

**Partnership for Transparency (PTF) Comments on the  
World Bank Group Gender Strategy 2024 - 2030: Accelerate Gender Equality  
for a Sustainable, Resilient, and Inclusive Future**

**General Comments**

- The [gender strategy](#)'s candor about the difficulties of achieving gender equality, and its recognition of the backlash that progress can elicit, provide an important backdrop to the conceptual framework that is articulated. Its emphasis on the intersectionality of gender with other development challenges, and stress on the importance of behavioral approaches to inform interventions, are also useful.
- The strategy rightly advocates a comprehensive methodology, but it would be important that the approach be also holistic and interconnected, so that gender equality both underpins and is underpinned by everything that the World Bank Group (WBG) does.
- The “what” is well explained; the “how” rather less so. This may be reasonable in a strategy whose purpose is to lay out the broad parameters and approach, but much more specificity about how proposed actions and interventions will be conducted so they yield real results is needed. This goes beyond an outcome-oriented results framework and could be in the form of an action plan for each of the proposed outcomes.
- The focus on accountability is particularly welcome. The strategy's emphasis on gender outcomes should be carried down to investment operations. As the strategy notes, gender tags and flags are important tools that have increased attention to gender in WBG operations, but much more rigorous assessment of what has been achieved in real terms is needed to help build understanding of what works and why and in what circumstances.

**Corruption**

- Corruption is not mentioned in the strategy, despite its corrosive impact on development. The World Bank recognizes that corruption disproportionately affects the poor and vulnerable,<sup>1</sup> and that women and girls are overrepresented among the global poor,<sup>2</sup> for reasons the strategy highlights. Given this, corruption should feature much more explicitly.
- There is evidence that corruption affects men and women differently and that gender inequality impacts corruption.<sup>3</sup> Women are disproportionately affected by corruption, because they are more reliant on public services such as health and education, are less able

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<sup>1</sup> World Bank, 2020, [Enhancing Government Effectiveness and Transparency: The Fight Against Corruption](#).

<sup>2</sup> World Bank, 2020, [Poverty and Shared Prosperity 2020 - Reversals of Fortune](#).

<sup>3</sup> UNODC, 2020, [The Time is Now: Addressing the Gender Dimensions of Corruption](#).

to pay for services that are supposed to be free, are often engaged in the informal sector, and frequently lack the ability to seek redress.<sup>4</sup>

- There are linkages between corruption and gender-based violence (GBV) and evidence that sex is used as currency in some instances of corruption, particularly when power dynamics are involved.<sup>5</sup>
- While Transparency International and UNODC have drawn attention to sextortion, it is likely to be much greater than has been documented, in part due to the difficulties of obtaining information and lack of protection for victims who speak out. The strategy should explicitly recognize this problem and WB projects and policies should include measures to prevent and address it.
- The education sector seems to be particularly susceptible to corruption and transactional sex,<sup>6</sup> with grades provided or inflated in return for sex if monetary bribes cannot be paid, yet this is rarely addressed in WB education projects.<sup>7</sup>

### Gender-Based Violence (GBV)<sup>8</sup>

- The increased emphasis on GBV is essential and very much welcomed. As the strategy notes, GBV is a foundational issue that affects everything else to do with gender, equity, and dignity. As a result, GBV should be given even greater emphasis. The recommendations for promoting gender equality should also be specifically applied to GBV.
- As the 2022 review<sup>9</sup> indicates, the World Bank has made tremendous progress in addressing GBV. The strategy could more fully reflect the conclusions and recommendations of the review and emphasize the need for additional resources to be devoted to preventing and ending GBV. While the number of WB operations that address GBV has increased since 2012,

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<sup>4</sup> Ibid.

<sup>5</sup> Transparency International, 2020, [\*Breaking the Silence Around Sextortion: The Links Between Power, Sex and Corruption\*](#).

<sup>6</sup> See U4 Anti-Corruption Resource Centre, 2009, [\*Gender, Corruption and Education\*](#). Much of the information about sexual exploitation in education and sex for grades has come through investigative journalism. This is now changing; see for example, Transparency International Madagascar 2022, [\*La Corruption Sexuelle en Milieu Scolaire et Universitaire a Madagascar\*](#), based on research and surveys undertaken in 2021 and 2022.

<sup>7</sup> This is in spite of the fact that many World Bank education and women's empowerment projects focus on making schools and journeys to school safe for girls. The DRC [\*Girls Learning and Empowerment Project\*](#) and the [\*Emergency Equity and System Strengthening in Education Project\*](#), which explicitly address sexual exploitation in schools, could provide useful models.

<sup>8</sup> PTF associates itself with the [\*Gender-based violence can and should be a World Bank priority\*](#) letter advocating action on the part of the World Bank, which was sent to the World Bank Global Director for Gender in November 2023.

<sup>9</sup> World Bank, 2023, [\*Gender-Based Violence Prevention and Response in World Bank Operations: Taking Stock After a Decade of Engagement, 2012-2022\*](#).

the volume of financing has not kept pace. Both the number of operations and the financing allocated to them need to increase.

- Given the enormity of the problem and the impact it has on the lives and livelihoods of women, girls, sexual and gender minorities, and marginalized groups, concerted efforts to prevent and end GBV, as well as support victims, should feature much more prominently in all of the World Bank’s work.
- The strategy rightly notes that sexual harassment in transport, public spaces, and the workplace is a deterrent to women’s economic participation, but this is a significant understatement. Preventing GBV is a matter of public safety, a core obligation of government that would allow women, girls, sexual and gender minorities, and marginalized groups to participate in all aspects of life without fear.
- GBV should be included as a matter of course in policy dialogue with governments and should explicitly feature in Country Partnership Frameworks as a component of the country gender assessments.
- The World Bank should also increase lending for GBV and include measures to prevent and address it in all projects, including those in social sectors, following the approach used in infrastructure and civil works projects.
- Greater emphasis on GBV in WB research and knowledge work would help to close data gaps and provide the evidence to forcefully advocate for its elimination. This data should be widely publicized and available. WBG management should also powerfully make the case that eliminating GBV is a development imperative.

### **Partnerships with Civil Society**

- It is extremely positive that the strategy recognizes the importance of civil society and indicates that partnership with civil society will be expanded. This is crucial, not only to close gender gaps, but to improve the development outcomes of all WB projects and programs.
- Partnership with civil society organizations (CSOs) is especially important to bring about the social change needed to close gender gaps and promote gender equality. The strategy could give greater recognition to the roles that local CSOs play and how the World Bank can partner with them to not only address constraints to gender equality, but also build on successes that have been achieved.
- Such partnership must be meaningful and civil society recommendations acted on. Too often, WB assurances of engagement with civil society tend to be pro forma and serve to “check the box” rather than genuine commitment and actual processes and mechanisms to work with civil society for better development outcomes. Demonstrable, and documented, progress, not rhetoric, is needed.

- CSOs also need to be empowered and supported and PTF has provided specific recommendations for doing this.<sup>10</sup> Perhaps nowhere is civil society more important than in dealing with GBV and the lessons of WB programs and projects should be widely disseminated.
- Financing of CSOs has to be a key element of partnership. Without a specific source of financing, either from the World Bank or facilitated by it, CSOs working with the World Bank on gender equality and GBV will be hampered in their efforts to bring about meaningful change.

### **Data**

- The strategy rightly notes the importance of data and the need for much better gender-disaggregated data. The World Bank can have a significant influence on the collection and use of gender data given its analytical capacity, financing, and relationships with statistical agencies in its member countries.
- There is particular need for data on GBV to inform policies and programs to combat it. For example, there is very limited data on sexual violence in schools in low- and middle-income countries. Only 17 percent have data on sexual violence perpetuated within school and none have data on sexual abuse experienced on the journey to or from school, although this is now recognized to be a significant problem.<sup>11</sup>
- To have the desired impact, data also has to be publicly available in a form that is easy to understand. This is particularly important for CSOs to be able to monitor progress or identify risks.

### **About Partnership for Transparency**

[Partnership for Transparency](#) (PTF) is a CSO headquartered in Washington, DC with affiliates in Asia and Europe and a special committee for Africa. We support innovative CSO-led approaches to reduce corruption, increase transparency and accountability, and strengthen governance in low- and middle-income economies. PTF envisages a world free of corruption in which citizens trust public officials and institutions and hold them accountable and responsive to their communities' needs.

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<sup>10</sup> See PTF 2023, *[Partnership for Transparency Calls for Strengthening Partnership with Citizens and Civil Society Organizations in the World Bank Evolution for Greater Impact](#)*. Before the end of 2023, PTF will publish a study entitled *Partnering with Civil Society for Citizen-Driven Country Engagement, Delivery, and Accountability in IDA- and IBRD-Financed Operations*.

<sup>11</sup> Center for Global Development, 2023, *[Bridging Data Gaps to Illuminate and Eliminate Violence Against Children in Schools](#)*.