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Public Participation and Oversight in Climate Finance

A Rapid Assessment Checklist

Rapid Assessment Checklist

Public Participation and Oversight (PPO) in Climate Finance Processes

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1. Background

Climate finance has emerged as one of the most significant and rapidly evolving areas of international development funding. The Green Climate Fund (GCF), for instance, has already committed over USD 20 billion to climate-related projects in more than 100 developing countries. Alongside this, a growing ecosystem of multilateral, bilateral, and national climate funds channel hundreds of billions of dollars each year to governments, banks, NGOs, and private sector actors to drive climate mitigation and adaptation activities.

Yet, the governance of these funds, i.e., how decisions are made, who benefits, how project implementation is monitored, and what happens when goals are not met, remains uneven. Communities most vulnerable to climate change often have the least voice in the projects designed to protect them. Environmental and social safeguards are agreed at international level but do not always translate into practice at the national or subnational level. Corruption risks that are well-documented in other public finance domains are equally present in climate finance but have so far received comparatively limited systematic civil society scrutiny.

Transparency International's (TI) broader work on public participation, including the SANCUS Assessment Toolkit on Public Participation in Budget Processes (see here), has shown that meaningful and inclusive participation requires the right enabling conditions and robust mechanisms in practice. Beyond this, evaluating and assessing these conditions systematically, and doing so in a way that is grounded in evidence, is a prerequisite for advocacy and reform.

This Rapid Assessment Checklist on Public Participation and Oversight in Climate Finance (**PPO Checklist**) applies the same overarching logic, though tailored specifically for the climate finance context. Intentionally leaner than a full assessment toolkit, the PPO Checklist contains 11 core indicators, 4 pillars, and a simple traffic light scoring system, designed to be completed in a short amount of time using publicly available information and a small number of key interviews.

1.1 The Green Climate Fund

The GCF is used as an anchor for the development of the PPO Checklist for two reasons. First, the GCF is the largest dedicated climate fund under the UNFCCC and has developed a relatively comprehensive set of policies and regulations on a range of areas including on information disclosure, environmental and social safeguards, gender, grievance redress, and stakeholder engagement. Entities accredited by the GCF, also known as Direct Access Entities (DAEs), are expected to operate in alignment with these policies and, therefore, provide a ready-made baseline for good practice.

Second, GCF DAEs, i.e., national and subnational institutions directly accredited by the GCF to develop and manage funded projects, are an especially relevant entry-point for civil society engagement and oversight. As nationally based entities, they are both accessible to TI chapters and accountable to the communities they serve.

That said, TI's PPO Checklist is not exclusively a GCF tool. The indicators are grounded in the universally applicable good governance principles of transparency, participation, inclusion, independent oversight, and accountability, and can be applied to *any* institution that receives climate finance, regardless of the source of funding, type of institution, or country context.

1.2 The Pilot: Honduras, Nepal, and Zambia

The PPO Checklist will be piloted through three TI national chapters, each assessing a GCF DAE operating in Honduras, Nepal, and Zambia. These three pilots were selected to field test the checklist across different types of institutions and across different regional contexts.

	Honduras	Nepal	Zambia
GCF Direct Access Entity	Central American Bank for Economic Integration (CABEI)	National Trust for Nature Conservation (NTNC)	Zambia National Commercial Bank (Zanaco)
TI Chapter	Asociación para una Sociedad más Justa (ASJ, TI Honduras)	Transparency International Nepal	Transparency International Zambia
Entity Type	Regional Development Bank	National Non-Governmental Organisation	Private Sector / Commercial Bank

Findings and lessons from the three pilots will inform a final version of this checklist and will support collaboration with the assessed institutions on strengthening public participation and oversight in their respective climate finance portfolios.

2. Scope and Application

The PPO Rapid Assessment Checklist is designed to assess the extent to which any institution receiving climate finance provides meaningful opportunities for public participation in, and facilitates effective public or civil society oversight of, its climate finance projects and activities. It is applicable to:

- National climate finance institutions and funds (e.g., national implementing entities, green funds, climate trust funds etc.).
- Direct Access Entities (DAEs) accredited to multilateral climate funds, such as the Green Climate Fund (GCF), Adaptation Fund, or Global Environment Facility (GEF).
- Private sector bodies (e.g., banks, investment funds, companies etc.) that receive public climate finance and implement climate-related projects.
- International implementing entities operating at a country-level, where a national civil society assessment of their local practice is necessary or would be helpful.

The checklist aims to assess and understand what institutions do in practice; beyond the information they publish or put on paper. Each indicator explicitly explores whether policies and mechanisms are implemented in practice, not merely whether they exist as written commitments. This distinction is central to the checklist's value as a practical diagnostic tool.

It is also important to note that the checklist does **not** endeavour to assess the technical quality or climate ambition of funded projects. It focuses exclusively on governance, i.e., how institutions engage the public, whether they are transparent about their activities and finances, and whether adequate mechanisms exist for independent oversight and redress.

3. Methodology

3.1 The Scoring System

The indicators in the PPO Checklist are scored using a simple three-point 'traffic light' scale:

Score	Rating	What It Means
Fully Met – 2	**Green**	A formal policy or mechanism exists, is publicly available, and there is clear evidence of consistent implementation in practice.
Partially Met – 1	**Yellow**	A policy or mechanism exists on paper but is vague, incomplete, or implementation is inconsistent or ad-hoc. There is limited evidence that it functions in practice.
Not Met – 0	**Red**	No formal policy or mechanism exists, or the practice is entirely absent. No evidence of any relevant action or initiative.

Scores should always be accompanied by a brief justification and reference to *at least* one source of evidence (e.g., a document with a page reference, a link to a website, or the anonymised details of a key informant). This justification and evidence serve to distinguish a credible assessment from an unsubstantiated opinion.

Assessors should assign an appropriate score based on all relevant evidence gathered through a combination of research methods, such as desk research, key informant interviews, and focus group discussions (see section 3.3 below).

Where a score of 1 (yellow) or 0 (red) is assigned, the assessor should indicate specifically how the institution falls short. This may include the need for a more explicit policy, stronger implementation, better outreach to marginalised groups, or greater efforts to ensure public visibility. This level of detail and specificity can help inform targeted advocacy and smarter recommendations.

Not Applicable	**Grey**	The indicator is inapplicable or irrelevant in the assessed context. An indicator would not be applicable only in exceptional and justified circumstances.

In rare and exceptional circumstances, assessors may find that a particular indicator is inapplicable or irrelevant in a specific context. If so, non-applicability would need to be triangulated through multiple sources of evidence, with assessors expected to justify why an indicator does not apply.

3.2 Interpreting the Score

Once the indicators have been scored, assessors are expected to total the scores and refer to the following performance bands:

Score	Rating	What It Means
18 – 22 **(80 – 100%)**	**High**	The assessed institution demonstrates high or strong performance across most areas of public participation and oversight. Gaps may exist but are isolated.

11 – 17 **(50 – 79%)**	**Moderate**	The assessed institution has *some* meaningful participation and oversight structures or practices in place, but gaps remain. Targeted reforms are necessary.
0 – 10 **(0 – 49%)**	**Low**	Fundamental gaps exist across most areas assessed at the institution. Substantial reform is needed to ensure meaningful participation or oversight.

Assessors may also choose to report scores and sub-totals at the level of each pillar. For example, how the institution performs on transparency indicators, or oversight and accountability indicators, can be reported on their own to provide a more granular picture of institutional strengths and weaknesses. This can be especially useful when advocating for reforms in a specific area.

3.3 PPO Checklist Implementation Guide

The PPO Checklist is designed to be completed in a period of approximately **2 weeks** by a small team of assessors. In the context of this checklist, 'assessors' refers to TI chapter or partner civil society representatives conducting the assessment. It is possible that the proposed timeline for implementation differs for better or worse, based on a variety of different factors including the responsiveness of the assessed institution and the availability of public information.

- **STEP 1: Selecting an Institution** (1 - 2 days)

Identify the institution to be assessed and confirm that it is an appropriate subject for the PPO rapid assessment checklist. Relevant considerations may include whether the institution receives climate finance and if it operates in the assessor's national or local context.

In parallel, assessors are encouraged to scope out and gather basic background information on the institution, such as the institution's mandate, the climate funds it is accredited to, the portfolio of projects it manages, and any existing public assessments or audit reports. This helps the assessors better understand the institutional context prior to collecting evidence against specific indicators.

- **STEP 2: Desk Research** (3 - 4 days)

Review publicly available documents and online sources to effectively evaluate and assess the institution's performance against each checklist indicator. Key sources include the institution's website, annual reports, environmental and social management plans and frameworks, minutes from board meetings, or any funding proposals that are publicly disclosed, including those available on websites of climate funds.

Note: Before commencing desk research, explore climate fund databases, such as the GCF's project database, for any funded projects associated with the assessed institution. This can often lead to a wealth of publicly accessible documentation. For example, GCF funding proposals, environmental and social safeguard reports, and board decisions are publicly available by policy. Their absence itself may be evidence that can be used when scoring.

- ### **STEP 3:** Interviews and Discussions (3 - 4 days)

Conduct a feasible number of targeted key informant interviews and/or focus group discussions to, *inter alia*, obtain further information and verify whether written policies are working in practice. Aim for at least three to four interviews across different groups of stakeholders. These may include one or two representatives from the assessed institution (ideally someone working in the areas of governance, compliance, or communications), one civil society group working in the areas where the institution's climate projects are being implemented, and where possible, a community member affected by the project, or a relevant local government representative.

Assessors are encouraged to approach these conversations constructively, framing the assessment as a collaborative exercise to identify reform opportunities, as opposed to a public audit.

- ### **STEP 4:** Scoring and Drafting the Assessment (3 - 4 days)

Use the scoring table in section 5 (see here), assign a consolidated score to each indicator based on a balanced assessment of the evidence collected. For each score, provide a brief justification (in two to three lines) explaining why that score was provided and citing at least one clear source of information. Assessors should avoid vague or unsubstantiated reasoning, noting that the strength and credibility of the assessment depend on traceable evidence.

Once all indicators have been scored, calculate the total score for public participation and oversight at the assessed institution and note which areas or pillars show the biggest gaps.

- ### **STEP 5:** Validation and Feedback (1 - 2 days)

Share the draft findings, preferably in summary form, with the assessed institution and offer them a fair opportunity to respond before the assessment is finalised. This validation step further strengthens the credibility of the assessment and opens a channel for constructive dialogue. It also models the spirit of accountability the checklist is designed to promote. Record whether the institution engages with the findings or disputes specific scores, inviting them to provide additional evidence or feedback where relevant.

The final assessment report should include a brief profile of the institution and context, a summary scoring table, indicator-specific narrative findings, and three - five concrete recommendations for reform linked to the findings and gaps.

4. PPO Checklist Indicators

The 11 indicators below are organised across 4 pillars. Each indicator includes a brief description of what to assess and questions to ask, along with a note on the potential alignment of indicators with GCF policies and standards, or to their broader relevance to climate finance governance frameworks and principles.

#	Indicator	What to Assess / Guiding Questions	GCF / Governance Link
PILLAR 1: Transparency & Access to Information			
1	**Proactive Disclosure**	Does the institution proactively publish project proposals, environmental and social impact assessments, funding details, and implementation plans on their website and/or via other publicly accessible channels before project approval? Is this done sufficiently in advance for public review?	This indicator applies to any climate fund operating under transparency norms. The GCF Information Disclosure Policy requires Category B/I-2 environmental and social reports to be disclosed at least 30 days before Board approval. Category A/I-1 projects require 120 days.
2	**Language & Accessibility**	Are key project documents consistently translated into relevant local languages and shared through channels that are accessible to non-technical and rural stakeholders? Channels may include community radio, town halls, local language summaries, public consultations etc.	This indicator is essential for 'meaningful and inclusive' participation as articulated in the GCF Environmental and Social Policy, as well as the UN Declaration on the Rights of Indigenous Peoples, which underpins GCF's Indigenous Peoples Policy.
3	**Financial Traceability**	Does the institution maintain a publicly accessible registry, dashboard, or reporting mechanism showing the flow of climate funds, e.g., from the institution to sub-entities or to other project partners? This may include financial information on disbursements, contracts, and other project-related expenditures.	Fiduciary standards across global climate funds require entities that receive such funding to demonstrate financial management capacity and transparency. The GCF's own 'presumption in favour of disclosure', as per the Information Disclosure Policy, applies to all funded activities.
PILLAR 2: Participation			

4	**Stakeholder Engagement & Consultation**	Does the institution possess a formal, documented process for engaging and consulting civil society organisations, members of the public, affected communities, and/or other relevant stakeholders during project design, selection, and implementation, i.e., before key decisions have been made? This may include timely engagement in project approval discussions, budget allocation meetings, or in the oversight of project implementation.	The GCF Environmental and Social Policy requires 'meaningful stakeholder engagement' as a key safeguard standard. A Sustainability Guidance Note linked to this policy goes on to outline clear measures and expectations for managing and documenting consultations.
5	**Advance Notice**	Are stakeholders notified of public consultation and participation opportunities with adequate advance notice? Are stakeholders provided accessible background information and material that enables them to participate in an informed and substantive manner?	According to best practice on public participation, adequate prior notice and the provision of relevant contextual information, in accessible formats, are essential prerequisites for stakeholder engagement. The GCF Environmental and Social Policy includes these prerequisites, emphasising the importance of engaging stakeholders "early and often".
6	**Feedback Loop**	To what extent does public and civil society input inform and influence the final project design and/or project implementation? Is there a documented process showing how public and/or civil society input collected during consultations is considered by the institution? Does the institution inform the public and other stakeholders about the outcome of projects?	Efforts to close the feedback loop helps the public feel that their views are taken seriously and encourages sustained and constructive engagement. The GCF's Environmental and Social Policy requires DAEs to develop strong stakeholder engagement strategies, which include documenting stakeholder views and demonstrating how these views have been taken into account.
PILLAR 3: Inclusion			
7	**Gender Responsive Participation**	Does the institution have dedicated mechanisms to ensure meaningful gender-responsive participation in climate projects and processes?	Drawing on the policies and best practices of other international organisations, the GCF's Gender Policy (adopted in 2015, updated 2019), and associated Gender Action Plans, commit all GCF-

		These may include gender quotas, targeted outreach measures, the provision of safe spaces, or gender-disaggregated tracking and reporting.	funded activities to gender-sensitive and gender-responsive approaches. DAEs are also required to develop and implement project-level Gender Action Plans.
8	**Vulnerable & Marginalised Groups**	Does the institution undertake targeted measures to actively include Indigenous Peoples, youth, persons with disabilities, and other vulnerable or under-recognised groups in consultations and decision-making processes? Are measures being taken to proactively identify, engage, and track the inclusion of such groups?	This indicator recognises that climate finance projects should respond to the needs and priorities of those most affected by climate change. The GCF's investment criteria includes a co-benefit indicator for social inclusion and vulnerability. GCF's Indigenous Peoples Policy and Environment and Social Policy both require institutions to ensure Free, Prior, and Informed Consent (FPIC) for stakeholders in relevant projects.
PILLAR 4: Oversight & Accountability			
9	**Social Accountability**	Does the institution recognise, support, or fund independent civil society and/or public oversight initiatives? These may include a range of social accountability approaches, tools, and mechanisms, such as independent social audits, collaborative integrity initiatives, third-party monitoring efforts, and other community-led verification processes, beyond the institution's own internal audit and formal reporting measures.	The GCF's monitoring and evaluation frameworks require DAEs to submit annual performance reports. Community- and civil society-based oversight goes a step further by allowing institutions to align with best practices in anti-corruption, including those advocated by the GCF's Independent Integrity Unit (IIU).
10	**Grievance Redress**	Does the institution have a functional, accessible, and safe channel through which project-related stakeholders, including vulnerable groups, can lodge complaints and grievances? Is there a clear process in place the institution to acknowledge, investigate, escalate, and resolve complaints? Does the institution, either formally or by practice, publicly disclose information on	GCF accreditation standards and frameworks require DAEs to have a functioning Grievance Redress Mechanism (GRM). Where project-level mechanisms are considered inadequate or inaccessible, the GCF's own Independent Redress Mechanism (IRM) accepts complaints from affected individuals.

		complaints received, their status, and outcomes in a full and timely manner?	
11	**Whistleblower Protection**	Does the institution have a clear, robust, and comprehensive policy protecting, *inter alia*, employees, partners, and community members who report corruption, fraud, environmental violations, and/or other misconduct from retaliation? If so, what evidence is there of this policy being implemented in practice?	Recognising that the protection of whistleblowers and witnesses is a key fiduciary standard, the GCF's Policy on the Protection of Whistleblowers and Witnesses considers retaliation against whistleblowers a "prohibited practice". While the GCF works to evaluate and strengthen their own WB policy, the GCF IRM's retaliation protection measures and the GCF IIU's integrity mandate require that DAEs apply the same norms and do not tolerate or contribute to retaliation against those raising concerns.

5. PPO Checklist Assessment Template

Assessors are invited to use this assessment template to record scores and findings for each of the PPO Checklist Indicators. Each indicator can receive a score of 0 (red), 1 (yellow), or 2 (green). Please note that each score must be accompanied with a clear justification and reference to relevant sources of evidence.

All 11 indicators under the 4 pillars of assessment reflect universally applicable principles of good governance and thus can be applied to **any** institution that receives climate finance. A score of 'not applicable' should only be recorded in exceptional and justified circumstances.

Assessed Institution:	
Country of Assessment:	
Period of Assessment:	
Assessed by:	

#	**Indicator**	**(2)**	**(1)**	**(0)**	**N/A**
Pillar 1: Transparency & Access to Information					
1	**Proactive Disclosure**				
Justification:					
Sources of Evidence:					
2	**Language & Accessibility**				
Justification:					
Sources of Evidence:					
3	**Financial Traceability**				
Justification:					
Sources of Evidence:					

Pillar 2: Participation						
4	**Stakeholder Consultation**					
Justification:						
Sources of Evidence:						
5	**Advance Notice**					
Justification:						
Sources of Evidence:						
6	**Feedback Loop**					
Justification:						
Sources of Evidence:						
Pillar 3: Inclusion						
7	**Gender-Responsive Participation**					
Justification:						
Sources of Evidence:						
8	**Vulnerable & Marginalised Groups**					
Justification:						
Sources of Evidence:						

Pillar 4: Oversight & Accountability					
9	**Social Accountability**				
Justification:					
Sources of Evidence:					
10	**Grievance Redress**				
Justification:					
Sources of Evidence:					
11	**Whistleblower Protection**				
Justification:					
Sources of Evidence:					

PPO Checklist Assessment Summary

PPO Checklist Assessment	Score	%	Rating
Pillar 1: Transparency & Access to Information	- /6	-	
Pillar 2: Participation	- /6	-	
Pillar 3: Inclusion	- /4	-	
Pillar 4: Oversight & Accountability	- /6	-	
Public Participation & Oversight (PPO) Score	**- /22**	**-**	

6. Sources of Evidence

The use of multiple and varied sources of reliable evidence is essential to delivering a credible assessment. The PPO Rapid Assessment Checklist requires assessors to use the template above and document sources of evidence for each of the assessment indicators. While assessors may obtain relevant evidence and information from a wide range of different sources, the following may be especially relevant for this checklist:

6.1 Document-Based Sources

- The GCF project database may provide information on GCF-related funding proposals, ESS reports, and board decisions for projects associated with the assessed institution.
- The website of the assessed institution may provide relevant information through annual reports, project pages, policy documents, board meeting minutes, and other proactively disclosed data, including data on complaints and grievances.
- National legislation and regulations relevant to the governance of climate finance, public participation, and whistleblower protection.
- Previous assessments, audits, or evaluations of the assessed institution by the institution itself, government, donors, or independent oversight actors.

6.2 Interview-Based Sources

- Staff and leadership of the assessed institution, especially those responsible for compliance, communications, gender, and/or community relations.
- Local civil society organisations working in project areas of the assessed institution, or those with direct knowledge of the institution's community engagement practices.
- Where safe and practical to engage local communities, community representatives or people affected by projects delivered by the assessed institution.
- National Designated Authorities (NDAs), or government institutions responsible for coordinating global climate fund engagements at national level.

6.3 Confidentiality

It is possible that key informants interviewed in the implementation of the PPO Rapid Assessment Checklist may sometimes request confidentiality. In such cases, assessors should record and present the broad category of the source of evidence, such as "local NGO representative, anonymised", instead of providing identifying details.

Prior to conducting interviews, assessors should inform all interviewees of the purpose of the assessment, how findings will be used, and the option to remain anonymous. For community members it is particularly important to avoid registering any identifying information without free, prior, and informed consent.

7. Public Participation & Oversight: From Findings to Action

The purpose of the PPO Rapid Assessment Checklist is not simply to produce a score and rate an institution on their performance against indicators. It is, more crucially, to generate strong evidence that supports informed, constructive engagement between civil society, climate finance institutions, and climate funds, towards strengthening public participation and oversight in the governance of climate finance.

In the spirit of this objective, once the PPO assessment is complete and the findings have been validated, civil society and/or those leading the assessment process, may consider the following next steps:

- Share the final assessment findings with the assessed institution and offer dialogue on reform opportunities, grounded in evidence from specific indicators and areas where gaps and deficits were identified.

- Share the final assessment findings with the relevant National Designated Authority, or the government institution responsible for coordinating climate fund engagement in the country. These authorities often have a formal role in overseeing the activities of entities that receive climate finance.

- Where the assessed institution is a Direct Access Entity of the Green Climate Fund (GCF), and where significant compliance gaps are found, consider whether findings warrant engagement with the GCF Secretariat or the GCF Independent Integrity Unit (IIU) at the global level.

- Use the final assessment findings to inform and design national advocacy on climate governance reform including, for example, by advocating for stronger national regulations on public participation and oversight in climate finance, or for greater access to information on climate finance projects.

- Share the final assessment findings and emerging best practices with other civil society organisations, including the TI Movement, to broaden the evidence base on climate finance participation and oversight, and encourage other civil society to replicate similar assessments in other contexts.

Alongside these advocacy efforts, assessors are strongly encouraged to re-administer the PPO Rapid Assessment Checklist periodically, ideally every year, to follow-up and track whether the assessed institution's performance improves over time. Documenting changes, or the lack thereof, in this way can be a powerful accountability tool as well.

About the PPO Rapid Assessment Checklist

The Rapid Assessment Checklist on Public Participation and Oversight (PPO) in Climate Finance was developed by Transparency International (TI), in consultation with national chapters and global partners involved in the PPO pilot initiative in Honduras, Nepal, and Zambia.

The PPO Rapid Assessment Checklist draws on the approach and methodology of TI's Assessment Toolkit on Public Participation in Budget Processes developed under the SANCUS project in 2022 (see here), and adapts it for use in the context of climate finance. It is primarily designed for use by TI national chapters and civil society organisations as a practical diagnostic and advocacy tool.

The author is grateful for the support and valuable feedback of all those involved in the design and delivery of this initiative, including Alice Gracy, Brice Böhmer, Daniela Patiño Piñeros, and Madhumitha Srinivasamoorthy at the Transparency International Secretariat, Dineyla Erazo and Mario Alejandro Romero at the Asociación para una Sociedad Más Justa (ASJ / Transparency International Honduras), Ashish Thapa, Babita Sharma, and Tumburu Gautam at Transparency International Nepal, and Sandie Sikazwe and Tamika Halwiindi at Transparency International Zambia.

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Feedback and suggestions on the PPO Checklist and pilot initiative are welcome and will inform future iterations. Please address such feedback, or interest in using the PPO checklist in your own work, to the author, Anoukh de Soysa, Climate Governance Specialist at Transparency International, at adesoysa@transparency.org.

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