Security Sector Engagement: That the UNDP found in its 2018 Journey’s to extremism in Africa report that a majority of people who joined violent groups were motivated to do so as a result of abuses by state security forces should give the Bank serious pause before it embarks on an expansion of security sector collaboration. The principal risk associated with work in this area, whether the Bank, UNDP or foreign forces, is that a technical approach (systems and operational capacity) is taken to substantially political problems. Where forces are contributors to fragility and conflict any technical interventions must be paired with a political strategy to change fundamental behaviours of forces where they are involved in national politics, economic life and in the way they interact with and treat citizens. This necessitates actively shaping institutional incentives and accountabilities to ensure that inputs actually translate into behavioural change. As such, the Bank will need to increasingly invest in both formal and informal partnerships that extend beyond the immediate client to other multilaterals, bilateral donors as well as civil society organisations working on community security, when working in this space. In the context of infrastructure, using military forces, even as a last resort, comes with a significantly higher risk profile given in many conflict contexts it is often unclear where business interests end and the security forces start. Political risk for the Bank spikes where security forces are seen to be partisan by one or another group, associated perceptions having the potential to rapidly undermine the Bank’s broader in-country portfolio. The proposed review of the Bank’s legal and policy framework for security and military engagement will have to traverse these difficult issues. We would encourage the Bank to draw on all available expertise in security sector reform and engagement during this process and seek out available models of SSR that reinforce positive state citizen relations and interactions. Clear red lines around when such collaboration is in the interest of the Bank and the citizens of the
country it’s seeks to assist need to be developed as part of this process, in lockstep with sounds political economy and conflict analysis. Jobs As an area of special emphasis the strategy’s treatment of Jobs warrants more nuanced analysis, principally the caveat that, while jobs are without question important in conflict contexts the correlation between more jobs and less violence is not straight forward. Studies have shown that both jobs and education programs that do not pair with interventions that address fundamental drivers of exclusion, political and psychological motivations for joining violent groups, have limited or no impact on conflict dynamics and can indeed exacerbate the same. It is likely that the Bank will need to augment its Jobs Diagnostics for use in conflict contexts to take account of this reality.

Section III: Operationalizing the WBG’s Strategy for FCV
A. Policies, Processes, and Practices: Ensuring the WBG is Fit-for-Purpose (page 33-37)

B. Programming: Maximizing Impact On-The-Ground (page 37-40)

C. Partnerships (page 41-43)
The strategy's acknowledgement of the importance of engaging with civil society is most welcome. It however skews this towards civil society as an adjunct to, not the focus of, its work and partnerships. There are positive examples of where the Bank has worked in partnership with NGOs to promote more transformational change, including the NSP in Afghanistan and Conflict Alert monitoring mechanism in the Philippines, that could be brought more to the fore as collaborative models with the potential for replication or scaling up. Civil society offers an important vehicle for continued delivery in active conflict and as an alternative to complete disengagement where the client government is actively contributing to instability. Recognizing the mandate constraints of the Bank it will be important to somehow better reflect these partnerships in the strategy.

D. Personnel (page 43-46)

E. The Financing Toolkit for FCV Settings (page 46-51)

F. Risk Management in FCV Settings (page 52-53)

Do you have any additional comments or suggestions?
Overall, we strongly welcome the new strategy. While there are some areas that could be improved, it does suggest that the Bank and its shareholders have been listening. It represents the culmination of efforts internally and externally, by civil society, shareholders and the Bank itself to more effectively integrate conflict sensitive practice into Bank operations over more than a decade. We look forward to engaging with the Bank as it moves to implementation.