The International Rescue Committee (IRC) commends the World Bank (WB) on the proposed World Bank Gender Strategy 2024-2030: Accelerate Gender Equality for a Sustainable, Resilient and Inclusive Future, and offers the below comments for consideration in future drafts and, ultimately, implementation.

The strategy has increased its ambition on gender equality - with a clearer focus on overcoming the economic, social, and political barriers to gender equality, prioritizing the agency and leadership of women and girls to achieve this vision. References to ‘unprecedented crises’ and the ‘backlash’ against women’s rights and gender equality must continue to feature prominently in the WB’s assessment of the challenges faced in the achievement of gender equality. More specifically, the fact that gender inequality exacerbates the impact of conflict and displacement for women and girls should be the lens through which the WB reaches the most marginalized.

The increased attention to GBV, particularly the emphasis on prioritizing prevention and response in fragile and conflict setting, is also well-placed. Both decades of research and lived experiences have shown that GBV rises in times of conflict and crisis and is a barrier to women and girls accessing health, education and livelihoods; yet in continues to be severely underfunded in humanitarian contexts (less than 1% of humanitarian funding). Continued WB investment to combat GBV – specifically by working in humanitarian contexts – are needed to help fill these gaps.

At the same time, the strategy could go much further to focus on how to advance outcomes for women and girls in fragile and conflict settings across sectors, beyond GBV. As it does in sections pertaining to GBV, the strategy needs to articulate targets, indicators, and partnership approaches to unlock education, health, economic empowerment and climate adaptation for women and girls in crisis settings. Examples from IRC’s experiences are offered below.

Critically, realizing the ambition of the Gender Strategy in fragile and conflict settings will require the WB to expand its partnership model beyond a government first/government only approach to support ‘people first’ partnerships models, that partner with a range of actors, both state and non-state. The Gender Strategy recognizes that in FCV contexts, where GBV is particularly acute but national systems are weak, partnerships with nongovernmental actors and the private sector help to improve impact and to identify long-term solutions that avoid dependence on humanitarian aid. Partners can serve in an advisory or technical capacity jointly or fully delivering services via direct financing of non-sovereign actors. Potential non-sovereign partners include national civil society organizations, including Women’s Rights and Women-Led Organizations, INGOs, local authorities, UN agencies and financial institutions— among others— that can offer comparative advantages to ensure that the WB projects are implemented and continue despite violence or political shocks. Speaking from experience, IRC partnerships with local and community-based organizations offer deep connections into affected populations, and are key to identifying communities who may otherwise be left behind. These partnerships help progress gender equality and improve inclusion and accountability to affected populations. Similar partnerships would support implementation of the WB Gender Strategy and support the long-term continuity of services in conflict affected countries.
Specific Feedback and Examples:

- The shifts between the previous and new Gender Strategies (page 21) are smart and, if fully implemented, will prove effective.
  - Of particular note:
    - **Acting Collectively** - enhanced partnership particularly with women-led and women’s rights organizations, and those organizations and coordination mechanisms operating in humanitarian contexts, is critical to supporting gender equality across the globe. Particularly in humanitarian contexts, where governments often cannot (or are unwilling to) provide basic services and economic opportunities and where there is no “gender sector/cluster,” but instead efforts to incorporate gender into various aspects of work, increased investment and partnership will be critical to success.
      - Harnessing the benefits of partnerships for the Gender Strategy and World Bank operational delivery relies on a shift in approach and recognizing non-sovereign partnerships as part of the World Bank’s operating model in the Gender Strategy and the Evolution Roadmap will help institutionalize this approach, which is otherwise ad hoc and exceptional. The IRC offers the October 2023 brief “The New Geography of Extreme Poverty: How the World Bank can deliver for communities impacted by conflict” as a supplemental reference to these Gender Strategy-specific recommendations.
    - Partnerships rely on World Bank financing to non-sovereign entities either as partners to the state or in place of the state when they have limited capacity, reach or will to deliver. Partnerships can take advantage of innovative methods of funding for instance funding consortium to maximize absorption capacity with attention to building the capacity of non-sovereign actors on WB accreditation processes, project proposal and reporting requirements, as well as anti-corruption/PSEA/anti-fraud policies.
    - Advisory groups made up of WRO/WLOs and other non-sovereign partners systematically established during project design, monitoring and evaluation would ensure World Bank programs are better informed by gender analysis and contextual understanding of the barriers to inclusion, and drive increased accountability to affected populations.
    - Expanded, more flexible, approaches to risk will be necessary to enable strategic partnerships with humanitarian organizations and other CSOs who can access hard to reach communities (see below expanded point on partnerships).
    - As WB seeks to “further engage and learn from working with CSOs, women’s groups, and the private sector,” this should critically mean actively shifting power to these groups to: ensure truly feminist partnerships in which WROs/WLOs work collaboratively and not extractively with WB and other partners; and direct/more direct and flexible funding to these non-sovereign actors, especially in contexts where engaging with government actors is not possible due to
instability or where government actors are seeing to undermine gender equality efforts.

- **Increased attention to GBV** – enhanced attention to this human rights violation is clear; the learning incorporated from the FCV note, as well as across the 10 years of GBV interventions from the WBG is noted with appreciation.

- **Country-level Accountability** – efforts noted across the Strategy to increase gender-relevant work at country level, including how this will be measured, are well placed to encourage grounded and sustainable change.
  - Increased emphasis on gender analysis (and use of gender analysis) is well-placed and examples which show the importance of intersectional gender analysis are important; however, a specific call to undertake and use the results of *intersectional gender analysis* would be well-placed to support all marginalized people.
  - Language on working with civil society organizations and women’s groups, is critical. Strategic partnerships with women’s groups are central to closing gaps on gender equality, inclusion and accountability to affected populations, which will in turn bolster ambitions to increase country-level accountability.

- **Changes to the Draft should increase Policy and “Note” Coherence, including to increase integration of FCV contexts.**
  - **Meaningful FCV integration:** FCV contexts and the WB’s efforts in these contexts should be more thoroughly integrated across the entirety of the Strategy, including analysis on how women and girls in FCV experience gains or set-backs, which should help WBG to further clarify on where to invest.
    - For instance, the section on GBV brings to bear much of the learnings around FCV contexts that the Bank has gleaned over their roughly 10 years of efforts around GBV and the FCV Note; this level of detail should be incorporated into other sections/other topics.
    - This effort should include how WB can work with (and not in parallel to) humanitarian architecture which is engaged in and coordinating humanitarian response. Specific consideration could be given to support for the Cluster architecture, to the efforts of IASC groups such as the Gender Reference Group, and directly funding humanitarian aid organizations that are operational in FCV countries.
    - WB’s current efforts like the Mashreq Gender Facility, working to enhance resilience and self-reliance for vulnerable populations, should be expanded through enhanced and intentional inclusion of refugee and IDP women and further partnership with humanitarian aid organizations.
  - **Areas for further integration:**
    - **Care economy and FCV investments:** A large amount of work has been done around specific topics related to Gender Equality throughout the WB’s efforts. In particular we acknowledge the thoughtfulness that has gone into a focus on care economies and FCV settings. However, the interconnected nature of care and FCV is entirely absent, which indicates a lack of consistency in priorities and approaches.
      - The Bank’s stated commitment on the care and FCV investments should be more thoroughly brought to bear on the Gender Strategy and in
future policy stances on care, such as the Addressing Care to Accelerate Equality briefing note that was recently released. This is particularly relevant for regional financing mechanisms such as the Mashreq Gender Facility given countries such as Jordan and Lebanon’s economic stability are deeply affected by displaced populations.

- **Access to education systems for refugees** (both girls and boys) who often are omitted from formal social infrastructure in countries, while defining “quality” to include foundational learning and social emotional learning. Where necessary, the Bank should increase engagement in the provision of education and early childhood development (ECD) in non-formal settings to ensure children retain some form of education and nurturing care support in their lives.

  - **Examples of investments in FCV:**
    - To achieve the ambition to **elevate human capital, expand and enable economic opportunities**, the GS should focus on outcomes for women’s increased use and control of resources during emergencies and early recovery, and set targets for increased support to small scale women led businesses in crisis settings and access to financial services for women who are underserved. Meeting these targets relies on strategies to remove gender barriers to economic opportunities and incentivizing private sector engagement in high-risk settings.
      - A good example of the ways in which IRC extends these types of services to refugee youth entrepreneurs is our [Citi Resilient Futures project](#) that offers loans and business training to young people impacted by displacement.
    
    - IRC’s [EAGER](#) program, targeting out-of-school girls and female community-based volunteers in Sierra Leone, was able to track outcomes on girls’ literacy, numeracy, and life skills, as well as impact on their economic empowerment. 77.5% of girls were saving money after EAGER, compared to just 31.5% before.
    
    - A focus on outcomes that are gender transformative has been shown to effectively address the **drivers of gender inequality** across sectors and have sustainable impact. IRC has developed gender **transformative approaches** to our economic, health and violence prevention and response interventions. For example, IRC’s ‘Safe at Home’ project focuses on positive behavior change in the home that addresses both gender based violence and child protection. Randomized control trials, conducted by our Airbel Innovation Lab in DRC (one of the most challenging FCV contexts in which we work) showed significant reductions (86%) in the occurrence of intimate partner violence (IPV).

- **While the Evolution Roadmap is referenced as critical to the Gender Strategy, and is the guiding document for overall WBG reform, it should be noted in the Strategy where the Evolution Roadmap lacks a gendered lens/analysis, and how the Gender Strategy can fill some of those gaps if appropriately implemented across**
The type of gender analysis incorporated in the Strategy should push the conversation forward, with the Strategy specifically calling for intersectional analysis. Fulsome gender, diversity, and inclusion analysis can help to actualize the intersectional intentions of the Strategy in critical ways, but ensuring that the intersecting discriminations felt by marginalized populations are taken into account when designing and delivering Bank-supported programming (as well as who/what organizations are supported to design/deliver that programming).

Incorporation of a GEDI analysis will necessitate the use of truly intersectional markers (ie beyond gender/age/disability marker), which should be developed in consultation with expertise within and outside of the WBG and ensure that safety, access, control/personal agency, and systemic discrimination is taken into account when analyzing the impacts of WBG-supported efforts and their efficacy.

- **There remain a few critical places where the Strategy lacks necessary nuance, which could lead to incorrect conclusions around the progress made on gender-relevant issues.**
  - One stark example where nuance is critical:
    - The Strategy mentions maternal mortality rates falling substantially but the reality is that between 2000 and 2020 rates fell overall, but significantly stagnated from 2016-present (a phenomenon known to the Bank) and critical when determining where to invest and what to invest in.

- **Appreciative of language and examples which show the importance and strength of feminist movements and women’s rights organizations/women-led civil society,**
  - Critical that the focus remains on women and girls throughout, and appreciate that the Strategy is clear that “gender” is not “just a women’s issue” and that gender inequality is harmful to all societies.
  - Where men and boys are being discussed, encourage is nuance. For instance:
  - In some countries, boys are falling behind in educational attainment; information about this should be given context and efforts to ensure boys are able to safely learn alongside girls should be encouraged.