July 2015

The UK Gender and Development Network (GADN) Women's Economic Justice (WEJ) working group's submission to the World Bank Group's Gender Strategy

The World Bank Group is committed to supporting countries in their efforts to reduce poverty and promote more equitable societies. In this context, what are key gender gaps the World Bank Group should focus on to support countries in implementing these goals?

1. The WBG's Gender Strategy requires a more holistic approach to achieving substantive gender equality within the context of reducing poverty and promoting equality

The WEJ working group welcomes the World Bank Group's (referred to as the WBG) concept note on *'Promoting Gender Equality to Reduce Poverty and Boost Shared Prosperity'* (referred to as the Gender Strategy) which is currently open for consultation until July 2015. The Gender Strategy presents opportunities for the WBG to deepen, scale up and consolidate its work on gender, such that substantive gender equality[1] is prioritized and mainstreamed robustly across all of the WBG's work.

The WEJ working group is concerned that the focus of the WBG's Gender strategy on women's economic empowerment is limited in its scope and analysis. This approach views women's access to jobs and assets in isolation from the range of structural inequalities that limit women's economic empowerment. Consequently, it neglects core social determinants of gender equality, such as health, education, autonomy and freedom from violence that are not only women's human rights in and of themselves, but impact on the economic opportunities of women worldwide. The WEJ working group is concerned that the draft of the Gender Strategy is at odds with recent work of the Gender Unit, particularly its report on Voice and Agency, published in 2014. *Voice and Agency* provides robust analysis of structural inequalities that limit women's human rights from being realized, and importantly also recognizes the varying forms of multiple discrimination that women and girls face.

Over the last twenty years, much donor discourse on women's economic empowerment has focused on integrating women into the market economy, and raising the income of individual women often through, for example, micro-credit programmes.[2] While useful, this response has not increased women's economic

[1] *'Substantive equality'* includes equality of opportunity as well as equality of outcomes. The foundational definition taken from the Convention of Elimination of all forms of Discrimination against Women (CEDAW) prohibits discriminatory treatment (direct discrimination) as well as discriminatory outcomes (indirect discrimination); it also precludes discrimination that is intended (purposive) as well as unintended (discrimination in effect).

[2] Gender and Development Network (2015). *Turning Promises into Progress: Gender equality and rights for women and girls - lessons learnt and actions needed*

empowerment substantially for a number of reasons. Income, although important, is not enough. Women's economic empowerment requires an increase in control over their income and household finances, greater influence in economic decision making at every level, access to essential services and social protection and macroeconomic policies that enable the realisation of women's rights.

In order to support countries in reducing poverty and promoting equality, it is important that the WBG adopts an approach to substantive gender equality that considers not only the differential economic opportunities and assets available to women and girls, but understands the structural inequalities that deny women the realization of their full range of rights. This includes inequalities across the following areas:

- Health, particularly in relation to the realization of sexual and reproductive health and rights (SRHR);
- Sexual and Gender-Based Violence;
- Education, including availability of comprehensive sexuality education;
- The disproportionate unpaid care responsibility that women and girls face worldwide;
- The impact of macroeconomic policies on women's rights, including access to decent work; and,
- Women's participation and decision-making across public and political life.

The WEJ working group recommends that the WBG adopts a more holistic approach to achieving substantive gender equality within its strategy. This requires that the WBG addresses the wide range of structural inequalities that curtail women's rights and limit their empowerment.

What are examples of policies approaches and programs (either by the public or private sector) that have helped remove economic and social constraints to women and girls and that the World Bank Group strategy could learn from?

1. Increasing women's economic opportunities requires recognizing, reducing and redistributing women's responsibility of unpaid care work

Worldwide, women spend at least twice as much time on unpaid care work compared to men.[3] In Africa, women account for two thirds of caregivers for people living with HIV.[4] Increasing women's paid employment may have unintended negative consequences particularly if they continue to bear primary responsibility for care work with little or no support in the form of childcare, infrastructure and essential public services. Economic empowerment, particularly for the most marginalized women, requires investment in social infrastructure, essential public services and care sensitive social protection.

For example, the level of care work women face affects women's access to sexual and reproductive health services, both in terms of time burdens as well as practical barriers that directly limit their access to critical services. The reverse is true as well: without access to essential sexual and reproductive health services such as family planning, women cannot choose if and when and how many children to have. This can, in turn, increase women's care burden and impacts the health and economic consequences that result from unplanned and/or frequent pregnancies, such as unsafe abortions.[5]

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[3] UN Department of Economics and Social Affairs. (2010) The World's Women 2010: Trends and Statistics http://unstats.un.org/unsd/demographic/products/Worldswomen/WW2010%20Report_by%20chapter(pdf)/Executive%20summary.pdf

[4] UNAIDS (2008) 'Report on the Global AIDS Epidemic' http://data.unaids.org/pub/GlobalReport/2008/JC1511_GR08_ExecutiveSummary_en.pdf

[5] Gender and Development Network (2015). *Turning Promises into Progress: Gender equality and rights for women and girls - lessons learnt and actions needed.*

Provisions for family friendly policies, maternity leave and public care services are primary elements of any policy attempt to draw women into paid work in a fair and empowering way. For example, in Guatemala City, the introduction of community day care increased the income of mothers by 30 per cent and made them more likely to be employed in the formal sector.[6] In rural Colombia, community day care had positive impacts on women's labour participation, as well as benefits for children's well-being, while a pre-school programme in Argentina increased women's employment by 7–14 per cent.[7]. In addition, there is a need to tackle social norms that see the domain of care work as a women's work. For example, in Sierra Leone Christian Aid's partner SEND is working with couples to ensure a more equitable sharing of household chores and caring duties. Investing in low-carbon decentralised energy and other time saving technologies is also critical to reduce time spent on care and its drudgery elements.

The WEJ working group recommends that the WBG Gender Strategy should recognise the contribution of unpaid care work to the economy and promote infrastructure, time-saving technologies and quality public services such as childcare, care for the elderly, healthcare and regulatory frameworks for universal access to SRHR. The Gender Strategy should commit the WBG to understanding the direct or indirect impact of its work on women's unpaid care.

Such an approach would include:

- **Supporting and promoting gender-responsive fiscal policies, including tax policy, that invest in social infrastructure and high quality public services e.g. through its technical assistance through country development programs, as well as specific initiatives such as Doing Business rankings, and Women, Business and the Law reports.**
- **Supporting and promoting the development of low-carbon decentralised energy solutions, including clean cook stoves and public transport;**
- **Investing in quality and rights based SRHR services, commodities and information; and,**
- **Ensuring that programmes to deliver employment for women are care sensitive, for example by providing care facilities on site and family friendly policies.**

2. Macroeconomic policies must support women's access to decent work

Key multilateral agencies such as UN Women acknowledge that not all pathways to economic development advance gender equality.[8] UN Women notes that some patterns of economic growth rely on maintaining gender inequalities in conditions of work and earnings and enforcing unequal patterns of unpaid work.[9] A greater understanding is needed of how current growth models impact negatively on women and girls, and the development of alternative models.[10] This would include recognition of the different impact of all policies– including taxation, trade and investment – on women and men with measures to promote gender

[6] Todd P (2013) How to Improve Women's Employability and Quality of Work in Transition Economies. Research analysis produced for UNF. Available at Accessed 18 September 2014. See also UNDP and International Labour Organization (2009) Work and Family: Towards New Forms of Reconciliation with Social Co-responsibility. Women in Guatemala City cited lack of child care as the number one reason that they did not work in the formal sector.

[7] Ibid.

[8] UN Women (2015) Progress of the World's Women 2015-2016. Transforming Economies, Realizing Rights. Pg. 69

[9] Ibid.

[10] Gender and Development Network (2015). *Turning Promises into Progress: Gender equality and rights for women and girls - lessons learnt and actions needed*

equality and ensure that women are not disadvantaged.[11] It would also include a greater commitment to the creation of decent work opportunities, the provision of high quality public services, accepting the responsibility of governments to provide care rather than depend on the invisible, unremunerated provision by women within households and communities.[12]

Women's economic empowerment initiatives will only succeed if they are located within a broader transformation of the way in which economic resources are governed.[13] This will require lasting change in economic decision making, and in the distribution of, access to, and control over resources in favour of women who are marginalized and living in poverty.[14] Ultimately, it is important that social and economic policies work together to create a virtuous cycle of generating decent work and gender-responsive social protection and social services, alongside enabling macroeconomic policies that prioritize investment in the social infrastructure.[15]

The WEJ working group recommends that the WBG adopts an approach that explicitly recognizes the interrelationship between economic policies and gender equality. Such an approach would pay attention to:

- **Systematically reviewing the impact of macroeconomic and fiscal policies on women and rectifying inequalities;**
- **Implementing policies to redress women's inequality at work;**
- **Challenging discriminatory social norms and gender stereotyping that underpin macroeconomic and fiscal policies;**
- **Promoting the review of domestic revenue mobilization policies, including all tax policies, to identify explicit and implicit gender impacts for women's unpaid care, paid work and unpaid labour;**
- **Promoting investment in data to enable accurate gender impact assessments of tax instruments, actual disaggregated data on income, expenditure and consumption for all individuals, as well as for households, families, and all business forms;**
- **Promoting an increase in the share of tax and budget policies and laws subject to periodic, participatory gender equality analysis;**
- **Supporting budgetary transparency mechanisms that allow for the public scrutiny of the costs and benefits of tax and Domestic Revenue Mobilization (DRM) policies based on gender equality, human rights and environmental protection principles; and,**
- **Support reforms to tackle global tax dodging, including by transnational corporations in order to increase the domestic resources available to promote gender equality.**

[11] Gender and Development Network (2015). *Turning Promises into Progress: Gender equality and rights for women and girls - lessons learnt and actions needed*

[12] Ibid.

[13] UN Women (2015). Op. cit.

[14] Srilatha, B. (2012) What does transforming economic power mean? One of a series of articles addressing themes for discussion at the 12th AWID International Forum, 'Transforming Economic Power to advance women's rights and justice', available at: http://www.opendemocracy.net/5050/srilatha-batliwala/what-doestransforming-economic-power-mean

[15] UN Women (2015). Op. cit.

3. Women's access to the financial sector

The financial sector has been one key target of discussion in terms of gender equality. The WBG's own research has shown that women disproportionately lack access to financial services.[16] This gap is widening in developing countries. [17] Use of financial services remains significantly related to gender, even after controlling for a host of individual characteristics, including income, education, employment status, rural residency and age. In recent years the International Finance Corporation (IFC) has sought to promote women's economic empowerment, including through investments in Financial Intermediaries (FIs). For example in March 2013, the IFC teamed up with multinational company Coca-Cola to launch a $100 million, three-year joint initiative to provide access to finance for women entrepreneurs in Eurasia and Africa.[18] In March 2014 it signed an agreement with international investment bank Goldman Sachs which it claims will support up to 100,000 women small and medium sized business owners in gaining access to capital.[19]

However, questions remain about the mechanism of women's integration into the financial system and whether the IFC's approach promotes the necessary structural changes that empower women and support women's rights. In IFC supported financial sector institutions, women may be seen more as a source of profit, essentially as untapped markets. The microfinance industry, in particular, has been criticized for loading women with unsustainable debt without sufficiently dealing with the underlying economic, social, cultural and legal barriers to women's equality. There are also concerns about the power dynamics generated by microfinance's use of community shame to ensure repayment compliance. The IFC itself is unable to assess the gender impact of its investments because there is little to no knowledge about the ground-level social implications of the IFC's investments. At best, the IFC might measure data about the reach of its financial sector clients in a sex- disaggregated way, but little beyond that. Assessing the real gender impacts constitutes an important future line of enquiry into the FI agenda.[20]

The WEJ working group recommends that the WBG employs a rights-based approach to addressing women's economic equality, including supporting macroeconomic policies that advance women's rights.

In your experience, what are the best examples of policies and programs that have created access to better jobs for both women and men? What made these work?

1. Invest in the public sector as both a service provider and key employer of women

Entering employment does not automatically lead to empowerment and equality for women. Many women and men, especially in developing countries, simply do not earn a *living wage* – in other words, enough to have a decent standard of living and meet their own and their families' basic needs. What's more, as noted

[16] World Bank Policy Research working paper no. WPS 6416, April 2013Financial inclusion and legal discrimination against women: evidence from developing countries", Asli Demirguc-Kunt, Leora Klapper, and Dorothe Singer, http://www-wds.worldbank.org/external/default/WDSContentServer/ IW3P/IB/2013/04/19/000158349_20130419105349/Rendered/PDF/wps6416.pdf.
[17] World Bank Group (2012)World Development Report on Gender Equality and Development, World Bank, 2011
[18] See http://www.coca-colacompany.com/press- center/press-releases/the-coca-cola-company- and-ifc-announce-initiative-to-support-women- entrepreneurs-across-emerging-markets
[19] See http://www.goldmansachs.com/citizenship/10000women/news-and-events/10000women-ifc.html
[20] Follow the Money: The World Bank Group and the use of financial intermediaries, Bretton Woods Project 2014 http://www.brettonwoodsproject.org/2014/04/follow-the-money/

in *Gender at Work*, the WBG's companion to its World Development Report on Jobs, women consistently earn less than men and no country has reached gender wage parity. They earn on average 10 to 30 percent less than men for work of equal value. In developing countries women are concentrated in informal work and less likely to have full-time wage jobs with a formal employer. Policies and programmes which prioritise job creation without attention to gender discrimination in the labour market are at risk of reinforcing and exacerbating gender inequality.

The public sector is an important source of jobs, as well as providing services that benefit both the economy and society more broadly.[21] Women working in the public sector are concentrated in health, education and care services, which both support and reduce women's unpaid care and domestic work. The public sector has historically been an important source of formal wage employment for women, providing decent pay, good employment conditions, job security and pension contributions linked to high levels of unionization and opportunities for collective bargaining.[22] The public sector can play an important role in setting and advancing standards for gender equality policies for the private sector. However, austerity policies have led to a sharp downward trend in public sector employment; this has disproportionately hurt women as they depend on public services more and are more likely to be employed by the public sector.

Scaling up public services to achieve women's rights will require the creation of new jobs. Globally 10.3 million additional health workers are required to ensure the effective delivery of universal health care and this presents a major opportunity to create decent employment for women in these sectors.[23] Capitalizing on this opportunity would be beneficial in more ways than one. It would provide support for women's well-being as well as employment and wider economic benefits.

The WEJ working group recommends that the WBG should prioritize the creation of decent jobs and investment in well-resourced public services, which have the potential to support and reduce women's unpaid care work and meet their sexual and reproductive health needs, as well as providing good quality jobs for women.

2. Address the causes of violence against women and girls (VAWG) and ensure women are not at more risk of violence due to increased economic participation.

It is positive that the Gender Strategy acknowledges the importance of addressing VAWG, including through challenging social norms. VAWG is one of the most pervasive human rights abuses and is estimated to cost between 1.2 and 3.7 percent of GDP.[24] Violence impacts on a woman's ability to earn an income and has negative consequences for their employers as it limits their levels of productivity.[25]

Women's economic empowerment can be a key driver in challenging the social norms which create VAWG, and in allowing women to have the resources to leave violent relationships. However, women can experience increased violence as a result of their employment or economic activity, and it is important that the WBG's Gender Strategy, to increase women's economic participation acknowledges and mitigates

[21] UN Women (2015). Op. cit.
[22] UN Women (2015). Op. cit.
[23] UN Women (2015). Op. cit.
[24] Klugman, Jeni; Hanmer, Lucia; Twigg, Sarah; Hasan, Tazeen; McCleary-Sills, Jennifer; Santamaria, Julieth. 2014.Voice and Agency : Empowering Women and Girls for Shared Prosperity. Washington, DC: World Bank Group
[25] Georgia, T. (2015) DFID Guidance Note on Addressing Violence Against Women and Girls (VAWG) Through DFID's Economic Development and Women's Economic Empowerment Programmes – Part A, London: VAWG Helpdesk.

against any increased risk of violence which this could result in. Women can experience an increased risk of violence as they travel to and from work, while they are at work as the result of being in public spaces, or from their employers themselves.[26] For example, UN Women found that 55 percent of women working in market spaces in Papua New Guinea had experienced sexual violence in the previous year.[27] Oxfam found through its work with strawberry pickers in Morocco that women were frequently experiencing sexual harassment from their supervisors.[28]

Women's increased economic independence can also challenge the power balance within their family or community, resulting in the use of violence to redress it.[29] The relationship between violence, economic empowerment and social norms is therefore complex and context specific.

The WEJ working group recommends that the WBG adopts a context specific approach to ensuring that increasing women's economic participation and access to assets does not increase their risk of violence, and works to prevent VAWG, including through addressing harmful social norms.

3. Women and Agriculture

Women constitute an estimated 43 per cent of the global labour force in agriculture, and in sub-Saharan Africa, women make up close to an estimated 50 per cent of the agricultural workforce.[30] Yet, there is a widespread and deep-rooted bias against women farmers - women working in the agriculture, forestry and fisheries sectors have received only 7-9 percent of agricultural development assistance in recent years. Women farmers face a range of unique production and marketing constraints. These include time spent on unpaid care work and social norms preventing them from participating in decisions, collective action, and accessing essential services and skills training. As a result, they produce, on average, up to a third less than their male counterparts. The Food and Agriculture Organization of the United Nations (FAO) has calculated that, given the same access to agricultural resources, women farmers can be just as productive as men, which in turn would translate into up to 4 per cent increase in agricultural output in the developing world.

Therefore, all WBG's projects and programmes aiming to develop the agricultural sector should be underpinned by gender-sensitive problem analysis, and promote solutions that address gender inequality directly. This is not currently the case. For example, the Enabling the Business of Agriculture (EBA) project, which aims to identify and monitor policies and regulations that impact how markets function in the agricultural sector, in order to provide policy makers with accurate, evidence-based data and analysis to help them improve policies, has so far failed to ask gender-disaggregated questions about most of the regulations and policies it aims to monitor. The project team and donors to the project should ensure that every policy area the project will be monitoring includes gender analysis and impact assessments.

[26] Georgia, T. (2015) DFID Guidance Note on Addressing Violence Against Women and Girls (VAWG) Through DFID's Economic Development and Women's Economic Empowerment Programmes – Part A, London: VAWG Helpdesk.
[27] UN Women (2014) In Brief: Safe Cities Global Initiative. New York: UN Women
[28] Oxfam International (2014) Women Strawberry Workers in Morocco: Accessing rights to secure and decent work. Oxford: Oxfam International
[29] Georgia, T. (2015) DFID Guidance Note on Addressing Violence Against Women and Girls (VAWG) Through DFID's Economic Development and Women's Economic Empowerment Programmes – Part A, London: VAWG Helpdesk.
[30] The Food and Agriculture Organization of the United Nations (2011) The Role of Women in Agriculture.

How can the World Bank Group better support countries and companies in their efforts to strengthen their systems and institutions with respect to gender equality to yield more sustainable results?

1. Measure the things that matters

Accurate disaggregated data are critical for informing policies and advancing gender equality. These data give us a better picture of what progress has been made and can encourage political will to act on areas where progress is stalling. Increasing the capacity to produce reliable, accurate and timely statistics, in particular gender statistics, remains a formidable challenge for many countries. For example, despite the United Nations definition of 'adolescent' as anyone between the ages of 10 and 19, most of the internationally comparable statistics and estimates available on adolescent pregnancies or births cover only part of the cohort – ages 15 to 19. Similarly, when women reach the age of 49 they virtually drop off statistics. Improvement on disaggregation of data by sex, age and other categories such as marital status, ethnicity, caste, disability and location is crucial to understand what particular challenges different groups of women face and inform policy responses.

Sex- disaggregated employment and wage data is limited. This weakness in the data points to a further aspect of women's economic inequality: that of data gaps. As the WBG notes, the coverage, definitions and methods of compiling wage statistics differ significantly and in the absence of strong, reliable data and investments in countries' capacity to improve tracking and comparison of key gender indicators, our understanding of the true scale of the injustice of women's economic inequality is constrained and potentially underestimated.[31]

The WEJ working group recommends that the WBG prioritize greater investment and effort to fill knowledge gaps and collect robust data on women's participation in the labour market and wider economy. We further recommend that the WBG work with governments and companies to increase data collection disaggregated by sex and age. In addition, there is a need to extend the implementation of time use surveys which have proved a valuable instrument to quantify and make visible the time women spend on unpaid care.

Gender-responsive budgeting is a widely applied approach that aims to guide the formulation of fiscal and budgetary policies to enhance gender equality outcomes. Gender-responsive budgeting involves analysis of the gender-specific impacts of the allocation of public spending, taxation and public service delivery using sex-disaggregated data on the beneficiaries of different categories of spending or service provision and on the incidence of taxation.[32] A gender analysis of national budgets should also, ideally, examine fiscal policy at the aggregate level: total spending, total revenues and deficit financing. Investing in sex-disaggregated income and expenditure data would greatly enhance the degree to which fiscal policies can be gender responsive.

The WEJ working group recommends that the WBG supports governments to use gender-responsive budgeting to guide revenue mobilization and spending decisions.

It is important that that the WBG's Regional Gender Action Plans, as well as the Country Gender Assessments, are underpinned by strong systems of accountability as well as frameworks that monitor

[31] The World Bank Group (2014) Gender at Work: A Companion to the World Development Report on Jobs. http://www.worldbank.org/content/dam/Worldbank/Event/Gender/GenderAtWork_web2.pdf
[32] UN Women (2015). Op. cit.

progress against core gender and SRHR indicators. This requires transparency on the part of the WBG, donor community and national governments to collect and monitor timely and relevant data.

The WEJ working group recommends that the WBG collects, disaggregates and analyses data on its own impact on gender equality and sexual and reproductive health and rights.

2. Ensure safeguards and accountability, particularly with private sector engagement

While acknowledging the need to ensure a mix of financing mechanisms in delivering SRH services and advancing gender equality, the WBG's engagement with the private sector must be rights-based and equitable.

The WEJ working group recommends that the WBG undertakes robust gender impact assessments before recommending private sector engagement in its work.

In particular, we are concerned about the weight given within the Gender Strategy to engage the IFC in advancing gender equality. This is particularly poignant in light of recent reports of gross violations of human rights through IFC lending.[33]

Financial intermediaries

The issue of the IFC's investment via FIs, including commercial banks, private equity and hedge funds, is emerging as increasingly problematic. Between July 2009 and June 2013 the IFC invested $36 billion in FIs.[34] These investments lack accountability because of the absence of important measures that apply to other WBG lending/projects, such as third-party verification by independent auditors, public disclosure of subprojects, sufficient capacity-building for clients ahead of investment and the absence of binding measures in contracts with FI clients to enable sanction for wrong-doing. This lack of scrutiny has had harmful impacts on many of the communities affected by FI investments. A 2015 joint NGO report highlighted, via a number of case studies, that women are particularly affected through loss of access to common resources on which their families depend, and in some cases sexual violence. The cases also demonstrate a systemic failure of the IFC to identify risks, and where they do become aware of problems, to take effective action to intervene. The IFC's failure to be able to account for the impacts of its clients' subprojects renders it blind to the disproportionate impacts of its investments on women.[35]

The WEJ working group recommends that the WBG ensures that robust gender- sensitive policies are in place when financing is mobilized through its private sector arm, the IFC, to ensure that human rights protections are in place, particularly when subsidiary companies are employed to deliver health services. The group also recommends the need for transparency of FI sub-projects so that women and girls can avail themselves of grievance mechanisms available (the CAO). The role of Development Policy Lending and the World Bank/ IFC advisory services have also played a part in undermining labour rights.

[33] Oxfam Press Release (2015). "Billions in "out of control" IFC investments into third-parties causing human rights abuses around the world" Available at: https://www.oxfam.org/en/pressroom/pressreleases/2015-04-02/billions-out-control-ifc-investments-third-parties-causing-human-rights-abuses,

[34] Bretton Woods Project (2014), Follow the money: The World Bank Group and the use of financial intermediaries, http://www.brettonwoodsproject.org/2014/04/follow-the-money/

[35] Oxfam International et al, (April 2015) The Suffering of Others: The human cost of the International Finance Corporation's lending through financial intermediaries, , http://policy-practice.oxfam.org.uk/publications/the-suffering-of-others-the-human-cost-of-the-international-finance-corporation-347438

Infrastructure
How infrastructure projects are initiated and designed can have significant impact on women's access to services, such as water and energy provision, for which women and girls are often responsible. The WBG's push for large scale "transformational" infrastructure raises additional concerns, where not only questions around access and costs can be limiting, but can also imply more substantial changes in circumstances where the scale or location of the project requires resettlement or implies other significant impacts on the environment that can impact negatively on women and children in particular. The renewed focus on public-private partnerships (PPPs) raise additional concerns; following the Independent Evaluation Group's (IEG) 2014 review of the Bank's support for PPPs finding that "*little is recorded on the effects of PPPs on the poor*". Moreover 'gender' or 'women' does not receive a single mention in the IEG review, suggesting that no data is available from the Bank, hence the gendered impacts of PPPs are not known.

Infrastructure projects implemented by the WBG have the potential of reducing the impact of unpaid care responsibilities, through increasing access to water, transport, and energy. Consulting with and taking the needs of women into consideration should therefore be a priority for WBG infrastructure projects in order to ensure consistency and coherence with the aim of increasing women's economic opportunities. A study of WBG infrastructure projects in sub-Saharan Africa found that they failed to take unpaid care into consideration, and were implemented in gender insensitive ways as they failed to consider the needs of women.[36]

The WEJ group recommends that the Gender Strategy should include considerations of gender impacts, including related to unpaid care responsibilities, mandatory for all WBG infrastructure projects. This should include consultations with women during the project preparation phase to establish their needs and consider how to best reduce their unpaid care responsibilities through infrastructure investments, and to monitor and follow this up during project implementation.

Any other comment or suggestion that you may have

1. Opportunities for the Gender Strategy to strengthen mainstreaming across the WBG

The WEJ working group notes that the creation of 14 global practices, including health and education, and five cross-cutting solutions areas, including gender, has led to the centralisation of country programmes, which has been problematic.[37] This approach risks creating a disconnect between different global practices, and in particular, of the cross-cutting solutions area 'gender', falling into the gap. This risk already been identified in respect of children's programmes by the IEG, in a May 2015 report: *World Bank support to early childhood development*. The report found that the WBG *"lacks a strategic framework and an organisational structure to support a coordinated approach across global practices toward the development of children*." It pointed out that while the Bank's 2012 *World Development Report* "*highlights the importance of twin-generational approaches to women's economic empowerment and support to their children's development through quality childcare … synergies have not been established between the Bank's work in gender and early childhood development.*"[38]

[36] Sarah Bibler and Elaine Zuckerman (2013) The care connection: The World Bank and women's unpaid care work in select sub-Saharan African countries. UNU-WIDER Series: WIDER Working Paper Volume: 2013/131
[37] Bretton Woods Project (2015) Out with the new, in with the old? World Bank restructure reveals "colonial mindset", http://www.brettonwoodsproject.org/2015/02/new-old-world-bank-restructure-reveals-colonial-mindset/
[38] Independent Evaluation Group, (2015), *World Bank support to early childhood development: An independent evaluation*, , https://ieg.worldbankgroup.org/Data/reports/chapters/early_child_dev_eval.pdf

A holistic approach to gender equality can be achieved only if substantive gender equality is mainstreamed effectively across the WBG, including across its work on fiscal policy management, regulation and investment. Such an approach would require additional resourcing for the WBG's gender team. In addition, consolidating the WBG's expertise on gender equality could be achieved through ensuring there are focal points on gender equality across the WBG's global practices and regional offices, as well as including objectives related to gender and accountability within the WBG's Corporate Scorecard.

2. **Developing and strengthening diagnostic tools**

The WEJ working group welcomes the WBG's commitment to develop and strengthen diagnostic tools to enable a better understanding of country and sector-specific constraints to more and better jobs and barriers to ownership and control of assets. However, it is vital that the country analysis investigates not only what the constraints are – including as noted in the strategy gender based violence, unpaid care, occupation segregation – but why these inequalities exist and how best to address the causes.

About the WEJ working group

The Women's Economic Justice group is part of the UK Gender and Development Network. The group's mandate is to develop and promote policy recommendations towards the achievement of women's economic rights and justice. Member organisations of the group which have contributed to this submission are International Planned Parenthood Federation (IPPF), Christian Aid, ActionAid UK, Oxfam GB, Bretton Woods Project and Progressio. The views expressed in this paper do not necessarily represent the views of all the members of the group.

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