IFAD's policy on SH and SEA and notes that violations may result in investigations and sanctions.
- **IFC:** As part of the World Bank Group (WBG), IFC benefited from the group-wide corporate statement on sexual harassment and the corresponding WBG Action Plan from FY19–FY21. While these systems apply to all WBG staff, including IFC personnel, the MOPAN assessment noted the IFC-specific requirement to incorporate SH risk into enterprise and operational risk frameworks. As with the World Bank below, a new Protocol on Protection and Support to Survivors of Sexual Harassment has been implemented that outlines the process and resources to protect staff from retaliation and stigmatisation and to maintain a safe work environment.
- **World Bank:** The MOPAN assessment noted that in 2021, the World Bank issued a specific corporate statement on SH, operationalised through a three-year action plan developed by the Ethics and Business Conduct Department (EBC, now EIJ). This action plan was informed by an independent external review of World Bank policies and outlined concrete deliverables, including ensuring managerial accountability, expanding training, and increasing transparency about prevalence and sanctions. The Bank defines SH in its anti-harassment guidance note and in the action plan. The definition is integrated into the overarching Staff Rules and Code of Ethics, which apply to all Bank staff, including consultants. Whether the Bank plans to implement another action plan could not be determined. Since the assessment, the Bank signed a new Protocol on Protection and Support to Survivors of Sexual Harassment that outlines the process and resources to protect staff from retaliation and stigmatisation and to maintain a safe work environment. Demonstrating good practice, the protocol includes putting in place interim measures to protect survivors during an investigation, holding meetings with survivors to hear their views and concerns before making disciplinary decisions, and offering ongoing support regarding career progression and work environment after an investigation.

Element 2: Mechanisms are in place to regularly track the status of SH policy implementation at HQ and at field levels.

All the MDBs have oversight bodies to track training, awareness and undertake case management.

All assessments indicated that SH approaches were kept under review and codes of conduct extend to staff and board officials, except in the case of ADB.

The World Bank, IFC, IFAD, ADB, and EBRD provided evidence of regular reporting to their Governance on the status of cases received.

The World Bank, IFC, and ADB were able to provide evidence of assistance to country office staff in developing and implementing SH prevention and response.

- **ADB:** The ADB's Office of Professional Ethics and Conduct (OPEC), the Office of Anticorruption and Integrity (OAI), and the Office of Budget, Personnel and Management Systems (BPMSD) administer the Code of Conduct and respond to misconduct complaints, including SH, across HQ and resident missions. Annual reporting is conducted by both OPEC and OAI and is made public. Their oversight includes advice, mediation, investigations, and disciplinary action. The ADB's approach, which emphasises a survivor-centred model and is supported by Administrative Order 2.04, was benchmarked by OAI and found to be in line with international best practices. The MOPAN assessment notes that OPEC's mandate does not extend to Board Officials. In 2006, the Board of Directors established the Ethics Committee, whose procedures were amended in 2020, to address requests from Directors, Alternate Directors and/ or the President that relate to various ethical issues, including allegations of misconduct.
 - **AfDB:** The MOPAN assessment notes that the AfDB has established reporting mechanisms related to SH through its ethics and integrity offices which produce annual reports accounting for activities and case statistics. However, a challenge identified is that these reports focus on the incidence and typology of cases, rather than case management at both headquarters and field levels. The number of SH cases is
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available in the integrity offices' 2023 Annual Report. A 2019 staff survey on harassment, though limited by a low response rate (14.5%), provided some insights and led to the development of an action plan involving joint sensitisation sessions and Open Days on Harassment. Whether the AfDB still has an SH action plan since the assessment could not be verified. The Bank's system of reporting to its Governing Body on SH policy implementation also remains unclear.

- **EBRD:** The EBRD details procedures for SH under its Harassment-free and Respectful Workplace Directive. Reporting occurs both quarterly and annually, with the Office of the Chief Compliance Officer (OCCO) reporting to the Audit and Risk Committee, a subset of the Board of Directors, on the status of complaints, including those from headquarters and country offices. The quarterly and annual reporting of the OCCO to the Board of Directors tracks the status of complaints of suspected sexual harassment by EBRD staff within the category of harassment and bullying. Its publicly available annual reports identify the number of harassment and bullying complaints investigated each year from headquarters and country offices. However, it does not report the timeline on which cases were resolved. EBRD also completed a benchmarking exercise in 2023 comparing its SH response against other IFIs, which according to EBRD, affirmed alignment with international good practices. Interviews for this study noted that EBRD established, a Speak-Up Culture Working Group, alongside a Diversity and Inclusion Working Group, where relevant issues and actions are discussed to further improve the Bank's environment and response mechanisms. The MOPAN assessment noted a challenge in the underreporting in country offices, where the risk of SH is considered greater, despite equivalent reporting levels to headquarters, suggesting a need to strengthen outreach and trust at the field level.
- **IDB:** The MOPAN assessment noted that IDB developed an internal working group that includes representatives from several departments, to discuss issues of SH and misconduct. While this group reflects a cross-functional approach, it was noted to not issue regular reports. Follow up/results of this group could not be found. Additionally, while the Office of Ethics reports annually on misconduct incidents, including number of SH cases, there is no evidence of structured reporting to the Bank's governing body.
- **IFAD:** IFAD maintains a mechanism for tracking SEAH policy implementation through its Chief Ethics Officer and a SEA/SH Task Force. Progress reports are presented to the Executive Board every four months, including updates on lessons learned, which demonstrates good practice. Country Directors also provide regular updates to the Ethics Office. However, as SEA and SH are not clearly separated in either the policy or the Action Plan, the assessment noted that it remained difficult to measure implementation progress specific to SH.
- **IFC:** The Ethics and Internal Justice unit provides operational leadership, and a joint WBG Working Group on SH monitored progress against the Action Plan. However, follow-up/results of this working group could not be found. The MOPAN assessment noted that the IFC had also expanded its presence in key field locations at the time of assessment. As with the World Bank, whether the WBG Action Plan on SH is still in place could not be confirmed.
- **World Bank:** The Ethics and Internal Justice vice-presidency lead SH policy implementation, supported by specialised roles such as the anti-harassment coordinator and Respectful Work Advisers. The assessment notes that the WBG Action Plan on SH is treated as a "living document," reviewed and updated biennially, and progress is tracked through data aggregated in an annual report submitted to the Executive Board and made public. The Ethics and Business Conduct Annual Report 2022 notes that the SH action plan resulted in a 46 percent increase that year in the use of the Ethics and Business Conduct office services, addressing 172 cases of harassment and SH. The extent to which this information is formally reported to the Board is unclear.

Element 3: The organisation has clearly identifiable roles, structures, and resources in place for implementing its policy/guidelines on SH at HQ and in the field: a support channel for victims, a body co-ordinating the response, and clear responsibilities for following up with victims.

All IFIs have established structures to support SH prevention and response at HQ, with some extending these mechanisms to the field through focal points or ethics champions, though coherence at country level remains limited. All have identifiable channels for victims to report concerns, seek advice, and victim support services. Coordination of SH response across multiple divisions is in place but varies in effectiveness, with weak or inconsistent sanctions noted at IDB and unclear implementation at AfDB. Responsibilities for victim follow-up are established in IFIs, with stronger case management practices evident at the World Bank and IFAD.

Budget provisions for SH-related personnel and accountability mechanisms were explicitly documented only at the World Bank and IFAD and interviews for this study demonstrate strong management support to bodies handling SH cases.

Interview evidence confirms that staff at most IFIs can identify structures and responsibilities for SH in their institutions, though trust in the system is undermined where sanctions are weak (IDB) or victim support is unclear (EBRD, ADB).

- **ADB:** The organisation's Code of Conduct is enforced by the OPEC, which provides guidance, manages complaints, and in collaboration with OAI ensures protective measures during investigations. Complaints can be made through email, chatbot, telephone or through a secure online form. OPEC is functionally and financially independent from all other departments and offices and reports directly to the President. OPEC works from a staff-facing engagement perspective and can refer to other units however, but case investigation, follow-up, disciplinary actions and reporting lies with investigation and HR. In follow-up conducted for this study, the Bank noted that OPEC has an in-house counsellor who is available by appointment to provide help and support where needed. The MOPAN assessment notes that staff awareness is high, with 94% stating they know where to report misconduct. The ADB does not publicly report the timelines for closing investigations, and most reports still originate from HQ rather than field offices. Additionally, support services for victims remain unclear.
- **AfDB:** The MOPAN assessment notes that the AfDB has taken steps to strengthen its institutional response to internal SEAH, including allocating two additional staff positions to PIAC in 2021 to enhance its investigation function and overall response capacity, as well as appointing thirty "ethics champions" in regional and country offices to raise awareness and provide localized support. To address mistrust amongst staff in reporting misconduct, a third-party mechanism was introduced. PETH plays an informal role, and all SEAH-related allegations are channelled

to PIAC for investigation, and disciplinary measures are applied through the Bank's established administrative mechanisms, including the authority of HR to dismiss staff for serious misconduct. The 2018 Code of Conduct for Service Providers, Suppliers and Contractors requires preventive, monitoring, and reporting mechanisms for SEAH and allows the Bank to impose sanctions or terminate contracts for violations. While roles and responsibilities are outlined in the directive, their implementation and coordination are unclear.

- **EBRD:** The Managing Director Human Resources and Organisational Development (MD HROD) deals with allegations of improper interpersonal behaviour, including SH, with appropriate escalation to OCCO to carry out any required investigations through the CDRP. Through the CDRP, OCCO carries out independent investigations of incidences of improper interpersonal behaviour, which includes SH. OCCO maintains regular communication with complainants throughout the process. OCCO is an independent oversight function funded through EBRD's administrative budget. Complaints about instances of SH are encouraged to be made in the first instance to the Employee Relations team in Human Resources but can be made to any of the prescribed reporting channels in the Whistleblowing Policy. Staff members may also approach the Ombuds, the Staff Legal Adviser, or the Staff Council directly. Additionally, the Bank lacks a consistent approach to assigning focal points in regional offices, limiting the comprehensiveness of its field-level response. Interviewees for this study noted that recruitment is ongoing to help support coordination of internal SEAH cases.
- **IDB:** The IDB tasks supervisors with fostering a workplace free from harassment, and staff have multiple identifiable entry points for advice or support, including the Office of Ethics, the Office of the Ombudsperson, the Office of Mediation, an SH advisor, and the Employee Assistance programme, which provides psychological support. Victims can also be referred to the Bank's medical centre for additional counselling services and to corporate security or domestic violence hotlines as needed. The Bank has significantly strengthened its Ethics Office, increasing staffing levels and resources in response to rising caseloads, with strong management and Board backing for further resource allocation. Good practice is demonstrated through ELSA (Espacios Laborales Sin Acoso – Workplaces Free of Harassment), a digital tool developed to collect data on tolerance, prevalence, and trust around internal SEAH in the workplace and aims to identify cultural and systemic barriers to reporting. However, use and reporting on this tool could not be verified. Responsibilities for coordinating SH response are also spread across multiple units and disciplinary action has been identified as a weak link. Interviewees for this study noted that weak or inconsistent sanctions undermine trust in the system.
- **IFAD:** IFAD has an SH/SEA Task Force led by the Chief of the Ethics Office and supported by members from multiple departments, including HRD, AUO, and Communications. It also appoints focal points with specific responsibilities across all ICOs. Following the MOPAN assessment, management increased resources by appointing a dedicated Ethics Officer for SH/SEA, expanding the team to four full-time staff, and providing additional funding for outreach, training, and educational materials. However, the assessment notes that the most senior post in the Ethics office was downgraded from D-1 to P-5. The Ethics office held 26 training events with over 1,200 participants, according to the Annual report on the activities of the IFAD Ethics Office for 2024. However, interviewees for this study noted that capacity to conduct trainings at the project level is a stretch on the team's capacity. The most senior post on the team also remains at the downgraded level identified in the MOPAN assessment.
- **IFC:** As part of the WBG, the IFC benefits from the same resources as the World Bank mentioned below. Reports can be made by phone, online, anonymous hotline, or in person. Staff can also contact the AHC to report or to receive advice. There are other services available to staff as well, including Ombuds Services, Respectful Workplace Advisors, Mediation Services, Peer Review Services, and the Staff Association. Of the 43 senior leaders that received ethics onboarding (mentioned below for the World Bank), 17 were from IFC. At the field level, IFC has been able to demonstrate engagement on protecting from SH. An example of good practice stems from the WBG Gender Strategy Action Plan 2024-2030, where IFC engagement in Sri Lanka through the She Works program resulted in initiatives included policies on anti-sexual harassment, equal employment opportunities, anti-bullying, third-party grievance mechanisms and training on anti-sexual harassment and bullying in the workplace. As a result, the share of women newly recruited rose from 49 percent to 73 percent, equating to 12,000 more women employed.
- **World Bank:** The Ethics and Internal Justice unit hosts the AHC who acts as a bridge between informal support mechanisms and the formal investigation process. It provides a single, consistent channel for addressing all internal SEAH allegations and is codified in the WBG Staff Rules. A good practice identified in the MOPAN assessment is the structured integration of the AHC and RWAs that make it easier to support managers and HR business partners and provide consistency in approach. The AHC serves as the central and identifiable channel for staff to confidentially raise concerns, seek advice, and trigger protective measures. The AHC team has expanded significantly in recent years, from one individual and an assistant to a team of 13, including a counsel and two staff posted to country offices (Istanbul and Delhi) to strengthen outreach and access for field-based personnel. The Ethics Annual Report 2023 states that the World Bank also continues to lead a working group in the Chief Executive Board Task Force on Sexual Harassment, dedicated to victim protection and support. It also notes that demand for the AHC grew by 49% in FY23 and that 43 senior leaders received ethics onboarding.

Element 4: All managers have received training on preventing and responding to SH, and all staff have been trained to set behavioural expectations (including with respect to SH).

All IFIs assessed provide SH-related training, either as stand-alone modules or integrated within broader ethics or SEA training. Training is mandatory for all staff in IFIs and all IFIs offer specialised training for managers. Refresher courses are common, though the extent of ongoing training remains unclear at the World Bank Group.

Scenario-based approaches were documented at IDB, World Bank, IFC, EBRD, and ADB, while bystander interventions were evidenced at IDB, World Bank, IFC, and ADB, but not confirmed at AfDB or EBRD. All IFIs raise awareness through internal communications, ranging from newsletters and campaigns (AfDB) to brochures and reporting guides (ADB).

Evidence of delivery is documented in annual or ethics office reports across institutions, though participation data and evaluations beyond attendance are limited. Interviews indicate training is widely available at HQ and in field locations, though rollout at the World Bank Group and AfDB depends in part on local management.

- **ADB:** ADB conducts mandatory Code of Conduct and anti-harassment training for all staff and managers. Specialised training on SH assertiveness and women's security and awareness trainings are also available to staff. More than 600 current and aspiring managers participated in specialised training modules. Training formats include videos, role-play, storytelling, and quizzes, although the inclusion of a bystander approach and frequency of refresher training remains unclear. ADB reinforces learning with outreach to resident missions, internal communication tools, and knowledge products such as the "Building Trust Together" brochure and the "Speak Up!" reporting guide. Workshops in eight countries were conducted to reinforce these efforts. Evaluation of training beyond participation rates could not be verified.
- **AfDB:** The MOPAN assessment notes that the Ethics Office has implemented regular training and awareness campaigns, including a 2020 SEAH awareness session that attracted over 200 participants and provided clarity on key misconduct concepts, whistleblower protections, and policy updates. The bank also conducts annual trainings on the Code of Ethics and is the only bank with a podcast on SEAH in their training material platform. In 2021, a Joint Awareness Session and a sensitization event on the SPOT reporting system engaged hundreds more staff. Notably, SEAH themes were embedded in 26 training sessions, reaching 1,543 participants, complemented by creative outreach methods such as newsletters and anti-SEAH cartoons. In 2023, eight training sessions were also facilitated on the Bank's new Whistleblowing Policy. However, a key challenge is the lack of clarity on whether this training is mandatory for all staff, especially managers. Additionally, training appears to be integrated with SEA.
- **EBRD:** EBRD's ethics training system at EBRD is mandatory. The mandatory flagship "Integrity Matters!" course which is a Code of Conduct training is complemented by a compliance mechanism that stipulates failure to complete training within six months may result in departmental financial penalties. Training must be refreshed every three years. Dedicated mandatory training also exists for Board officials and staff in resident offices, where bespoke and interactive scenario-based workshops under "Living Our Ethical Values" are held. Following implementation in 15 out of 40 country offices, stakeholders reported increased reporting of SH incidents. While the assessment highlights that content is periodically updated to reflect emerging cases, whether training includes a bystander approach could not be confirmed. Additionally, stakeholders note that managers are regularly trained by OCCO in how to facilitate reports of sexual harassment, but it is unclear whether this training is mandatory. The MOPAN assessment notes that EBRD plans to develop a strategy for staff training to raise awareness of gender-related issues, according to its document Access to Services Support Programme Gender Advisory Services.
- **IDB:** IDB training incorporates specific modules on sexual harassment. Since 2021, the ethics training includes a fictional SH case study and a segment called "Living your values at work," which has reached all regional offices and is mandatory for all staff. Managers receive additional, tailored training emphasising the role of bystanders through a video campaign promoting a "Safe to Speak Culture". Training is further enriched through virtual courses on psychological safety, the use of virtual reality simulations for sensitive conversations, and multilingual informational flyers to inform employees about the organisational norms on SH. According to the 2023 Office of Ethics annual report, 98.7% of IDB Group employees had completed the Ethics Core Course. In 2024, IDB plans to further innovate using tools like ELSA mentioned above. Since the MOPAN assessment, a survey on respectful workplaces was conducted and led to tailored training touching on issues covered in survey responses, demonstrating a good practice initiative. Despite these strengths, the MOPAN assessment noted a lack of evaluation mechanisms beyond participation rates.
- **IFAD:** IFAD mandates ethics training that includes anti-harassment content and refresher modules every three years. IFAD has developed a comprehensive training system on SEAH that is mandatory for all staff and individuals with work contracts. Training modules cover the Code of Conduct, Anti-harassment Awareness, and on Preventing and Responding to SEA with a certificate issued upon successful completion. Training participation is also tied to performance evaluations. IFAD has developed a toolkit to guide managers in addressing workplace concerns related to SH/SEA. In 2024, IFAD expanded its outreach with 26 classroom-based events and training for 1,354 personnel across 20 corporate events. Regional in-person missions were conducted to further engage field-level implementers and community-facing teams. Despite the overall strengths, a primary challenge remains the absence of a dedicated training track for managers, which deviates from UN Model Policy standards. Additionally, evaluation of training beyond participation rates could not be verified. Nevertheless, the integration of performance assessments to incentivise training completion represent good practice.
- **IFC:** IFC's SH training system is aligned with the broader World Bank Group and features implementation of manager-specific modules. As mentioned below, training includes facilitated discussions on misconduct, roles, and case management, scenario-based content and a bystander intervention. The WBG training programme also includes a mandatory refresher course, "What's Your Role?" which covers SH from multiple perspectives, victim, alleged perpetrator, bystander, and manager. Despite these strengths, a challenge identified in the MOPAN assessment is that it remains unclear to what extent staff are required to have ongoing training beyond onboarding.
- **World Bank:** The MOPAN assessment noted that the World Bank integrates SH training with policy stipulations. While periodicity could not be determined, training content was said to be mandated to both staff and managers through the Action Plan. However, this is no longer clear given that an Action after FY21 could not be found. ATV delivered more than 264 training sessions for 8,113 staff in FY23 (a 12.56 percent increase from the previous fiscal year), and the training "From Bystander to Upstander" was the most attended course, followed by "Creating a Respectful and Harassment-Free Workplace". For the former, on average after attending the training, participants showed an increase of 25 percent in their level of comfort to intervene when witnessing inappropriate behaviour. The World Bank is currently developing an e-learning on prohibited conduct. The AHC participated in 49 training and outreach sessions that reached 1,839 staff at HQ and in country offices. These ranged from townhalls to training sessions to focus groups of vulnerable populations (including STs and contractors). The 2023 ethics office annual report notes that following the AHC's missions to seven countries, there was an increase in reports from several country-office-based

staff and contractors. However, the assessment noted that rollout of some training in country offices was contingent upon active demand from Country Directors and Managers, posing a potential challenge to full uptake in the field.

Element 5: Multiple mechanisms can be accessed to seek advice, pursue informal resolution, or formally report SH allegations.

This is the highest rated element for 4.8. All the MDBs have multiple reporting avenues which can be used for SH reports. However, clarity on support availability differs. The IDB, IFAD, EBRD, and ADB detail services such as a counselling, psychologists, confidential advice, and mental health and well-being support. Interviews for this study show that support is increasingly being provided.

There is limited evidence to demonstrate whether support is gender sensitive. Six of the IFIs have noted an uptick in reports of SH signalling an increase in awareness of resolution and support mechanisms. All the cohort have a whistleblower policy.

Overall, information is limited on how SH is addressed for this element at country level.

- **ADB:** Formal mechanisms include secure, confidential, and anonymous platforms via email, chatbot, phone, and online forms. Informal avenues such as mediation services, the Office of the Ombudsperson, and a peer support network provide additional support. Protections are in place for whistleblowers and retaliation is treated as misconduct. Notably, ADB uses Microsoft Azure's GPT-4 chatbot to provide around-the-clock access to information and reporting guidance. Uptake of mechanisms is strong, with annual reporting reflecting increased usage and improved confidence in systems. Staff surveys show that 94% know where to go to report misconduct and 71% feel safe doing so without fear of reprisal. However, gender sensitivity of reporting processes remains unclear.
 - **AfDB:** The AfDB has mechanisms to address SH including the Ethics Office, the Office of the Ombudsman, and PIAC, depending on the level of formality. The Ethics office functions as the informal reporting mechanism. Anti-retaliation policies are outlined in the newly updated 2023 Whistleblower policy. The MOPAN assessment noted that annual reports mention that these mechanisms are being used, although it is unclear to what extent this relates to SH. A noteworthy innovation is the 2021 introduction of the SPOT system, a third-party artificial intelligence tool designed to enhance anonymous reporting of misconduct, including SH. However, a challenge is seen in the lack of distinction between SH and SEA in reporting tools, which may complicate efforts to assess interventions and allocate resources appropriately. The assessment also found it difficult to ascertain whether these mechanisms are gender sensitive. The AfDB notes not having any internal SEAH cases to date.
 - **EBRD:** Multiple mechanisms for reporting at the EBRD are available through direct the Chief Compliance Officer, Director of Investigations, Head of Internal Audit, the MD HROD, or the President, or any member of the Executive Committee. Reporting channels include an email sent to a dedicated address accessible only by the Chief Compliance Officer and the Director of Investigations. Links are available to make an online report to these focal points, including anonymously. Complaints may also be sent by post to the OCCO. These are advertised through mandatory training and recently centralised in a newly launched 'Reporting Hub' on the intranet. The Harassment-Free and Respectful Workplace Procedure supports both informal and formal complaint resolution, and staff have access to a suite of support services including an Employee Assistance Programme, Staff Legal Advisor, Ombuds, and the Inside-Out mental health app, demonstrating good practice. Despite these strengths, a noted gap is the absence of staff perception surveys evaluating trust or experience with these reporting channels, limiting the Bank's ability to measure effectiveness.
 - **IDB:** Entry points for SH survivors seeking support can be found through supervisors trained to assist, Human Resources, the Office of the Ombudsperson, and the Employee Assistance Program (EAP), where victims can receive confidential counselling and referrals to staff. The Office of Mediation can help employees work through more minor issues using peer-to-peer informal mediation and/or facilitate restorative justice in instances where lapses in behaviour may have already occurred, which demonstrates good practice. A challenge for IDB remains the low number of SH reports and services accessed, raising questions about underreporting or limited awareness.
 - **IFAD:** IFAD offers several avenues for victims of SH to seek advice or file complaints, including the Ethics Office, HR officers, supervisors, the Staff Counsellor, psychologist, and staff representative. Reporting can occur through email, helplines, WhatsApp, or via country-level channels such as the UN Country Team. A distinguishing feature is the availability of both male and female staff to receive grievances, allowing complainants to choose whom they feel more comfortable speaking with. The Bank also enforces whistleblower protection procedures that apply to all who engage in good faith reporting activities. The 2024 Ethic Office annual report highlights IFAD's behavioural audit to identify barriers to effective reporting and bolster its current reporting processes to improve the overall reporting experience for victims/survivors and bystanders in reporting sexual misconduct incidents. Nonetheless, staff interviews for the MOPAN assessment revealed fear of breach of confidentiality, particularly in a small organisational setting, posing a challenge to full trust and use of the mechanisms.
 - **IFC:** The IFC provides reporting mechanisms through the EIJ office, AHC, online forms, a 24/7 hotline, and peer support such as RWAs and Mediation Services. Retaliation is explicitly addressed in staff rules and Code of Ethics, and misconduct proceedings apply to retaliators. As with the World Bank, a significant increase in reporting is attributed to the publicisation of the AHC role. However, the gender sensitivity of mechanisms could not be confirmed. Despite extensive outreach and training, field staff uptake appears more limited.
 - **World Bank:** Reporting of SH can occur through line management, the EIJ unit, the AHC, online forms, and a 24/7 hotline. Complementary resources include Ombuds Services, RWAs, Peer Review, and Mediation Services. The Bank has embedded anti-retaliation protections within its Staff Rules and promotes these services through training and awareness campaigns. A significant increase in reporting is attributed to the publicisation of the AHC role, with interviews from the MOPAN assessment confirming that staff feel more comfortable reporting inappropriate behaviour before it escalates to misconduct. However, the gender sensitivity of mechanisms could not be confirmed, and a challenge may lie
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in improving reporting from country offices, where fewer complaints have been recorded, and staff use of services remains limited. Over the course of a year, the World Bank regularly provided updates to the complainant and after several workshops, complainants reported substantial improvements, demonstrating good practice.

Element 6: The organisation ensures that it acts in a timely manner on formal complaints of SH allegations.

While all the organisations have a body or entity that oversees investigations, when it comes to monitoring on the timeliness of cases, the World Bank, IFC IDB, EBRD, and ADB provided evidence that tracking of allegation responses and timeliness of investigations takes place against timeframes and the World Bank and IFC assessments discuss how they address bottlenecks in the system.

- **ADB:** Allegations of misconduct are responded to within two business days and, if deemed material and credible, referred to OAI within two weeks. Although fewer timelines are specified for informal resolutions or investigations, the ADB Integrity Principles and Guidelines stipulate that investigations must be concluded within one year, with possible extensions for complex cases. The Ethics Link portal tracks all inquiries and provides real-time case management, supporting timely and transparent resolution processes. Annual reporting includes data on complaints, including gender-disaggregated data and outcomes of mediation or investigations, though specific SH statistics are not public. Notably, a recent joint review of misconduct cases and administrative procedures concluded that ADB's implementation is aligned with good practices across MDBs. Still, there remains room for greater specificity around timelines for SH-specific investigations.
 - **AfDB:** The MOPAN assessment found little evidence to assess the Bank's practices in this area. While annual reports produced by PETH and PIAC provided statistics on the number of cases being handled, they do not include information on the time taken to address or resolve these cases. Moreover, benchmarks or internal standards for the timeliness of case resolution are not clearly articulated.
 - **EBRD:** EBRD has set out timelines for addressing complaints submitted through various channels, with allegations reported via informal mechanisms required to be escalated to the Chief Compliance Officer within one day. The relevant procedures specify that the MD HROD must take initial action within 15 days, and staff accused of misconduct must respond within another 15 days. Between 2016 and Q3 2023, nine SH cases were investigated, all resolved within four to six months. While stakeholders confirmed that SEAH cases are treated with urgency, one area for improvement is the absence of a systematic feedback mechanism to capture complainant input. Nonetheless, OCCO maintains ongoing communication with complainants about case progress and disciplinary measures. Good practice is seen through the creation of a Speak Up working group that comprised HR, OCCO, legal, the Staff Council, and Ombudsman that allowed the bank to develop lessons around addressing internal SEAH and other cultural issues relevant for the Bank.
 - **IDB:** The 2023 Ethics Office Annual Report notes strengths and good practices through the clear time standards that require a complaint be assessed within 45 business days and that an investigation be completed within 180 calendar days. A good practice noted is that the Ethics Office maintains a service standard of responding to inquiries within 10 business days, with an internal target to meet this standard in at least 80 percent of consultations. However, interviewees for this study noted cases may take more time causing complaints among staff. A particular issue was noted with complaints received from staff leaving the institution that now feel more comfortable coming forward and their departures making cases harder to address. The MOPAN assessment notes that the office answered 63 percent of consultations within two business days and another 27 percent within three to five business days. This efficiency is noted to be inversely proportional to the steady increase in the volume of consultations over time. However, given the increasing complexity of the consultations, the Office anticipates that the average response time will likely increase and interviewees for this study noted that cases reported have increased in the past two years.
 - **IFAD:** IFAD has a policy commitment to timely and objective investigations of SEAH cases. Interviewees for this study noted that cases reported among personnel and third parties has steadily increased. AUO uses a key performance indicator that targets a six-month window between receiving an allegation and issuing a report outlining measures, including disciplinary action. IFAD also prioritises SEAH allegations received. However, the institution faces challenges in implementation. Neither the AUO nor the Ethics Office annual reports discuss the timeframes for reviewing SH allegations specifically, nor do they identify bottlenecks or delays. The lack of explicit targets is attributed to IFAD's commitment to a victim-centred approach and the due process obligations it entails. However, the assessment notes that this commitment should not preclude the establishment of timelines, provided deviations are monitored and justified appropriately.
 - **IFC:** The IFC falls under WBG timelines indicated below for the World Bank. This commitment to timeliness is supported by annual reporting, which also reveals some challenges. In FY22, the average processing time for cases requiring reporting to the HR Vice President was 343 days, with SH cases resolved at the lower end (179 days), and others extending to 497 days. For cases not requiring formal reporting, timelines were considerably shorter, 122 days for those closed at the preliminary inquiry stage and 161 days during investigation. The EIJ FY23 annual report does not make mention of timelines for SH cases. Although no specific bottlenecks were identified for SH cases, general issues such as case complexity and the need for translations were noted in the MOPAN assessment. Like the World Bank, IFC implements an annual satisfaction survey to gather feedback and improve timeliness and survivor support.
 - **World Bank:** The MOPAN assessment notes that the SH Action Plan, the Ethics and Business Conduct Department (now EIJ) committed to acknowledging receipt of allegations within one business day, completing intake and assessment within 10 days, and finalising the investigation process (excluding report writing) within three months. Preliminary inquiries are to be completed within one month. Interviews for the assessment supports these timelines, with reporters typically contacted within 48 hours, a consultation scheduled within a week, and resolution occurring within a month, depending on the chosen mechanism. The World Bank has implemented additional recourse mechanisms through the AHC, which facilitates informal resolutions and refers serious misconduct cases for investigation. Furthermore, the Bank utilises an annual
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satisfaction survey among users of AHC services, enabling continuous service improvements including those related to timeliness, which demonstrates good practice.

Element 7: The organisation transparently reports the number and nature of actions taken in response to SH in annual reporting and feeds into inter-agency HR mechanisms.

This was the lowest rated element for indicator 4.8. The World Bank, IFC, IFAD, EBRD, and ADB provided evidence of regular reporting on actions taken in response to SH allegations to its governing body. However, the nature of cases and time between complaints is less clear. The World Bank, EBRD, and ADB showed evidence of public reporting on numbers of complaints received, classification, and types of disciplinary actions taken.

Only the World Bank, IFC, and IFAD provided evidence on taking steps to share information to prevent re-hiring of perpetrators through ClearCheck due to their UN affiliation.

Unlike the UN or INGOs there is no common reference checking mechanisms for IFIs. None from the cohort are part of the Misconduct Disclosure Scheme. All are part of the Ethics Network of Multilateral Organisations (ENMO).

- **ADB:** ADB reports anonymised data on SH-related complaints and outcomes, including information from investigations, in annual public reports produced by OPEC and Internal Audit Office. In 2023, OPEC recorded eight SH-related reports, compared to six in 2022 and one in the 2020–2021 period. Terminated staff are barred from re-employment as either staff or consultants. Disaggregated data on SH complaints is made publicly available, and case summaries from tribunal decisions are also shared in a confidential but informative manner. However, ADB does not currently participate in inter-agency mechanisms to share misconduct-related employment data, such as the Misconduct Disclosure Scheme or ClearCheck. Implementing such a mechanism would require formal agreements with other development partners, alongside safeguards to protect privacy. ADB's participation in cross-organisational forums, such as co-chairing the annual Ethics Network of Multilateral Organisations meeting, and its commitment to publishing disaggregated data, reflect promising practices.
- **AFDB:** PIAC and PETH both produce annual reports detailing SH cases. While PIAC's report is made public, the Ethics Office's report is shared internally. Additionally, the Corporate Human Resources Management Department has compiled internal Case Management Reports for 2019 and 2020, which document allegations, factual findings, and disciplinary outcomes, with SH cases included when applicable. It could not be determined if this document has been produced in years after 2020. The Ethics Office also implements a risk assessment tool that incorporates harassment risks, which helps target outreach efforts and supports focused reporting, including on SH, which demonstrates a promising practice. Evidence though, was not provided on outcomes of this tool. Additionally, the 2023 PIAC Annual Report noted one case of SH. However, a challenge is found in that the organisation does not publicly report the outcomes or resolutions of SH cases, and it does not disclose any mechanisms aimed at preventing the re-hiring of offenders.
- **EBRD:** The Office of the Chief Compliance Officer (OCCO) provides quarterly and annual updates to the Board and the Annual Report is publicly available. These reports detail the number of complaints, how many led to investigations, the outcomes of those investigations, and any resulting disciplinary action. The Staff Council and the Ombuds also present staff concerns to the Board on a regular basis. Stakeholder feedback affirms that EBRD's practices align with those of other MDBs. EBRD states that their staff council survey includes questions on SH and retaliation, and that the survey report is published on the Bank's intranet and shared with staff through Town Hall meetings. Nonetheless, the institution's staff survey does not directly measure trust in reporting systems or protection against retaliation. EBRD is not a member of ClearCheck although discussions on possible cooperation frameworks with other IFIs are currently ongoing. In line with most of the IFIs in this study, sharing data externally could further strengthen the system. However, it does conduct internal screening, including criminal record and conflict of interest checks. For re-hired staff, consultants, or suppliers, the procurement and HR teams coordinate to ensure no terminated staff are re-engaged. EBRD has internal procedures to prevent the rehiring of individuals dismissed for misconduct.
- **IDB:** The IDB has integrated SH tracking into the annual reports of its Office of Ethics, which include data on formally reported allegations and closed cases. The ethics office 2023 annual report notes that SH allegations went from one in 2022 to four in 2023, the highest total since 2019. The use of ELSA is promising for assessing tolerance, prevalence, and trust within the workplace to address underreporting, but outcomes of its use could not be found. Nonetheless, challenges include nondisclosure of whether staff departures relate to SH or misconduct by IDB's Human Capital Analytics and the institution not publicly reporting on its procedures to prevent rehiring of perpetrators. While IDB participates in the common sanctions procedure with other international financial institutions, SH is not included in this framework.
- **IFAD:** IFAD reports credible SH allegations and responsive actions through a confidential platform accessible to its Executive Board and member states. This platform provides details on the type of allegation, party involved, case status, and outcomes, including disciplinary actions. IFAD also contributes to inter-agency data-sharing initiatives. It uses the UN ClearCheck tool to screen for past sexual misconduct and has reported data to the CEB Task Force for a broader UN system review. Additionally, in 2024, IFAD received seven SEA/SH matters, up from three in 2023. Nonetheless, public transparency is limited. The public can only access aggregated SH data through annual AUO and Ethics reports, which do not disaggregate outcomes by misconduct type. As a result, it is a challenge to assess the nature and resolution of SH cases from the public domain.
- **IFC:** Like the World Bank, the IFC reports regularly on SH through internal and external mechanisms, including the EIJ Annual Report. Staff rules also list a range of disciplinary measures for substantiated misconduct, including termination and prohibition from future employment with the World Bank Group. Despite these strengths, documentation is unclear about how SH cases are specifically discussed with the Board. Additionally, Although the Staff Rules outline that loss of future opportunities for employment at the WBG as one of the potential disciplinary

measures available for instances of misconduct, there is no documentation that all instances where sexual harassment is substantiated results in prevention of rehiring.

- **World Bank:** The EIJ provides regular reports to the Executive Board and the HR Committee, which include publicly available data on misconduct, substantiated allegations, and disciplinary outcomes. This information is also shared on the WBG intranet, with disaggregation by location, type of misconduct, sanctions imposed, and subject grade level. IN FY23, the AHC received 42 cases involving SH. There were five alleged instances of recent sexual assault taking place by a staff member, and three instances of sexual assault involving historical incidents where the alleged perpetrator had left the World Bank or where none of the parties involved was still employed by the World Bank. The number of cases of sexual assault in FY23 is worrisome and unprecedented, five compared to a single incident reported in FY22. While this surge may reflect successful awareness-raising, it also revealed troubling patterns, such as the role of alcohol consumption during mission-related travel in several of the most serious cases. The report identified peer norms surrounding alcohol use as a significant cultural challenge in addressing sexual misconduct. The Bank's transparency, the inclusion of SH-specific sanctions, and the disqualification of contractors from future work due to SH violations reflect good practices. Since 2024, the World Bank has participated in ClearCheck.
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Annex C - Entry points for PSEAH in operations

This annex complements Chapter 3, providing more detail on how PSEAH commitments are anchored in operational processes related to Banks' operations.

Phase 1 – Country alignment

The IFI and the borrower establish the strategic framework that determines how systematically PSEAH can be integrated across a country portfolio, which anchors all future operations in a shared strategy between the two entities. Through a collaborative process referred to as “Policy Dialogue”, “continuous dialogue” or “country engagement”, IFIs and governments develop strategic instruments jointly – such as the World Bank’s “country partnership framework” or IFAD’s “country strategic opportunities programmes” that set priorities, diagnose development constraints, and determine the scope for using country systems. Diagnostics at this stage typically assess the quality of national environmental and social safeguard systems and identify where IFIs may need to supplement or reinforce borrower capacity. For private-sector operations, IFIs also seek non-objection to ensure alignment with national priorities.

For PSEAH, this phase is decisive. It shapes the early identification of GBV/SEAH risks, the feasibility of relying on national safeguards and survivor assistance, and the level of support required to strengthen systems. However, MOPAN interviews indicate that **GBV/SEAH appears in country strategies only if it is a strong government priority or if there has been prior engagement on these themes** (see Challenge 3).

Phase 2 – Design

This phase determines whether PSEAH risks are properly identified and built into the project’s core design requirements. Borrowers prepare an environmental and social impact assessment (ESIA) and an E&S management plan, while IFIs assess the Plan’s feasibility and borrower capacity, e.g. for providing survivor services and monitoring frameworks. Where SEAH/GBV risk is identified, E&S management plans must include an action plan outlining prevention and response measures, ideally stakeholder engagement plans, reporting arrangements, capacity building, grievance mechanisms, and mapping of survivor services. IFIs provide technical support to ensure that measures reflect project-specific risks and implementing-partner capacity. Borrowers must also establish a project-level grievance mechanism (GM) in SEAH-risk contexts. It must be equipped to receive SEAH complaints, with some IFIs recommending stand-alone or third-party GMs in higher-risk settings (see Annex B, element 4.7.3, 4.7.5 and 4.7.8 and section 4.3 in the Main Report on Grievance Mechanisms).

Practice shows that strengthened safeguards and risk-rating systems are improving consistency but remain uneven. ADB's upgrade of its E&S framework to binding policy has made PSEAH measures in the E&S management plan legally binding, affecting later loan approval (phase 4). IFIs typically apply tiered risk ratings, with higher risk projects triggering stronger SEAH requirements; the World Bank's mandatory SEA/SH screening since 2021 and its good practice notes associating minimum mitigation measures to risk levels, set a benchmark. Yet gaps persist in coverage and systematisation and initiatives such as ADB's new SEAH-linked risk categorisation are still in pilot stages.

Phase 3 – Appraisal

During this phase, IFIs verify whether the project design – including PSEAH measures – is sufficiently sound to advance the approval. Multidisciplinary teams assess technical, financial, institutional, environmental, and social viability and **validate compliance with institutional policies and alignment with development objectives**. For private sector operations, appraisal places additional emphasis on economic and financial returns. This stage also allows borrowers to address any outstanding questions.

Practice shows that appraisal methods vary but centre on quality assurance. IFIs use management presentations, consultations with interested or affected groups (including NGOs), document reviews, and readiness criteria. Once measures (including on SEAH) in ESMPs are deemed acceptable, the project proceeds towards approval.

Phase 4 – Loan negotiation and approval

In this phase, SEAH safeguards agreed during the design are converted into legal obligations. The borrower and IFI negotiate the loan or investment terms, including disbursement conditions, covenants, and performance and monitoring requirements. Once these are finalised, the project is submitted to the Board for approval. After approval, the loan is signed and disbursed. This is the point in the cycle where SEAH requirements move from technical plans into enforceable commitments with remedies for non-compliance.

Practice shows that SEAH requirements are now explicitly embedded in legal agreements across several IFIs. ADB's upgraded E&S framework has made PSEAH measures mandatory rather than good practice. IFC requires clients to report incidents (in a way that encourages them to report), adopt SEAH policies or integrate them into HR systems, and apply child-safeguarding clauses when relevant. The World Bank similarly includes SEAH provisions in its model/template legal agreements, including the E&S commitment plan. IFAD requires all government and third-party agreements to comply with its PSEAH policy and cascade obligations to contractors and downstream partners.

Phase 5 – Implementation

During this phase, the borrower executes the project, putting PSEAH requirements into practice, while IFIs monitor project implementation, fiduciary controls, and safeguard compliance. Borrowers apply agreed measures through procurement requirements, contractor codes of conducts, and PSEAH training for project workers. They also manage cases, coordinate referrals, and ensure survivors can access health, psychosocial, and legal services. IFIs supervise implementation – typically semi-annually – monitoring environmental and social performance, ideally adjusting oversight based on project risk.

Practice shows that uneven national capacity makes close supervision and digital tools especially important. Annex B (Element 4.7.5) highlights variation in borrowers' due diligence systems. Several IFIs

provide contractor CoC templates (ADB, AfDB, IFAD, WBG). Interviews with all seven IFIs note that consistent case management and survivor services depend heavily on in-country capacity. Some institutions have strengthened oversight: **AfDB** requires monthly reports for high-risk projects, annual visits, and virtual E&S meetings with PIUs. Most IFIs have appointed GBV focal points or specialists who take on PSEAH work in addition to broader E&S duties. Digital monitoring systems — used by **ADB, AfDB, EBRD, and IFAD** — are a major advance, and **IFC's AI-powered MALENA tool** illustrates the potential of structured reporting (Box 6.6 in the main report).

Phase 6 – Completion and evaluation

During this phase, borrowers and IFIs review how well E&S goals (including those on PSEAH) were implemented and what outcomes were achieved. Once project activities end, both parties prepare structured assessments examining whether environmental and social goals were met and how E&S issues — including SEAH — were managed. For sovereign operations, IFIs require a project completion report; for private-sector operations, IFC prepares an extended annual review report. These documents record implementation of agreed action plans and sometimes capture lessons learned. ADB has indicated it will introduce a requirement for completion reports to demonstrate how SEAH issues were addressed.

Annex D – Definitions used by IFIs

While most of the IFIs adopt similar language around SEAH and draw from frameworks of the UN or IASC, the precise wording, emphasis, and scope of these definitions differ. Coercion or unequal conditions are common as part of the definition of sexual abuse; some IFIs the World Bank Group includes clarifying elements or examples. Definitions of sexual harassment also vary in scope; the ADB has included online behaviour in their definition. The terms GBV or GBVH are also not used uniformly across the IFIs. EBRD is the only IFI to use the term GBVH while IDB is the only IFI to use “SGBV.” The ILO’s Convention 190 on the Elimination of Violence and Harassment in the World of Work defines GBVH as “violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately and includes sexual harassment,” marking the recognition of harassment, typically non-physical violations, as part of the continuum of GBV.⁵ The term survivor and the definition of sexual exploitation are used similarly among the IFIs.

Because definitions are embedded in policies, they establish the normative and legal boundaries of what an institution is committed to prevent, respond to, and resource. Definitions codified in policy influence what risks are seen as relevant, what counts as misconduct, and how survivors are treated. It is particularly important for how survivors understand and trust the protection available to them.

At the same time, IFIs still acknowledge some grey areas in their definitions. Both EBRD and the World Bank raised questions about how to define and address issues such as staff relationships or employee behaviour outside the workplace. For example, the World Bank considers going to strip clubs or paying for sexual “favours” to constitute sexual exploitation, while EBRD noted concerns about how to handle consensual relationships between staff, notably where power differentials exist. These ambiguities illustrate the challenge of tailoring messages to staff and point to areas where existing definitions leave room for interpretation.

The IFIs in this study noted that certain interpretations of definitions also had unintended consequences, such as fear among project stakeholders that reports of misconduct might lead to project shutdown due to rigid understandings of “zero tolerance,” or, conversely, increased recognition of harassment among women in certain national contexts where such behaviour had been normalised and only identified as misconduct after being exposed to institutional policies.

Many member states, in particular those that have driven efforts to agree on ‘harmonised language’, and a majority of IFIs consulted for this study, are of the view that differences in definitions and language impedes collaboration, both with regard to reporting requirements and to collaborative agreements between IFIs.

⁵ International Labour Conference (ILC), (2019), *Convention 190 Convention Concerning the Elimination of Violence and Harassment in the World of Work*, https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190

Table A.D.1. Definitions

	ADB	AfDB	EBRD	IDB	IFAD	World Bank Group
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.	Refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily or socially from the sexual exploitation of another, when such conduct interferes with work, is made in a condition of employment, or creates an intimidating, hostile or offensive work environment.		Any person who requests sexual favours in exchange for work, goods or any benefit related to the project. Refers to actual or attempted abuse from a position of vulnerability, power, or trust for sexual purposes, including but not limited to taking financial, social, or political advantage of the sexual exploitation of another person.		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.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or unequal or coercive conditions.	Refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, when such conduct interferes with work, is made in a condition of employment, or creates an intimidating, hostile, or offensive work environment.		Unwanted sexual activity in which those who perpetrate it take advantage of the fact that the victim cannot consent to it, using physical threats of a sexual nature, either through force, unequal and/or coercive conditions, or duress. The vast majority of victims know their perpetrators.		Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse is a broad term, which includes a number of acts including rape and sexual assault, among others.
Sexual harassment	Any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile, or	Refers to any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any behaviour of a sexual nature that might reasonably be expected to cause	A range of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for "sexual favours", sexual, verbal or physical conduct, or	Covers a range of behaviours and practices of a sexual nature, including unwelcome sexual comments or advances, requests for sexual favours, verbal or physical conduct or gestures of a sexual nature, or any other conduct of a sexual nature	Any unwelcome sexual advance, request for sexual favour or other verbal, non-verbal or physical conduct of a sexual nature that unreasonably interferes with work, alters or is made a condition of	Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading,

	offensive work environment. Sexual harassment can occur outside the workplace and outside working hours, including during official travel, social functions related to work, and online. Sexual harassment does not need to be between colleagues and can occur within society in general.	offense or humiliation to another, when such conduct interfere with work, is made in a condition of employment or creates an intimidating, hostile or offensive work environment.	gestures that are or might reasonably be perceived as offensive or humiliating.	that may reasonably be seen or perceived as a cause of offense or humiliation to another person when such conduct interferes with work, becomes a condition for employment, or creates an intimidating, hostile, or offensive work environment. Sexual harassment can be perpetrated by different people, such as colleagues, supervisors, subordinates and third parties. Bullies and victims can be of any gender.	employment, or creates an intimidating, hostile or offensive work environment.	humiliating or offensive environment. This may include unwelcome sexual advances, requests for sexual favors, and may take place through online activity or mobile communications as well as in person.
Sexual exploitation and abuse			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. Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, including sexual assault, rape, molestation and other forms of non-consensual sexual activity.		In the context of IFAD's operations in the field, 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 others (sexual exploitation); the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (sexual abuse).	
Sexual exploitation, abuse, and harassment	Although sexual exploitation, abuse, and harassment can occur anywhere in society, when used as an umbrella term within the official development assistance (ODA) sector the term refers to acts of SEAH perpetrated		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			

	by those working in, with, or through ODA actors and their projects. This includes within a program setting, as a part of work travel, or in online interactions. Service users, members of the community, and staff working in the ODA sector are vulnerable to being targeted for SEAH.		exploitation of another. Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, including sexual assault, rape, molestation and other forms of non-consensual sexual activity. All sexual activity with a child (as defined by the UN Convention on the Rights of the Child as any person under the age of 18) is considered to be sexual abuse, regardless of the age of maturity or consent locally. Sexual harassment is a range of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for "sexual favours", sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating.			
GBV	An umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially constructed and ascribed differences in power between men and women. Although violence may be based on a number of inequalities, the inequality between men and women in society is the focus				(The SECAP reference the World Bank's Environmental and Social Framework for IPF) Operations: Addressing sexual exploitation and abuse and sexual harassment (SEA/SH) in investment project financing involving major civil works (Good Practice	Is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such

	of the definition of gender-based violence (GBV). Inequalities based on power fluctuate over time and location. Frequently perpetrated types of GBV and the acceptability of GBV shift from context to context. GBV is a continuum and includes acts that inflict physical, sexual, or mental harm or suffering; threats of such acts; coercion; harassment; psychological abuse; and other deprivations of liberty. These acts can occur in public or in private. The term GBV is most commonly used to underscore how systemic inequality between men and women, which exists in every society in the world, acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls.			Note) to distinguish acts of GBV. The World Bank definition is drawn from the IASC): Is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.	acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.
GBVH			Any harmful act perpetrated based on socially ascribed gender differences, including acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivation of liberty. GBVH covers all acts of sexual exploitation, sexual abuse and sexual harassment.	The SECAP reference the World Bank's Environmental and Social Framework for IPF Operations: Addressing sexual exploitation and abuse and sexual harassment (SEA/SH) in investment project financing involving major civil works (Good Practice Note). The World Bank does not use the term GBVH.	

SGBV				Refers to any act that is perpetrated against a person's will and is based on gender norms and unequal power relationships. It encompasses threats of violence, coercion, and harassment. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to them. It inflicts harm on people of all genders.		
Zero tolerance	(Is encompassed under Principle 1 of ADB's Good Practice note) Refers to zero tolerance to inaction on SEAH. SEAH is not acceptable under any circumstance, action should be taken on every allegation, action should be fair, timely and have due regard for procedural fairness.	Zero tolerance to retaliation means that any punitive or adverse action against someone who reports a PSEAH concern or participates in an investigation is strictly forbidden and will be addressed immediately. In the financed project, the PIU guarantees required protections, confidential reporting channels, and independent investigations; any retaliation triggers swift action and may involve legal remedies where required. Information is shared on a need-to-know basis to protect the complainant while preserving fairness, and investigations are conducted promptly and impartially.			(Current statement) IFAD has no tolerance towards acts of sexual harassment or SEA and takes action to prevent sexual harassment and SEA from occurring in the first place and ensures a prompt and effective response to allegations.	
Survivor/victim	"Survivor" is used to describe the person who has experienced SEAH. While the term "survivor" may be used interchangeably with "victim,"	The ISS does not make explicit reference either term, reference is partially made to how a country's national legislation refers to	Survivor is used to refer to survivors of GBVH. When responding to incidents or allegations of	The priority must be to protect the safety and wellbeing of the survivor and any action should always be taken with due regard for the survivor's safety	The terms "survivor" and "victim" are used interchangeably. IFAD consults victims/survivors on their preferred	The WB primarily use the term survivor, although this is not explicitly defined in its SEA/SH policies.

the use of “survivor” is more empowering and implies resiliency. A survivor-centred approach is based on the principles of privacy, confidentiality, agency, dignity, respect, and non-discrimination. A survivor-centered approach guides professionals—regardless of their role—in their engagement with survivors who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, and to reinforce the survivor’s capacity to make decisions about possible interventions – but said in a way that responders must understand this.	either a victim or survivor.	GBVH and child sexual abuse, the client will adopt a survivor-centred approach that prioritises the rights, needs and wishes of the person who has experienced GBVH and/or child sexual abuse, as well as their safety. The client will provide survivors with or refer survivors to appropriate medical, psychosocial and judicial support services. Incidents and allegations of sexual exploitation and abuse associated with the project will be reported to the EBRD and addressed in a timely manner	and needs and with their explicit consent, allowing survivors to make decisions about how to solve issues and providing information together with available support. In contexts where there is mandatory reporting of sexual violence to law enforcement, the Borrower should have an explicit policy on how to manage the potential conflict between this legal requirement and the safety and confidentiality of the survivor. This policy and the legal requirements and its implications should be explained to the survivors before they disclose, so they have as much control as possible over what they share, and the consequences of their disclosures.	terminology. IFAD promotes a victim-centred approach in relation to prevention, mitigation and response to sexual harassment, sexual exploitation and abuse. Paramount to this approach is the protection of survivors, the importance of confidentiality in treating allegations and the respect of survivors’ wishes and needs.	Survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men, boys, and gender minorities) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions, including non-intervention. In SEA/SH cases involving children, the survivor-centred approach is guided by an assessment of the best interests of the child.
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Source: Definitions provided by ADB, AfDB, EBRD, IDB, IFC, IFAD, and the World Bank in Q2/Q3 2025

Annex E – Terminology used in this report

This section complements the Terminology section of the main report, providing more detail on how terms are used in this publication.

Enabling environment refers, in this report, to the wider national and societal context in which IFI-financed projects operate. The enabling environment for PSEAH is understood as the conditions that reduce the likelihood that GBV and SEAH will occur.

Environmental and social framework is used as a generic term referring to the institution-wide vision, policy, requirements, and procedures governing how environmental and social risks and impacts are identified, assessed, mitigated, and monitored by both the IFI and the client. The IFIs in this study use varying terms: The World Bank uses environmental and social framework (ESF); AfDB uses integrated safeguards system; EBRD environmental and social policy (ESP); IDB environmental and social policy framework (ESPF); IFC sustainability framework, and ADB is moving from a safeguards policy statement (SPS) to an ESF. Where an IFI's specific framework is mentioned in the main report, that institution's acronym is used.

Environmental and social management plan: This report uses E&S management plan as a generic term referring to the project-specific document describing how clients will avoid, minimise, mitigate, and monitor environmental and social risks and impacts throughout any project lifecycle. The IFIs in this study use ESMPs, with the exception of IFAD, which uses an environmental, social, and climate management plan, and the World Bank, also uses the term ESMP but may incorporate its content directly into the Environmental and Social Commitment Plan (ESCP), a document that forms part of the legal agreement and sets out the borrower's obligations for implementation.

Environmental and social standards in this report refers to the set of principles and requirements guiding clients in assessing, mitigating, and monitoring environmental and social risks and impacts associated with a project. The IFIs in this study use various terms. The AfDB uses operational standards; IFC uses performance requirements; EBRD uses environmental and social requirements; ADB, IFAD and the World Bank (IBRD) use Environmental Social Standards (ESS). IDB uses Environmental and Social Performance Standards (ESPS). For clarity and consistency, this report employs E&S standards even when institutions use alternative terminology.

Grievance mechanism: This report differentiates between three types of GMs. Project-level grievance mechanisms, established and overseen by the borrower or client and intended to provide a first point of access for affected individuals to raise concerns related to a specific project. Institutional grievance mechanisms are overseen directly by the IFI and typically handle complaints that cannot be addressed or resolved through the project-level mechanism. The independent accountability mechanism (IAM) is the IFI's independent office that addresses concerns raised around IFI financed projects. Although terminology differs and nuances exist between grievance mechanisms and grievance redress mechanisms, this report uses the term GM primarily for different types of such reporting mechanisms.

IFIs here means multilateral financial institutions. The term "IFI" can encompass a wider range of institutions (e.g. bilateral or national ones), however this report exclusively focuses on multilateral IFIs and

does not use the term “multilateral development bank” (MDB) or “multilateral financial institution” (MFI), which here refers solely to the MFI Working Group.

Institutional refers to measures, policies, systems and practices that apply across the whole of the IFI. This includes both internal operations (for example, staff management, workplace culture, governance) and external roles (e.g. frameworks, policies, safeguards) that apply to all projects and engagements. The term encompasses internal and external SEAH (see SEAH definition).

Safeguarding refers to keeping staff, contractors, partners, clients and community members safe in humanitarian, development and peace settings. It means putting in place policies and procedures across organisations to prevent and respond to staff misconduct including (SEA/SH) or other harms such as bullying and harassment.

Safeguards is often used interchangeably with environmental and social standards (ESS). ESS is also sometimes used to mean environmental and social sustainability. Environmental and social safeguards or standards is a set of rules (IFC Performance Standards) that DFI-financed clients and others follow to ensure their projects or investments manage environmental and social risks responsibly. It covers environmental impacts (pollution, biodiversity loss), land acquisition and involuntary resettlement, labour and working conditions; community health and safety, indigenous peoples’ rights; cultural heritage, and, increasingly, project-level gender-based violence and harassment (GBVH) and SEAH risks.

Operational refers specifically to how PSEAH measures are applied within *project* operations, both sovereign and private sector, which can be financed through lending or grants.

Annex F – Additional information on Guidelines and Good Practice Notes

Box A F.1. A Growing Body of GPN and Guidelines (full titles)

This list of Good Practice Notes, Guidance Notes, How-to documents and toolkits for IFI-internal and external misconduct accompanies Table 4.2 A Growing Body of GPN and Guidelines in the main report. This shows the full titles of documents and provides links for documents that are public.

ADB

- [Good Practice Note on Addressing SEAH in ADB-Financed Projects with Civil Works \(2023\)](#)
- [Building Trust Together: A Guide to Our Code of Conduct](#)
- [Speak Up! Guide to Safely Reporting Suspected Integrity Violations or Misconduct \(2023\)](#)
- [Integrating Sexual Exploitation, Abuse, and Harassment Reporting and Case Handling into Project Grievance Redress Mechanisms: Good Practice Note for ADB-Financed Projects with Civil Works \(2023\)](#)
- [GPN on the Management of Workplace Mental Health and Well-Being Preventing Psychosocial Risks and Promoting Positive Mental Health in the Workplace \(2025\)](#) with EBRD
- [GPN Managing Grievances \(2025\)](#)
- [Guidance Note Gender and Law: Temporary Special Measures to Promote Gender Equality \(2012\)](#)

AfDB:

- [Preventing, mitigating and responding to SEAH within AfDB operations](#) (Advisory Note)
- [Borrower Guidance Note for E&S Operational Safeguard 1: Assessment and Management of Environmental and Social Risks and Impacts\(2024\)](#)
- [Borrower Guidance Note for E&S Operational Safeguard 2: Labor and Working Conditions \(2024\)](#)
- [Borrower Guidance Note for E&S Operational Safeguard 7 - Vulnerable Groups \(2024\)](#)
- [Borrower Guidance Note for E&S Operational Safeguard 10 - Stakeholders Engagement and Information Disclosure \(2024\)](#)
- Communication Plan on the Prevention of SEAH (2019) (unpublished)

EBRD:

- [Guidance Note on Addressing GBVH: Emerging Good Practice for the Private Sector \(2020\) with the IFC](#)
- [Guidance Note on Ethics and Integrity Training \(2021\)](#)
- [Guidance Note on Employee Grievance Mechanisms \(2023\)](#)
- [Guidance Note on non-discrimination and equal opportunity \(2023\)](#)
- [Toolkit for EBRD clients EBRD Performance Requirement 2: Labour and working conditions \(2023\)](#)
- [Guidance note Performance Requirement 2: Labour and working conditions \(2023\)](#)
- [Guidance note Performance Requirement 4: Health, safety and security \(2023\)](#)
- [GPN on the Management of Workplace Mental Health and Well-Being Preventing Psychosocial Risks and Promoting Positive Mental Health in the Workplace \(2025\)](#) with ADB
- GBVH Project risk screening, assessment and monitoring procedure (2020) (unpublished)
- GBVH Risk Appraisal Guidance Note for E&S Consultant (2020) (unpublished)
- GBVH ESD Reporting Protocols for Project Related Allegations and Incidents (2020) (unpublished)
- [Procedure: Harassment-free and Respectful Workplace \(2021\)](#)

IDB:

- [Preventing sexual exploitation: A practical guide to the public sector \(2021\)](#)
- [Gender-based Violence and Harassment Prevention: The Role of the Private Sector in Latin America and the Caribbean \(2020\)](#)
- [Guide to Support the Design and Implementation of Measures to Prevent and Address Discrimination Based on Gender and Sexual Orientation \(2025\)](#)
- [GPN for the Private Sector: Addressing the Risks of Retaliation Against Project Stakeholders \(2021\)](#)

- Guide to Working Places Free of Harassment (2024) (unpublished)
- IFAD:**
- [Good practices from the UNRBA for gender equality incentive and mainstreaming mechanisms \(2021\)](#)
 - [Project Procurement Guidelines \(2019\)](#)
 - SEAH Allegation Process (unpublished)
 - [SECAP Volume 2 \(2021\)](#)
 - IFAD Policy to Preventing and Responding to Sexual Misconduct A Guide for Third Parties Receiving IFAD funding for the implementation of an IFAD Activity or Operation (unpublished)
 - IFAD Third Party PSEAH Capacity Self-Assessment (2025) (unpublished)
 - IFAD PSEAH Best Practices for IFAD Third Parties (2025) (unpublished)
 - SEA FAQs (2025) (unpublished)
 - [Mainstreaming Gender-transformative Approaches at IFAD / Action Plan 2019-2025 \(2020\)](#)
- IFC**
- [Addressing GBVH: Emerging Good Practice for the Private Sector \(2020\) with the EBRD](#)
 - [Toolkit to Support Firms to Develop and Manage Community-Based SEA/SH Grievance and Feedback Mechanisms \(2022\)](#)
 - [How to Support Your Company to Develop a Community-Based Grievance Mechanism for Sexual Exploitation and Abuse \(2021\)](#)
 - [How to Support Your Company to Establish and Manage a Worker Grievance Mechanism for Sexual Harassment \(2021\)](#)
 - [How to Support Your Company to Write and Implement an Employee Code of Conduct for Prevention of Sexual Exploitation and Abuse \(2021\)](#)
 - [Addressing Gender-Based Violence and Harassment \(GBVH\) in the Agribusiness Sector \(2020\)](#)
 - [Addressing Gender-Based Violence and Harassment \(GBVH\) in the Construction Sector \(2020\)](#)
 - [Addressing Gender-Based Violence and Harassment \(GBVH\) in the Education Sector \(2020\)](#)
 - [Addressing Gender-Based Violence and Harassment \(GBVH\) in the Hotels, Catering and Tourism \(HCT\) Sector \(2020\)](#)
 - [Addressing Gender-Based Violence and Harassment \(GBVH\) in the Manufacturing Sector \(2020\)](#)
 - [Addressing Gender-Based Violence and Harassment \(GBVH\) in the Public Transport Sector \(2020\)](#)
 - [Toolkit: Supporting Companies To... Develop a Community-based Grievance Mechanism for Sexual Exploitation and Abuse \(2021\) with the Government of Canada](#)
 - [Guidance Note on Addressing GBVH: Emerging Good Practice for the Private Sector \(2020\)](#)
 - [Write and Implement a Workplace Policy for Prevention of Sexual Harassment \(2021\)](#)
 - Global Gender-based Violence and Harassment Roadmap: Action Plan for Implementation (2020) (unpublished)
 - SEAH Allegation Process (unpublished)
 - [GPN Addressing Child Safeguarding in the Private Sector](#)
- WB:**
- [GPN on Addressing Sexual Exploitation and Abuse and Sexual Harassment \(SEA/SH\) in Investment Project Financing involving Major Civil Works \(2020\)](#)
 - [GPN on addressing SEA/SH in IPF with Major Civil Works \(2022\)](#)
 - [GPN on Addressing SEA/SH in Human Development Operations \(2022\)](#)
 - [GPN on Managing the Risks of Adverse Impact on Communities from the Temporary Project-Induced Labor Influx \(2021\)](#)
 - [Guidance Note for Borrowers: Environmental & Social Framework for IPF Operations ESS2: Labor and Working Conditions \(2018\)](#)
 - [Sustainable Procurement An introduction to sustainable procurement in IPF projects for practitioners \(2023\)](#)
 - [Guidance Note for Borrowers: Environmental & Social Framework for IPF Operations ESS4: Community Health and Safety \(2018\)](#)
 - [GPN Environment & Social Framework for IPF Operations Gender \(2019\)](#)
 - [Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects \(2017\)](#)
 - [Procurement Sexual Exploitation and Abuse and Sexual Harassment \(SEA/SH\) Prevention and Response Measures Questions and Answers](#)
 - [Action Plan for preventing and Addressing Sexual Harassment FY19-21](#)

Table A.F.1. Standards covering PSEAH/GBV requirements

This table shows where SEAH/GBV risk identification and mitigation requirements appear within environmental and social policies and standards of IFIs. Only standards with explicit SEAH requirements in E&S frameworks are shown (standards such as resource conservation, biodiversity, that do not contain references to SEAH, are not included).

Key								
	PSEAH requirements stated							
	Only child SEAH requirements stated							
	Attention should be paid to gender impacts/risk (PEAH requirements implied but not stated)							
	PSEAH requirements not stated							
	Standard not present overall							
	ADB		AfDB	EBRD	IDB	IFAD	IFC	WB
	SPS (2009)	ESF (2026)	ISS (2023)	ESP (2024)	ESPF (2020)	SECAP (2021)	Performance Standards (2012)	ESF (2018)
Environmental and Social Policy	Embedded as general requirement							
Assessment and management of environmental and social risks and impacts		Standard 1	Standard 1	Standard 1	Standard 1	Embedded as general requirement	Standard 1	Standard 1
Labour and working conditions		Standard 2	Standard 2	Standard 2	Standard 2	Standard 2	Standard 5	Standard 2
Community health, safety and security		Standard 4	Standard 4	Standard 4	Standard 4	Standard 6	Standard 4	Standard 4
Gender equality					Standard 9			
Stakeholder engagement and information disclosure	Embedded as general requirement	Standard 10	Standard 10	Standard 10	Standard 10	Embedded as general requirement	Embedded as general requirement	Standard 10

Note: Since ADB is transitioning from the SPD 2009 to the ESF to be effective in 2026, both are reflected in this table.

Source: MOPAN Research on the basis of IFI Risk Frameworks. Presentation inspired by ODI document on streamlining but adapted for SEAH (ODI, 2024^[6])

In terms of SEAH grievance mechanism (GM) requirements, some differences are not presented in the table above. IFIs that do not have a standalone stakeholder engagement and disclosure standard (e.g. IFC, IFAD in table 1.3 above) that include the requirement for a GM, instead embed GMs as a general requirement of environmental and social risk management. IFC and IFAD do not explicitly mention SEAH requirements for grievance mechanisms in their E&S frameworks however, IFAD's SECAP state that "any complaints of sexual harassment, sexual exploitation or abuse received through the complaints procedure will be forwarded immediately to IFAD's Ethics Office for further action" (IFAD, 2021c_[7]).

Where risk assessments flag community health and safety risks, most IFI E&S frameworks require GMs to be able to receive and handle SEAH cases linked to the project. Where assessments flag risks to labour and working conditions, IFIs require borrowers and contractors to establish workplace GMs that can manage SEAH allegations stemming from the project workplace, including provisions for special protection measures underpinned by a "survivor-centred" approach.

The ADB (ADB, 2024a_[8]) has issued additional guidance on how SEAH grievances should be handled in its Good Practice Note on SEAH in Civil Works Projects (2023c_[9]). The WBG also provides guidance for Grievance Mechanisms in their Good Practice Notes (2022b_[10]) (2022c_[11]) and has an internal technical note on survivor centred GMs.

Annex G – Annex references

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