

FRAMEWORK FOR SOCIALLY AND ENVIRONMENTALLY RESPONSIBLE GRANT-MAKING

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1. Introduction

As a multilateral, pooled financing mechanism supported by public and private funds, the International Fund must manage its funds responsibly and in alignment with its commitments and obligations to its funders, its Grantees, and, by extension, the audiences and media ecosystems served by its Grantees.

The International Fund draws its principles for social and environmental responsibility from the 2030 Agenda for Sustainable Development. It is committed to supporting and, where possible, directly contributing to the protection of human rights and the achievement of the Sustainable Development Goals (SDGs).

The International Fund also views its social and environmental responsibility as central to its mission of enabling the increased economic viability of independent, public interest media in low- and middle-income countries. Through exercising its responsibility as part of its making and managing of grants to media organizations and initiatives, the International Fund aims to support its Grantees in exercising good governance and independent decision-making, in service of effectively managing funds received from donors and other sources to benefit the individuals and communities that are served and employed by these organizations.

In view of these commitments and objectives, the **Framework for Socially and Environmentally Responsible Grant-Making** (herein, the “Framework”) sets out the principles that guide the International Fund’s approach to social and environmental responsibility and describes how Grant funds are distributed and managed in accordance with those principles.

2. Definitions

ACOS Self-Assessment: A tool developed by the ACOS Alliance which supports media outlets in assessing their approach to the safety and security of journalists, including through identifying any risks or weaknesses that need to be addressed.

Focus Region: The International Fund’s internal approach by which it geographically groups the countries and jurisdictions in which it makes Grants to media organizations and related initiatives.

Grant: An agreement between the International Fund and a media or media support organization to provide charitable funding in support of that organization’s work.

Grantee: An organization that has received a Grant from the International Fund.

Regional Team: The Members of the International Fund Secretariat that lead grant-making and related activities within each of the Focus Regions.

3. Scope of Framework

The Framework articulates the International Fund's approach to defining and meeting its social and environmental responsibility as part of its primary activity: making and managing grants to media organizations and related initiatives.

The International Fund's approach to making and managing grants is outside of the scope of this Framework. Instead, this is described in separate and mutually reinforcing frameworks: the **Funding Policy**, which describes the International Fund's approach to sourcing and making Grants, and the **Framework for Portfolio Management and Grantee Institutional Strengthening**, which describes the International Fund's approach to managing the active grants in its Portfolio.

This Framework focuses on five (5) areas of social and environmental responsibility, within which the International Fund takes a nuanced, risk- and impact-based approach to assessing and monitoring Grants:

- Gender and Inclusion
- Compensation and Retention of Staff
- Governance and Decision-Making
- Physical and Digital Safety and Security of Journalists
- Sustainability and Environmental Impact

Assessments of each focus area are made prior to the signing and throughout the term of each Grant, in alignment with regular grant management processes as described in the **Framework for Portfolio Management and Grantee Institutional Strengthening**.

The impact- and risk-based assessment of each focus area described in this Framework only takes place following confirmation that a particular Grantee meets baseline requirements and does not engage in certain prohibited activities described in the **Grantee Code of Conduct**. The International Fund's approach to assessing and monitoring compliance with the **Grantee Code of Conduct** is outlined in its **Risk Framework**.

4. Application of Framework

The Framework is applied through the **Social and Environmental Responsibility Marker** (herein, the “Marker”), which provides guidelines and tools to conduct an organizational assessment across each of the five (5) focus areas. Through the Marker, the International Fund takes an inquiry-based approach that is designed to engage meaningfully with Grantee organizations around their current processes and practices, potential risks or weaknesses, and areas for growth and improvement.

This inquiry-based approach is also informed by an analysis of the potential impact of each Grant and, when relevant, context about disproportionate burdens historically experienced by specific populations as a result of geographic location or identity characteristic, both contemporarily and throughout history.

Risks or weaknesses identified through the use of the Marker may result in the following outcomes:

- *Condition Precedent:* The International Fund may require an organization to meet a condition (for example, the development and implementation of a particular policy) as a pre-requisite for awarding a Grant.
- *Condition Subsequent:* The International Fund may include in its Grant Agreement with a particular organization a condition that the organization must meet during the Grant Term. Such conditions are often linked to the disbursement of future payments.
- *Monitoring, Evaluation, and Learning (MEL) Objective or Milestone:* In circumstances where the International Fund and an organization identify an opportunity for growth that could improve the organization’s approach in one or more of the focus areas, but is not directly tied to any areas of Downside Risk (as described in the **Risk Framework**), this opportunity for growth may be included in the MEL Plan that is developed as a central component of each Grant – often in the form of a goal against which the organization can report on its progress.
- *Decision Against Funding:* The Framework sets out the International Fund’s approach to each of the social and environmental responsibility focus areas, including its vision for how positive outcomes in each area can contribute to the development of sustainable media organizations and ecosystems. Typically, assessment within each of the focus areas is conducted with the intent of identifying areas in which the International Fund can support the capacity building or strengthening of its Grantees.

As a result, the Framework is not typically the sole mechanism through which the International Fund decides not to proceed with a particular Grant.¹

However, to the extent that a particular organization demonstrates that it is not aligned with the International Fund's vision and values with respect to a particular focus area, and is not willing or able to address this discrepancy, this Framework may be the mechanism through which the International Fund decides not to progress a Grant further.

Monitoring compliance with and completion of such conditions and objectives is a key component of ensuring compliance with this Framework and is generally accomplished through review of regular reports submitted by Grantees, as described in the **Monitoring, Evaluation, and Learning (MEL) Framework**.

5. Market-Level Assessments

Across all focus areas, the International Fund's assessment of a particular organization may rely, in part, on a market-level assessment of related dynamics in the region or jurisdiction where that organization operates. This assessment initially takes place prior to the first grant made by the International Fund in a particular jurisdiction and is refreshed at least as frequently as the beginning of each of the International Fund's strategic periods. Within each of the focus areas, the approach to market-level assessment is described in the **Social and Environmental Responsibility Marker**.

In all instances, the aim of market-level assessment is to provide a pathway through which regional or national dynamics can — when relevant — inform the assessment of individual Grants. Though market-level assessment presents an opportunity for more nuanced and contextually informed analysis, it does not replace the standard approach established for Grant-level assessment of each of the focus areas. All organizations are assessed on their own merit, following the process described in this Framework and in the Marker, as opposed to solely in relation to peer organizations or market standards. This approach is designed to

¹ Typically, the **Risk Framework** and the **Grantee Code of Conduct** — which set out the International Fund's baseline requirements with respect to overall risk appetite and prohibited activities, several of which relate to the focus areas of this Framework — guide the International Fund's approach to choosing not to progress a particular Grant opportunity as a result of an identified risk. In some instances, assessment via the **Social and Environmental Responsibility Marker** may help to identify lack of alignment or compliance with requirements presented in either document.

uphold the International Fund's commitment to encouraging positive development outcomes across all responsibility focus areas.

Decisions to begin funding media and/or related initiatives in a new jurisdiction are taken as part of the International Fund's regular strategic planning process.

6. Focus Area Descriptions

This section details the principles guiding the International Fund's approach in each of the five (5) focus areas for social and environmental responsibility. Within these areas, practical assessment of organizations being considered for funding is guided by the **Social and Environmental Responsibility Marker**, which sets out an approach to organizational assessment that considers (a) the anticipated or ongoing impact of the proposed Grant and (b) the organizational capacity of the Grantee.

6.1. Gender and Inclusion. Recognizing that equitable representation and inclusive practices can contribute to more sustainable, robust, and impactful media, the International Fund is committed to promoting gender equality in its grant-making and related activities. To support this commitment, the International Fund leverages an inquiry-based approach in discussing the following topics with organizations being considered for funding:

- Editorial Perspective: Understanding the balance and diversity of sources engaged and content produced by the organization in relation to contextual norms or biases in the market;
- Workforce Metrics: Assessment of gender representation, pay equity, and advancement across all levels of staff and management;
- Audience Reach and Engagement: Analysis of audience demographics and gender-specific feedback and interaction;
- Organizational Policies: Examination of existing gender equality policies and their effectiveness.

Engagement on these topics takes place when (a) assessing and structuring individual Grants and (b) when designing funding mechanisms or programs, including calls for proposals or grant funding disbursed through third-party intermediaries.

The assessment approach set out in the Marker supports the International Fund in better understanding how its grant-making and related activities can support

gender equality and inclusion across its portfolio and within the media ecosystems in which it works. To support engagement on gender and inclusion prior to and during the term of each Grant, Grantees are expected to provide any policies or documented processes in place related to maintaining an equitable and inclusive workplace.

The International Fund recognizes that gender is one of many intersectional identities that may impact the experiences of individuals working with and consuming media produced by the organizations it funds. The International Fund is committed to pursuing equality across all intersecting identities that may be relevant in particular contexts, including, but not limited to, race, ethnicity, language, sexual orientation, socioeconomic status, and tribal affiliation.

6.2. Compensation and Retention of Staff. Among the symptoms of the economic crisis currently facing independent media organizations in low- and middle-income countries are challenges in recruiting, compensating, and retaining staff. As a multilateral financing mechanism designed to provide core financial support, the International Fund aims to support media organizations in addressing these challenges through enhancing their economic resilience and sustainability. The International Fund's goal is to strengthen the ability of media outlets to recruit and retain talented, diverse teams, including through compensating journalists and media ecosystem leaders in such a way that media can compete with other sectors as an attractive and stable destination for talent.

To support its analysis in this area, the International Fund collects information about each organization's approach to recruiting, compensating, and retaining staff (full- and part-time) as well as freelancers. Depending on the maturity and structure of each organization, this information comprises the following:

- Quantitative data, including total workforce size, compositional diversity statistics (if available), and breakdown of employees and freelancers;
- Policies and other mechanisms that inform the organization's approach to compensation, such as salary scales, rate sheets, and approaches to ensuring equitable compensation;
- Organizational charts, including an overview of reporting lines within the organization;
- Other policies and protocols that guide recruitment, benefits, professional development, freelancer engagement, and maintaining a safe and inclusive workplace.

Following review of information provided by a particular organization, the International Fund may choose to engage further with the organization about an identified weakness or risk. This direct engagement is guided by the Marker.

The International Fund's assessment in this area may also be informed by its financial analysis of a particular organization, guided by the **Approach to Financial Analysis of Grantees**. Through its standard financial analysis, the International Fund may become aware of challenges that prompt further discussion, including, but not limited to, unusually low compensation levels across the organization, compensation equity concerns across employee groups on the basis of identity, or unreasonably large compensation gaps on the basis of organizational seniority.

6.3. Governance and Decision-Making. In order to effectively and strategically steward Grant funding, and to ultimately achieve financial sustainability, media organizations must have in place governance arrangements that are independent and fit for purpose. Effective governance promotes ethical decision-making and helps media organizations build trust with key stakeholders, including audiences and potential funders. Effective governance is also among the most effective mitigants against a range of risks that a media organization can face, from purposeful or accidental mismanagement of funds to threats to editorial integrity and independence.

The International Fund aims to encourage the development and continued strengthening of appropriate governance mechanisms for the organizations that it funds. It also recognizes that, for some media organizations — particularly organizations that are newer or face significant resource constraints — the development and/or strengthening of governance structures and processes may be an area for growth over the course of a Grant from the International Fund.

In assessing the governance mechanisms of a potential Grantee organization, and depending on the maturity and structure of the organization, the International Fund collects the following information:

- Constitutive governance documents, e.g. Statutes and Bylaws, to ensure that the scope of the board (or similar body) is independent and has sufficient oversight over relevant areas to ensure thorough and ethical decision-making, including with respect to receiving, managing, and spending Grant funds;

- Information about the organization's ownership structure, including the role that beneficial owners play in the day-to-day management of the organization, if relevant;
- Editorial policy or guidelines, to ensure that the mechanisms in place to ensure editorial independence are of sufficient strength, contemplate relevant risk factors, and are overseen by an appropriate member of the team (often the editor-in-chief or other senior member of the editorial team);
- Further to the three areas above, the organization's approach to identifying and managing conflicts of interest, including with respect to the production of editorial content;
- Composition of the board or other comparable governance bod(ies), including to ensure that an appropriate diversity of professional experience and perspectives are represented and that any conflicts of interest have been appropriately identified and managed;
- Approach, if any, to compensating members of the board or other comparable governance bod(ies);
- Processes for making and documenting governance decisions, including through producing and appropriately retaining minutes of relevant meetings, maintaining audit logs, enforcing internal controls, etc.

In support of its assessment in this area, the International Fund may request an organization to share documents in addition to those named explicitly above. In addition to reviewing policies, the International Fund also seeks to understand how each Grantee puts its governance principles into practice, particularly with respect to the safeguarding of independence and the management of Grant funding.

6.4. Physical and Digital Safety and Security of Journalists. In the pursuit of truth and holding power to account, journalists and media organizations may experience threats to their physical and digital safety and security. Such threats represent clear risks that must be mitigated in order to ensure the continued production and dissemination of public interest content relevant to the lives of audiences served by these organizations.

The International Fund expects its Grantees to take every reasonable precaution to secure the physical and digital safety and security of its staff and other individuals associated with the organization. It also expects its Grantees to provide

for the safe and secure handling of Personally Identifiable Information (PII), to the maximum reasonable extent and in compliance with all relevant data protection regulations.

The International Fund also recognizes that journalists are better insulated from a range of risks, including those related to safety and security, when the organizations that employ them are financially resilient and able to access relevant resources. Through enhancing the economic resilience of media organizations, the International Fund aims to ensure that those organizations and the journalists that they employ are maximally prepared for and able to navigate such risks.

In this area, the International Fund exercises its responsibility toward its Grantees through thoroughly assessing each organization's approach to identifying, mitigating, and managing risks associated with safety and security. To support this assessment, all organizations considered for funding are required to share the following materials with the International Fund:

- Written summary of the outcomes of the ACOS Self-Assessment, including a clear articulation of any findings as well as confirmation that best practices were followed in completing the Self-Assessment;
- All formal policies and protocols related to both physical and digital safety adopted across the organization (or either (a) a detailed plan to develop such policies and protocols or (b) a compelling justification as to why such policies and protocols are not applicable or necessary in the organization's operational context);
- Written description of any events related to safety and security that have impacted the organization or individuals employed by or otherwise affiliated with the organization within the past three (3) years;
- Any certifications that the organization has received or other externally produced indications of internal capacity related to physical and digital security (this can include participation in trainings or other capacity strengthening programs).

Assessment of materials shared by potential Grantees is guided by the **Social and Environmental Responsibility Marker**. The Marker also describes resources that are curated for Grantees in the standard course of the International Fund's approach to Portfolio Management. As a financing mechanism, the International Fund maintains relationships with a robust roster of partners that are prepared

to respond to emergency situations experienced by Grantee organizations or individuals associated with them.

The assessment described in this Framework also informs the International Fund's approach to assessing each Grant against its Safeguarding Risk, according to the process described in the **Risk Framework**. Such assessments are updated as part of regular Portfolio Reviews, as described in the **Portfolio Management Framework**.

As described in the **Grant Agreement**, all Grantees are expected to notify the International Fund immediately of breaches of the **Grantee Code of Conduct** and of other events that may be relevant to the safety and security of the organization and its employees.

- 6.5. Sustainability and Environmental Impact.** Vibrant, resilient, and independent media ecosystems play a key role in raising public awareness about issues related to climate and environment and in promoting sustainable attitudes and behaviors, including with respect to achieving the SDGs.

While the International Fund's primary goal is to enhance the economic resilience of public interest media, it also prioritizes environmental sustainability in its grant-making and related activities. While pursuing sustainable development outcomes, the International Fund also recognizes that markets in its Focus Regions have historically experienced a disproportionate burden of harm related to climate and the environment. The International Fund's overall risk tolerance in this focus area is informed by the principle that this discrepancy must be rectified in order to achieve the SDGs and other goals related to climate and the environment.

The **Grantee Code of Conduct** sets out certain prohibited activities with the potential to create negative environmental impacts. Beyond these, all Grants are assessed on the basis of (a) the potential environmental impacts or risks created by that Grant and (b) the environmental impacts or risks to which the Grantee organization is or may become exposed.

The full list of impacts and risks against which all Grants are assessed is included in the **Social and Environmental Responsibility Marker**. The International Fund recognizes that some Grants (for example, those focusing on the implementation of Generative AI or other emerging technologies) may create environmental impacts. As described in the Marker, the International Fund takes a risk-based approach to requiring its Grantees to identify and mitigate such impacts.

At a high level, the International Fund considers the following factors when evaluating the anticipated scale of potential environmental impacts created by its Grants:

- Whether the anticipated impact of the Grant (as described in the Grant Proposal) on the audiences served by the organization, as well as the broader media ecosystem, is of a sufficient scale to justify the anticipated environmental impacts;
- Whether the demonstrated capacity and willingness of the Grantee to effectively monitor and, where possible, reduce or mitigate the environmental impacts of the Grant is commensurate with the scale of the potential impacts as well as the organization's size and maturity;
- The current and historical context of environmental and climate-related risks in the area(s) where the Grant will be implemented, recognizing comparative differences in the present capacity of different jurisdictions to mitigate environmental risks as well as the history of disproportionate environmental harms experienced in some jurisdictions.

Finally, to the extent that Grantees use Grant funding in support of travel, they are expected to comply with the **Travel and Travel-Related Expenses Policy**, which sets out a range of principles for responsible travel management, including with respect to minimizing emissions and environmental impact.

7. Framework Review

The Framework is reviewed and updated as needed every three (3) years, in alignment with the International Fund's regular strategic planning processes.