

**Audit Trail**  
**GEFSEC Comments on Approach Paper for the Evaluation of Institutional Policies and Engagement at the GEF**  
**May 2020**

REFERENCE TEXT	COMMENTS	RESPONSE
<p><b><i>For GEF-financed activities, implemented through GEF Agencies, these policies establish minimum requirements to ensure engagement, inclusion, and avoidance of harm to people and the environment.</i></b></p>	<p>The GEF Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement set forth (1) a number of minimum standards and require GEF Partner Agencies to demonstrate that they have in place the necessary policies, procedures, systems, and capabilities to meet these standards, and (2) a number of minimum requirements. It is important that the evaluation recognize the difference of these two different kinds of minimum standards and requirements. We therefore suggest an expansion of this statement accordingly.</p>	<p>Revised.</p>
<p><b><i>This evaluation will assess the operational relevance of these policies and look at whether there is any evidence that the application of these policies has led to increased engagement, inclusion, and risk mitigation, and whether this has improved outcomes from GEF interventions over time.</i></b></p>	<p>While an analysis of the potential improvement of outcomes over time is a laudable goal for the assessment, we would like to point out that all three policies (and their effectiveness dates) are too recent to allow for the fulfillment of this objective. For the ESS Policy in particular, the recent Agency assessment (see GEF/C.57/05) found that many agencies were not yet compliant; these Agencies are therefore currently updating their ESS policies and procedures.</p> <p>Please note that this view on what may or may not be possible relative to the timing of this assessment applies to the overall approach of the paper and will be repeated in several specific comments throughout.</p>	<p>In response to these comments, and reflecting on the previous meeting with IEO/GEFSEC, the scope has been revised as follows:</p> <p>(paragraph 4): For all three policies, the evaluation will assess: the internal and external coherence of these policies, the consistency between them, and their alignment with GEF strategy; and their operational relevance including the level of buy-in across the partnership and support for implementation. Because the Stakeholder Engagement Policy has never been evaluated by IEO, the evaluation will also do a ‘deep dive’ on the effectiveness and impact of this policy, asking whether there is any evidence of improved</p> <p>Updated evaluation questions:</p> <p>Coherence/Strategic Alignment: To what extent is there strategic alignment and consistency between the Stakeholder Engagement, Gender Equality and Safeguards policies?</p> <p>Operational Relevance: To what extent is there buy-in across the Partnership and support for implementing these policies?</p> <p>Effectiveness: To what extent do GEF supported activities promote inclusive and meaningful stakeholder participation in GEF governance and operations? To what extent are the updated policies (Stakeholder Engagement, Gender Equality, and Safeguards) being applied to new GEF-financed activities and are there any lessons from early implementation of these policies?</p>

		Impact: To what extent is there evidence linking stakeholder engagement with project and program impacts?
<b><i>This will lead to better understanding of whether the application of these policies moves beyond a compliance exercise, and whether they lead to behavior change which drives improvements in design of GEF-financed interventions.</i></b>	At this early stage of application of the three policies, while there can perhaps be some very preliminary analysis of behavioral change at design, all that <u>can</u> feasibly be considered is compliance. In addition, even when a behavioral change analysis is possible, Agencies and initiatives that were already in full compliance with the policies are unlikely to register much change.	Addressed, see previous comment on scope.
<b><i>As the Partnership grew there was a need to ensure that all GEF Agencies were consistent in their policies and approaches for GEF-financed activities, including, inter alia, measures for safeguarding against environmental and social risks, ensuring adequate attention to gender and sufficient stakeholder engagement.</i></b>	Please reference here the recent compliance assessment and its findings: GEF/C.57/05, <i>Report on the Assessment of GEF Agencies' Compliance with Minimum Standards in the Policies on Environmental and Social Safeguards, Gender Equality, and Stakeholder Engagement</i> , <a href="https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF_C.57_05_Report%20on%20Assessment%20of%20Agencies%20Compliance.pdf">https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF_C.57_05_Report%20on%20Assessment%20of%20Agencies%20Compliance.pdf</a>	Revised. Added Footnote 4
<b><i>Recommendations from both documents are reflected in the Guidelines for the Implementation of the Public Involvement Policy (GEF 2014d) approved at 47th Council Meeting in October 2014.</i></b>	This is a Guidelines document and as such it did not come for "approval" by Council. Please replace with: "presented as an information paper to the 47 <sup>th</sup> Council meeting in October 2014".	Revised.
<b><i>At the 51st Council meeting, the Working Group recommended an update to the policy.</i></b>	It would be useful to include here some further detail on the Working Group: the Working Group, led and facilitated by the GEF Secretariat, presented to Council a series of recommendations to Update the Public Involvement Policy after a 2-year participatory and consultative process.	Revised.
<b><i>Clear minimum standards were identified for Agencies, to build on and complement those already established through safeguards and fiduciary standards;</i></b>	Please change "minimum standards" to "minimum requirements".  The Policy on Stakeholder Engagement was never intended to complement other Policies but rather to establish mandatory requirements on Stakeholder Engagement that would apply to all projects, irrespective of their level of social or environmental risks. We suggest an adjustment of language accordingly.	Revised.
<b><i>An updated Policy on Gender Equality (GEF 2017a) was approved by the 53rd GEF Council in November 2017</i></b>	In this statement (and also throughout the paper), we recommend that the <u>effectiveness</u> dates of the relevant policies be explicitly clarified, in addition to the approval dates, as there is often a time lag between the two.	Revised.
<b><i>The 55th GEF Council approved an Updated Policy on Environmental and Social Safeguards (GEF 2018c) in December 2018.</i></b>	As discussed in the point above, it would be instructive to adjust the language throughout the paper with respect to approval versus effectiveness dates.	Revised.
<b><i>The updated policy expands the minimum standards to new areas including...</i></b>	It would be useful if this paragraph referenced and discussed the findings and the process outlined in GEF/C.57/05.	Revised.

<p><b><i>Due to the cross-cutting nature of this topic it is likely that there are relevant findings across the portfolio of IEO evaluations, this evaluation will seek to incorporate and build on these findings where they are applicable.</i></b></p>	<p>It would be useful to explicitly discuss here the ongoing IEO evaluations on both the GEF Small Grants Program and the Country Support Program and discuss their complementarities to this study, given the role of these two initiatives in engaging with key stakeholders. The Small Grants Program in particular is a key vehicle for engagement with CSOs and indigenous peoples.</p>	<p>Agreed and revised accordingly.</p>
<p><b><i>The findings from this evaluation, especially the third learning question, can be used to help the evaluation team shape criteria to use when assessment engagement in GEF-financed interventions.</i></b></p>	<p>While the CIF Evaluations referenced in this paragraph will provide some valuable guidance to this study, these studies may only pick up issues that are particularly relevant to the MDBs.</p>	<p>Noted.</p>
<p><b><i>A number of these findings are relevant for the current evaluation and have been reflected in the evaluation questions. These include: the extent to which there is buy-in for the policies; the quality standards used during the review process; the extent to which indicators used to track progress are adequate; and an examination of capacity development to support implementation of the policies.</i></b></p>	<p>As in the point above, while the World Bank evaluations will provide some valuable guidance to this study, these studies may only pick up issues that are particularly relevant to the MDBs.</p> <p>In addition, while the point on capacity development is referenced as being reflected, this topic appears to be largely absent from the evaluation questions of this paper.</p>	<p>Noted.</p> <p>Capacity building is an important element and is reflected in the evaluation matrix under KQ 2: To what extent is there buy-in across the Partnership and support for implementing these policies?</p>
<p><b><i>The purpose of this evaluation is to provide evidence on the relevance and application of three GEF policies that promote inclusivity, engagement, and avoidance of undue harm to stakeholders: the Stakeholder Engagement Policy; the Gender Equality Mainstreaming Policy; and the GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards.</i></b></p>	<p>Please replace “Gender Equality Mainstreaming” with “Gender Equality” (this may need to be corrected in multiple places throughout the paper).</p> <p>Please replace “GEF Policy on Agency Minimum Standards on Environmental and Social Safeguards” with “GEF Policy on Environmental and Social Safeguards”.</p>	<p>Revised.</p>
<p><b><i>The objective of the evaluation is to assess how these policies have been applied over time, and to what extent there is any evidence they have impacted how the GEF identifies, designs, and implements GEF-financed interventions. The evaluation will look at these policies against the following criteria: strategic alignment, operational relevance, and contribution to additional benefits beyond the objectives of GEF-financed interventions.</i></b></p>	<p>As raised in earlier points, we are concerned that the timing of this evaluation relative to the recent effectiveness dates of the three policies may not allow for the fulfillment of this objective. There is little likelihood of finding meaningful evidence that the application of the new policies has improved outcomes. We suggest the modification of this objective (and the paper) accordingly.</p>	<p>Addressed, see previous comment on scope.</p>
<p><b><i>The evaluation will look at these policies against the following criteria: strategic alignment, operational relevance, and contribution to additional benefits beyond the objectives of GEF-financed interventions.</i></b></p>	<p>It is not clear what is intended with the criterion of: “additional benefits beyond the objectives of GEF-financed interventions”. These (and other) GEF policies are not additive to the process of project conceptualization and implementation, but rather are interwoven into project objectives and are directly related to its success. We would welcome more clarity on this point.</p>	<p>Addressed, see previous comment on scope.</p>

<b><i>Other important stakeholders include the executing agencies, operational focal points (OFPs), country governments, the Civil Society Network, staff at international environmental conventions, civil society organizations, and community members affected by GEF-financed interventions.</i></b>	An additional stakeholder that can be included here is “other environmental funds”, for example the Adaptation Fund, CIF, GCF and FFEM.	Revised.
<b><i>In line with IEO’s standard approach, the evaluation will form a Reference Group, composed of representatives from the GEF Secretariat, GEF Agencies (including UN agencies and an NGO Agency), and civil society representatives.</i></b>	Given that the evaluation has already begun, we would welcome clarity on the GEF Secretariat representatives, and on the consultations that have taken place / are taking place on this approach paper with these and other stakeholders.	The evaluation has only begun in the sense that we have hired consultants and done some preliminary interviews. We plan to form a Reference Group comprised of representation from the following stakeholder groups: GEFSEC, CSO Network, IPAG, and GEF Agencies.
<b><i>Effectiveness: Is there any evidence that these policies shape the way that GEF-financed interventions are identified, designed, and implemented ?</i></b>	As per earlier comments on timing, it may be too early in the application of these policies to answer this evaluation question, in particular with respect to implementation.	Addressed, see previous comment on scope.
<b><i>Impact: To what extent does the application of the policies matter for achievement of development objectives? Is there any evidence that these policies have led to benefits beyond the GEF environmental objectives?</i></b>	As per earlier comments on timing, it may be too early in the application of these policies to answer this evaluation question, in particular with respect to implementation.	Addressed, see previous comment on scope.
<b><i>These policies apply to the Secretariat, GEF Agencies and all GEF-financed interventions, the evaluation design will reflect this coverage, making every effort to ensure that interactions occur with all GEF Agencies.</i></b>	It seems that Agencies can only be covered in this evaluation if the projects chosen for analysis span all Agencies. Will this be the case?	Stakeholder interviews and the portfolio review are separate activities and not interdependent. However because the stakeholder engagement portfolio review goes back to GEF-5, we anticipate broad agency coverage and will also aim for broad agency coverage through other activities such as interviews and surveys.
<b><i>The timeline covered by this evaluation includes interventions financed under GEF-5 through those approved before July 1, 2020.</i></b>	Given this timeline, there appears to be little likelihood of finding meaningful evidence that the application of the new policies has improved outcomes.	Addressed, see previous comment on scope.
<b><i>An online survey will be conducted with different modules targeted at specific stakeholder groups (Operational Focal Points, Council Members, CSO Network, CSO members, Agency staff).</i></b>	It would be useful to understand how the survey respondents will be chosen, particularly with respect to the CSO network and CSO members (representatives of civil society?). An examination of the GEF-portfolio of projects (through GEF-7) may provide names of CSOs that have been engaged as, for example, project executors, co-executors, and/or co-financiers. As mentioned in an earlier point, the separate Joint Evaluation of the GEF Small Grants Programme can also provide relevant information regarding engagement of civil society in the GEF more broadly.	Revised.
<b><i>Figure 1. Key policy milestones and GEF periods</i></b>	It would be useful to also highlight in Figure 1 the windows of the effectiveness dates of the respective policies.	Revised.
<b><i>Project/program documents (especially at the PIF/PDF approval and CEO endorsement phase), terminal evaluation reports, and document templates will be reviewed to answer questions about effectiveness and impact.</i></b>	Project documents beyond PIF/CEO endorsements would not have been created in line with the latest policies, and so these will not be able to answer questions about effectiveness and impact.	Addressed, see previous comment on scope.

<b><i>This evaluation will rely heavily on feedback from stakeholders across the partnership. Interactions will take place with staff and volunteers from the following stakeholder groups...</i></b>	The GEF Gender Partnership should be included in this list of stakeholder groups.	Revised.
<b><i>It is also anticipated that this exercise [Network Analysis] could reveal examples of excellence in terms of institutions or individuals that apply the policies well.</i></b>	It is unclear how a network analysis will reveal these examples.	Revised. Please see evaluation matrix for an updated approach - stakeholder mapping (needs/yields) exercise.
<b><i>Field Visits: The evaluation will carry out field visits to project sites to conduct interviews with project stakeholders to gain an in-depth understanding of whether these policies, when applied holistically, have intended or unintended impacts.</i></b>	The approach paper in general, inclusive of field visits, stakeholder outreach and survey methods, needs to be revised in line with necessary adjustments to the COVID-19 crisis. We would welcome clarity on how the work will progress in light of these constraints.	Agreed. In the time since the approach paper was drafted the situation has changed. Additional paragraphs addressing the challenges and limitations associated with COVID-19 have been added.
<b><i>The selection of countries and intervention types will be informed by the portfolio analysis, network analysis, and stakeholder interviews and be guided by the following criteria: GEF Agency, type of executing agency, geographical distribution, and GEF focal area.</i></b>	It may be useful to also consider the additional criteria of (i) type of project (program, FSP, MSP, EA) and (ii) stage of implementation, and select representative sample points accordingly.	Agreed, added language expanding proposed selection criteria.
<b><i>The evaluation will conduct a portfolio review based on PMIS data and Annual Performance Reports.</i></b>	The GEF Portal will also be a source of information.	Revised.
<b><i>Using the review template, the evaluation team will rate projects along criteria related to application of the policies and look for any relationship between these ratings and project performance (as reflected in terminal evaluation ratings).</i></b>	All projects at TE stage in this review would not have been designed or (largely) implemented under the jurisdiction of the new policies. This methodology and/or statement therefore needs adjustment.	Addressed, see previous comment on scope.
<b><i>The approach paper will be circulated to the GEF Secretariat, the CSO Network, the Indigenous Peoples Advisory Group, and implementing agencies and the evaluation report will be shared with the same stakeholders plus relevant executing agencies and other stakeholders consulted for the evaluation.</i></b>	<p>Given that the Secretariat did not get the opportunity to formally comment on the approach paper before the Evaluation began, it would be useful to know if these other stakeholder groups have indeed been consulted as initially planned.</p> <p>The Operational Focal Points are mentioned for consultation in other parts of the paper, but not in this paragraph. We suggest consistency across the document in terms of the stakeholder groups to be consulted.</p>	We plan to form a Reference Group comprised of representation from the following stakeholder groups: GEFSEC, CSO Network, IPAG, and GEF Agencies.
<b><i>This will not diminish the ability to look at trends in application of these policies over time, given the long history and previous versions of the policies being evaluated.</i></b>	We suggest that this "Limitations" section be more clearly defined. While the paper explicitly (and correctly) recognizes as a limitation the small portfolio that is under the jurisdiction of the new policies, the statement is also made that this "...will not diminish the ability to look at trends in application of these policies over time, given the long history and previous versions of the policies being evaluated." It is unclear how this can be done.	The scope has been revised, we will conduct an in-depth review of stakeholder engagement and associated policies and guidelines (including the precursor to the current policy), looking at trends over time. The review of the Gender and Safeguards policies is more limited, as discussed in the comments on scope.
<b><i>Conducting an evaluation at this point allows for a better understanding of factors within the Partnership that matter for effective implementation of these policies. The broader impacts of the new policies could be covered as part of future IEO evaluations.</i></b>	An evaluation at this stage that is largely limited in scope to "...a better understanding of factors within the Partnership that matter for effective implementation of these policies", with broader impact left to future evaluations that will by definition have a larger evidence base, indeed seems to be	Addressed, see previous comment on scope.

	an achievable goal. However, the objectives as discussed throughout the paper move well beyond this scope.	
<b>another limitation is the number of field visits that can be carried out within the resource envelope (time and finances) for this evaluation.</b>	COVID-19 restrictions should be mentioned here as a limitation.	Limitations section has been revised to reflect considerations and limitations from the COVID-19 pandemic.
<b>Table 1. Gantt chart of project activities.</b>	As per earlier comments, this needs to be adjusted in terms of COVID-19 restrictions – the inability to do field trips, as well as the inability to conduct interviews around council gatherings and ECWs. We would also welcome a discussion of how the Evaluation intends to compensate for these unavoidable changes.	Adjusted.
<b>Evaluation Design</b>	A general comment for this section is that the new Implementation Modules in the GEF Portal can also be considered a useful source of information.	Noted and revised.
<b>Evaluation Design: Perception on whether these policies have resulted in substantial inclusion or whether this is a box ticking exercise (look for examples to illustrate)</b>	This point may not be able to be addressed due to the timing of the new policies relative to the cohort being analyzed.	Addressed, see previous comment on scope.
<b>Evidence of catalytic effect of the policies: Do GEF Agencies report that they changed their internal policies or approaches based at least in part on the GEF policies?</b>	The opposite scenario is also equally relevant: evidence that some Agencies already had minimum requirements in place prior to these three GEF policies under analysis.	Noted.
<b>Figure 2</b>	As per an earlier comment, it would be useful to also highlight the windows of the effectiveness dates of the respective policies.	Revised. Figures 1 and 2 include effectiveness dates, which have also been added in the text.
<b>The current size of the portfolio for the recently approved policies follows...</b>	It would be useful to disaggregate the portfolio size by cohort of projects.	Revised, Appendix 3
<b>Appendix 4: Updates to previous IEO Evaluations – CSO Network and Engagement with Indigenous Peoples</b>	<p>While the evaluation questions are very clear, an evaluation design matrix such as in Appendix 1 that clearly links the key questions to (i) Indicators/basic data/what to look for, (2) Sources of information and (3) Methodology would be valuable.</p> <p>It would also be useful to explicitly discuss the recommendations of the previous evaluations (upon which these evaluation questions are based) in the context of any limitations. For example, the previous CSO Network Evaluation did not identify the governance issues and conflict amongst the Network’s leadership. The CSO Network encompasses a very limited subset of civil society stakeholders, most of which are not engaged in any projects financed by the GEF. Therefore, we would recommend that this evaluation revisits and updates the evaluation of GEF’s engagement with civil society (beyond the Network) more broadly. Another example is how changes in CSO Network leadership has meant that there are not consistent IP representatives that can serve as part of IPAG.</p>	The scope, framing, and evaluation matrix have been revised accordingly. Assessing the extent to which the recommendations from the CSO Network have been taken up is a starting point, but the line of inquiry regarding how the GEF engages with CSOs will be trained more broadly on the extent to which CSOs engage with the GEF, either as part of the CSO Network or otherwise, as per the Stakeholder Engagement Policy.

<p><b><i>What is the role of IPs in GEF projects and at ECWs and Council workshops?</i></b></p>	<p>We recognize that these questions come directly from the previous evaluation, but it would be good to understand how the IEO intends to assess the question of the role of IPs in GEF projects. This question is quite substantial and requires specific discussion.</p>	<p>We have reframed the thinking about the follow-on studies, we are looking at these evaluations as key inputs into a series of questions that relate to stakeholder engagement with CSOs and IPs. As we proceed with the work plan of the evaluation, we will share sub-questions and instrument designs with the Reference Group.</p>
---	---	--