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Gender Strategy Team  
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To Whom It May Concern:

We are writing to provide feedback on the development of a new World Bank Gender Strategy.

As the World Bank Concept Note states, gender equality is an important development outcome in its own right, and is central to poverty reduction and inclusive growth. We are pleased to see that gender is one of the five key Cross-Cutting Solution Areas guiding the World Bank's work.

The Gender Strategy should also affirm that respect for women and girls' human rights are important goals and inextricably tied to the realization of development goals. As early as 1998, the World Bank acknowledged that "creating the conditions for attainment of human rights is a central and irreducible goal of development" and that "the world now accepts that sustainable development is impossible without human rights." As such, it is critical for the new Gender Strategy to reference and to be aligned with women's and girls' rights as protected under international human rights law.

Additionally, In order to ensure that the new framework effectively advances gender equality and protects the rights of women and girls, it is essential to incorporate the principles developed as part of the strategy into the World Bank's Environmental and Social safeguards, which are currently under review.

We would like to highlight three key areas to supplement the proposed gender framework outlined in the Concept Note: 1) meaningful participation and consultation; 2) due diligence; and 3) accountability for implementation of the strategy.

### **Meaningful participation and consultation**

The Concept Note (paragraph 33) highlights women's empowerment and agency as a core part of its approach to gender mainstreaming. Consultation with women and girls on the initiation, design, implementation, and evaluation of development projects is key. The World Bank's safeguard policies, together with its access to information policy and consultation guidelines, demonstrate a recognition of the importance of participation, consultation, and access to information.

However, gaps remain in implementation and monitoring. Women and girls are often at heightened risk of being marginalized in consultation processes because of prevailing social norms, male-dominated leadership structures, and a lack of gender-sensitive methodologies. Women's civil society groups in many countries are often smaller, more informal, and less-resourced to mobilize and raise women and girls' concerns effectively. Specific groups of women may face additional obstacles to meaningful participation in both consultation processes and in implementation of development projects, including ethnic and religious minorities, migrants, adolescents, older women, and those with disabilities, among others.

And as highlighted in the June 2015 Human Rights Watch report, "At Your Own Risk:" Reprisals against Critics of World Bank Group Projects, the World Bank does not adequately address environments where freedom of expression, assembly, and association are not respected or where community members and others face retaliation for their criticism of proposed or ongoing projects. In such environments, women and girls may be subject to gender-based violence and harassment.

Human Rights Watch recommends that the World Bank Gender Strategy:

- Outline measures for ensuring engagement and consultation with a broad range of women and girls who are stakeholders in development projects, and for their participation to be meaningful in practice and not just a formality.
- Improve mechanisms for preventing, investigating, and remedying attacks on community members who speak out against proposed development projects, in order to foster stakeholder engagement, including for women.
- Elaborate the links with the current World Bank safeguards and the proposed social and environmental framework and make a goal of strengthening the implementation of these with respect to gender.

## **Due Diligence**

The World Bank does not currently have effective mechanisms for the kind of due diligence required to avoid serious human rights abuses, including against women and girls, in the proposed framework for the gender strategy, the World Bank's current safeguard policies, or its proposed environmental and social framework.

Such due diligence should involve the World Bank considering how each of its activities may create or exacerbate existing human rights problems for women and girls in order to determine how to constructively and proactively mitigate those risks. For example, a Human Rights Watch report on resettlement linked to the Rogun dam in Tajikistan, in which the World Bank was involved, found that the loss of land as a result of resettlement disproportionately harmed women because traditional gender roles and the gender gap in higher education caused many rural women to turn to informal sources of income such as farming and herding.

Human Rights Watch recommends that the World Bank Gender Strategy:

- Recognize gender as a factor which may increase vulnerability to adverse effects of the Bank's operations and which may be an obstacle in ensuring equal benefits of Bank-financed projects.
- Require staff to respect and protect international human rights law and not support any activities that are likely to contribute to or exacerbate human rights abuses, including against women and girls.
- Undertake due diligence to identify human rights risks against women and girls, including those posed by the broader operating environment of the project, and avoid, address, or mitigate any adverse human rights impacts.

## **Accountability of the World Bank to Implementing the Gender Strategy**


We are pleased that the World Bank is developing a new gender strategy to guide its work in coming years. However, the draft concept note remains vague on how the operationalization of the gender strategy will be monitored, evaluated, and improved. In Human Rights Watch's experience, explicit and vocal support from the highest levels of leadership accompanied by adequate resources are critical for ensuring that gender mainstreaming initiatives are successful.

Human Rights Watch recommends that the World Bank Gender Strategy:

- Elaborate benchmarks for the implementation and evaluation of the gender strategy.
- Set out a plan for dissemination of the gender strategy both internally and externally and establish channels for feedback and complaints on implementation.
- Receive strong and visible support from senior leadership of the World Bank Group along with adequate resources.
- Require convening and regularly consulting independent civil society advisory groups on its implementation. These could include women's advisory groups at the country level as well as at a global level. Members should include stakeholders in specific projects as well as well-respected and independent women's rights activists and scholars.

We appreciate the opportunity to provide feedback during the open consultation period and would be happy to discuss any of these recommendations in more detail.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nisha V' followed by a stylized flourish.

Nisha Varia  
Advocacy Director  
Women's Rights Division