

Sightsavers feedback on the draft World Bank gender strategy

Thank you for the ongoing engagement on the gender strategy, and particularly the efforts you have made to engage with women with disabilities in consultations.

We hope that this will be the start of ongoing engagement around gender and disability, particularly as we look towards IDA21. We have outlined some comments below based on the draft strategy, which we feel would strengthen the draft.

Feedback

We welcome the recognition up front in the strategy about **the importance of intersectionality, including gender and disability**, and the mentions of disability throughout the strategy in key areas such as GBV. We also welcome the strengthened human rights language in the strategy, compared to previous strategies.

However, we are concerned that there is **not yet sufficient focus on specific actions to ensure that the commitment to gender equality for all, particularly those who are most marginalised or face intersecting forms of discrimination such as women and girls with disabilities, is realised in practice.**

While the Bank has made significant progress on the mainstreaming of disability across its work this isn't yet a default. Without clear mechanisms and integration across the breadth of the strategy, we are concerned that the ambition on intersectionality and gender equality for all won't be realised.

We would suggest that more detail is added to the strategy on disability and intersectionality (recognising the need for it to remain brief) so that it goes beyond recognising and acknowledging intersectionality and reconfirming the commitment to non-discrimination - to **articulating what this means in terms of implementation and accountability for the strategy**, for the World Bank's and clients work on gender.

This could include:

- Making a **connection with existing World Bank commitments on disability** – including when documents like the Environmental and Social Framework are referenced. The Strategy should also reference and links to other strategies and frameworks, such as the **World Bank's Disability Inclusion and Accountability Framework**.
- The Human Capital outcome could more clearly bring out some of the areas of focus in IDA which specifically target people with disabilities and more clearly recognise the intersection of disability and gender across all aspects. This outcome would be strengthened by recognising the health inequities that women with disabilities experience, the **WHO report on health equity for persons with disabilities** could be a useful reference;
- Being clearer on intersectionality and how gender equality 'for all' will be achieved through the **drivers of change and the internal accountability** elements of the strategy. The current draft emphasises the importance of gender equality for all in relation to the outcomes of the strategy, but it is largely missing in terms of the 'drivers of change' and 'internal accountability.' There is no mention of disability in the sector starting at paragraph 62, for example, which is where the strategy really sets out the shift that it will drive. Our experience of working with the World Bank and other actors on the development and implementation of strategies shows that unless people with disabilities, and other excluded groups, are

considered in the 'how' then they are not included – as it is natural to default to a business-as-usual approach and change in this area takes a long time;

- It is positive to read in the strategy that **new mechanisms will be introduced to support internal accountability**. It would be good to provide more details of these in the strategy if possible, and they could be an opportunity to specifically advance efforts on intersectionality. Exploring opportunities around **data and disability** would also be positive;
- There is a strong emphasis on gender analysis in the draft which is positive. This could be an opportunity to emphasise that this **analysis should be intersectional and specifically consider those who might be most marginalised**;
- We welcome the inclusion of language on care and suggest it could be strengthened by recognising women with disabilities as caregivers as well as care recipients, and by including language on 'care and support' rather than just care. The discussions around care economy and economic participation could be made **explicitly disability-inclusive** rather than just mentioning people with disabilities as recipients of care. Instead of using the language of care services this could be replaced with 'disability-, gender-, and age-, responsive care and support services';
- Include 'for all' in Figure 2.1 of the conceptual framework - although this may seem like a minor detail as this acts as the summary of the strategy it is important not lost this at this level.

More broadly, it would be helpful to **expand on how the strategy will be monitored and reviewed**, as part of its implementation. For example, will there be an accompanying framework to track and monitor implementation? The strategy would be significantly strengthened if this was added, or at the least a commitment to add these later could be added. Including commitment to a mid-term review could also be helpful if possible, given the prominent role the previous review played.

For more information about our comments please contact Hannah Loryman, Head of Policy, hloryman@sightsavers.org