

| MANAGEMENT RESPONSE | |
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| Evaluation title: | Evaluation of UNHCR's Approach to Gender Based Violence Prevention, Risk Mitigation, and Response (2020-2024) |
| UNHCR evaluation reference: | EvO/2025/09 |
| Entity that commissioned the evaluation: | Evaluation Office (Geneva) |
| Due Date for Management Response: | 15 September 2025 |
| Date Management Response Completed: | 23 September 2025 |
| Coordinator of the Management Response: | Bernadette Castel-Hollingsworth, Deputy Director, Field Protection Service, Division of International Protection and Solutions (DIPS), UNHCR Geneva, Headquarters |
| Management Response cleared by: | Ruvendrini Menikdiwela, Assistant High Commissioner for Protection, UNHCR Geneva, Headquarters |

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| General comments on the evaluation: | <p>The evaluation into UNHCR's approach to Gender-based Violence prevention, risk mitigation and response is a timely opportunity to take stock of progress made towards the implementation of UNHCR's policy on GBV.</p> <p>The evaluation report is notable for its broad stakeholder engagement and commitment to upholding GBV standards. In particular, the evaluation has provided useful direction on content to be included in future operational guidance in support of UNHCR policy.</p> <p>The feasibility of addressing some of the recommendations may be limited due to the following critical challenges:</p> <p>Resource constraints: the impact of broad budget reductions will hamper implementation at the operational level. The number of trained personnel will also be limited.</p> <p>Context implementation: UNHCR's targeted role implementing GBV programming in IDP settings will be influenced by the operational presence of other actors.</p> |
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| RECOMMENDATION 1: | | <u>Align planning and resource allocation with GBV needs and prioritization</u> | | |
| | | <p><i>Rationale: The evaluation found that the delivery of GBV policy objectives has been constrained by limited accountability for mandatory policy implementation and that prioritization of GBV is often driven by individual staff advocacy rather than robust institutional mechanisms. As seniority of GBV positions is reduced, so is staff ability to occupy leadership spaces and advocate for prioritization in funding allocations. UNHCR must elevate GBV as a strategic priority at the institutional level and actively prioritize core funding to safeguard GBV prevention and response programming.</i></p> <p><u>Proposed Actions:</u></p> <ol style="list-style-type: none"> I. Draw from operations' risk registers and GBV policy self-assessments to establish an annual global GBV risk register that allows for ranking of priority countries/operations requiring support. II. Implement a budget red-flag mechanism to trigger early leadership action when resources for GBV interventions are disproportionately de-prioritized compared to other Outcome areas, in alignment with situational analyses of contexts most in need. III. Diversify funding streams by developing multi-year GBV funding flagship proposals with diverse donors to advance innovative and impactful interventions while stepping up efforts to fundraise with private sector, foundations and individual giving. | | |
| Management response: | | <input type="checkbox"/> Agree <input checked="" type="checkbox"/> Partially Agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | Partially agree with proposed action 2. See comments in point 2 below. | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 1 | Draw from operations' risk registers and GBV policy self-assessments to establish an annual global GBV risk register that allows for ranking of priority countries/operations requiring support. | DIPS and DDRM | To help prioritize support and second line interventions on GBV, the ERM Section of DDRM can work with DIPS to develop a GBV Risk Index ranking operations by risk. Such an index could draw on a mix of externally generated metrics of the environment in the host country as well as internal UNHCR data. This index would not rely on the identification of GBV risks in the Operational Risk Register but would rather serve as a validation for the identification of such risk. | December 2026 |
| 2 | Implement a budget red-flag mechanism to trigger early leadership action when resources for GBV interventions are disproportionately de-prioritized compared to other | DSPR/DFAM, DEPS (Division of Emergency and Programme Support), | In line with the Policy on Resource Allocation and Management, operations develop their multi-year strategies and annual budgets, allocate and prioritize available resources during the year based on a number of planning parameters, including Strategic Directions, which prevention and response to GBV is one of the corporate priorities. While decisions on resource allocation and management are informed by multiple | Ongoing |

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| | Outcome areas, in alignment with situational analyses of contexts most in need. | DIPS, Regional Bureaux, Country operations | considerations, including operational context, commitments to donors, criticality of needs and others, it is important that such decisions are based on data and information available at all levels of delegation. UNHCR acknowledge that the key issue to be addressed is the early warning of changes to prioritization during the year of implementation. UNHCR will improve its monitoring of GBV resource allocation and sharing of results of prioritization decisions at operational, regional and global levels at important milestones of the programme cycle. DIP Director will be informed of operational budget allocations. DIP and DSPR director together with Bureau Directors will in particular jointly advocate with refugee operations to address situations where GBV operating levels have been disproportionately impacted. | |
| 3 | Diversify funding streams by developing multi-year GBV funding flagship proposals with diverse donors to advance innovative and impactful interventions while stepping up efforts to fundraise with private sector, foundations and individual giving. | DER | <p>Building on the successes in thematic fundraising and the investments already made in UNHCR's fundraising capacity, UNHCR will strengthen efforts to raise funds for GBV prevention and response interventions (OA4) from government donors and the private sector (including companies, foundations and individuals).</p> <p>To this end, in close collaboration with DIP's GBV team, DER (PSP and DRRM) will:</p> <ul style="list-style-type: none"> • Develop dedicated fundraising materials and donor engagement tools on GBV, tailored to private sector audiences. • Organize an annual GBV-focused capacity-building webinar for fundraisers, to strengthen knowledge of UNHCR's GBV programming, its impact, and sensitivities in reporting. • Continue to explore opportunities with new and existing partners to position GBV as a thematic funding priority, including through global accounts and targeted outreach across a range of donors. Moreover, given the potential of GBV to become a strong thematic focus for fundraising, UNHCR will assess options to mobilize individual giving through thematic or campaign-style approaches (contingent on adequate resourcing for PSP campaigns). | Ongoing |

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| RECOMMENDATION 2: | | <u>Promote sustainable GBV expertise and localization</u> | | |
| | | <p><i>Rationale: The evaluation found that UNHCR's partnerships are diverse but that a shift towards generalist partners has sometimes led to a reduction in GBV expertise. UNHCR is increasing its commitment to localization and engaging with WLOs, though gaps were identified, particularly related to heavy bureaucratic and administrative requirements. Local WLOs deliver cost-effective, culturally relevant services but face barriers to funding. Strong GBV partnerships are essential to maintaining GBV minimum standards.</i></p> <p><u>Proposed Actions:</u></p> <ul style="list-style-type: none"> I. During partner selection processes, consistently implement criteria to assess the strength of GBV funded partners to ensure that all partners have the required institutional capacities, minimum standards for programme delivery, and expertise to deliver quality GBV programming. II. Maintain partnerships with WLOs, ensuring that resources are allocated swiftly and efficiently while easing administrative and reporting burdens. III. Consider a GBV localization mentoring pilot in selected operations to support transitioning GBV partnerships with INGOs to partnerships with local WLOs. IV. As part of contingency plans, map local WLOs who can assume GBV coordination in refugee settings and/or programming roles. | | |
| Management response: | | X <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 4 | During partner selection processes, consistently implement criteria to assess the strength of GBV funded partners to ensure that all partners have the required institutional capacities, minimum standards for programme delivery, and expertise to deliver quality GBV programming. | Country Offices, with the support of DSPR/DEPS and DIPS | Continue to implement the GBV Areas of Specialization – United Nations Partner Portal . Update and disseminate the Sample Technical Evaluation Matrix with GBV sector technical evaluation criteria. | Ongoing |
| 5 | Maintain partnerships with WLOs, ensuring that resources are allocated | DSPR/DEPS, Country Offices | Continue to enhance and train operations through regular global webinars (Events) on modalities available for providing increased direct funding to organizations led by displaced | Ongoing |

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| | swiftly and efficiently while easing administrative and reporting burdens. | | persons, via grants and Innovation fund for innovative projects coupled with technical support, mentoring, training, peer-to-peer learning, etc. In parallel, global dashboards will be built by DSPR that demonstrate and track funding to all WLOs in real time, enabling closer monitoring of such progress. | |
| 6 | Consider a GBV localization mentoring pilot in selected operations to support transitioning GBV partnerships with INGOs to partnerships with local WLOs. | DER and DIPS, RBs and Country operations | Fundraise within the GBV Flagship project proposal. UNHCR has a global standardized technical evaluation matrix for partnership selection, that could be further tailored to GBV localization with the editable/adaptable 'sector specific criteria'. | January 2026 |
| 7 | As part of contingency plans, map local WLOs who can assume GBV coordination in refugee settings and/or programming roles. | Country operations, DEPS/DER | Include the mapping of WLOs in the list of preparedness actions. | June 2026 |

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| RECOMMENDATION 3: | | <u>Define UNHCR's comparative advantage in GBV coordination and leverage its potential to empower local action</u> <p><i>Rationale: The comparative advantage of UNHCR lies in its operational presence and knowledge, where it is deeply embedded in subnational structures and communities. The evaluation found that UNHCR's coordination is strong at the sub-national level but often weaker at the national level, emphasizing the need for strategic engagement to sustain credibility and influence in national inter-agency coordination.</i></p> <p><u>Proposed Actions:</u></p> <ol style="list-style-type: none"> I. Clarify UNHCR's comparative advantage in GBV coordination across the diverse settings where it operates together with other actors. Prioritize those areas where UNHCR's coordination results are strongest and ensure visibility and advocacy in national coordination platforms is maintained. II. Mandate co-leadership roles for WLOs and government actors in coordination platforms where feasible. | | |
| Management response: | | <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 8 | Clarify UNHCR's comparative advantage in GBV coordination across the diverse settings where it operates together with other actors. Prioritize those areas where UNHCR's coordination results are strongest and ensure visibility and advocacy in national coordination platforms is maintained. | DER, DIPS, DRS/SRS (Sustainable Response Service) | Clarification to be articulated into updated or new guidance, coordination and fundraising materials developed by DER and/or DIPS as well as in materials produced by DRS/new Sustainable Response Service. | Ongoing |
| 9 | Mandate co-leadership roles for WLOs and government actors in coordination platforms where feasible. | DER, DIPS | UNHCR will reiterate guidance that GBV coordination forums in refugee settings, where available, be co-led with the national authorities. If not available, a local actor specialized in GBV is the preferred co-lead. Similarly, as lead of the Global Protection Cluster, UNHCR will enable the participation of and co-coordination roles for WLOs and government actors wherever possible. | Ongoing |

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| RECOMMENDATION 4: | | <u>Ensure GBV risk mitigation is mainstreamed across all operational contexts</u> | | |
| | | <p><i><u>Rationale:</u> The evaluation found that UNHCR demonstrates commitment to GBV risk mitigation and mainstreaming, particularly through multifunctional sector teams. However, ownership varies across contexts, influenced by operational settings, leadership communication, capacity, resource constraints, and accountability mechanisms. GBV risk mitigation should be a minimum requirement in all operational contexts and a priority for UNHCR. This aligns with its core protection mandate i.e. in refugee settings and leadership role within the Protection Cluster, and other clusters it leads and co-leads in IDP contexts.</i></p> <p><u>Proposed Actions:</u></p> <ul style="list-style-type: none"> I. Mandate GBV risk mitigation as a core responsibility across all sectors and response phases. II. Provide technical tools to support the rollout of the GBV risk mitigation indicator, monitor uptake, and document good practices in its implementation. | | |
| Management response: | | X <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 10 | Mandate GBV risk mitigation as a core responsibility across all sectors and response phases. | DRS/DEPS, SRS | When the GBV Policy is updated reiterate the mandatory responsibility of GBV risk mitigation across all areas of work. | Ongoing |
| 11 | Provide technical tools to support the rollout of the GBV risk mitigation indicator, monitor uptake, and document good practices in its implementation | DRS/DEPS, SRS | Disseminate the GBV risk mitigation indicator guidance and track usage. | Ongoing |

| RECOMMENDATION 5: | | <u>Streamline policy guidance and accountability</u> <i>Rationale: The evaluation found that while the GBV policy provides important direction, its implementation is hampered by a lack of timely and adaptable guidance, particularly in non-refugee settings. Accountability for policy implementation is weak at the senior leadership level.</i> <u>Proposed Actions:</u> <ol style="list-style-type: none"> I. Develop concise operational guidance that can be contextualized, prioritizing essential principles, minimum requirements, and adaptability for different types of settings. Ensure guidance is aligned to inter-agency frameworks with a focus on exit strategies and building local capacity for a gradual hand-over of responsibilities. II. Enhance accountability by integrating GBV policy implementation responsibilities and measurable targets into existing performance appraisals for senior managers and leaders. III. Prioritize UNHCR participation and leadership in global strategic advocacy spaces, including capitalizing more strongly on the spaces in which UNHCR is already fully present. In particular, ensure strengthened advocacy and engagement on protection from GBV in the Global Refugee Forum, Standing Committee, Ex Com meetings and similar spaces. | | |
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| Management response: | | X <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 12 | Develop concise operational guidance that can be contextualized, prioritizing essential principles, minimum requirements, and adaptability for different types of settings. Ensure guidance is aligned to inter-agency frameworks with a focus on exit strategies and building local capacity for a gradual hand-over of responsibilities. | DIPS | Update and disseminate revised operational guidance for the GBV Policy to incorporate guidance on different operational contexts. | July 2026 |
| 13 | Enhance accountability by integrating GBV policy implementation responsibilities and measurable targets into existing | DHR | Within the organization's overarching accountability for results framework, the level of granularity in performance reviews is delegated to managers and teams to enable meaningful, context-specific assessments that reflect operational realities and avoid highlighting all corporate priorities in every appraisal. To address the recommendation, targeted guidance will be | December 2026 |

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| | performance appraisals for senior managers and leaders. | | provided to include a point on the GBV policy in updated Compact Assessment for D2s and above as part of the performance review cycle. | |
| 14 | Prioritize UNHCR participation and leadership in global strategic advocacy spaces, including capitalizing more strongly on the spaces in which UNHCR is already fully present. In particular, ensure strengthened advocacy and engagement on protection from GBV in the Global Refugee Forum, Standing Committee, Ex Com meetings and similar spaces. | DER, DIPS, GCR coordination team | Continue to ensure that GBV is featured in global publications and documents such as the annual Note on International Protection, global appeal and global reports. Promote and ensure participation of expert refugee participants in global events such as the Global Refugee Forum Progress Review 2025. | Ongoing |

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| RECOMMENDATION 6: | | <p><u>Prioritize GBV response and case management in refugee contexts, develop clear exit strategies, and pivot towards more sustainable partnership models particularly for GBV prevention</u></p> <p><i>Rationale: The evaluation found that UNHCR's leadership in case management is widely recognized by partners and external stakeholders and the evaluation observed improved service availability and survivor satisfaction, particularly in refugee settings. UNHCR plays a vital role in securing justice and legal protection for GBV survivors, despite systemic barriers, and successes are evident in advocacy, capacity development, and survivor-centered approaches. UNHCR should prioritize lifesaving GBV services in refugee settings where it leads. This entails ensuring the continuity of services through responsible exit strategies, which involve carefully planned transition processes to maintain the integrity and availability of GBV services. Further, prevention efforts are often underfunded and reduced to awareness-raising activities, limiting their impact.</i></p> <p><u>Proposed Actions:</u></p> <ol style="list-style-type: none"> I. Prioritize and focus program delivery by concentrating resources on GBV programming in refugee operations while strategically transitioning out of direct service delivery where feasible through local capacity building. II. Enhance program effectiveness through investment in scalable, evidence-based primary prevention models delivered through local partnerships. Advocate for dedicated, multi-year funding for sustainable prevention efforts. | | |
| Management response: | | X <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 15 | Prioritize and focus program delivery by concentrating resources on GBV programming in refugee operations while strategically transitioning out of direct service delivery where feasible through local capacity building. | Country operations, RB, DIPS | Further guidance on different operational contexts will be included in the updated GBV policy operational guidance notes. Implementation monitoring will be carried out by DIPS in coordination with the RB. | September 2026 |
| 16 | Enhance program effectiveness through investment in scalable, evidence-based primary prevention models delivered | Country Operations, RB, DIPS, DER | UNHCR will finalize the gender and power analysis tool which will help inform evidence-based GBV programming. UNHCR will continue to advocate for multi-year funding for GBV programs wherever possible including through the multi-year GBV flagship initiative. | Ongoing |

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| through local partnerships. Advocate for dedicated, multi-year funding for sustainable prevention efforts. | | Regional Bureaux and operations will be encouraged to include primary prevention interventions when relevant in their thematic fundraising efforts. | |
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| RECOMMENDATION 7: | | <u>Invest in GBV staffing, learning and talent development</u> <p><i>Rationale: The evaluation found that staff burnout and turnover, and a lack of clarity on GBV roles and responsibilities, are important challenges. UNHCR should find ways to maintain GBV technical expertise that can serve operations and partners in a flexible manner. Staffing optimization should be accompanied by a strong focus on capacity building, fostering a culture of learning by establishing platforms for peer exchange, and interagency collaboration.</i></p> <p><u>Proposed Actions:</u></p> <ol style="list-style-type: none"> I. Provide clear guidance and indicators for when GBV expertise (staff) are required vis-à-vis generalist staff who can manage certain GBV tasks. Integrate GBV expertise requirements into national and international job descriptions and performance evaluations to ensure accountability. II. Strengthen platforms for peer learning opportunities and build linkages across protection areas (e.g., GBV, CBP, Child Protection) to ensure that peer learning opportunities are integrated and avoid burdening staff. | | |
| Management response: | | <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 17 | Provide clear guidance and indicators for when GBV expertise (staff) are required vis-à-vis generalist staff who can manage certain GBV tasks. Integrate GBV expertise requirements into national and international job descriptions and performance evaluations to ensure accountability. | DIPS, DHR | UNHCR will finalize the HR Action Plan including guidance on placement of GBV specialized staff in certain contexts. | October 2025 |
| 18 | Strengthen platforms for peer learning opportunities and build linkages across protection areas (e.g., GBV, CBP, Child Protection) to ensure that peer learning | DIPS, RB | Using the various communities of practice, UNHCR will promote peer exchange and learning opportunities to staff in different functions. | Ongoing |

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| opportunities are integrated and avoid burdening staff. | | | |
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| RECOMMENDATION 8: | | <u>Streamline data/monitoring systems for reporting and planning</u> | | |
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| | | <p><i><u>Rationale:</u> The evaluation found data systems to be fragmented and inefficient, with limited opportunities to monitor/measure progress towards results. The evaluation also found inconsistent implementation and use of safety audits to support risk mitigation activities and missed opportunities to better utilize Results Monitoring Surveys (RMS) and other assessments/data for planning, prioritization, and decision-making.</i></p> <p><u>Proposed Actions:</u></p> <ol style="list-style-type: none"> I. Strengthen the consistent implementation of safety audits, including with the integration of appropriate AGD tools, and ensure that multifunctional teams use data to influence GBV risk mitigation strategies, and multi-year planning for programmes. II. Conduct a comprehensive review and revision of the current GBV results indicators to address gaps in measuring outcomes and impact, especially for prevention programming and in localizing the response with WLOs. | | |
| Management response: | | X <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree | | |
| Reasons (if partially agree or disagree): | | | | |
| | Top-line planned actions | By whom | Comments | Expected completion date |
| 19 | Strengthen the consistent implementation of safety audits, including with the integration of appropriate AGD tools, and ensure that multifunctional teams use data to influence GBV risk mitigation strategies, and multi-year planning for programmes. | DIPS, DRS/DEPS, RBs | UNHCR will develop materials to help sectors carry out regular safety audits and promote the adoption of GBV risk mitigation indicators across sectors, through practical guidance and training that enable safe and ethical consultations with women and girls. | December 2025 |
| 20 | Conduct a comprehensive review and revision of the current GBV results indicators to address gaps in measuring outcomes and impact, especially for prevention programming and in localizing the response with WLOs. | DIPS, DSPR/DEPS | The GBV related results indicators were reviewed in 2024 and it was assessed that the existing indicators are largely fit for purpose with a gap in measuring GBV risk mitigation. Following this, a new GBV risk mitigation indicator for all sectors and CBI was introduced as a good practice indicator which corresponds to the finding of the evaluation on risk mitigation indicators. | Ongoing |

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| | | | It is recommended that GBV results indicators are reviewed as part of larger results indicator review processes in future (timing to be confirmed). | |
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