The Council for Global Equality Comments in reference to the Consultation Draft of the World Bank Gender Strategy 2024-2030

The Council for Global Equality appreciates the opportunity to submit our comments on the Consultation Draft of the World Bank Gender Strategy 2024-2030. Our overarching reaction is that the strategy’s inclusion of sexual and gender minorities and its recognition that development initiatives that seek to promote gender inclusion must address the challenges facing sexual and gender minorities is extremely important and a welcome departure from the earlier strategy. While acknowledging the positive step of recognizing the impact of sexual orientation and gender identity (SOGI) on development outcomes, we highlight the need for additional precision and clarity in the document's rationale, actionable guidance for staff, and a comprehensive approach to addressing the needs of sexual and gender minorities.

**Rationale for SOGI Inclusion:**

The draft should strengthen its rationale for including sexual and gender minorities, incorporating evidence from peer-reviewed literature and World Bank documents. Explicitly connecting SOGI inclusion to economic growth, productivity, and the business case for equality would enhance coherence.

**Guidance for Staff:**

Clear language should be integrated into the Gender Strategy, assuring staff that work related to sexual and gender minorities aligns with the mission of the World Bank and the gender strategy itself. The strategy should emphasize broad language indicating the inclusion of sexual and gender minorities across all objectives and outcomes.

**Role of SOGI Thematic Note:**

The SOGI Thematic Note should be explicitly referenced and incorporated into the Gender Strategy. The document should affirm the guidance provided in the Thematic Note to ensure that the priorities for sexual and gender minorities are not relegated to a document lacking full institutional authority.

**Data and Expertise:**

Acknowledge the need for SOGI data while emphasizing the ability of Bank staff to take action based on available evidence and expertise in the absence of such data. A nuanced approach is required, recognizing the importance of local data and the existing body of research on sexual and gender minority populations. Future World Bank projects should seek to collect data to provide future guidance on the needs and development outcomes of the community.

**Definition of Gender:**
Refine the definition of gender to encompass its multifaceted nature, explicitly acknowledging non-binary individuals. The revised definition should address gender as both a social construct and an individual trait, considering intersections with other factors but emphasizing that it is not synonymous with terminology limited to women and girls.

**References to Sexual and Gender Minorities:**

Ensure consistency in referencing sexual and gender minorities across all objectives and outcomes. The document should explicitly state that these populations are presumed to be part of all objectives and provide additional examples of sexual and gender-minority inclusion across all objectives and outcomes.

**Eliminating Gender Based Violence:**

This is an essential outcome and one that is particularly relevant to sexual and gender minorities. As an element of this outcome, more attention should be given to efforts to prioritize changing mindsets and reducing stigma by establishing a new “changing mindsets and reducing stigma” approach as a separate, standalone objective. Eliminate the reference to GBV against sexual and gender minorities as a "frontier area" and integrate comprehensive strategies to address violence against these populations. The strategy also should recognize that gender-based violence against sexual and gender minorities often is endemic within the very institutions that are charged with developing and promoting human capital, including schools, medical facilities, and the workplace itself, thereby relegating some gender and sexual minorities to the margins of the economy in informal, precarious, or criminalized work.

**Human Capital Development:**

Expand the discussion on building and protecting human capital for sexual and gender minorities, recognizing the specific challenges they face in health, education, and employment. Reframe discussions around social protections to be more inclusive, going beyond traditional frameworks and the traditional labor market. This should include a more thorough discussion of social protections, including for the informal sector and outside the traditional labor market, and how these will be secured.

**Equal Access to Jobs:**

Integrate sexual and gender minorities throughout discussions on equal access to quality employment. Clarify the World Bank’s role in supporting legal, policy, and community actions for marginalized groups.

**Ownership of Economic Assets:**
Address barriers faced by sexual and gender minorities in accessing financial services, including differential needs related to familial arrangements and care-related leave policies.

**Advance Women’s Participation:**

Frame this outcome in a more inclusive way, recognizing the logic for advancing sexual and gender minorities’ participation, decision-making, and leadership alongside women.

**Shifts:**

Provide clarity on how the gender tag and flag will incorporate sexual and gender minorities, ensuring accountability for outcomes for these populations. Include a detailed discussion on the consultation process regarding their integration.

In conclusion, these recommendations aim to enhance the clarity, precision, and comprehensiveness of the World Bank Gender Strategy, ensuring it effectively addresses the needs of sexual and gender minorities and contributes to a more inclusive and equitable world. The Council for Global Equality is extremely grateful for the direction of this draft and looks forward to working with the World Bank to ensure robust inclusion of gender and sexual minorities over the life of the strategy.