
We welcome the World Bank’s commitment to consulting widely on its development of the upcoming *Fragility, Conflict and Violence Strategy*. The focus on multi-causal drivers, particularly the potential impacts of climate change, the emphasis on creating incentives to action, and the integration of broader risk concepts are all particularly welcome. The following comments are reflections on the Concept Note shared in April 2019. We hope they will be taken into account in the strategy development process.

**Data**

It’s encouraging to see that *improving data, evidence and monitoring*, through a) access to better data and b) by strengthening monitoring frameworks, is recognised as one of the key thematic challenges. However, the description of these two issues on page 10 (and further expansion in the upcoming Strategy) would benefit from a clearer explanation of the difference between these two issues. Further, in its current form, the content under the ‘monitoring and evaluation’ part of page 10 would better belong under ‘programming’ as it relates to data on pages 11-12, as it focuses more on what the Bank can do, i.e. the ‘how’ of addressing the issue.

This links to another point, which is that in Part 5, the text dealing with data under programming on page 12 does not indicate how the Bank intends to address the issues around access to good data, but rather restates what needs to be done (‘collecting reliable and representative data’).

Another point is that while the section on page 10 which calls for access to reliable, timely and accurate data on ‘local and regional dynamics’ neglects the need to also collect and analyse data on vulnerable populations (in line with the strategic area of engagement that aims to ‘mitigate the impact of FCV on the most vulnerable’). Collecting data on, and monitoring, risks and progress toward risk reduction should also form part of the focus on data.

Finally, while the need to build better systems for more reliable data is clear, the upcoming Strategy should make clear how these efforts will align with, support or complement the numerous existing processes which aim to improve data collection, indicator development and monitoring. These include efforts to monitor progress and commitments under the SDGs, the Sendai Framework on Disaster Risk Reduction, the Paris Agreement, as well as various statistical and operational capacity-building programs. It would also be useful for the Strategy to outline how the Bank will use initiatives such as the planned Joint Data Centre to support the delivery in FCV settings.

**Displacement**

The Concept and upcoming Strategy would also benefit from an *explicit recognition of displacement*, whether internal or cross-border, as not just a symptom or consequence of FCV, but also a driver of further fragility or conflict, particularly in combination with other drivers. For example, in situations where people are displaced by slow-onset disasters (such as drought), they can come into conflict with other populations, including those displaced by violence, further exacerbating national or regional fragility – the Lake Chad basin and the Horn of Africa both offer examples of this phenomenon. Currently, displacement is mentioned briefly in the overview, but given the scale of forced displacement globally, that displacement is often a feature of FCV contexts, its linkages to climate impacts, and the role of displacement crises – particularly protracted crises – in driving fragility and undermining stability, it should be featured more prominently in the thematic section.
Risk
The integration of risk in the Concept Note is welcome, and in particular of the need to manage and identify risks early. The operational risks of working in FCV settings are rightly recognised (p. 5-6). But the Strategy should also more explicitly recognise political risks, and potential contradictions in the objectives. For example, mitigating the impact of FCV on vulnerable groups is a key area of engagement, as is building state legitimacy and capacity. But there are cases where state behaviour drives fragility, conflict and violence (for example in many displacement crises). An outline of how to balance these two potentially contradictory aims should be considered, and the risks of doing this should be assessed.

Other
Coordination and partnership will also be key to ensuring the Bank engages at the right times, the right levels, and with the right actors. We look forward to a more detailed outline of which sort of partnerships the Bank will pursue, as well as how it will work to coordinate with different actors to ensure its efforts support and help improve on existing coordination processes.