

International Rescue Committee’s Feedback on the World Bank Group’s Draft Fragility, Conflict and Violence Strategy

The International Rescue Committee (IRC) welcomes the development of the World Bank’s first-ever Fragility, Conflict and Violence (FCV) Strategy. The draft strategy accurately and fully captures the World Bank’s comparative advantages in FCV contexts, and does a good job at outlining how it will work at the ‘nexus’. The World Bank’s goals and focus in displacement contexts are clear, and reflect the areas where the World Bank can have an outsized impact compared to other institutions and organizations working in these situations. The current draft makes vast improvements from the original concept note, bringing in important details and nuances specific to FCV contexts. There are seven areas where the strategy could be strengthened:

1. Define and measure a set of well-being outcomes. We understand the challenges of including well-being outcomes among the accountability measures for the strategy, particularly given that such outcomes are driven or inhibited by factors beyond the World Bank’s control. However, it is critical that the changes in well-being of people caught in crises (refugee, IDPs, etc.) are captured as a measure of whether the World Bank and other actors are collectively moving the needle in a positive direction. The goals of the strategy should not just be to enhance and clarify the World Bank’s work in FCV contexts, but to deploy more effective programs and subsequently drive improved outcomes. The measure of progress (pages ix-x) should reflect this.

IRC resource to support integrating our feedback into the strategy:

- [The SDGs, in Crisis](#) (see annex of outcome areas).

2. Include forcibly displaced and stateless among “vulnerable populations”. While people who are forcibly displaced deserve their own section (as is the case in the current draft), they should also be recognized among the other vulnerable groups mentioned. Forcibly displaced people are at high risk of being left out and left behind in progress towards the Bank’s twin goals and the SDGs. Stateless populations experience many of the same challenges as the forcibly displaced but with greater risks of entrenchment of disadvantage over time, and should also be acknowledged as being among “vulnerable groups” to which the strategy gives special attention. A few places where this should be reflected are in Section II, paragraphs 98 and 101.

IRC resources to support integrating our feedback into the strategy:

- [SDG progress: Fragility, crisis and leaving no one behind](#)
- [Missing Persons: Refugees left out and left behind in the SDGs](#)

3. Prioritize necessary policy reforms, including through enhanced diagnostic tools. Influencing national policies is a core comparative advantage of the World Bank. World Bank country staff will increasingly need to become more capable and willing to engage in, sometimes difficult, policy discussions with their government counterparts. The World Bank will need to ensure that its diagnostic tools (e.g., Risk and Resilience Assessment (RRAs), Jobs Diagnostics) adequately support policy dialogue and identify areas for reform. For example, the RRAs should include assessment of opportunities and challenges to women’s empowerment, and the Jobs Diagnostic should consider the unique policy and practical barriers that women and refugees face in acquiring a job (e.g. restrictive laws, high costs to formalize a business, lack of safe transportation, lack of child care). While the measures outlined in paragraph 112 are certainly ways to improve jobs outcomes, there are other measures that will be required to specifically enhance labor market access for displaced populations who face additional

barriers. The refugee policy assessment framework being developed under IDA19 will be a good start, and should be expanded to other refugee contexts, even if they are not drawing on the Window for Host Communities and Refugees (WHR). It would be useful for the World Bank to provide consultation opportunities with humanitarian and development actors around drafting of the RRAs and other tools designed to support implementation of the FCV strategy in country program frameworks.

IRC resources to support integrating our feedback into the strategy:

- [Unlocking Refugee Women's Potential: Closing economic gaps to benefit all](#)
- [Ruled out of work: Refugee women's legal right to work](#)

4. More clearly define the Bank's partnership models in FCV contexts.

With NGOs: The strategy rightly recognizes the importance of the World Bank building complementary partnerships such as with the UN and engaging with civil society. Where the strategy remains weak is on how the World Bank will standardize its partnerships with NGOs like the IRC so that they are more predictable for both World Bank staff and for NGOs. The draft currently only "encourages" Bank staff to engage with civil society; there should be a stronger mandate and specific guidance, in the strategy itself or separately, on the practice. For example: require country teams and Task Team Leaders (TTLs) to include multi-stakeholder consultation at each stage of program cycle, including at key decision points during project development and design, to ensure greater effectiveness and accountability.

In addition, the World Bank should consider standardizing its direct financing to non-government entities beyond its MOU with the UN, and more recently ICRC, to include NGOs. We understand the ongoing internal debate on moving away from the World Bank's traditional funding structure, however NGOs like IRC can provide added-value through a more formal partnership with the Bank. We have unique access to crisis-affected populations, a deeper understanding of the needs in crises, and the technical knowledge and experience of designing and implementing effective programs in protracted displacement contexts. The World Bank can consider adopting a consortium partnership with a number of NGOs to avoid the pressures of partnership management.

With other Multilateral Development Banks (MDBs): Greater collaboration across the MDBs could have a game-changing impact. The strategy should expand on what role the MDB Platform will play, and identify priority areas where a range of MDBs can develop joint financing mechanisms, analysis and operational approaches in FCV settings. For instance, there could be a clearer and formal partnership between the World Bank and the Inter-American Development Bank to coordinate their responses to the Venezuelan displacement crisis.

IRC resources to support integrating our feedback into the strategy:

- [World Bank Financing to Support Refugees and Their Hosts: Recommendations for IDA19](#)
- [The Venezuelan Displacement Crisis: A Test of Global Commitments and Solidarity](#)

5. Provide more specific guidance on decisions to engage and disengage.

Maintaining national systems to support basic needs during a conflict or crisis is crucial, both for the immediate response and for ensuring that development gains are not completely unraveled. However, the World Bank will need to develop clear guidance for its staff on where, when and how to remain engaged in contexts where the Bank's government clients are causing fragility, violent conflict and displacement and/or are corrupt. There may be situations where it is better for the World Bank to disengage, and support non-government (humanitarian) partners that are independent, impartial and neutral, to avoid doing more harm than good. Relatedly, the strategy would benefit from placing the Bank's "do no harm"

considerations more front and center. In addition to more detail on engagement and disengagement, the strategy or subsequent guidance should outline a timeframe for World Bank engagement based on different crisis contexts (e.g. drought, mass influx of refugees, violent conflict), and ensure that the World Bank is set-up to move quickly and become a key player in the response early enough to influence and align with a set of shared outcomes.

IRC resource to support integrating our feedback into the strategy:

- [The Role of the World Bank in Fragile and Conflict-Affected Situations](#)

6. Apply a gender lens more robustly. Through this new strategy, the World Bank has an opportunity to influence how governments and other multilaterals are thinking about FCV contexts. One of the key areas that it could and should build greater momentum around is the interlinkages between crises and gender equality and violence against women and girls. For example, the strategy should emphasize that gender-based violence (GBV) undermines programming aimed at attaining peace and/or stability; gender equality impacts how programming is designed (including for projects the Bank historically funds like infrastructure and health systems strengthening) and their outcomes; and GBV and gender inequality, if not addressed as part of reforms and efforts towards stability, will undermine stabilization efforts. Gender equality is key as the Bank looks to not only working within fragile and conflict contexts, but to preventing fragility and conflict. While this feedback pertains to the entire document, the executive summary in particular is one place where a gender lens should be more apparent.

IRC resource to support integrating our feedback into the strategy:

- [Intersections of Violence against Women and Girls and State-building and Peacebuilding: Lessons from Sierra Leone, Nepal and South Sudan](#)

7. Ensure the most vulnerable will benefit from private sector engagement. The private sector undoubtedly has an important role to play in responding to FCV challenges and contexts, especially when it comes to advancing livelihoods and local economies. However, we are concerned that creating functioning markets, supporting investors, and growing private sector champions to generate income and opportunities (as outlined in paragraph 153) is insufficient. The efforts of the World Bank, IFC and MIGA must ensure that these opportunities for employment and income are accessible to the most vulnerable in FCV contexts—particularly refugees and women; otherwise, they may only deepen existing inequalities.

IRC resource to support integrating our feedback into the strategy:

- [We Build Bridges: Roadmap to the Sustainable and Responsible Financial Inclusion of Forcibly Displaced Persons](#)