

**Comments in reference to the
Consultation Draft of the World Bank Gender Strategy 2024-2030**

**submitted to the World Bank by
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ORAM - Organization for Refuge, Asylum and Migration (Minneapolis),
and Outright International (New York, NY)¹**

We welcome the opportunity to submit these comments to the World Bank in reference to the Consultation Draft of the World Bank Gender Strategy 2024-2030² (hereinafter “Consultation Draft”). We appreciate the Bank’s recognition that a person’s sexual orientation and gender identity (SOGI) can impact their development outcomes. Our experience affirms the analysis in the draft that a central driver of stigma, discrimination, and exclusion of sexual and gender minorities are the same gender norms and expectations that disproportionately impact cisgender, heterosexual women and girls. We support the Bank’s approach to include the development concerns of sexual and gender minorities in its gender strategy.

Our comments pertain not just to the fact that the new strategy includes sexual and gender minorities but also that the inclusion of sexual and gender minorities is part of strategic “shifts for the World Bank... to accelerate gender equality for all.”³ Effectively accomplishing this shift will determine the success of the Bank’s commitment to SOGI-inclusive development in the longer term.

Ensuring an effective shift to include sexual and gender minorities

Explaining the rationale for the shift.

The commitment to include sexual and gender minorities will seem new to many readers of the final gender strategy document, including countries, development partners, and Bank staff. The document would be more robust if it included a more thorough analysis of the rationale for such

¹ We would like to acknowledge the contribution of Mary Borrowman, PdD, Policy Fellow, Gender Equality and Inclusion Program, Center for Global Development to the drafting of these comments.

² World Bank Group, *Consultation Draft World Bank Gender Strategy 2024-2030* (Washington, DC: The World Bank, 2023)

³ *Ibid.*, paras. 62 - 63.

a shift. The Consultation Draft focuses on the existence of stigma⁴ and human rights⁵ as the central rationale for this shift. References to sexual and gender minorities are absent in discussions about economic growth, productivity, and the business case for equality.⁶ Including the logic and evidence about the benefits of investing in human capital, potential productivity gains, the business case, and the national economic case for SOGI inclusion would provide coherence for the shift to include sexual and gender minorities. Additionally, explaining how SOGI inclusion impacts economic outcomes would help the Bank achieve its goal, identified in paragraph 77 of the gender strategy, of “[a]ssisting policymakers and other public and private sector stakeholders to quantify the potential gains from addressing specific gender barriers, including SOGI-based barriers.”⁷

We recommend including references to peer-reviewed literature and other World Bank documents that explain the losses to human capital, firm profits, and national economics because of stigma and discrimination against LGBTQI people, as well as the potential benefits and gains of investing in LGBTQI inclusion, for both economic and human development.

Supporting World Bank staff with actionable guidance.

One of the principal functions of the gender strategy document will be to empower country-level staff with a mission-driven rationale to propose, design, and implement projects that include sexual and gender minorities. Surveys of World Bank staff indicate that many staff are reluctant to initiate work related to sexual and gender minorities because of the perception that such work is not within the mission of the WBG. Despite the Bank’s directive that sexual and gender minorities are considered “disadvantaged or vulnerable” under the Bank’s Environmental and Social Framework,⁸ some Bank staff continue to point to the lack of references to sexual orientation and gender identity in the central Environmental and Social Framework document itself⁹ as a rationale to exclude LGBTIQ people in E&S activities. Staff need clear language in the strategy document itself to assure them that work related to sexual and gender minority populations is legitimately part of their work.

The Bank’s mid-term review of the previous gender strategy provides additional insight into the need to have such language in the central strategy document. It noted that a lack of familiarity with gender strategy priorities among country staff constrained their implementation of the strategy. The review also noted that “staff typically do not read gender-related knowledge products if those products are too technical or do not immediately seem applicable within the country or sector context.”¹⁰ Including clear references to sexual and gender minorities throughout the gender strategy will help ensure the strategy is implemented.

⁴ Ibid., paras. 1, 7 - 8.

⁵ Ibid., para. 9.

⁶ Ibid., paras. 9 - 11.

⁷ Ibid., para. 77.

⁸ The World Bank, President, *Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups* (Washington, DC: The World Bank, March 27, 2021), 1.

⁹ The World Bank, *Environmental and Social Framework* (Washington, DC: The World Bank, 2016).

¹⁰ World Bank, *World Bank Group Gender Strategy Mid-Term Review: An Assessment by the Independent Evaluation Group* (Washington, DC: World Bank, 2021), xi, ix.

We recommend that the gender strategy document include broad language indicating that sexual and gender minorities are included in each objective and outcome, and that references to populations such as men and women include the sexual and gender minorities among them.¹¹

Clarifying the role of the SOGI Thematic Note

During informal consultations about the gender strategy, Bank staff have referenced the SOGI Thematic Note,¹² one of twelve thematic notes, as a source of guidance on how SOGI inclusion might fit into the strategy. Yet, the Consultation Draft makes no reference to the SOGI Thematic Note except in a footnote to a sentence that mentions scholarships to sexual and gender minorities. We are grateful for the role the SOGI Thematic Note has played while the gender strategy was being formulated. However, now that the Consultation Draft has been issued, we are concerned that continued reliance on the SOGI Note weakens the SOGI-related aspects of the gender strategy. Though the SOGI Thematic Note provides a list of possible programmatic examples of the three broad objectives, it does not reference the gender strategy's conceptual framework or any of the outcomes listed in the Draft Document. The SOGI Thematic Note also lacks the institutional authority of the gender strategy, as it makes clear that “the findings, interpretations, and conclusions expressed in this work are entirely those of the authors. They do not necessarily reflect the views of the World Bank.”¹³ Given the observations of the Independent Evaluation Group, it is likely that staff will not read the thematic notes in addition to the gender strategy document itself. Accordingly, we do not feel that the SOGI Thematic Note can legitimately be considered part of the gender strategy.

We recommend that the SOGI Thematic Note not be considered part of the gender strategy. Rather, the sections in the SOGI Thematic Note that align with the gender strategy should be repeated in the gender strategy document.

Empowering staff to take action based on available data and expertise

The Consultation Draft cautions that “[r]obust data on the differential development experiences and outcomes of sexual and gender minorities in developing countries are scarce, and this jeopardizes achievement of the Sustainable Development Goals and countries’ commitment to “leaving no one behind” in addressing poverty and inequality.”¹⁴ This statement is concerning

¹¹ For example, the USAID 2023 Gender Equality and Women’s Empowerment Policy notes that “USAID affirms that the empowerment of women is central to the realization of gender equality. Here and throughout this policy, this includes women and girls in all their diversity—including those of the lesbian, gay, bisexual, transgender, queer, intersex, plus (LGBTQI+) community.... USAID affirms that men and boys benefit from gender equality and are crucial to engage as stakeholders, partners, and potential positive agents of change for gender equality. Here and throughout this policy, this includes men and boys in all their diversity—including those of the LGBTQI+ community.” USAID, *2023 Gender Equality and Women’s Empowerment Policy* (Washington, DC: USAID, 2023), 6.

¹² Clifton Cortez, Trischna Rana, Rudaba Nasir, John Arzinos, *Sexual Orientation and Gender Identity (SOGI) Inclusion and Gender Equality. Gender Thematic Policy Notes* (Washington DC: the World Bank, 2023)

¹³ *Ibid.*, Table of Contents, Note.

¹⁴ Consultation Draft, para. 64.

because it implicitly endorses a data-first perspective – that data (usually meaning quantitative national population data, as called for under the SDGs) is needed *before* actions can be taken to improve the lives of sexual and gender minorities.

Previous World Bank discussion papers have similarly claimed that “[i]n the absence of such data, governments and the development and humanitarian communities lack the quantitative grounds for developing SOGI-sensitive policies and programs.”¹⁵ The lack of quantitative data is sometimes used as an excuse for not addressing issues for sexual and gender minorities. A data-first approach would undermine the ability of local Bank staff to rely on locally relevant data and expertise, particularly from consulting with and listening to civil society.

Though national-level population data may be lacking, research about sexual and gender minority adults and adolescents, development outcomes, and potential development interventions is increasingly available. In fact, the World Bank and development partners have designed and implemented development projects in all regions of the world without the benefit of national quantitative population data. Where national-level systems to collect data about sexual orientation and gender identity exist, they have usually been preceded by smaller, more local data-collection initiatives.

We recommend that the gender strategy recognize the need for data but acknowledge the ability of Bank staff to rely on available evidence and expertise to take action. Additionally, we recommend that the strategy suggest data collection at the project and local community level to track the impact of project activities and assess the needs of local sexual and gender minority communities.

Terms and references to populations

Definition of Gender

The definition of gender in the Consultation Draft does not adequately reflect multiple aspects of gender. Also, it does not distinguish between gender as a social construct and gender as an individual trait. Though it does explicitly state that “Gender inequality extends beyond women and girls,”¹⁶ it does not define gender or utilize examples that move beyond the gender binary, and this will likely be insufficient to educate and support country staff for the inclusion of non-binary populations.

¹⁵ Nicolas Salazar Godoy, *Sexual Orientation & Gender Identity in Contexts Affected by Fragility, Conflict and Violence. Discussion Paper* (Washington, DC: The World Bank, 2020), p.13.

¹⁶ Consultation Draft, para. 3.

We recommend the following definition.

Gender refers to a socially constructed set of rules, responsibilities, entitlements, and behaviors associated with being a woman, a man, or non-binary individual. These social definitions are multifaceted and their consequences differ among and within cultures, change over time, and intersect with other factors (e.g., age, class, disability, ethnicity, race, religion, citizenship, and sexual orientation). The term gender can also refer to a personal characteristic of an individual, though it is not interchangeable with the term *sex* or the term *women*. As a personal characteristic, gender includes one's gender identity (how someone understands their own gender) and gender expression (how someone expresses their gender through clothing, mannerisms, names, and functions in life that have social meaning related to gender).

The meaning of references to sexual and gender minorities

Sexual and gender minorities are referenced in relation to some, but not all, objectives and outcomes, and in very few examples of programs. It is unclear whether sexual and gender minorities are presumed to be part of all objectives and outcomes, and sporadic references are only to give examples how objectives and outcomes could apply to sexual and gender minorities, or whether objectives and outcomes only apply to sexual and gender minorities when they are explicitly referenced.

For example, in the section detailing *Outcome 2: Build and Preserve Human Capital*, one passage references various interventions targeting specific groups (cash-plus support to women, increasing women's participation in science, addressing needs of sexual and gender minorities).¹⁷ Another passage refers to sexual and gender minorities in relation to one intervention but not others ("Measures could include cash-plus support, scholarships (including for students belonging to sexual and gender minorities), safe transport, and safe, appropriate, and universally accessible schools.").¹⁸ In another passage about digital literacy and STEM education, sexual and gender minorities are not referenced at all.¹⁹ The significance of a reference to sexual and gender minorities, or lack thereof, is unclear.

We recommend that the gender strategy document employ a more deliberate and consistent style regarding references to various populations, and advocate for inclusion of sexual and gender minorities throughout ALL of the objectives and outcomes. To support "a sustainable, resilient, and inclusive future," there is not a single outcome or objective in which incorporating sexual and gender minorities is not essential. This includes reframing the third strategic objective, "Engage Women as Leaders," to be more inclusive, such as "Promote Greater Equality in Leadership."

¹⁷ Ibid., para. 36.

¹⁸ Ibid., para. 38.

¹⁹ Ibid., para. 39.

Outcomes

Focus on changing mindset and stigma reduction

Mindsets and norms are referenced throughout the Consultation Draft as a central driver of gender inequality, violence, and deprivation. Research from around the world shows social stigma and discrimination are primary drivers of gender-based violence (Outcome 1), disparities in health, education, and productivity, i.e. human capital (Outcome 2), and exclusion from the workplace (Outcome 3). Mindsets and norms are an important component of the policy arena framework, on which the gender strategy relies for its conceptual framework. We believe that mindset and norm change activities should be prioritized given their importance to the gender strategy.

We also believe that mindset and norm change activities should be described as a distinct set of activities because they are inherently different from other objectives and outcomes. Other outcomes in the Consultation Draft focus on achieving changes experienced by those people who are negatively impacted by gender norms – women and girls and sexual and gender minorities. For example, when the draft discusses building human capital or improving access to jobs, these are outcomes measured by changes in the lives of women, girls and sexual and gender minorities. Mindset and norm change activities seek changes in men, boys, and heterosexual/cisgender people. Thus, one set of activities looks to outcomes of women, girls, and sexual and gender minorities, while mindset and norm change activities look to outcomes of men, boys, and heterosexual/cisgender people. Given this fundamental difference in the structure of the strategic goal, these activities need to be treated differently.

We recommend that the gender strategy explicitly include changing mindset and norms as a separate set of activities, where the desired outcome is a change of mindset in men, boys, heterosexual/cisgender people, and/or the general population.

Eliminating gender-based violence

We appreciate the focus on eliminating gender-based violence as indicated in *Outcome 1: Accelerate progress in eliminating all forms of gender-based violence*. (Paragraphs 34, 35). Research from many parts of the world has documented high rates of gender-based violence against LGBTIQ people. However, references to sexual and gender minorities are virtually absent in the sections related to this outcome in the Consultation Draft. The only reference to sexual and gender minorities is a passage describing GBV against sexual and gender minorities as a “frontier area.”²⁰ There is no indication of what constitutes a frontier area or why such a characteristic is relevant to the gender strategy. Additionally, gender-based violence against LGBTIQ people is considered a frontier area by those who have only recently recognized it as a form of gender-based violence. Those more familiar with the field understand that violence against LGBTIQ people has been a focus of research, advocacy, and prevention efforts for several decades.

²⁰ Ibid., para. 35.

We recommend that the reference to GBV against sexual and gender minorities as a frontier area be deleted. We also recommend that the document include references to the prevalence of violence against LGBTIQ people, as well as language that indicates strategies the Bank can incorporate into its projects to reduce gender-based violence against sexual and gender minorities as part of the gender strategy. The strategy also should recognize that gender-based violence against sexual and gender minorities often is endemic within the very institutions that are charged with developing and promoting human capital, including schools, medical facilities, and the workplace itself, thereby relegating some gender and sexual minorities to the margins of the economy in informal, precarious, or criminalized work.

Building and protecting human capital

The draft includes a broadly stated reference to addressing the diverse health, education, and social protection needs of sexual and gender minorities.²¹ In addition, it identifies scholarships,²² “social protection delivery systems that leverage digital technologies” and the promotion of rights by social workers as specific interventions related to sexual and gender minorities.²³

The objective of building and protecting human capital is particularly salient to LGBTIQ people as it encompasses many of the most important development concerns. Research from all regions of the world has revealed a causal link between the experience of discrimination and lower health outcomes. Compounded by exclusion from access to healthcare, LGBTIQ populations face health disparities that erode their human capital development and economic outcomes. Additionally, educational attainment is often limited by bullying and higher dropout rates. LGBTIQ people face employment discrimination that can limit their opportunities and experience, with compounding effects over time. The strategies to build and protect human capital for LGBTIQ people include many of the priorities of LGBTIQ communities in all parts of the world – non-discrimination policies, anti-bullying and stigma reduction/public opinion campaigns, training for educators and healthcare providers, job training programs, and corporate diversity initiatives, to name a few.

Social protections are framed in terms of protecting human capital within the gender strategy and within this outcome, which is a narrow framing that implies the importance of protecting skills for participating in the labor market, rather than a critical support for wellbeing beyond labor force participation across the lifecycle. For sexual and gender minorities, reframing this and expanding programming beyond it will be especially critical, as inequalities in access to health, education, other vital social services, and jobs, compounded with wider discrimination, means they are at high risk for poverty, homelessness, and violence, that again compounds over time for the elderly who will not be participating in the labor force. This also puts them at greater risk for informal and precarious employment which likely is not covered by social protections or retirement benefits. The gender strategy is contextualized within multiple crises, and these crises mean social protections broadly conceived need to be centered to prevent

²¹ Ibid., para. 36.

²² Ibid., para. 38.

²³ Ibid., para. 40.

further setbacks to livelihoods and well-being, and for sexual and gender minorities to go beyond digital technologies and social workers promoting their rights, to prioritizing tailored and holistic social protection programs that backstop and support their livelihoods.

We recommend that discussions about building and protecting human capital include references to the importance of this issue for LGBTIQ populations in each of three areas: health, education, and workplace experience as each of these issues corresponds to a high-priority LGBTIQ development concern. We also recommend adding a separate outcome for social protections beyond the outcome of human capital, either under the objective of “Foundational Wellbeing” or under a more broadly conceived objective that moves beyond “Economic Participation” to “Supporting Livelihoods.” This should include a more thorough discussion of what social protections can encompass for sexual and gender minorities, including for the informal sector and outside of those participating in the labor market, and how this will be prioritized amidst crises and cutbacks to the domestic fiscal space countries will have to provide them.

Improve equal access to more and better jobs, including jobs of the future

Paragraph 42, “Equal access to quality employment, entrepreneurship, and opportunities across formal and informal sectors requires actions on multiple fronts,” is again an area critical to the livelihoods of sexual and gender minorities. Yet there is no mention until the last sentence in terms of “marginalized groups working in precarious jobs” that need “legal, policy, and community actions” and “to support the creation of quality jobs in formal and informal sectors.” We support these aspects as being critical, but the lack of mention until the last sentence does not indicate that these populations will be integrated into the major areas of this outcome aimed at increasing labor force participation, programs, and policies for the private sector (including DEI), or leveraging sustainable finance linked to inclusion. Paragraphs 43 and 44, are exclusively framed around women—women farmers and women-led businesses—again implying that sexual and gender minorities will not be prioritized in this outcome. There is compelling evidence for the economic inclusion of sexual and gender minorities, including by the World Bank, which is cited in the SOGI Thematic Note, so this is an important gap within the gender strategy in terms of addressing the needs of sexual and gender minorities, supporting their more equal economic outcomes, as well as supporting the stated goals of the strategy by leveraging available evidence to create the greatest resilience, sustainability, and inclusion.

We recommend integrating sexual and minorities throughout each of these paragraphs, including in the bolded intros in Paragraphs 43 and 44 to emphasize that they are a priority within this outcome. Evidence should be cited to support this and examples included. We also recommend that the role of the World Bank is made more clear in terms of supporting the legal, policy and community actions to protect marginalized groups and in creating jobs, and what is meant by “quality jobs,” particularly in the informal sector.

Expand ownership and use of economic assets

This outcome, which encompasses a broad range of important economic assets, also only briefly mentions sexual and gender minorities, except with respect to access to housing, though

the bolded intro for that paragraph (46) is solely framed around women. Given the importance of the numerous assets mentioned here for economic outcomes—housing, land, property, digital skills, investing in tech jobs, digital platforms, financial inclusion, including, credit, savings, and insurance products, and expanding access to markets and supply chains—and the World Bank’s comparative advantage and expertise in these areas, sexual and gender minorities must be included in programs and not left behind.

In some regions, sexual and gender minorities seeking to access financial services are often faced with requirements that a male head of household sign financial documents or that all identity documents must bear the same name and gender markers. Because sexual and gender minorities may be estranged from their family, live in households headed by women, or have a gender identity and name that does not match their legal documents, many may not be able to open a bank account, obtain a cash/credit card, or transact business. We applaud the efforts of the IFC to bring light to this issue in its report on inclusive Banking.²⁴

As with the previous outcome, we recommend meaningful integration of sexual and gender minorities in each paragraph, including the framing and examples used.

Expanding access to and use of services that enable economic participation

The Consultation Draft does not reference sexual or gender minorities in relation to this outcome. However, it is clear that sexual and gender minorities will also have different needs for care services due to different familial arrangements and rights to care-related leave policies and other social protection.

We recommend that discussions of this outcome include references to strategies that address the barriers faced by sexual and gender minorities and differential needs to incorporate in program design and implementation.

Advance women’s participation, decision-making, and leadership

As stated above, we recommend framing this outcome, and the objective it is under, in a more inclusive way to not be solely focused on women. This is essential to support World Bank staff in seeing the inclusion of sexual and gender minorities as a central throughline to the strategy, and not just populations to be included when convenient or when there are available resources. The logic for advancing sexual and gender minorities’ participation, decision-making, and leadership is the same as for women, and a strategy that truly wants to advance inclusion can’t exclude these populations from one of its three objectives.

Gender tag and flag

The applicability of the gender tag and flag to sexual and gender minorities remains unresolved. There are numerous questions to be answered, such as will sexual and gender minorities be

²⁴ International Finance Corporation, *Inclusive Banking: Emerging Practices to Advance the Economic Inclusion of LGBTI People* (Washington, DC: IFC, March 30, 2022)

incorporated into the existing gender tag/flag system, and if so, will they be differentiated so that this can be tracked separately, or will all populations be grouped together? Even if this is still being developed, we recommend a discussion of this, as well as more detail regarding the consultation process, to provide context on how sexual and gender minorities will be included in the implementation. It is likely that one predicate for the application of a gender tag/flag to sexual and gender minorities will be understanding the sexual orientation and gender identity of project-affected persons. Developing safe, ethical methods to collect such data will be a key step for this issue, particularly in countries where governments are supportive of explicitly including sexual and gender minorities in financed projects. We recommend referencing the priority of developing such data collection methods.