Annex B.
United Kingdom comments on the World Bank Group consultation on the new Gender Strategy, July 2015

Putting girls and women at the heart of international development is a top UK priority. It will be central to the delivery of the post 2015 development framework and essential if the World Bank Group (WBG) is to achieve its twin goals by 2030. The Gender Strategy must clearly set out how the WBG will accelerate achievement on this agenda. The concept note is an excellent basis for discussion on how best to increase attention and action on gender equality.

We welcome the proposed strategic mainstreaming approach. We also support the focus on two key levers of change, jobs and access to productive assets. The level of global funding to improve economic outcomes for women and girls remains inadequate and there is a recognised lack of data and analysis. Our experience shows that targeting specific issues is needed in addition to mainstreaming to increase visibility and drive progress in critical areas.

We welcome the commitment to strong collaboration between the World Bank and IFC expressed in the concept note and the clarity of focus on women’s economic empowerment. This area is a core strength for the WBG and it can raise the global focus on this important issue. We welcome the ambition to align the strategy to relevant global initiatives. We support the country-led approach, recognising the importance of context, including fragility. Developing strong, country-level diagnostics will support this. We hope that recognition of unpaid work will be integrated into the analysis of where opportunities exist for scaling up good practice.

We welcome the proposals set out in the section on, operationalising the approach. We look forward to seeing this expanded in the Strategy to ensure the challenges of gender equality are more consistently addressed by WBG staff and clients at the country level.

We welcome the increased focus on results including at the outcome level, reflecting the findings of the IEG evaluation. In addition, we support the emphasis on, “Learning what works” and working with clients to test transformative approaches to closing gender gaps and enhancing voice and agency and, “improving the evidence base for results”. The Gender Labs are an important part of understanding what works and it is good to see that reflected in the concept note. We welcome the Strategy’s emphasis on sex-disaggregated data and filling gender data gaps and are keen to work together on this challenging area of work.

Outstanding questions or areas we would like to see addressed in the final Strategy
Strategic mainstreaming and the key levers for change

1. We would like to understand how strategic mainstreaming is defined and implemented.

DFID, like the WBG is looking at ways to ensure effective gender mainstreaming across our investments. We would like to understand more about how WBG staff and clients would be encouraged to meaningfully consider gender across all its country programmes and projects. Including whether and how interventions might achieve gender equality and then to take steps to address inequality where appropriate. We are interested to learn about plans to develop exit ratings and any proposals to track financial commitments on girls and women. We are happy to share our experience of our own mainstreaming efforts during the consultation process.

2. We ask that the Strategy explicitly state how the WBG will create more enabling environment for the most disadvantaged girls and women including promoting greater voice and agency of girls and women.

Specifically:

Addressing the economic empowerment of the poorest women and girls: We would welcome clear signalling in the Strategy of how the WBG will support the productivity and incomes of those in the informal sector and subsistence agriculture, as well as those moving into more formal jobs. We would also like to see the Strategy building on the WBG’s comparative advantage in social safety nets to deliver a broad range of development outcomes for women and girls.

Tackling harmful social norms: The evidence in the World Bank’s recent Voice and Agency Report’s shows that we will not be able to realise the SDGs nor have the full and equal participation of women and men, girls and boys, around the world unless we increase women’s agency. As part of this agenda we need to see long-term transformational change of social norms.

It would be helpful for the Gender Strategy to set out how WBG operations will tackle the root causes gender inequality, supporting social norms change particularly given this is an area where the WBG traditionally has less capacity.

Gender Based Violence: We would welcome stronger positioning of GBV in the Strategy, and greater articulation of WBG’s role in supporting actions to prevent and respond to gender-based violence. We would welcome clarity on how WBG’s resources can be used to (a) support the integration of GBV into economic development programmes to ensure the programmes do no harm/prevent backlash at a minimum; and (b) maximise the impact of economic development and female economic empowerment
programmes on building resilience and agency to reduce violence and the effects of violence.

We are happy to share DFID’s recent Guidance Note on Tackling VAWG through Economic Development and Female Economic Empowerment Programmes.

**Human Capital Development**

There is still a high need for critical investment in human capital particular at transition points such as during adolescence.

**Health:** It would be useful if the WBG could set out how it sees investments in health systems supporting gender equality and for this to be more explicit in the gender strategy. Poor health outcomes for women and their families clearly undermine women’s economic and political participation. In addition, in many contexts the majority of health workers and unpaid carers of the sick are female which provides an important entry point for supporting decent paid work for women.

A critical barrier to higher education and labour market participation is limited access of girls and women to SRHR including modern methods of contraception. Lack of universal health care can also disproportionately affect women and girls.

**Education:** Equally we would like the WBG to set out the critical role of education in relation to women’s economic empowerment. This is noted in the Concept Note. However, the focus on gains in enrolment is not in line with the broader goals of SDG4 (education). Evidence suggests that it is the quality, not the quantity of education that really matters for economic growth. The poorest girls and young women are least likely to have achieved foundational skills (literacy, numeracy). Cognitive and socio-emotional skills, in part acquired in early childhood and during basic and secondary schooling are also important determinants of employment dynamics.

Investments also need to be targeted during key turning points in the lives of girls and women, such as the transition from primary to secondary school. For many girls, this is a time when opportunities and horizons shrink. Girls are pulled out of school; forced into unskilled labour, married off early, fall pregnant. Targeting interventions during this critical period, when her education and future is most at risk, can have a transformative effect and help unlock her full potential.

3. **It would be helpful if the Strategy could set out how the WBG’s approach, specifically the key levers for change, will be adapted to different contexts, including Fragile and Conflict Affected States.**

Conflict-affected contexts offer an opportunity to work on the building blocks that support empowerment of women and girls over the longer-term. It is
critical to get these building blocks in place to support social and economic empowerment of women and girls particularly in post-conflict situations where early interventions are needed to address entrenched norms, legislation and structures. It would be useful to see how WBG can address these critical building blocks for peace and security including land and assets, education, legislative change, political (formal and informal) inclusion etc.

Implementation

4. **Beyond what is already included in the section, ‘Operationalising the Approach’ it would be helpful for the Strategy to set out:**

   - How senior managers, including at the country level, will be provide leadership and generate client demand on tackling gender equality;
   - How OP 4.20 on Gender and Development will be updated to reflect the strategic mainstreaming approach. In line with this approach we would recommend that staff do a gender assessment for each project as well as at the country level;
   - How will the WBG will collaborate across its different units to deliver this agenda including through key tools such as the Systematic Country Diagnostic;
   - How task team leaders might be incentivised to encourage uptake of the strategy;
   - The level and type of human and financial resources needed support the roll out of the strategy.

5. It would also be helpful to set out how existing WBG platforms will engage with the WB’s new organisational structure to drive forward action to end GBV, eg. the Global Platform on Addressing SGBV in Fragile & Conflict Situations;

6. Beyond operations, the Gender Strategy would benefit from setting out how the WBG can use its convening power to amplify southern voices to strengthen political commitment and leadership on gender equality. For example using the Gender Community of Practice of Finance Ministers and providing support for women’s rights organisations.

Results

7. **We are keen to understand the role the WBG will play in helping deliver the SDG process at the country level.** The strategy could usefully set out how the WBG with support from the Gender CCSA will respond to the new set of SDG goals and indicators through the WBG corporate scorecard(s), country results frameworks and its ambition to address gaps in data (see below).

8. **How will a results driven approach be used to incentivise deeper thinking and a high level of ambition by staff and clients?**
9. It would be helpful to understand more about the use of gender markers and how the WBG proposes to use these at design, completion and for tracking expenditures on programmes which have targeted and mainstreamed approach to gender. The Asian Development Bank marker might be a good model from which to learn lessons as it categorises projects according to the extent to which gender equality issues are incorporated. The gender exit rating will be an important part of this system. It’s not clear from the concept note whether this will be used for all projects that address gender equality or targeted at economic opportunity and voice and agency only but we assume it is the former. In addition, if there is a differentiated approach between the World Bank and IFC with regards to a gender marker why and what the differences are.

Building the evidence base/understanding what works

10. Instruments like the Gender Lab are important for understanding challenges and what works to address them. Does the WBG itself plan to invest more on leaning and sharing lessons on what works?

We encourage the Gender Labs to ensure that mechanisms are in place to provide lessons from impact evaluations that are more generalizable across similar contexts. We would encourage more synthesis products, such as ‘Levelling the Field’ that examine findings emerging from global research as well as GIL products.

It would be interesting to understand how the Strategy will link into other learning initiatives across the WBG such as the Open Learning Campus and south-south knowledge exchange.

11. The strategy should set out how the WBG and Gender CCSA will encourage use and uptake of evidence by staff, clients and partners to improve programming and generate demand.

12. The Strategy would benefit from greater articulation of how WBG operations will use the evidence on prevention and responding to GBV in the Voice and Agency Report, alongside the WBG’s very useful Multi-Sectoral Toolkit on GBV.

Data

13. How will the WBG support countries in the generation and use of data both for tracking progress in gender equality including progress against the SDG indicators?

14. Once SDGs have been formally agreed – a major challenge will be tracking progress against the new ambitious set of targets and indicators, including on girls and women. The Strategy could set out more clearly the World Bank and the IFC’s role in supporting generation and use of gender and age disaggregated data in neglected areas such as, violence against women and girls, social norms
change and women’s economic empowerment. We encourage the World Bank to advocate for use of the UN Washington Group’s question on disability in census’ and surveys.

Particular focus is needed on strengthening data on most marginalised groups to ensure no-one is left behind post 2015. This will mean ensuring we can track progress in reaching hard-to-reach groups e.g. adolescent girls and girls and women with disabilities.