

# U4 Helpdesk Answer

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## Anti-corruption measures for locally led climate actions

Climate change interventions (i.e., mitigation and adaptation actions) are put at risk by corruption. Locally led climate actions involving actors on the 'frontlines of climate change' tend to be context specific and yield higher returns. Anti-corruption tools give climate change practitioners a better chance to deliver successful climate mitigation and adaptation projects. Such measures include enabling access to information on key subjects to the community, effective monitoring of projects by local leaders, setting up robust complaints mechanisms and whistleblower protection strategies.

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# Query

Please provide anti-corruption measures for locally led climate actions.

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## Caveat

There is limited information in the public domain for anti-corruption measures specifically pertaining to locally led climate actions. For the purpose of this paper, climate actions have been understood in a broad sense to include all types of climate change interventions (i.e., mitigation and adaptation actions). This answer aims to present illustrative anti-corruption measures that can be adapted to specific local contexts.

## Background

Climate change is a significant threat to people and their livelihoods worldwide. Climate change mitigation and adaptation actions are put at risk by corruption. For example, donors and other funding agencies invest large amounts in climate change mitigation interventions, and climate finance is a critical intergovernmental tool for countering the ongoing climate emergency (Nest et al. 2020, 5; Schran 2021). Such funds are often “stolen, wasted, or directed to suboptimal activities – all problems caused by corruption” (Nest et al. 2020, 10). Top beneficiaries of climate finance are among “the riskiest places in the world for corruption”; however,

### MAIN POINTS

- Locally led climate actions are particularly important as they are informed by first-hand local knowledge which is foundational to designing and implementing successful adaptation strategies.
- Anti-corruption tools give climate change practitioners a better chance to deliver successful climate mitigation and adaptation projects.
- Illustrative anti-corruption measures that can be applied to locally led climate actions include but are not limited to encouraging public participation, using social accountability tools, streamlining climate finance, and focusing on monitoring, learning and evaluation (MEL), amongst others.
- Locally led climate actions need to consider voices of vulnerable groups and

41.9% of all climate-related overseas development assistance goes to them (Nest et al. 2020, 3).

According to a recent [report](#) by Transparency International Bangladesh and the School of Oriental and African Studies, Bangladesh - a country highly vulnerable to climate change - loses close to 35% of climate project funds to embezzlement (Khan et al. 2020). Another analysis by Haque et al. (2020) of four projects associated with the construction, renovation and maintenance of coastal structures for disaster prevention in

Bangladesh found that between 14% and 76% of allocated funds were lost to corruption (Rahman 2021, 17).

Moreover, forms of corruption such as undue influence<sup>1</sup> can affect climate policies. For example, political interference from industries (i.e., oil and gas companies) with vested interests (whose profits depend on activities that harm the climate) can result in politicians forming policies that do not adequately address or ultimately undermine climate actions (Schran 2021).

While the socio-economic impacts of climate change are visible across all scales and sectors, the phenomenon does not affect everyone equally – vulnerable communities at the local level are disproportionately affected (Mfitumukiza et al. 2019, 3). In countries across the world, “gender and other forms of inequality and exclusion, such as those relating to poverty, race, ethnicity, disability, and age, drive vulnerability to the impacts of climate change and undermine resilience”. Indigenous or rural communities are also known to be especially vulnerable to climate change impacts (Fern and Transparency International forthcoming, 2). The COVID-19 pandemic has further exacerbated these inequalities (United Nations 2021).

Even before the ongoing pandemic, experts had estimated that between 35 and 122 million people could be additionally pushed into extreme poverty by 2030 due to climate change without “rapid, inclusive, and climate-informed development” (Hallegatte and Rozenberg 2017). In such a scenario, local level leadership of climate actions, “access to finance, climate change education and

climate-resilient learning systems, and the meaningful engagement of civil society” are considered crucial for the “effective and sustainable resilience-building efforts that leave no one behind” (United Nations 2021).

Locally led climate actions are particularly important as they are informed by first-hand local knowledge, which is essential to designing and implementing successful intervention strategies. For example, such knowledge can be key to (Mfitumukiza et al. 2019, 3):

- capture and confirm the historical and observed changes in weather patterns
- ascertain the degree to which climate-related shocks and stresses endanger people, assets and livelihoods within the context of more comprehensive local development
- shed light on the social norms (such as women’s social, reproductive and productive roles in the community) that add to the existing vulnerabilities
- understand the local skills, practices and

## Understanding locally led climate actions

**Local action** (which can be applied to mitigation and adaptation measures) is a blend of interventions undertaken by a range of actors including but not limited to, national governments, development practitioners, civil society organisations (CSOs) and private

resources for dealing with shocks and

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<sup>1</sup> Undue influence is a form of corruption in which a person or interest group influences decision makers in an opaque or disproportionate manner (Bosso et al. 2014).

sector entities that intend to support households, communities, and/or local governments in their interventions to counter impacts of climate change and strengthen resilience. These can be directed at climate mitigation or adaptation. These actions can be designed at any level: national, subnational, or local. However, they are implemented at the local level in close consultation with local stakeholders. (Mfitumukiza et al. 2019, 4).

**Community-based adaptation (CBA)** is an empowerment-based approach that promotes community-level leadership to assess risks, plan strategies, arrange the use of investment resources, implement measures and monitor the results of climate change interventions. The method targets communities as a whole – people living in a particular area, sharing a common culture, values, and norms, or those that are exposed to shared shocks and stresses. CBA involves the use of participatory processes (such as enabling access to information, as well as explaining complex climate finance related processes) to: engage and empower community members, especially marginalised people and those living in poverty; enable close partnerships with local governments; and to support community leadership and local

stresses, which can be turned toward climate change adaptation

“People and communities on the front lines of climate change are often best placed to identify solutions” and are therefore invaluable to climate change interventions (Tye and Coger 2021). Nevertheless, while designing local climate actions, it is essential to pay appropriate attention to understanding how different intersectional factors

like age, marital status, ethnicity, gender or class affect how people (and even various members of the same household) experience and respond to climate risks (Mfitumukiza et al. 2019, 3). Such an approach can help enhance the inclusivity, uptake and sustainability of climate projects and increase communities’ sense of ownership (McNamara and Buggy 2016).

Recently, over 50 institutions endorsed the eight [Principles for Locally Led Adaptation](#) after the [Climate Adaptation Summit](#) in January 2021. These principles strive to generate more inclusive decision making and leadership spaces for “local communities, local organisations, civil society groups and other local actors at the forefront of climate impacts”. The principles are as follows:

1. devolving decision making to the lowest appropriate level
2. addressing structural inequalities faced by women, youth, children, disabled, displaced, Indigenous Peoples and marginalised ethnic groups
3. providing patient and predictable funding that can be accessed more easily
4. investing in local capabilities to leave an institutional legacy
5. building a robust understanding of climate risk and uncertainty
6. flexible programming and learning
7. ensuring transparency and accountability
8. collaborative action and investment

Apart from Principle 7, which explicitly calls for transparency and accountability in locally led climate actions, other anti-corruption measures are also reflected in several principles. For example, capacity building, investing in monitoring and learning, and inclusive decision making all

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contribute to mitigating corruption risks in local climate actions.

It comes as little surprise that anti-corruption tools offer those working to curb climate change a better chance to deliver successful climate mitigation and adaptation projects. However, while some climate change interventions already make use of certain anti-corruption measures (such as “transparency in policymaking; accountability in decision making; bottom-up engagement with climate-affected communities and civil society; controls around fraud, bribery, and procurement; regulation of lobbying; and financial monitoring”), there is a “lack a comprehensive understanding of what these are, the corruption risks they target and, most importantly, if they work” which points to a need for greater research in this area (Nest et al. 2020, 11).

## Anti-corruption measures that can be applied to locally led climate actions

Local leadership and context specific strategies are vital to developing resilience to climate change impacts. However, these practices are often neglected (Illick-Frank 2020). Less than 10% of international climate funds go to local communities most directly affected by climate change (Soanes et al. 2017, 4). For example, despite its necessity, locally led adaptation, one form of local climate action, is not taking place on a large scale.

The World Resources Institute (WRI) reviewed 374 community-based projects and programmes on the topic of climate change adaptation around the world and found that only 22 (about 6%) of the

examples strongly showcased locally led elements (Tye and Coger 2021).

In many of the 22 cases identified by WRI, the community’s or their representatives’ control over funding allocations was the determinant for a project being locally led. It was understood that donors are often hesitant to invest in local actors, institutions and organisations because of external risk perceptions, high transaction costs and insufficient subnational capacities from local governments and organisations (Hesse 2017, 1).

Anecdotal evidence from the [Targeting Natural Resource Corruption](#) project also points to structural challenges that locally led models pose to participating CSOs’ standard programme design. Partly as a result of traditional hierarchical structures and lines of accountability to donors, supporting CSOs can find it difficult in practice to fully devolve design making from national headquarters to the community level.

More broadly, while “community-based anti-corruption efforts are often seen as a way to circumvent corrupt state actors”, a recent study of community-based natural resource management projects in Madagascar suggests that bypassing high level corruption in practice is extremely difficult (Klein et al 2021). Particularly where locally led climate actions affect natural resources such as timber or minerals that provide highly lucrative revenue streams for local elites, “institutional capture that effectively takes power away from local actors is a persistent challenge” (Klein et al 2021).

Accessibility is also known to hinder locally led adaptation as several intermediaries are included before funds reach the local level. Due to this, funding is “lost on the way – either due to

corruption and misappropriation in recipient countries, complex administrative processes, or resulting from a lack of directly addressing local entities with available money” (Restle-Steinert et al. 2019, 15).

Anti-corruption measures ought to ideally address these challenges in order to facilitate successful climate change interventions. However, it should be noted that, while the following sections provide insights into various types of anti-corruption measures that can be tailored to locally led climate actions, their effective application would depend on the context in which they operate (Mfitumukiza et al. 2019, 1). For example, even when considering locally led climate actions, not including voices of vulnerable groups or a failure to recognise the appropriate focus areas (i.e., disaster mitigation, agricultural support, etc.) in a specific context can result in measures that are not as effective, inclusive or long-lasting. In some cases, where locally led climate actions are not thoughtfully designed, it could result in scenarios of overburdening local partners, and consequently undermining the desired project outcomes (Tye and Coger 2021).

The first step to tailoring anti-corruption measures for climate actions is conducting corruption risk assessments<sup>2</sup> to determine the status of governance and institutional frameworks in the areas where climate interventions are taking place, map corruption risks and vulnerability areas, identify key actors and then apply tools to the context specific landscape (Chêne 2014, 5). Thus, context is key in adapting relevant anti-corruption measures to particular locally led climate actions.

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<sup>2</sup> There are several toolkits available. For example, see [Climate Governance Integrity – A Handbook for Getting Started](#).

The following sections lists illustrative anti-corruption measures/tools which can be applied to locally led climate actions. The list of measures is not exhaustive and aims to provide a flavour of existing anti-corruption tools that can be directed towards local level climate actions.

## Encourage active public participation

Involving citizens in governance often results in the increase of social trust, which in turn has been linked to reduced corruption in many contexts (UN DESA n.d.).

Participation is also highlighted in Article 6 of the 1992 United Nations Framework Convention on Climate Change, which calls for parties to promote and facilitate “public participation in addressing climate change and its effects and developing adequate responses” (UNFCCC 1992, 17).

There is a consensus on the benefits of public participation in environmental decision making. These include but are not limited to increased community acceptance and support for climate measures, developing new insights based on local knowledge and expertise, and social learning (Andersson and Kampli 2020).

Most climate change interventions have calls for public consultation processes involving multiple stakeholders, which brings ethical and practical value in formulating adaptive strategies (Few et al. 2007, 47). Concerningly, however, a recent U4 paper on lobbying around climate change policies found that the voices of local communities are typically drowned out by corporate lobbyists with

deeper pockets and, often as a direct result, greater political clout (Nest and Mullard 2021). Similarly, it is important to understand that including a broad array of stakeholders in decision making, especially in a local context, poses certain challenges, many of which are embedded in relations of power (Few et al. 2007, 49). For example, there is “overwhelming” evidence that climate change effects on women and men often differ and are further pronounced or severe in developing contexts and for some local communities and Indigenous peoples (UNFCCC Subsidiary Body for Implementation 2019, 5).

Public participation can range from “passive participation”, in which people are essentially receivers of information about decisions that have already been made, to “self-mobilisation”, where people take actions independent of external agencies. In the middle lies active consultative methods, in which affected people are encouraged to present opinions on strategies and more interactive processes. Stakeholders then participate in a joint analysis and exert more comprehensive control over decisions (Few et al. 2007, 49).

Constructive dialogue is an effective method of ensuring inclusive active participation. For example, a regeneration project was started in the housing area of Järva in Stockholm, Sweden, which would result in a decreased energy demand from 180 to 88 kWh/m<sup>2</sup> a year as part of the project. Initially the project faced strong resistance. Nevertheless, it was turned around via the process of “Järva Dialog” which was initiated by the housing company by inviting the inhabitants to open meetings and considering their input. Citizens were also made aware of how to save energy and recycle, and property managers and maintenance workers were trained to spread knowledge about sustainable lifestyles. Ultimately, a top-down project concerned only with energy efficiency was

converted into one involving public participation and local engagement (SMARTEES 2020).

## Access to climate information to facilitate participation and capacity building

Improving access to information by customising knowledge products and tools to local audiences can enhance capacity to engage in strategic design and monitoring, evaluation and learning activities for climate interventions. In such a context, CSOs and local educational institutions can act as “climate knowledge brokers”, converting data and information into knowledge for practical climate interventions, often working with local actors to coproduce knowledge on project experience (Coger et al. 2021, 7).

For example, University of Arizona’s Cooperative Extension system offers insights into context specific local adaptation, investigating adaptation methods and circulating information about local adaptation interventions to aid local governments and local actors (predominantly farmers) to make informed decisions about adapting to shifting climatic conditions (Brugger and Crimmins 2015).

In Senegal, information related to the climate is translated into local languages and communicated to community members via telephone, messaging systems and community radios. This process has been key to assisting farmers in using adaptation technologies in their intervention programmes (Ouedraogo et al. 2018, 13).

However, it is crucial to understand how access and use of climate information is often affected by gender and other characteristics of identity (for example: age, educational status) that may

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preclude its inclusiveness or reach. An analysis and redressal of such barriers is vital for effective interventions, for example through the use of vetted/appropriate intermediaries that seek to overcome such power differentials (ASSAR 2018).

## Enhance institutional and technical capacity

Grassroots organisations, local governments and other local actors often do not have all the resources they need to adequately operate (or effectively monitor). In such cases, investment in local institutions through partnerships with governments, donors and the private sector can help build capacity so that local actors are able to sustain project continuity (Tye and Coger 2021).

The Global Environment Facility (GEF) Small Grants Programme (SGP), created in 1992, for example, offers “direct and continuous technical and financial support” to local CSOs and communities through small-scale grants. These grants are based on the concept that a demonstrated, “community-driven idea” will be easier to “scale up through local networks and partner organisations” (Tye and Coger 2021).

## Use social accountability tools

Essentially, social accountability revolves around generating and articulating citizens’ voices to promote the answerability of authorities and elicit sanctions where applicable.<sup>3</sup> Accordingly, effective social accountability comprises three building

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<sup>3</sup> Clarity on sanctions is recommended for ensuring the highest level of disclosure and participation. Currently, the Green Climate Fund (GCF) acts as a primary channel to assist developing countries in adapting to and mitigating the impacts of climate change according to the Paris Agreement of 2015. While GCF’s fiduciary standards

blocks: “voice, enforceability and answerability” (Camargo 2018, 4).

Integrating social accountability in locally led climate actions can include the use of various tools such as (Camargo 2018, 2-4):

- citizen charters: this helps make citizens aware of their rights and entitlements, including shedding light on the standards they can expect (i.e., timeframe and quality), and available relief measures
- social audits: these are publicly conducted monitoring mechanisms where relevant information is “collected, analysed, and shared publicly in a participatory fashion”
- community scorecards: it is a monitoring tool that assesses services, projects and government performance by evaluating qualitative data that is collected through focus group interviews with the community
- citizen report cards: these are appraisals of services by the users (citizens) by way of feedback surveys
- participatory budgeting: is a procedure by which citizens engage directly in “budget formulation, decision making, and monitoring of budget execution”

Obtaining citizen feedback and engagement via the deployment of social accountability tools helps ascertain specific corruption risks and consequent adoption of appropriate mitigation measures.

include a range of requirements on accredited entities regarding transparency, disclosure and participation, there are certain gaps, including a lack of clear guidance on what happens if there is a mismatch between the disclosure and participation requirements of accredited entities (Transparency International 2018, 3).

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For example, in Kenya, there is a constitutional provision for citizens to engage in county governance through public participation devices to demand and improve transparency and accountability standards. In light of this, TI Kenya conducted a survey involving 7,632 respondents from 47 counties. The results showed that most respondents were not aware of the various county planning and development services. About 45% of respondents rated services (such as stormwater management systems in built-up areas) under county public works as poor. As for the level of corruption in their counties, 62% of respondents reported high levels of corruption, and 20% reported average levels (TI Kenya 2016, 19, 28).

## Streamline efficient climate finance at local levels

Corruption in climate finance means that mitigation measures cannot produce desired results and adaptation measures will be suboptimal (Nest et al. 2020, 5). To enable climate finance to be locally effective, decisions regarding how financing will be regulated and monitored ought to include “local voices so that funds reflect local needs, priorities and evolving contexts” (Tye and Coger 2021). Such involvement ought to be at the stages of decision making for financing and the monitoring of allocated funds.

In Kenya, for example, several counties have set up county climate change funds (CCCFs),<sup>4</sup> which is a method of organising and consolidating climate funding from a variety of sources to finance local climate actions. Makueni county, for example, has formulated specific regulations to provide funds for

recognised climate actions in the county. Wajir county, on the other hand, through the Climate Change Fund Act (No. 3 of 2016) seeks to safeguard appropriate coordination of finance to community-led adaptation and mitigation projects (Odhengo et al. 2019, 22).

Moreover, since the implementation process is driven by ward-level committees known as ward county climate planning committees (WCCPCs), they can actively monitor those involved in local climate projects, which further enhances accountability (Odhengo et al. 2019, 23). Ward-level planning committees are tasked with identifying climate intervention needs and are an institutional structure that connects communities to the county fund. Thus, CCCFs are designed to promote public participation in the control of climate funds (Odhengo et al. 2019, 22).

The focus areas are customised to contextual requirements in the CCCF, as they strive to improve interventions that target livestock, water, natural resource governance and climate information services (as they are relevant to different counties). In terms of infrastructure, CCCFs build on past climate funding platforms in some counties while, in others, the fund is instituted as a new enterprise (Odhengo et al. 2019, 22).

Looking at interventions in Bangladesh operating in a different context, Watkins and Khan (2021) offer two methods for making climate change intervention funding more effective. Firstly, community leaders should spearhead anti-corruption monitoring to make it more successful. Second, projects should create genuine participation and optimise the involvement of local

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<sup>4</sup> The establishment of CCCFs is one of the priorities of the National Climate Change Action Plan (2018–2022). As of

2019, five counties had established CCCFs: Makueni (2015), Wajir (2016) and Garissa, Isiolo and Kitui (2018).

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families. One way of incentivising participation is by enabling climate projects to be of “dual use”, ensuring that communities benefit not only in the future but also the present. For example, storm shelters in several Bangladeshi villages double up as public spaces for community centres, schools, etc. (Khan et al. 2020, 11).

## Focus on monitoring, evaluation and learning

Monitoring, evaluation and learning (MEL) can be optimised in locally led climate actions to “balance power, promote mutual accountability, elevate local knowledge and priorities, and create value for local actors” (Coger et al. 2021, 3).

However, conventional MEL (often characterised as “project-focused, ex-post, and designed and delivered by external international evaluation teams”) does not always meet locally led climate interventions’ needs (Coger et al. 2021, 10).

There is a requirement for a coordinated development method to create the “framework evaluation criteria, methods, terminology, goals, and financing” mechanisms to suit MEL frameworks to local priorities. Additionally, MEL systems should be built on distinctly defined “purpose- and location-specific information needs” while concentrating on enabling sharing knowledge and building capacity at local levels (Mfitumukiza et al. 2019, 10).

A recent working paper by World Resources Institute (WRI) and Global Commission on Adaptation (GCA) lists 10 methods for institutions and individual practitioners, especially donor and intermediary organisations, to sync MEL with the principles of locally led interventions (Coger et al. 2021, 15-17):

- structural inequalities should be recognised and addressed by all actors in the MEL process
- there should be an equal or greater priority to downward accountability and learning than upward accountability in MEL processes. This can be achieved by allowing local partners to define learning goals and collaborate in their decisions to choose those programmes that adequately support these goals
- enable MEL methods that are value-creating for local actors
- acknowledge local needs when building capacity for “self-directed MEL”
- execute appropriate processes to enhance understanding of complexity and uncertainty concerning climate dynamics and locally led intervention contexts and settings
- generate locally applicable and context specific indicator frameworks and metrics
- use MEL tools to enable increased local ownership, voice, participation and representation
- create techniques to encourage management, experimentation and learning from failure
- employ relevant “knowledge brokers” to enable ownership and contributions by local partners
- ensure learning is being employed, recorded and shared

In Kenya, the County Integrated Monitoring and Evaluation System (CIMES) developed an indicator handbook for the county integrated development plans (CIDPs). The handbook focuses on the training of all actors to track climate intervention expenditure (for example, understanding budget codes) (Odhengo et al. 2019, 25).

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The Consortium of International Agricultural Research Centres (CGIAR), under its Research Program on Climate Change, Agriculture and Food Security (CAAFS), has developed a climate-smart villages (CSV) project which assists farmers to identify approaches for modifying farming practices to climate impacts. These are applied through bottom-up evaluation approaches using surveys, evaluations by farmer groups and information and communications technology (ICT) feedback mechanisms like crowdsourcing. The result is “response-based evidence” on the effects of climate change on agriculture, which is customised to “hyperlocal contexts” by being locally driven. Additionally, this local learning is made globally available through an online platform, allowing a variety of actors (including both funders and farmers) access to this information in real-time (Tye and Coger 2021).

Such “climate-smart villages” in Africa and Asia have led to collaboration between “researchers, international and local NGOs, governments, community groups, rural agro-advisory service, village officials, and farmers to evaluate, learn, and maximise synergies across climate-smart agricultural interventions” (Mfitumukiza 2019, 10). In the first phase from 2011-2014, as many as 18 climate-smart villages were successfully established across West and East Africa, South and Southeast Asia, and Latin America. By 2017, a total of 35 were actively managed by CCAFS and partners, covering 20 countries (CGIAR 2021).

In terms of showcasing examples of dynamic learning, the Climate Adaptation through Sustainable Urban Development research project in South Sulawesi Province, Indonesia, tested several qualitative and quantitative participatory assessment approaches to comprehend the value

added in creating a learning culture in its water resilience project (Coger et al. 2021, 14).

## Encourage inclusive and innovative projects through competitive and performance-based funding criteria

Innovative programmes that are inclusive and seek to build on local contextual conditions in terms of “design, funding proposal, and subsequent implementation” should be favoured when allotting climate funds to mitigate corruption risks (such as nepotism and favouritism). A greater focus on local needs and outcomes can be created by introducing competitive elements in fund allocation and performance-based funding. “Strong, localised, and targeted project proposals at the local level” can be effectively supported by aligning impact priorities with competitive selection criteria (Restle-Steinert et al. 2019, 29).

Performance-based funding that works with performance criteria during a more extended timeframe helps smaller pilot programmes ascertain the appropriate communities or projects to support throughout the disbursement process in different phases (Restle-Steinert et al. 2019, 30).

For example, the Local Climate Adaptive Living Facility (LoCAL) of the UN Capital Development Fund (UNCDF) was established in 2011 to address the “unfunded mandate of local authorities in implementing climate change adaptation”. It essentially serves as a tool to integrate the climate adaptation agenda into local agencies’ planning and budgeting practices, promote awareness of and response to climate change at the local level, and improve the amount of finance available to local authorities (UNCDF 2014). LoCAL combines performance-based climate resilience grants

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(PBCRGs), ensuring the local level's programming and verification of climate change expenditures, with technical and capacity-building assistance (Restle-Steinert et al. 2019, 39).

## Effective complaints mechanism and whistleblower protection

Complainants support these processes by being the “eyes and ears about compliance problems” (European Union 2020). They can be particularly beneficial in highlighting issues of corruption. For example, informants reported the “corruption of key officials, collusion between contractors and the implementing agency, as well as resource leakage and use of poor-quality materials” in storm shelter construction projects being implemented at the local level in Bangladesh (Khan et al. 2020, 25).

Apart from traditional grievance tools, dispute redressal mechanisms and whistleblower protection also play an essential role in improving ownership and accountability at the local level in climate projects (Ardigó 2016, 11). For example, the Green Climate Fund (GCF) has an independent redress mechanism, allowing beneficiaries to file complaints against GCF funded projects that violate its social and environmental provisions (GCF 2020).

Whistleblower mechanisms could also be designed to be sensitive to gender differences. For example, mobile units and face-to-face communication is often preferred by women when reporting corruption (Zúñiga 2020, 8).

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## **KEYWORDS**

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