We are pleased that the lifelong impacts of fragility and violence on children and youth are recognized, and we agree that understanding these lifelong impacts on individuals and communities is critical to developing effective approaches to improving human and social capital. We welcome the inclusion of violence against children (VAC) and gender-based violence (GBV) in the Bank’s definition of violence.

World Vision welcomes the Bank’s commitment to working together with a broad set of stakeholders in FCV settings to address the drivers of fragility and strengthen the sources of resilience and peace. The critical role of civil society actors in efforts to overcome hardships, build resilience, and prevent future crises cannot be overstated. Civil society actors are not only beneficiaries of government and international action, they are rights holders and active development actors that play an instrumental role in sustainably addressing the four strategic areas of engagement outlined in the strategy at the national, subnational, and community levels. As well, they play an instrumental role in strengthening core governance functions and ensuring an inclusive, people-centered approach in fragile contexts (page 15). Work in fragile contexts requires a focus on both national and subnational action and investments in both rural and urban development. While the draft strategy acknowledges the critical role and value of engagement with civil society, it does not provide sufficient detail about how the Bank will support or reinforce the capacities of civil society organizations to manage future shocks and address the drivers of fragility in their communities over the long-term. The strategy also recognizes that greater investment is needed to build the capacity of local authorities, communities, civil society, and citizens to hold institutions accountable (page 16), but we’d like to stress the importance of paying particular attention to ensuring children, youth, women, and local faith actors are also included in these capacity building efforts. World Vision recommends that the World Bank includes details in the final strategy about how it will support and reinforce civil society and their organizations’ capacities to manage future shocks and effectively address the drivers of fragility in their communities in the long-term and how these efforts contribute to a broader aid consensus around new ways of working (e.g., the 2030 Agenda, World Humanitarian Summit commitments, the Sendai Framework for Disaster Risk
Reduction and the OECD-DAC Recommendation on the Humanitarian-Development-Peace Nexus). This could include weaving both resilience and peacebuilding approaches into broader, multi-sector programming and social accountability approaches which involve children, youth, women, persons with disabilities, and local faith actors. • While the strategy acknowledges the need for differentiated responses to the drivers of FCV in low- and middle-income countries, more can be said about the Bank’s strategy, plans, and approach for addressing the unique drivers of urban fragility. At a subnational level, violence and conflicts are increasingly taking place in urban centers. Displacement is impacting cities and towns more than rural areas, with migrants and forcibly displaced populations choosing to move to cities and small towns instead of rural camps and settlements. The Bank’s strategy should provide greater detail on its approach to these issues, including the implications of rapid urbanization on social cohesion and its engagement with local, municipal, and city authorities who are at the frontlines of service delivery in urban settings. World Vision recommends that the World Bank provide greater detail in the strategy on how it will address rapid urbanization in fragile contexts and support resilience, social cohesion and durable solutions for fragile towns and cities. • An enhanced view of pathways to ‘state legitimacy’ is needed. In the current strategy, the Bank is relying on a concept of state legitimacy deriving from the concept of fair and tangible delivery of services; however, mounting evidence from the Overseas Development Institute/Secure Livelihoods Research Consortium (ODI/SLRC) finds no direct link between service delivery and state legitimacy. ODI/SLRC, IDS, and other state legitimacy research initiatives have begun to point to the importance of political and social narratives, inter-group contestation, and the quality of how state “relationships” with citizens in service delivery forge state legitimacy. These elements are consistent with several findings in the ‘Pathways for Peace’ report on the importance of narrative, trust, and inter-group dynamics, although the same report also relies on process and outcomes legitimacy. The Bank should support core institutions, systems, and service delivery even if they do not directly translate into greater state legitimacy, as these services are vital. World Vision recommends that the World Bank takes stock of emerging literature/evidence on state legitimacy and the greater importance of narratives, “relational statebuilding” and grievance mechanisms over direct service delivery in contributing to legitimacy and considers the programming implications of this evidence for the strategy. • World Vision strongly affirms the Bank’s commitment to Do No Harm as a guiding principle and minimum standard for all decisions around engagement in FCV situations. It is critical to apply the Do No Harm concept across the Bank’s work to ensure that interventions and approaches are not harming program stakeholders or recipients, and across programming to ensure that interventions are minimizing tensions and increasing connectors between communities.

B. Pillars of Engagement (page 17-29)

• We welcome the Bank’s commitment to ensuring its programs are adapted to the needs of at-risk groups, who disproportionally suffer from violence and the economic impact of war, by working towards providing comprehensive services for children as well as capacity building and employment opportunities for young people (page 27). • Mounting evidence shows that social capital is a resilience driver, yet under the section on improving human capital and social capital (page 27), there is little reference to the latter. The Bank’s Social Capital Initiative was a pioneering effort that advanced thinking on the linking role of social capital. The FCV strategy is a critical moment to articulate a complementary approach to human capital and social capital to drive a “fragility to resilience” approach.
World Vision recommends that the World Bank puts forward a comprehensive “fragility to resilience” approach to guide policy and practice. RRAs should be a centerpiece of this approach. This approach would require more engagement with resilience thinking, including how to build absorptive, adaptive, and transformative capacities across the humanitarian, development, peace nexus and in the face of complex, interacting risks of shocks and stress. World Vision also recommends that the World Bank adopts a more robust focus on social capital that includes promoting the functions of bonding, bridging, and cohesion which have been shown to drive resilience within and across communities, and between communities and formal institutions (governmental, private sector).

C. Areas of Special Emphasis (page 29-32)

- World Vision welcomes the reference to the important role of social safety nets and social protection in improving equity, inclusion and individual, household, and community resilience (page 30). The Bank has a critical role to play in supporting the transition of humanitarian cash and voucher programs to government-led and nationally owned social protection systems in fragile contexts. World Vision sees a significant opportunity for the Bank to innovate by combining its organizational commitments to citizen engagement, and to national social protection systems through integrating social accountability approaches into its M&E frameworks in fragile contexts. World Vision encourages the World Bank to include financial inclusion as a key outcome of inclusive social protection programs, and promote the role of social transfers in establishing the building blocks of government-led, nationally owned and equitable social protection systems in fragile contexts, including through the use of social accountability mechanisms in the strategy.
- World Vision welcomes the Bank’s inclusion of engaging on justice and the rule of law as an area of special emphasis and its plans to enhance the justice and rule-of-law components of its operational and analytical work to support countries in better understanding and addressing grievances, protecting rights, and reducing crime. In these efforts, VAC should also be included along with GBV (page 31). World Vision also recommends the promotion of social accountability approaches, including Citizen, Voice and Action to enhance citizen engagement and empowerment, contributing to increasing quality social protection and rule of law support for the most vulnerable, provided by national governments.
- As another area of special emphasis, the Bank plans to update its approach to engagement with the security sector and military actors in these contexts. It will be important to ensure any such engagement or convening upholds and promotes international humanitarian law and respects humanitarian principles.

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

- World Vision welcomes the strategy’s emphasis on strong monitoring and evaluation frameworks and appreciates the Bank’s effort to balance qualitative and quantitative measures to capture a wider range of multidimensional impacts and better determine its impact towards achievement of concrete, tangible improvements in the lives of the most vulnerable children, families, and communities, in alignment with the 2030 Agenda’s commitment to ‘leave no one behind’. We see as positive the Bank’s intent to use scaled up M&E to learn, adapt, and course correct during programming, to monitor community trust and perceptions, and to empower beneficiaries. It would be helpful in the
next version of the strategy to provide greater detail on how the Bank will engage beneficiaries in M&E, including for capacity building and a truly inclusive approach. It will also be very important for the Bank’s M&E framework/indicators to collect data disaggregated by age and sex in order to capture the specific needs of males and females across the lifecycle (e.g., boys and girls, women and men). Children and youth make up the majority of the population in many fragile contexts. As such, it is critical to understand and address the disproportionate, long-term impacts of fragility on children as this has significant negative implications for current and future national social and economic growth, equity, and inclusion. World Vision recommends that the World Bank provides greater details on how they will engage with and empower beneficiaries, as well as how they will ensure they and the governments they support are measuring impact on the lives of the most vulnerable children, families, and communities. Data should be disaggregated by age and sex.

The strategy highlights possible areas to incorporate new communications and digital solutions such as the Geo-Enabling Monitoring and Supervision (GEMs) initiative and use of mobile phones and remote sensing in fragile contexts to improve project supervision, monitoring and evaluation (M&E), coordination, and citizen empowerment. However, it is unclear how the Bank will address key digital literacy and capacity issues to ensure these digital solutions are appropriate and accessible for the most vulnerable. This is particularly relevant when humanitarian and social transfers are delivered digitally (e.g., mobile money). In these situations, digital accountability mechanisms can enable well-informed, empowered participation, choice, and self-reliance, but issues of privacy and the selling/monetization of data to the private sector must be addressed. Children and youth are a critical demographic in the digital space, not just for the potential for increased vulnerability but also their role as catalysts in embracing digital tools. World Vision recommends that the World Bank creates a plan for digital transformation in FCV situations that includes GEMs, iterative beneficiary monitoring, participatory tracking, and other measures, and extends this to issues such as digital literacy, access, and capacity, as well as data protection and privacy, to ensure digital solutions maximize impact for the most vulnerable.

World Vision believes that the Bank’s strategy can go further in committing to adaptive management approaches that link design, implementation, and M&E. While there are several references to adaptive approaches, work in fragile contexts requires more robust approaches to adaptive development, similar to the efforts DFID, USAID, and others are undertaking and consistent with 2017 World Development Report. This should include a more robust focus and strategy to guide shock-responsive adaptive efforts but also “complexity-aware” theories of change and problem-driven, iterative approaches. It should also include a commitment to convening and partnerships to advance adaptive thinking, building on the work of the Bank’s Global Delivery Initiative. World Vision recommends that the World Bank provides greater detail on how it will pivot to more robust adaptive management approaches that link program design, implementation, M&E, and learning.

World Vision welcomes the acknowledgment of the distinct risk environment in FCV settings and the likelihood that development progress will not be linear. We encourage the Bank to ensure that procurement processes and guidelines are fit for purpose given these circumstances. The same drivers of higher costs in FCV settings noted by the Bank (page 8) also apply for implementing organizations. Mismatched procurement processes can inhibit quality, innovation, and adaptive programming, particularly when they lead to underfunding of critical operational costs. World Vision recommends that the World Bank ensures its procurement processes and guidelines, and funding modalities more generally, are flexibly designed to achieve the broader aims of the FCV strategy. When partners are willing to adopt a higher risk tolerance and engage in FCV settings, the Bank should ensure
risk mitigation and critical associated costs (e.g., security, safeguarding and staff care) are adequately funded and key standards for quality funding are upheld by client governments.

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

- We agree that in the Bank’s Development Policy Operations, it will be critical not just to consider economic risks, but also ensure all such engagements take a conflict sensitive approach (page 39).

C. Partnerships (page 41-43)

- Faith-based organizations (FBOs) and faith leaders can be key partners in addressing the drivers of fragility and to achieve sustainable peace and prosperity. While the strategy does recognize the critical role faith actors play in addressing the drivers of fragility, they also play an important role in building resilience. The Pew Research Center has shown the growth trajectory of faith communities in fragile contexts and UN, JLI and University of Oxford research highlights the unique challenges but also the many opportunities created by engagement with faith leaders and FBOs for social mobilization, resilience building, and behaviour change. The Bank has a key role in supporting FBOs in efforts in prevention, resilience building and inclusive development. World Vision recommends that the World Bank uses entry points identified by emerging research to make greater linkages with faith leaders and FBOs, the Moral Imperative, the Bank’s ongoing Global Faith Initiative, and the International Partnership on Religion and Sustainable Development (PaRD).

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?

World Vision is pleased to submit our feedback on the World Bank’s draft strategy on fragility, conflict and violence. We appreciate the effort required to develop a comprehensive strategy that consolidates expertise from across the Bank and external stakeholders around a new way of working in the world’s most challenging contexts. It is positive to see the Bank’s commitments and plans for engaging earlier and across the full spectrum of fragility, with a broader range of stakeholders across the humanitarian, development, peace nexus towards achievement of sustained peace and the 2030 Agenda. We
congratulate the Bank for its continued efforts to deepen its impact in fragile contexts and, through its organization-wide FCV strategy, its commitment to bring greater coherence, structure, and vision to this work. Considering this, World Vision’s overarching comments would suggest that: • The strategy would benefit from greater clarity around what the Bank’s approach to building greater resilience will be. The strategy uses the term ‘resilience’ in different ways, referring to community resilience to disasters and climate change; institutional resilience, including for justice and the rule of law; economic resilience to macroeconomic instability; and resilience as a key element of prevention (consistent with the ‘Pathways for Peace’ report). The strategy’s financing toolkit list also refers to resilience as key to prevention and recovery, however, it makes no mention of resilience during active conflict/crisis, which is precisely where absorptive and adaptive capacities can play a critical role. Given many fragile contexts are characterized by chronic development failures, the strategy presents a major opportunity for the Bank to advance a comprehensive approach to resilience building which could significantly help advance global efforts to address fragility and reduce humanitarian vulnerabilities over the long term, and at scale. In addition, we welcome the Bank’s commitment to revising its Risks and Resilience Assessment (RRA) methodology. Given recent research from ODI demonstrating that disaster risk reduction (DRR) financing is lowest in fragile and conflict-affected contexts where disaster vulnerabilities are highest, we would also recommend that in revising the RRA, greater emphasis be placed on DRR approaches. This also provides an opportunity for the Bank to link the pioneering work of the World Bank-hosted Global Facility for Disaster Risk Reduction to its work in fragile contexts. • The strategy would benefit from a clearer, more consistent articulation of the Bank's comparative advantage in working with both private and public sector actors. The Bank has a unique competitive advantage and set of experience in working effectively with both the public and private sectors, yet at some points, the strategy seems to infer that the Bank will place much more emphasis on private sector engagement (e.g., reference that “the private sector lies at the center of sustainable development”) may give an impression that the strategy may privilege private sector over public sector investments. • Within the various high level structural elements which underpin the strategy overall (i.e., the Framework, Guiding Principles, Pillars of Engagement and "6 P’s" for operationalizing the strategy), more attention may be needed to further develop a coherent narrative around how these key elements align and reinforce each other in pursuit of the strategy’s goals and objectives. Building out a coherent narrative would likely have knock-on benefits in terms of facilitating the Bank's communications on the strategy with its partners and key external stakeholders. • World Vision welcomes the Bank’s commitment to scaling up its efforts and broadening its partnerships across the spectrum of fragility in some of the world’s most challenging operating environments. It will be helpful for the Bank to develop a scaling-up framework for FCV that guides Bank action for scaling, partnerships, and learning (including sharing successes and failures as a resource to guide the broader development communities scaling efforts) in diverse fragile contexts, similar to the efforts of other multilateral development banks such as the African Development Bank. World Vision recommends that the World Bank develops a scaling-up framework for FCV that guides the Bank’s efforts on scaling in diverse fragile contexts, including through multi-partner consortia and pooled funding that can leverage collective domestic and international resources and capabilities for achieving widespread development outcomes in ways that strengthen institutions and communities. • Implementation of this strategy will be an important contribution toward supporting FCV-affected countries to achieve greater prosperity and promote peace. Throughout the strategy, the Bank outlines its plans to change the way it works and focus more on prevention and mitigating FCV risks before conflict or violence take hold, which is positive. World Vision welcomes the Bank’s commitments
toward: conducting more joint analysis and sharing information generated from this and other analysis more openly with other actors on the ground; ensuring their engagements take a conflict sensitive approach; increasing citizen engagement and empowerment; focusing on preserving institutional capacity and human capital even in the most difficult settings to protect development gains; deepening partnerships with a diverse set of actors including FBOs; and stepping up its efforts to use its convening power to promote peace. As mentioned above, more can be said in the strategy about the Bank’s plans to increase citizen engagement and empowerment, and we encourage the Bank to consider long-term consortia with a diverse range of actors operating across the humanitarian, development, peace nexus to tackle the drivers of FCV.