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**Global Green Growth Institute**

Seventh Meeting of the Management and Program Sub-Committee

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Seoul, Republic of Korea

## **Accountability and Safeguards at GGGI**

### **Introduction**

1. GGGI has been committed to international standards and best practice for accountability and safeguards from the establishment in 2010. At the Sixth Meeting of the Management and Program Sub-Committee (MPSC) in July 2017, GGGI presented a plan to develop a GGGI Accountability Framework to house existing ‘good governance’ related policies. This framework was subsequently formally approved by the Director-General in 2018. The Framework encompasses both GGGI operations and programs, and it includes policies linked to: a) Transparency; b) Clarity of roles and responsibilities; c) Effective management and use of resources; d) Accountability for results; e) Compliance and redress of grievances; and, f) Integrity.
2. The Framework allows for a more systematic oversight of GGGI’s accountability and safeguards measures, which in turns strengthens overall accountability management and leadership. The overall leadership of the Framework sits directly with the Director-General.
3. The recent focus on accountability and safeguards in international development through the #metoo-campaign and Oxfam-scandal not only reiterates the importance of having rigorous systems in place, but also that ongoing leadership is needed to firmly state our commitment to accountability and safeguards and to ensure that policies are effectively enforced.
4. Also in the context of this focus on the issues, GGGI welcomed letters from DFID and NICFI as evidence that our funding partners take accountability and safeguards seriously. GGGI responded to these letters, which prompted a review of our systems. This paper addresses the current safeguard systems and initiatives at GGGI aimed at a) creating a safe and trusted environment for GGGI’s work; b) safeguarding our work through external parties; c) ensuring integrity and strengthening anti-corruption efforts; d) creating clear procedures for dealing with incidents, allegations and grievances; and e) building a value-based organizational culture for accountability and safeguards; and f) reporting requirements. The paper also outlines planned

initiatives and continuous improvements. With this paper we solicit input and feedback from the MPSC.

## Safeguard systems in place

5. Policies under the **GGGI Accountability Framework** are designed to create a safe environment, which safeguards anyone in contact with GGGI's operations and programs, including beneficiaries, staff and volunteers. The Framework also promotes sound and efficient management of GGGI's assets and financial resources. The policies covered under the Framework include Staff Code of Conduct, Staff Regulations and Rules, Program Level Sustainability and Safeguards Rules, Procurement Rules, Private Sector Engagement Rules, Anti-corruption Policy as well as whistleblower and grievance procedures. These policies are underpinned by clear leadership and an organizational wide commitment to the enforcement of the policies, which includes trainings and dissemination of information about policies and procedures and organizational wide engagement processes for two-way communication and feed-back and continuous reviews.

## Creating a safe and trusted environment within GGGI

6. **GGGI's Codes of Conduct** clearly states that every person working for GGGI has the right to an environment free of discrimination and harassment, including sexual harassment. These terms are defined in the document. All GGGI staff go through a mandatory training on sexual harassment and abuse.
7. Any violation of our Code of Conduct will be promptly acted upon in accordance **with GGGI's Staff Rules and Regulations**, which may include issuing disciplinary measures reflecting the gravity of the misconduct.

## Engaging with external parties

8. The program level **Sustainability and Safeguards Rules** are designed to avoid, mitigate and manage environmental and social risks and maximize opportunities for co-benefits in GGGI program and projects. The rules establish the principles that GGGI upholds in its programmatic work and includes inter alia child protection - clearly stating zero tolerance for abuse and exploitation of children. All GGGI staff go through trainings on Safeguarding as part of their

induction program; and GGGI's Project Cycle Manual requires a mandatory review of all project work adherence to these rules.

9. **The Private Sector Engagement Rules** mandates due diligence in the selection of partners to examine whether a potential partner, among other things: adheres to internationally recognized principles in the areas of human rights, labor, the environment and anti-corruption, particularly, the Ten Principles of the Global Compact; and poses no undue risk to GGGI in relation to activities in which GGGI is involved. The rule also states that GGGI will not partner with private sector entities that systematically fail to demonstrate commitment to meeting internationally recognized principles in the areas of human rights, labor, the environment and anti-corruption.
10. Our suppliers of goods and services undertake to comply with the **UN Supplier Code of Conduct**, which includes a commitment to refrain from sexual exploitation and abuse.

## Integrity and Anti-corruption

11. GGGI's **Anti-Corruption Policy** promotes a zero-tolerance policy against, fraud, corruption, coercion and collusion and provides, together with the **Guidelines for GGGI Anti-Corruption and Whistleblower Policies**, guidance on reporting, investigation and response to any such integrity violations.

## Whistleblowing, complaints and grievances

12. **GGGI's Whistleblower Policy** ensures that staff as well as external whistleblowers feel safe to raise concerns regarding misconduct or integrity violations in any form without fear of retaliation. The whistle blower mechanism clearly outlines the reporting, address and redress procedures.
13. In addition, any alleged failures of GGGI to comply with its own rules and policies may be addressed through the **Compliance Review Mechanism**, or where relevant, an award complaints procedure under the **Procurement Rules**.
14. **GGGI's internal grievance procedure**, currently being rolled out, is designed to create safe and neutral handling of complaints regarding staff and manager performance and conduct.

## Creating a culture for safeguards and accountability

15. GGGI Management are committed to leadership in the areas of safeguards and accountability and seek opportunities to raise related issues with staff. Most recently, the Director-General spoke

about gender equality in the work place during an internal International Women's Day event. He also specifically raised the issue of sexual harassment and the #metoo-campaign during GGGI's Annual Meeting in March 2018.

16. **The GGGI Culture Initiative** was presented during the 6<sup>th</sup> MPSC and has since made further progress. GGGI's Core Values were articulated in early 2017 with broad staff participation. The values have been widely shared throughout the organization. They were published in GGGI's Refreshed Strategic Plan 2015-2020 and posted in GGGI's offices around the world. In 2017, an organizational wide consultation process, named "Change Circles", was rolled out to identify behaviors to be encouraged and avoided in order to build a value-based culture aligned with GGGI's mission. Infographics of these behaviors were recently shared with all country offices and HQ. The aim is to create an organizational culture where performance, interactions, processes and procedures are assessed and evaluated based on the core values.
17. GGGI's **Staff Association** is an active and influential advocate and change catalyst with special focal points addressing specific topics of concern, including sexual harassment and abuse.

## Reporting

18. GGGI will report annually in order to update all GGGI members on GGGI's work on ethics, integrity and accountability. The reporting will include both proactive work as well as investigations and actions taken in accordance with GGGI's rules and procedures due to complaints or grievances.
19. GGGI also complies with specific reporting obligations under funding agreements with donors relating to incidents of fraud, corruption, or any financial impropriety. When required, this will mean reaching out to the relevant donor's integrity unit without delay.
20. In cases of grave misconduct or integrity violations, GGGI may, as appropriate, inform one or more members on specific action or disciplinary measures taken based on GGGI's investigative findings already in connection with such action or decision being taken.
21. In addition, GGGI is developing an internal policy on reporting of criminal activities to relevant national authorities, if such cases would occur.

## Planned initiatives and continued improvements

22. GGGI works continuously to strengthen and improve its rules and standards, and on the best ways to implement these. Our commitment is to create an environment with zero tolerance for

harassment and abuse of any kind and to ensure GGGI and its staff comply with the highest ethical standards in all our work. Some of the initiatives GGGI is currently working on is set out below:

23. Human Resources and Legal are leading the introduction of a policy on respectful work environment along with new mechanisms such as staff peer advisors and ombudsman/mediation services. The new policy on respectful work environment will include the promotion of a workplace free from harassment and sexual harassment and procedures on dealing with complaints of harassment and sexual harassment, and more generally promote culture change as part of the overarching GGGI's culture change and values efforts. HR is also developing a training module for peer advisors and managers on resolving conflicts in the workplace.
24. HR is also currently updating **GGGI's Gender, Diversity and Inclusion Policy**. One of the key aspects of this endeavor is to produce a gender gap analysis report, as well as develop a strategy and action plans to promote women in the workplace. Human Resources has recently started women's empowerment initiatives.
25. GGGI is also strengthening its work on financial management by establishing a policy on anti-money laundering and combatting financing of terrorism, as well as by strengthening its due diligence processes. This will be complemented by additional training and awareness raising for staff on integrity and anti-corruption work.

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