



How Do IFI Gender Policies Stack Up?

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About Gender Action

Gender Action was established in 2002. It is the only organization dedicated to promoting gender justice and women's rights in all International Financial Institution (IFI) investments such as those of the World Bank.

Gender Action's goal is to ensure that women and men equally participate in and benefit from all IFI investments.

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Preface

Gender Action is often asked: Which International Financial Institution (IFI) has the strongest gender policy and/or strategy?

To answer this question, this paper compares and ranks IFI gender policies and/or strategies based on IFIs' published information.

In our comparison, the IDB ranked highest hands down.

As we sought to exclusively identify strong mandatory IFI gender policies and/or strategies, we did not examine other IFI reports or statements (which Gender Action has done elsewhere).

There are several important reasons to have strong IFI gender policies and/or strategies: First, they are a prerequisite for successful IFI investments. Second, for women and men who suffer gender discrimination in IFI investments, robust gender policies facilitate their taking claims and complaints for redress to IFI accountability mechanisms. Third, they provide an incentive and signal to IFI staff to prevent harmful and ensure beneficial impacts on women, men, girls, and boys affected by IFI investments.

Ranking IFI gender policies and/or strategies provides a key benchmark for all IFIs in their quest to attain women's, men's, girls' and boys' rights and empowerment.

But ranking IFI gender policies and/or strategies still begs the question about which IFIs' operations best succeed in empowering and improving the lives of women, men, girls and boys. Based on tracking and analyzing the gender impacts of IFI investments in various geographies and sectors, an array of Gender Action reports assess IFI operational success in reducing gender gaps. You can find these reports on the Publications page of genderaction.org.

Meanwhile, we hope that this paper's ranking will push all IFIs to improve their gender policies and strategies, along with operations that successfully close gender gaps.

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April 19, 2013

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List of Acronyms

ADB	Asian Development Bank
AfDB	African Development Bank
CAS	Country Assistance Strategy (WB)
EBRD	European Bank for Reconstruction and Development
GAP	Gender Action Plan (EBRD)
IDA	International Development Association (WB)
IDB	Inter-American Development Bank
IED	Independent Evaluation Department (ADB)
IEG	Independent Evaluation Group (WB)
IFI	International Financial Institution
OED	Operations Evaluation Department (AfDB)
OP/BP	Operational Policy/Bank Procedure (WB)
SPS	Safeguards Policy Statement (ADB)
UGPOA	Gender Equality and Women's Empowerment: An Updated Gender Plan of Action (AfDB)
WB	World Bank
WDR	World Development Report (WB)

I) Introduction

As gender equality gains momentum on the international stage, many International Financial Institutions (IFIs) are channeling resources into developing new and innovative gender initiatives. But unless IFIs, the world's largest international development organizations, adopt basic and robust gender safeguard policies, they will miss the opportunity to achieve gender equality and women's rights in international development.

Gender policies should hold IFIs and their investments accountable for negative gender impacts. They are a prerequisite to promoting women's rights throughout IFI operations and achieving inclusive poverty reduction and sustainable economic growth. By the early 2000s, most IFIs had adopted gender policies and strategies. This marked a discernible, if largely rhetorical shift in attention to gender in IFI operations. Yet key weaknesses continue to plague most gender policies, undermining their ability to advance women's rights as a core development objective. A notable exception is the IDB gender policy which contains several laudable elements for other IFIs to emulate.

Absent robust gender policies, IFI investments often harm women, men, boys and girls. From private sector development to implementation of health care user-fees that disproportionately restrict women's access to jobs and essential services, Gender Action's research exposes the persistently negative impacts of gender insensitive IFI-financed projects. For example, Gender Action's reports on IFI-financed oil and gas pipelines in Central Asia, West Africa, and Russia uncovered how pipeline investments employed male workers, even in office jobs, while women lost traditional farmland and income, increasing their dependence on men, driving some into sex work, which in turn spread HIV, created unstable households for children, and intensified violence against women (Gender Action 2006; Gender Action 2010). These policies often marginalize and even harm women. IFIs need strong gender safeguard policies to guard against these outcomes.

This paper analyzes the gender policies or strategies of five IFIs: the World Bank; Asian Development Bank (ADB); African Development Bank (AfDB); European Bank for Reconstruction and Development (EBRD) and Inter-American Development Bank (IDB).¹ It offers a comparative analysis of the quality and value of IFI gender policies, finding that the strongest ones promote men's and women's equal rights, account for social barriers to project participation, such as women's unpaid care work, include enforceable do-no-harm gender safeguards, and uphold women's and men's economic and social wellbeing. Based on our systematic analysis, the IDB's Operational Gender Policy is the strongest, followed by the gender policies of the ADB, World Bank, and AfDB, and finally, the EBRD's Gender Action Plan. The remainder of the paper and its tables demonstrate the basis for this ranking. The paper concludes with recommendations to strengthen gender policies' long-term impact on gender equality.

II) Methodology

Following analysis compares and ranks the gender policies for the IDB, ADB, World Bank, and AfDB, as well as the EBRD's "Gender Action Plan," which lacks its own gender policy. Where available, IFI gender strategies are also reviewed.² This paper is strictly a review of public IFI gender policies and strategies. It does not discuss in depth IFI reports or statements. Based on their gender policies and strategies, each IFI is comparatively ranked from one to five on the extent to which it reflects: rights-based goals and priorities; an enforceable mandate; specific mechanisms to engender operations; staff gender capacity; adequate funding; and clear and effective monitoring and evaluation standards. Table 1 (below) ranks IFI gender policies from comparatively strongest (five) to weakest (one), within each of these eight criteria. The scores for each of the eight criteria are also tallied to provide an overall ranking for each IFI. The following narrative summary highlights the strengths or weaknesses of each IFI's gender

¹ In preparation for this paper, we also surveyed the European Investment Bank, International Finance Corporation and International Monetary Fund. They are however excluded from the paper because they lack gender policies or stand-alone strategies.

² Updated gender strategies are available for the IDB, World Bank, and AfDB.

policy and/or strategy. Given the comparative ranking system presented in this report, a gender policy might be ranked low for an individual criteria when compared to others, implying that it is weak, yet on its own it is fairly strong. Because of this, it is still highlighted under the “strengths” rather than “weaknesses” section. Underlying the narrative summary, Annex 1 analyzes IFI gender policies in detail.

Table 1: Comparative Ranking of IFI Gender Policies

Table 1:	ADB	AfDB	EBRD	IDB	WB
Goal	3	4	1	5	2
Priorities	4	3	1	5	2
Mandate	4 (Tie)	4 (Tie)	2	5	3
Mechanisms to Engender Operations	4	2	1	5	3
Staff Training and Awareness	3	2	1	5	4
Staff Incentives/Support Networks	4	2	1	5	3
Funding	4	2	3	5 (Tie)	5 (Tie)
M&E	4	3	1	5	2
Overall score (1-40)	30	22	11	40	24
Overall Ranking (Best=5)	4	2	1	5	3

*Rating 1 (weakest) to 5 (strongest)

III) Comparative Analysis

GOAL: Gender policy goals have the potential to influence IFIs’ strategic objectives and resource allocation. Because of this, it is crucial that they inclusively promote women’s and men’s equal rights and uphold economic and social wellbeing. All of the reviewed IFIs except for the EBRD reflect relatively strong goals.

Table 2: Strength of Gender Policies’ Goals

	ADB	AfDB	EBRD	IDB	WB
Goal	3	4	1	5	2

*Rating 1 (weakest) to 5 (strongest)

Goal Strengths: The **IDB’s** Operational Policy on Gender Equality and Development (Operational Gender Policy) has the strongest goal: it aims to integrate gender as a cross-cutting issue throughout all IDB interventions and commits to proactive and preventive actions to safeguard and advance women’s equal rights. The **AfDB’s** 2001 Gender Policy, which aims to promote gender equality across Africa and within the AfDB structure, reflects the second strongest rights-based goal oriented toward gender-inclusive interventions (AfDB 2001:20-21). The AfDB’s 2008 Updated Gender Plan of Action (UGPOA) also crucially supports sustainable and equitable economic empowerment of men and women (AfDB 2008). In third, the **ADB’s** 2003 Procedure on Gender and Development (GAD Policy) calls for gender mainstreaming to integrate gender into all aspects of ADB operations (ADB 2010; 2003).

Compared to its 2003 Operational Policy and complementary Bank Procedure on Gender and Development (OP/BP 4.20), the **World Bank’s** latest gender strategy, “Implications of World Development Report 2012: Gender Equality and Development for the World Bank Group” (Implications of WDR) reflects a substantial improvement to its institutional gender equality goals. While the World Bank’s OP/BP 4.20 Policy focused on countries’ responsibility to address gender inequalities (WB 2003a/b), “Implications of WDR” crucially frames gender equality and women’s agency as both a core development objective “in its own right” and a strategic investment (WB 2011). It also proposes a framework for elevating gender equality throughout the Bank’s development agenda (WB 2011).

Goal Weaknesses: The **EBRD's** 2009 Gender Action Plan (GAP), which aims to increase gender equality between men and women in order to improve women's economic participation in the private sector (EBRD 2008:4), reflects the weakest gender goal. Rather than adopting a rights-based approach to gender equality, as the IDB, AfDB, ADB, and to a lesser extent, World Bank do, the GAP identifies the opportunity to leverage women's "untapped potential," casting women's empowerment only as an operational vehicle for strategic economic growth (EBRD 2008:4). By focusing exclusively on private sector participation, the GAP overlooks social impacts that gender insensitive investments might have on women's health, safety and rights. Additionally, its primary focus on women likely precludes recognition of negative gender impacts on men and boys.

PRIORITIES: Specific gender policy priorities offer a road map for operationalizing an IFI's gender equality agenda. The strongest priorities move beyond traditionally gendered social sectors, like health and education, to promote a truly "engendered" cross-sectoral approach.

Table 3: Quality of Gender Policies' Priorities

	ADB	AfDB	EBRD	IDB	WB
Priorities	4	3	1	5	2

*Rating 1 (weakest) to 5 (strongest)

Priority Strengths: The **IDB's** Operational Gender Policy prioritizes proactive direct investment in projects that are likely to have a significant impact on gender equality and women's empowerment, including improving gender data and analysis, investing in labor market equality and institutional capacity, and addressing inequitable care responsibilities, social security reform, gendered barriers to project participation, and women's decision-making roles (IDB 2010: 4-5). The **ADB's** GAD policy reflects similar strengths in its emphasis on integrating "gender sensitivity" into analyses to observe project's differential gender impacts, improving 'gender planning' to advance equal opportunities, and addressing gender-related health, employment, and legal disparities (ADB 2010:1). These priorities reflect a strong understanding of the multi-dimensional and cross-sectoral nature of gender inequalities.

The updated gender strategies for both the **World Bank** and **AfDB** accentuate improvements to their original gender policy priorities. For example, the **AfDB** Gender Policy orients its priorities toward traditional "women's" areas of health, education and agricultural development (AfDB 2001). Fortunately, the 2008 Updated Gender Plan of Action (UGPOA) improves on these initial priorities by calling for gender interventions in transportation, domestic energy supply, water, and extractive industries, as well as crucially important investments in gender based violence.

Similarly, while the World Bank's OP/BP 4.20 policy fails to outline any priorities, "Implications of WDR" does incorporate specific ones. They are not mandatory but include: informing country policy dialogue on gender equality; enhancing country level gender diagnostics; increasing the availability of gender data; and leveraging partnerships to help implement priority actions (WB 2011). To the extent that their updated gender strategies improve upon past priorities, both the World Bank and AfDB have progressed. Unfortunately, the next section demonstrates that the World Bank's "Implications of WDR" and the AfDB's UGPOA lack an enforceable mandate to carry out these activities.

Weak Priorities:

The **EBRD's** gender priorities, as outlined in the GAP, are the weakest of the IFI gender policies. They include mapping and assessing gender impacts of investments, generating baseline gender data, and developing gender measurements and monitoring tools. Although at first glance these priorities seem strong, the fact that they are restricted to private sector and market development reflects a failure to account for the broader social impacts of EBRD investments.

MANDATE: Gender policies require robust mandates to implement their initiatives. The strongest gender policy mandates are those that apply to all IFI lending operations without exception and include an enforceable gender safeguard that holds IFI projects accountable for their potentially negative gender impacts.

Table 4: Strength of Gender Policies' Mandate

	ADB	AfDB	EBRD	IDB	WB
Mandate	4 (Tied with AfDB)	4 (Tied with ADB)	2	5	3

*Rating 1 (weakest) to 5 (strongest)

Strong Policy Mandate: The **IDB's** Operational Gender Policy mandate is the strongest because it incorporates essential do-no-harm safeguard measures. The **ADB's** Procedure on Gender and Development (GAD Policy), and **AfDB's** 2001 Gender Policy also reflect strong mandates. All three are mandatory and explicitly applies to all IFI investments without exceptions for different lending types (ADB 2010a:2; IDB 2010; AfDB 2001a:2). Such mandatory and inclusive application challenges traditional assumptions that any sector is irrelevant to gender. Despite broad authority, the ADB and AfDB's lack a gender safeguard undermines their ability to redress projects' potential harm to men and women.

Weak Policy Mandates: The **World Bank's** OP/BP 4.20 lacks the necessary mandate to guard against harmful gender impacts. OP/BP 4.20 explicitly exempts World Bank-financed policy-based lending from its jurisdiction. In recent years, these policy-based loans have made up over one third of the Bank's annual spending, leaving a large proportion of Bank lending unaccountable to its gender policy standards. World Bank staff maintains that despite OP/BP 4.20's language, in practice, policy-based lending is not exempt from the Gender Policy's mandate.³ If this is the case, OP/BP 4.20 must be updated to address this critical gap. Additionally, OP/BP 4.20 is unenforceable, which is all the more egregious given that the Bank lacks a do-no-harm gender safeguards policy to hold its investments accountable to negative gender impacts.⁴

The **EBRD's** GAP is its first gender stand-alone strategy (EBRD 2009). Its status as an Action Plan rather than a policy results in the weakest IFI mandate. Given its voluntary nature, the GAP is unable to enforce any of its recommendations, which are all oriented around increasing women's economic participation in the private sector (EBRD 2009). Worse, despite that fact that the GAP acknowledges how macroeconomic policies and government cuts to social spending have undermined women's economic opportunities (EBRD 2008), the EBRD lacks a gender safeguard policy to hold its investments accountable to these harmful impacts.

MECHANISMS TO 'ENGENDER' OPERATIONS: A good gender policy requires solid mechanisms to effectively carry out its goals and priorities. The strongest mechanisms include identification of an authority responsible for implementing gender initiatives, tools to conduct proposed actions, and a plan for reporting measurable progress on baseline and targeted indicators.

³ Personal communication WB staff and Elaine Zuckerman, April 2013.

⁴ At time of writing, the World Bank had just launched a two-year safeguards consultation process. It has indicated that the safeguard consultation and review process will include adoption of a new gender safeguard policy. In response, Gender Action led the Global Gender IFI Watcher Network in developing collaborative gender safeguard language, laying the foundation for a strong gender safeguards policy. The language was submitted to the World Bank in April 2013.

Table 5: Quality of Gender Policies' Implementation Mechanisms

	ADB	AfDB	EBRD	IDB	WB
Mechanisms to Engender Operations	4	2	1	5	3

*Rating 1 (weakest) to 5 (strongest)

Strong Mechanisms: The **IDB's** Gender Policy creates the strongest mechanisms. Like most IFIs, the IDB identifies a department, the Gender and Development Unit, to carry out its mandate. It also adopts gender capacity building tools for staff that aim to improve gender analysis, data, knowledge and research. Yet it is the IDB's inclusion of a gender safeguard, the only one among IFIs, that strengthens the Operational Gender Policy and its mechanisms with unmatched authority.

The mechanisms outlined in the **ADB's** GAD Policy are also strong. In addition to requiring a gender assessment in each project's Initial Poverty and Social Assessment and countries' Country Strategy Programs (ADB 2003), the ADB's Operations Manual outlines in-depth gender implementation tools (ADB 2010). These include gender guides for assessing key gender considerations throughout project design and implementation, including negative impacts arising from user-fees, land loss, or resettlement (ADB 2010, Annex 1/2/3).

The **World Bank's** "Implication of WDR" and **AfDB's** Gender Policy and outline moderate mechanisms to integrate gender concerns throughout their operations. The **World Bank** "Implications of WDR" promotes integrating gender into manuals and toolkits, supporting Regional Gender Action Plans and establishing "Gender Anchors" to work with Regions, Network Councils and Sector Boards to integrate gender dimensions across sectors (WB 2011). Specific mechanisms to integrate gender into **AfDB** investments similarly include adoption of gender sensitive indicators for staff (AfDB 2001a; 29), support for research and data collection (ibid: 32), integration of gender sensitive cross-sector reference guides and (voluntary) trainings (ibid: 30), and promotion of women's participation as stakeholders (ibid: 30). Over the last decade, the AfDB has developed checklists for gender mainstreaming in infrastructure, education, climate change, governance, and health sectors. Unfortunately, as with other IFIs, the voluntary nature of gender trainings and tools at both the World Bank and AfDB results in underutilization of gender mechanisms.

Weak Mechanism: The **EBRD's** GAP identifies some mechanisms to engender its operations, including implementing gender guidance notes, monitoring tools and gender pilot programs, and engaging in "strategic gender dialogue" with the external community (EBRD 2009:15-19). Unfortunately, all of the proposed actions are vague and lack measurable targets or incentives to carry out implementation. Additionally, they singularly address improving women's economic participation with little complementary emphasis on a quality, rights-based approach to advance men's and women's social wellbeing.

STAFF: In order to implement gender policy mechanisms and advance an actionable, broad mandate that promotes women's rights, IFI staff must possess strong gender capacity. Developing this capacity requires sufficient resources to support gender integration, a demonstrated institutional commitment to gender equality, and incentives to encourage staff development. All of the reviewed IFIs provide voluntary tools to increase the gender capacity of IFI staff, but only the IDB incorporates incentives.

Table 6: Extent of Staff Training and Incentives in Gender Policies

	ADB	AfDB	EBRD	IDB	WB
Staff Training and Awareness	3	2	1	5	4
Staff Incentives/ Support Networks	2	4	1	5	3

*Rating 1 (weakest) to 5 (strongest)

Strength: The **IDB's** Operational Gender Policy uniquely incorporates broad initiatives that proactively encourage gender integration and capacity building across sectors. These initiatives go beyond other IFIs common focus on strengthening “sector notes” to promote gender sensitivity amongst staff (IDB 2011:7). The IDB incentivizes staff gender capacity building by integrating staff contributions to gender equality into annual performance reviews.⁵ Although staff gender training is not mandatory, the inclusion of gender in annual staff evaluations elevates incentives to participate in gender capacity building, moving the IDB toward an institution-wide commitment to gender equality. The IDB's gender policy could be strengthened by explicitly mandating regular gender capacity buildings.

Weak staffing: Like the IDB, the **World Bank, ADB, AfDB, and EBRD** all promote voluntary gender staff training manuals, sector notes and gender capacity building sessions. For example, the **World Bank's** “Implications of WDR”: outlines gender training opportunities for country directors; pushes more accessible in-country and virtual capacity building; implements an annual “Gender and Development Seminar Series”; and integrates gender modules into existing “economist bootcamp,” “CAS Academy,” and other staff trainings (WB 2011). Similarly, **ADB's** GAD Policy offers workshops and manuals to enhance staff's gender sensitivity. The **AfDB's** Gender Policy proposes “regular” gender trainings for country economists, task managers, and Board members, and the **EBRD** emphasizes voluntary gender training and sector notes to enhance staff's gender capacity.

Unfortunately, absent incentives, a series of evaluations (IEG 2010; IED 2009; OED 2012) spotlight the ineffectiveness of these voluntary gender capacity buildings. For example, the World Bank's Independent Evaluation Group (IEG) reported in its 2010 gender evaluation that from 2003-2009, only *three* percent of Bank staff opted to attend gender-related training sessions, undermining staff ability to engender their operations. A 2012 report by the AfDB's Operations Evaluation Department (OED) exploring gender mainstreaming efforts across development organizations similarly identified a lack of gender capacity within most of the IFI staff. According to the report, this stems from a lack of mandate, resources, and higher-level gender commitment amongst IFI leadership (OED 2012:13, 41). While the establishment of in-country workshops will help improve staff's accessibility, the fact remains that absent incentives or policy enforcement mechanisms, non-gender staff have little reason to engage in gender capacity building.

FUNDING: Adequate IFI funding is not only essential to carry out gender policy initiatives; it also critically signals institutional and cultural commitment to lasting gender equality.

Table 7: Level of Gender Funding

	ADB	AfDB	EBRD	IDB	WB
Funding	4	2	3	5 (Tie)	5 (Tie)

*Rating 1 (weakest) to 5 (strongest)

⁵ IDB staff communication with Sarah Bibler via meeting, January 7 2013.

Strong Funding: Given that gender is a priority in the most recent **IDB** and **World Bank** funding cycles, these IFIs are likely to have the greatest source of core funding for gender initiatives. Indeed, gender is a “special theme” for both the **World Bank’s** IDA 16 (December 2010-June 2014) replenishment⁶--the Bank’s fund for the poorest countries--and **IDB’s** Ninth Capital Increase (2011-2015).

In reality, it is difficult to determine how much of either banks’ core funding is directed to gender initiatives. The World Bank maintains that gender mainstreaming in Bank operations is largely funded from core sources because projects funded by the core budget often contain gender-sensitive components (Lauterbach and Zuckerman 2013). Bank staff also notes that “it is not possible to accurately estimate the amount of funding from the Bank’s core budget that goes to mainstreaming gender.”⁷ Despite this, both the IDB and World Bank, along with the other IFIs continue to rely heavily on trust funds for many of their gender-related projects, relegating gender projects to specific donors’ interests and priorities.

Weak Funding: It is difficult to determine the strength of the **ADB’s** funding for gender equality initiatives. Like most IFIs, its GAD policy fails to identify specific funding sources. The ADB notes that from 2003 to 2012, the Gender and Development Cooperation Fund, an ADB-facilitated trust fund, received US\$ 12 million from donor countries, but it is unclear from reports how much of the ADB’s own core funding went to gender initiatives.⁸

The **EBRD’s** GAP is severely under resourced, undermining its ability to carry out its mandate. For its initial implementation, the GAP proposes a two year budget totaling €2 million with combined contributions from the EBRD, Shareholder Special Fund and regional donors. The proposed funding is insufficient to carry out the GAP’s priorities. Additionally, the fact that it draws from special, rather than core funding source leaves funding dependent on donors’ tenuous contributions.

Based on its Gender Policy and UGPOA, the **AfDB’s** gender funding sources are among the weakest of the IFIs. Neither the Gender Policy nor the UGPOA identify reserved funding for gender initiatives. Instead, the Gender Policy indicates that it will draw from the Technical Assistance Fund and Project Preparation Facility to finance gender mainstreaming initiatives (AfDB 2001:33), while the UGPOA expects funding for priority gender trainings and mainstreaming activities to come out of the Human Resources budget (WB 2008). This lack of a designated budget is troubling. Absent distinct and sufficient core funding sources, IFIs are unlikely to prioritize their broad gender equality mandates.

MONITORING AND EVALUATION: Clear monitoring and evaluation (M&E) guidelines are essential for IFIs to measure their progress towards achieving women’s rights, empowerment, and gender equality goals. The strongest M&E guidelines adopt project and institution level indicators to measure long term progress towards gender equality.

Table 8: Quality of Gender Policies’ M&E Mechanisms

	ADB	AfDB	EBRD	IDB	WB
M&E	4	2	1	5	3

*Rating 1 (weakest) to 5 (strongest)

Strength: The **IDB’s** Operational [Gender Policy](#) reflects both robust monitoring mechanisms and a commitment to evaluating the long term gender impacts of IDB operations beyond the initial project planning stage. The Policy requires incorporation of gender indicators into the “results matrix” of all country strategies and projects identifying gender equality as a ‘priority area’ (IDB 2010:7). It also

⁶ Gender is expected to be a “special theme” of the 2013 IDA 17 replenishment.

⁷ WB communication with Claire Lauterbach via email, September 26, 2012.

⁸ The ADB did not respond to repeated requests for funding information.

requires an in-depth framework for monitoring Policy implementation, including regular gender equality assessments. Additionally, it mandates that the President's Report to the Board, the Sustainability Review, and the Annual Report all account for gender progress (IDB 2011: 13).

Although not as robust as the IDB's Operational Gender Policy M&E mechanisms, the **ADB** does incorporate in-depth guides and checklists to encourage staff integration of gender dimensions throughout project planning and implementation. Since adoption of its 2003 GAD Policy, the ADB has also consistently published analyses and reports on its progress towards gender equality.

Weak: Few other IFIs have strong monitoring mechanisms. One common issue is that monitoring and evaluation of projects' gender sensitivity, when it does occur, is largely focused on project design and planning stages, ignoring gender integration in project implementation and long term gender impacts. This is particularly egregious given that negative impacts on women's and men's health, income, and employment resulting from gender insensitive investments rarely appear until long after the initial project planning stage.

This superficial focus is reflected in the **World Bank's** lenient evaluation of "gender-informed" projects. The World Bank Gender Unit's tracking system identifies projects as gender informed if they address gender dimensions in one of three areas: analysis, action, and monitoring and evaluation. Based on these criteria the World Bank calculated that as of March 2013, almost 90 percent of its operations were gender-informed.⁹ This percentage reflects superficial classification rather than thorough analysis of projects' differential impacts on men and women (Lauterbach and Zuckerman 2013).

Despite these weaknesses, the World Bank should be commended for its progress on implementing gender equality indicators. Select strengths include BP/OP 4.20 policy's requirement that gender indicators be reported to the World Bank Board and the 'Implications of WDR's' emphasis on improving sex-disaggregated data collection to highlight women's social and economic position worldwide. The integration of gender indicators into the Bank's Corporate Scorecard and the IDA 16 replenishment are also positive, especially given their emphasis on measuring the gender responsiveness of agriculture, infrastructure, health and 'safety net' projects. However the indicators overlook other impediments to gender equality, like persistently high rates of gender based violence and women's extensive unpaid care work (WB 2011).

The **AfDB** and **EBRD's** weakness lies in a lack of M&E tools, combined with minimal public reporting. For example, despite both the **AfDB's** UGPOA and Gender Policy's commitment to evaluating gender compliance at country and project levels, the AfDB has failed to publish regular and transparent gender reports on its website. The **EBRD's** GAP similarly calls for in-depth assessments of investments' impacts on gender equality, which is only superficially reported in its latest Annual Reports.

IV) Conclusion

This paper's comparative analysis of IFI gender policies and strategies highlights the urgent need for more robust policies that effectively promote women's rights and gender equality as a core development objective. Based on analysis, the IDB's Operational Gender Policy is likely to have the greatest impact on advancing gender equality (See Box 1). At a minimum, all IFI gender policies should incorporate the IDB's

Box 1: The IDB's Model Operational Gender Policy

Mandate: Enforceable mandatory mandate that applies to all lending operations without exception.

Goal: Proactive and preventive actions aimed at promoting gender equality and safeguarding men's and women's equal rights across sectors.

Priorities: Direct investment in areas with impact on women's empowerment, including violence prevention and social security reform.

Mechanisms: Clear mechanisms to engender IDB operations, coupled with ability to enforce policy violations through gender safeguard.

Staff: Mandatory annual staff evaluations that integrate assessment of staff contributions to promoting gender equality.

Funding: "Gender and Diversity" is a priority strategy/funding area of the IDB's 2010 Ninth General Capital Increase.

M&E: In-depth "Development Effectiveness Matrices", project indicators and mandated Board reports to measure project and IDB-wide impact on gender equality.

⁹ WB communication with Elaine Zuckerman and Claire Lauterbach via email, March 22, 2013

strengths, including accounting for social barriers to project participation, such as women's unpaid care work; adopting enforceable do-no-harm gender safeguards; and upholding men's and women's equal rights and economic and social wellbeing, including women's right to live a life free from violence. As outlined below, there are several common areas that IFI gender policies can immediately improve upon. Unless IFIs advance women's rights as a core development objective, as well as promote women's quality employment opportunities, they will fail to achieve their stated mission to reduce poverty and enhance sustainable economic growth. Strong gender policies are a prerequisite for this mission.

V) Recommendations

At a minimum, IFI gender policies must:

- Promote women's human rights as a core development objective.
- Address the gender implications of broader policy-based lending or macroeconomic reforms, which have distinct and often harmful impacts on women's health, education, and social and economic wellbeing.
- Account for gendered barriers, such as women's unpaid care work, that limit equal project participation.
- Mandate and enforce regular gender capacity building trainings for staff, including at the IDB.
- Design projects to proactively address gender inequalities, including men's and women's differential access to assets, property, education, and credit.
- Address outcomes of gender inequality, including high rates of gender based violence.
- Require specific mechanisms to monitor women's and men's equal project participation, decision-making roles, and differential long-term impacts.
- Combine enforceable staff requirements with incentives to participate in gender capacity building trainings.
- Adopt gender safeguards, like those in the IDB Operational Gender Policy, that explicitly guard against and proactively address negative gender impacts

Annex 1: Comparative Analysis of IFI's Highest Gender-Related Guidelines or Policies

Note: All data depends on up to date transparent information found on the IFI's public websites. Table data below does not incorporate those IFIs (International Finance Corporation, European Investment Bank, or International Monetary Fund) that lack a gender policy for analysis.

*Based on our in-depth and systematic analysis, we rank the IDB gender policy as best, followed by the ADB, WB, AfDB, and EBRD.

	ADB	AfDB	EBRD	IDB	WB
Highest Gender-Related Policy or Guideline	<ul style="list-style-type: none"> • Operational Manual Bank Policies: Gender and Development (BP GAD) (ADB 2010). • Policy on Gender and Development (GAD policy) (ADB 2003). • Safeguards Policy Statement (SPS) (ADB 2009). 	<ul style="list-style-type: none"> • Gender Policy (AfDB 2001). • Updated Gender Plan of Action 2009-2011 (UGPOA) (AfDB 2008). 	<ul style="list-style-type: none"> • Environmental and Social Policy (ESP) (EBRD 2008). • Gender Action Plan (GAP) (EBRD 2009). 	<ul style="list-style-type: none"> • Operational Policy on Gender Equality in Development” (Operational Gender Policy) (IDB 2010). • Gender Action Plan for Operations 2011-2012 (GAPO) (IDB 2011). 	<ul style="list-style-type: none"> • Operational Manual OP/BP 4.20 on Gender and Development (OP/BP 4.20) (WB 2003a & 2003b). • Implications for World Development Report 2012: Gender Equality and Development for the World Bank Group (Implications for WDR) (WB 2011).
Level of Mandate	<ul style="list-style-type: none"> • BP GAD is mandatory and “requires explicit integration of gender considerations in all aspects of ADB operations” (ADB 2010:2). • The 2003 GAD policy is mandatory and was strengthened by adoption of the ADB’s BP GAD into its operational manual. • The SPS is mandatory, and integrates some gender dimensions into its Environmental, Indigenous Peoples, and Involuntary Resettlement safeguards, although it lacks a stand-alone gender policy (ADB 2009). 	<ul style="list-style-type: none"> • The Gender Policy is mandatory and defines gender as a priority cross-cutting theme to be mainstreamed into all Bank work (AfDB 2001:2). • UGPOA is voluntary. Its results-oriented approach focuses on the Gender Policy, institutional accountability, and the Bank’s strategic priorities (AfDB 2008). 	<ul style="list-style-type: none"> • GAP is voluntary. It highlights the third Millennium Development Goal which seeks to end poverty by promoting gender equality. • The mandatory Environmental and Social Policy (ESP) that applies to all EBRD-financed projects integrates some gender references in select Performance Requirements (EBRD 2008). 	<ul style="list-style-type: none"> • The Operational Gender Policy is mandatory; it seeks to strengthen gender equality and women’s empowerment in member countries and advance international women’s rights standards (IDB 2010). • The GAPO is a guideline for Operational Gender Policy implementation. • The IDB’s 2012 “General Capital Increase” identified Gender and Diversity as one of nine priority areas (IDB 2011). 	<ul style="list-style-type: none"> • OP/BP 4.20 is mandatory, but it lacks the mandate of a gender safeguards policy. It explicitly excludes development policy lending and “Program for Results” (P4R) loans; its main focus is Country Assistance Strategies (CAS). • Gender is a theme of the Bank’s 2011-2014 IDA funding cycle and will be in the 2015-2018 IDA replenishment. • Implications of WDR is voluntary.
Goal	<ul style="list-style-type: none"> • Both the BP GAD and GAD policy use ‘gender mainstreaming’ to integrate gender into all aspects of ADB operations (ADB 2010:1, ADB 2003: 	<ul style="list-style-type: none"> • Gender Policy aims to: <ul style="list-style-type: none"> • Promote gender equality and development in Africa. • Mainstream gender in Bank operations and policies using guiding 	<ul style="list-style-type: none"> • GAP aims to promote gender equality between men and women and increase the economic participation of women in the private sector. Gender equality is seen as an 	<ul style="list-style-type: none"> • Operational Gender Policy promotes: <ul style="list-style-type: none"> • Gender mainstreaming as a cross-cutting issue throughout all phases of IDB interventions. • Proactive action (gender 	<ul style="list-style-type: none"> • OP/BP 4.20 goal is to help member countries address gender inequalities (WB 2003a). • Implications of WDR frames gender equality as both a core development objective “in its own

	<p>39).</p> <ul style="list-style-type: none"> • SPS incorporates gender where it is “specifically related,” but claims that gender is already sufficiently dealt with in the gender policy and operational manual (SPS 2009: 9). 	<p>principles.</p> <ul style="list-style-type: none"> • Help member countries achieve gender equality (AfDB 2001:20). • Promote gender analysis, cooperation between men and women, and targeted gender interventions. (AfDB 2001:20-21). <p>UGPOA supports:</p> <ul style="list-style-type: none"> • Sustainable and equitable economic empowerment of men and women through gender mainstreaming. • Enhancing institutional/managerial commitment to gender equality. • Integrating results-based, measurable goals (AfDB 2008). 	<p>opportunity to leverage women’s “untapped potential” (EBRD 2008:4)</p> <ul style="list-style-type: none"> • GAP lacks concrete measurements or specific mandate for implementation, and largely overlooks non-economic gender dimensions. • ESP aims to promote EBRD environmental and social sustainability by: “mainstreaming” environmental and social dimensions into all activities, establishing Performance Requirements, and promoting environmental and social benefits (EBRD 2008:2). These are not gender specific. 	<p>mainstreaming and direct investment) to promote gender equality and women’s empowerment.</p> <ul style="list-style-type: none"> • Preventive action (gender safeguards) to mitigate adverse gender impacts (IDB 2012: 3-5). • Improved gender focus on results and reporting. <p>The GAPO serves as a Gender Policy implementation guide. It identifies Bank-wide targets, commitments, and priorities, as well as responsible divisions for executing the Gender Policy (IDB 2011: 5).</p>	<p>right” and a smart economics approach. It identifies strategic gaps and actions in gender equality as highlighted in the WDR 2012 and proposes a framework for elevating gender equality in the Bank’s development agenda (WB 2011: 1).</p>
Author’s Comments	<p>Accountability to gender standards is likely undermined by the SPS’ assumption that gender issues will be sufficiently dealt with through ADB gender policies, and so do not require their own safeguard.</p>		<p>The GAP reflects EBRD’s focus on gender equality as a vehicle for economic growth.</p>	<p>The IDB Operational Gender Policy is the only IFI gender policy that incorporates an enforceable gender safeguard.</p>	<p>OP/BP 4.20’s primary focus on member countries instead of Bank staff shifts responsibility away from the Bank and allows the Bank to shirk responsibility for any failures.</p> <p>A shortcoming of both OP/BP 4.20 and Implications of WDR is their exclusion of gender implications of policy-based lending, although WB staff argue that these exclusions to not apply.</p>
Priorities	<p>BP GAD priorities (which draw from original GAD policy) include:</p> <ul style="list-style-type: none"> • Integrating “gender sensitivity” to observe how operations differently impact men and women. • Increasing gender analysis of proposed 	<p>Gender Policy priorities are:</p> <ul style="list-style-type: none"> • Support education for women’s empowerment (AfDB 2001:22). • Promote gender-sensitive agriculture and rural development (ibid:23-25). • Reduce women’s poverty (ibid: 25-26). • Increase women’s access 	<p>GAP priorities include:</p> <ul style="list-style-type: none"> • Building Bank capacity to mainstream gender in Bank projects (with emphasis on economic empowerment). • Mapping and assessing gender impact of EBRD’s investment. • Generating baseline gender data. 	<p>Operational Gender Policy prioritizes direct investment in areas with significant impact on gender equality and women’s empowerment, including social security reform, women in decision making, and prevention of gender-based violence (IDB 2010:3).</p>	<p>OP/BP 4.20 does not include priority areas to focus on in country gender assessments, monitoring and evaluation, or gender reports.</p> <p>Implications of WDR’s priorities relate to:</p> <ul style="list-style-type: none"> • Informing country policy dialogue on gender equality.

	<p>projects to assess economic and social gender impacts.</p> <ul style="list-style-type: none"> •Improving “gender planning” to formulate equal opportunity-oriented strategies. •Integrating gender mainstreaming to explicitly consider men’s and women’s distinct needs. •Improving ‘agenda setting’ to prioritize strategies that reduce gender disparities in development, including health, employment, and legal rights (ADB 2010:1). 	<p>to health services (ibid:26-27).</p> <ul style="list-style-type: none"> •Establish good governance (ibid:27-28). <p><u>UGPOA</u> priorities include:</p> <ul style="list-style-type: none"> •Integrate gender into transportation, domestic energy supply, water sector, extractive industries, and food security investments (AfDB 2008: 6-7). •Build institutional gender capacity and knowledge (AfDB 2008:8). •Mainstream gender into national budgets and legal reforms (AfDB 2008:3). 	<ul style="list-style-type: none"> •Developing measurement and monitoring tools (EBRD 2009). 	<p><u>Operational Gender Policy</u> mandates that projects account for:</p> <ul style="list-style-type: none"> •Impact of human life cycle and caring for persons, diversity of household/family structures, gender differences in time use, and inequalities in decision-making (IDB 2010: 4). <p><u>GAPO</u> priorities include:</p> <ul style="list-style-type: none"> •Conducting analytical work; increasing direct gender investments; addressing gender gaps in knowledge and research; improving mechanisms for gender-sensitive policy monitoring and implementation; and adopting staff incentives. 	<ul style="list-style-type: none"> •Enhancing country-level gender diagnostics. •Scaling up lending for domestic priorities identified by WDR 2012. •Increasing the availability of gender-relevant data and evidence. •Leveraging partnerships to help implement priority actions (WB 2011 ii-iii)
<p>Author’s Comments:</p>	<p>Although neither the <u>BP GAD</u> nor <u>GAD</u> policy adequately addresses gender implications of policy-based lending and macroeconomic reforms, both reflect strengths in prioritizing women’s and men’s equal decision making power; promoting equal economic and social opportunities, and addressing broad legal, poverty, and health disparities.</p>	<p><u>UGPOA</u> positively moves beyond Gender Policy’s original focus on traditional areas of education and health to include care constraints, extractive industries, management, national budgets, etc.</p>	<p>The <u>GAP</u>’s limited focus on private sector and market development overlooks social impediments, like access to education and political participation, that might undermine women’s economic opportunities. <u>ESP</u>’s minimal references to gender address barriers to women’s employment while overlooking negative gender impacts in environmental and social sectors. Additionally, <u>GAP</u>’s specific focus on women might preclude consideration of harmful gender impacts on men.</p> <ul style="list-style-type: none"> •None of the <u>ESP</u>’s 10 priority Performance Requirements, which apply to EBRD-financed 	<p>Along with the AfDB <u>Gender Policy</u>, the <u>Operational Gender Policy</u> is the only other IFI gender policy that identifies care economy dimensions. It is also the only IFI gender policy to address gender based violence.</p>	<p><u>Implications of WDR</u> marks a significant improvement to the Bank’s prioritization of gender equality as both a strategic and inherently “right” objective.</p>

			projects, relate to gender (EBRD 2008).		
Mechanism to 'Engender' Operations	<p>For BP GAD and GAD policy:</p> <ul style="list-style-type: none"> Regional and Sustainable Development Department (RSDD) is responsible for monitoring projects, programs and technical assistance operations for gender inclusion (ADB 2010a:2, ADB 2003j:48). Regional departments create a Country Strategy Program (CSP) to incorporate gender into country dialogue, collect gender data, prepare a Country Gender Assessment (CGA), and formulating country gender strategies (ADB 2010a:2). Each project's Initial Poverty and Social Assessment (IPSA) must include a preliminary gender assessment which is based off of an in-depth checklist, including analysis of negative gender impacts arising from user-fees, land loss, resettlement etc. (ADB 2010:Annex 1) If gender is identified as a theme, a social development or gender specialist must prepare a project-specific plan to 	<p>Gender Policy calls for:</p> <ul style="list-style-type: none"> Adopting gender macroeconomic policy framework in Country Strategy Papers, Poverty Reduction Strategy Papers and Portfolio Reviews (AfDB 2001a:29). Revising Operational Manual, Country Policies and Institutional Assessment to include gender equality goals (AfDB 2001a:29), as well as the Environmental Assessment Guidelines to account for gender (ibid:30). Supporting women-focused activities (ibid:31), gender inclusive policy dialogue, gender research and disaggregated data collection (ibid:32). Tasking Country Departments with creating a gender Plan Of Action (POA) (AfDB 2001a:32). <p>UGPOA calls for:</p> <ul style="list-style-type: none"> Improving gender based budgeting and auditing (AfDB 2008: 15). Building gender capacity for national statistical agencies and units (AfDB 2008:3). Tasking Gender, Climate, and Sustainable Development Unit with 	<p>GAP aims to implement its strategy by :</p> <ul style="list-style-type: none"> Establishing a Gender Steering Committee to develop a gender policy. Implementing gender pilot programs. Engaging in strategic gender dialogue with the external community. Ensuring that gender guidelines, tools, and trainings reach project implementation levels(EBRD 2009:15-19). In response to GAP's emphasis on streamlining gender-sensitivity into EBRD investments, country strategies now include a dedicated chapter outlining the sectors in which the Bank will attempt to introduce gender (EBRD 2012). A cursory review finds that eleven of the EBRD's thirteen Country Strategies adopted since 2011 do in fact include a "gender annex." 	<p>Gender Policy:</p> <ul style="list-style-type: none"> Gender and Diversity Unit (GDU) uses gender mainstreaming to analyze project gender issues and promote gender analysis in knowledge, institutional, and capacity building. Environmental Safeguards Unit (ESU) will use gender safeguards to assess project's potential adverse gender impacts. If negative gender impacts are identified, gender analysis is integrated into projects' social impact and risk assessment. <p>GAPO:</p> <ul style="list-style-type: none"> At country level, GDU works with IDB member countries, lending divisions, and civil society groups to introduce gender-related results matrices into country strategies (IDB 2011:7). For project design, GDU works with 9th General Capital Increase priority sectors to set yearly gender targets (Personal Communication, Sarah Bibler, January 7 2013). GDU and ESU develop technical tools to facilitate application of gender safeguards and set up pilot program to implement in design and supervision (IDB 2011:12). 	<p>Country Directors (CDs) oversee OP/BP 4.20 implementation through:</p> <ul style="list-style-type: none"> Preparing the Country Gender Assessment (CGA). Integrating the CGA into dialogue with country officials and the Country Assistance Strategy (CAS) to ensure CAS priority areas are gender sensitive (WB, 2003b: WB 2002:25) Supporting project task teams in assessing local gender context and integrating gender-responsive actions into projects (WB 2003b). <p>Implications for WDR</p> <ul style="list-style-type: none"> Gender Unit will increase number of gender toolkits and manuals across sectors, such as for agriculture and transportation. "Gender Anchor" works with Regions, Network Councils, and Sector Boards to identify and address constraints to gender mainstreaming. Regions emphasize developing Regional Gender Action Plans.

	<p>address gender concerns and report on women’s project participation. BP GAD Policy includes a guide to assessing key gender consideration in project design and implementation (ADB 2010: Appendix 2).</p> <ul style="list-style-type: none"> •Gender plan included as an appendix to the project report (ADB 2010a:3). 	<p>enforcing full gender assessments in projects (AfDB 2008:9).</p> <ul style="list-style-type: none"> •Nominating gender focal points (AfDB 2008:17). 			
Author’s Comments	<p>RSDD has a huge responsibility for overseeing ADB’s gender related work with little incentive or sufficient support to carry out thorough implementation. Additionally, there is little incentive for ADB project staff to identify and analyze gender issues within their own projects, which adds to their work load.</p> <p>Despite these weaknesses, <u>BP GAD’s</u> in-depth appendices (1, 2&3) are among the strongest for IFI project evaluation. They guide project and country staff to assess gender equality, women’s empowerment, differential decision making roles, negative impacts of user-fees, and other comprehensive</p>	<p>The <u>UGPOA</u> and <u>Gender Policy</u> are among the few IFI gender policies or strategies that explicitly identify the need to integrate gender budgeting at the national level, and consider harmful gender impacts in macroeconomic policy.</p>	<p><u>GAP’s</u> Proposed actions are vague and lack measurable goals, targets, monitoring tools, or incentives to carry out implementation. Perhaps most significantly, although it identified the need to establish a Gender Steering Committee to develop a gender policy (EBRD 2009:15), as of 2013, no such policy is publically under development. Additionally, it is unclear to what extent the “gender annex” influences project design or implementation.</p>	<p>The GDU works closely with the Safeguards Unit and implementing ESU to increase gender awareness, monitoring, and evaluation at safeguards level. It is the only IFI that integrates safeguards into its gender policy.</p>	<p>OP/BP 4.20 states that it does not apply to policy-based loans (WB 2003a) which comprises more than one third of loans and heavily impacts gender equality; the Bank’s Gender Unit staff claim that this exclusion is not enforced (Communication, Jeni Klugman and Elaine Zuckerman, April 2013). The Bank should remove this policy-based lending exclusion from OP/BP 4.20.</p> <p>Implications of WDR’s emphasis on integrating gender into manuals and sector strategies and adopting Gender Action Plans is not a new approach, but the Bank still lacks incentives for integrating these mechanisms across sectors.</p>

	gender dimensions throughout project implementation.				
Staff Training and Awareness	<p>BP GAD plans to increase gender awareness through:</p> <ul style="list-style-type: none"> • <i>Voluntary</i> workshops, seminars, and staff guidelines to implement GAD policy (ADB 2010:2). • Gender checklist to aid gender analysis in the Initial Poverty and Social Assessment. • A guide to key gender considerations in project design. • Sample gender plan format (ADB 2010:3). <p>GAD policy:</p> <ul style="list-style-type: none"> • Regional Technical Assistance department enhances gender capacity of country executing agencies and administers funds to small GAD initiatives (ADB 2003:45-46). 	<p>Gender Policy</p> <ul style="list-style-type: none"> • Provides voluntary Bank staff gender training (AfDB 2001:32). • Recommends developing reference guides to engender sectoral projects (AfDB 2001:30). • Provides materials for staff to do gender analysis (ibid:32-33). <p>UGPOA</p> <ul style="list-style-type: none"> • Conducts “regular” (voluntary) gender trainings for country economists, task managers, Board, and Ministers (AfDB 2008:4, 13). • Disseminates and monitors “quality assurance criteria” for gender mainstreaming among project staff. • Makes gender mainstreaming tools such as guidelines and checklists available online and integrates training incentives for gender mainstreaming (AfDB 2008). 	<p>GAP:</p> <ul style="list-style-type: none"> • Establishes gender training for Bank managers and staff (EBRD 2009: 14). • Following GAP adoption, voluntary guidance notes were developed to engender Environmental and Social assessment tools (EBRD 2010). 	<p>The Operational Gender Policy calls for strengthening gender staff capacity by developing gender “sector notes” that promote wider sensitivity (IDB 2011:7).</p> <ul style="list-style-type: none"> • Attention to gender is part of the annual staff evaluations (Sarah Bibler, personal communications with IDB, January 7 2013) <p>The GAPO identifies GDU-led gender capacity building initiatives for:</p> <ul style="list-style-type: none"> • IDB staff to address gender issues across sectors. • IDB quality assurance, risk management, and safeguard integration divisions. • IDB staff responsible for carrying out project impact evaluations (IDB 2011:10); 	<p>OP/BP 4.20 does not identify specific staff training opportunities.</p> <p>Implications for WDR outlines voluntary staff development measures, including:</p> <ul style="list-style-type: none"> • Training for country directors. • Implementation of “Gender and Development Seminar Series”. • Training on gender budgeting.
Author’s Comments	<p>BP GAD lacks mandate for gender training. As a result, gender capacity is limited at managerial or non-gender staff levels, a phenomenon that was confirmed by the AfDB’s IFI-wide gender analysis</p>	<p>Despite the UGPOA’s emphasis on gender training incentives, our research could not confirm whether they have been adopted. The voluntary nature of gender capacity building mechanisms,</p>	<p>The voluntary gender trainings are unlikely to result in broad staff participation. Despite noting “a generalized lack of awareness about gender issues” among EBRD staff, the GAP does not outline a budget or incentives</p>	<p>The IDB is the only IFI known to integrate gender into its staff evaluations. Beyond integrating gender into staff evaluations, it is unclear from GAPO or Operational Gender Policy whether staff gender training is mandatory.</p>	<p>Proposed trainings might not have widespread impact without adequate incentives to encourage participation. In fact, the Bank’s own Independent Evaluation Group (IEG) identified a track record of low attendance at gender trainings due to a lack of</p>

	(OED 2012). Additionally, GAD policy capacity building recommendations are very vague and lack measurable targets.	including use of gender tools, manuals, and gender training attendance, undermines their effectiveness.	for gender-training (EBRD 2009).		mandates or incentives (IEG 2010).
Staff Incentives or Support Networks	<p>GAD policy:</p> <ul style="list-style-type: none"> Establishes External Forum on Gender and Development to facilitate dialogue with members of academia, civil society and government on gender issues. Requires Bank to develop a voluntary GAD manual for staff and consultants and database of best GAD practices (ADB 2003:47); 	<p>Gender Policy</p> <ul style="list-style-type: none"> Does not provide incentives for staff to engender work. <p>UGPOA:</p> <ul style="list-style-type: none"> Claims to integrate gender into Annual Staff Performance evaluation (AfDB 2008:12); Updates Operations Manual and Bank’s Environment and Social Assessment Procedures to incorporate performance-related incentives for gender mainstreaming (AfDB 2008). 	<p>GAP Establishes:</p> <ul style="list-style-type: none"> An internal Gender Steering Committee to supervise departmental GAP implementation and encourage team commitment (EBRD 2009:15). A non-Bank Gender Advisory Group to engage annually in strategic gender dialogue (EBRD 2009:16). Central GAP coordinator (EBRD 2009:15). Gender focal points in regional offices (EBRD 2009:16). (It is unclear whether these are full or part-time.) Full-time gender consultant for Environment and Sustainability Department (EBRD 2009). 	<ul style="list-style-type: none"> Operational Gender Policy calls for gender equality, diversity, and work-family balance to extend beyond projects to human resource management and institutional environment. 	<p>OP/BP 4.20:</p> <ul style="list-style-type: none"> The Gender and Development Board, a body composed of representatives from the main operational units in the Bank, will collaborate with relevant Bank units to integrate gender issues and develop guidance for staff (WB 2003b; WB 2002:37). <p>Implications of WDR identifies weak staff capacity as a primary challenge.</p>
Author’s comments	The ADB policies lack incentives for staff to engender their work.	Our research could not confirm whether gender integration is in fact part of staff evaluations. Without this, staff attention to gender is likely to be limited.	The GAP ’s failure to identify incentives to engage staff in gender capacity building or training is particularly troubling considering the paltry number of EBRD gender specialists on staff. At the time of writing, the Gender Team in the Environmental and Social Unit consisted of only three members (Personal Communication, Sarah Bibler and Gender Team, November	The IDB’s emphasis on both promoting gender capacity building and supporting staff in different lifecycles is commendable.	Despite recognizing weak staff gender capacity, “Implications of WDR” does not outline concrete incentives to encourage staff participation.

Funding	<ul style="list-style-type: none"> • BP GAD only mentions funding for technical assistance operations that are classified as having the potential to correct gender disparities, significantly mainstream gender concerns, or are likely to have substantial gender impacts (ADB 2010a:3). • Like most IFI gender policies, the GAD policy does not outline additional funding for implementation (ADB 2003j:48). • From 2003 to 2012, the Gender and Development Cooperation Fund, a trust fund, received \$12 million from donor countries) (ADB 2012). 	<ul style="list-style-type: none"> • Gender Policy indicates that it will allocate resources for staff training, gender research, workshops, and seminars and use the Technical Assistance Fund and Project Preparation Facility to fund gender mainstreaming (AfDB 2001a:33). • UGPOA expects priority actions to be “mainstreamed” in Regional Directors administrative budgets, with funds for gender trainings to come out of Human Resource Department training budget. 	2012). <ul style="list-style-type: none"> • GAP proposes a 2 year budget totaling Euros 2 million (US\$2.5 million) with contributions from EBRD, the Shareholder Special Fund, and regional donors (EBRD 2009:12) (EBRD 2009). 	<ul style="list-style-type: none"> • Operational Gender Policy directly finances operations that address gender barriers to progress, conduct gender assessments, and promote sex-disaggregated data collection (IDB 2010:4). • Adoption of “Gender and Diversity” as an IDB Ninth General Capital Increase priority allows for periodic additional financing as decided by the Board (IDB 2011:13). • Gender and Diversity Fund was also established to foster gender equality, combat discrimination, and support development (IDB, no date). 	<ul style="list-style-type: none"> • OP/BP 4.20 does not mention funding provisions. • Gender is a “special theme” of the 2010 IDA 16 replenishment. • WB staff indicate that a large portion of gender activities are financed through core funding (Personal Communication with WB, Zuckerman and Lauterbach, March 22, 2013).
Author’s comments		Neither the UGPOA nor Gender Policy indicate their own designated core funding, which might undermine resources for gender mainstreaming.	The proposed funding of Euros 2 million is insufficient to carry out GAP’s outlined actions. It is also problematic that the funding comes from a shared, rather than core funding source. It is unclear how/where minimal funds will be allocated.		The World Bank Gender Unit maintains that since “nearly 90 percent” of World Bank lending is gender sensitive, a significant proportion of its gender operations are funded by core sources, although the amount is not determined. If gender is a true institutional priority, the Bank should develop rigorous assessments to identify the amount of core funding going to gender-related projects. It is the authors’ belief, based on in-depth research, that since 2009, many Bank gender mainstreaming activities have been funded by the Gender Trust Funds (GENTF) with

					support from Bank core funding (Lauterbach and Zuckerman 2013)
Monitoring and Evaluation	<p>BP GAD:</p> <ul style="list-style-type: none"> The Regional and Sustainable Development Department compiles information and prepares “periodic” gender reports and case studies (ADB 2010:3). Monitoring mechanism for GAD operations are formulated in gender plans for individual projects (ADB 2010:3). Country and project staff use in-depth gender guidelines, provided as appendices in the operations manual, to assess potentially positive or negative impacts throughout project implementation (ADB 2010: Appendix 1/2/3). <p>Gender Strategy:</p> <ul style="list-style-type: none"> Interim report to Board of Directors is due two years after policy is approved, followed by policy review five years after implementation (ADB 2003:48). 	<ul style="list-style-type: none"> Gender Policy calls for monitoring gender responsive indicators for country level outcomes and integrating gender into Annual Staff Performance evaluation (AfDB 2001: 29-30). UGPOA states that AfDB will integrate gender equality measures into Bank’s institutional Key Performance Indicators (AfDB 2008:8). 	<p>GAP calls for:</p> <ul style="list-style-type: none"> Tools to evaluate and monitor gender impacts of Bank’s investments and gender-sensitive indicators to assess Bank’s overall actions (EBRD 2008:8). Analysis of gender impact in EBRD annual reports. 	<p>Operational Gender Policy</p> <ul style="list-style-type: none"> Each project’s “Development Effectiveness Matrix” measures whether the project contributes to enhancing gender equality (IDB 2011:27). Indicators measure gender mainstreaming in project design, execution, and at project closure including collecting sex-disaggregated data (IDB 2010). IDB Management reports to Board of Executive Directors every three years on execution/attainment of Gender Policy objectives and action plans (IDB 2010); Bank reports on the Gender Policy’s monitoring indicators in annual report, President’s Report to the Board, and Sustainability Review (ibid:8). <p>GAPo assigns responsibility to various IDB divisions for:</p> <ul style="list-style-type: none"> compiling and tracking proposed gender outputs, outcomes, and policy monitoring indicators. Including gender equality indicators in Development Effectiveness Matrices and country strategies and projects (IDB 2011:12) 	<p>OP/BP 4.20:</p> <ul style="list-style-type: none"> “The Bank regularly monitors the implementation of the policy” (WB 2003a). Regional vice-presidencies annually report to the Managing Director concerning implementation (WB 2003b). Gender and Development Board will develop framework for M&E and consolidate regional reports into annual summaries (WB 2003b). <p>Implications for WDR</p> <ul style="list-style-type: none"> Implements “tracking system” on gender-informed projects for Task Team Leaders. Regional Vice Presidents hold Country Directors accountable for gender-informed CASs. New tools aim to increase collection of sex-disaggregated data, including Bank’s “Little Data Book on Gender” and “e-Atlas for Gender” (WB 2011:10). The Bank’s Corporate Scorecard includes measurements on gender and development.
Author’s comments	Implementation Reviews of the gender policies have been consistent and strong. They include relevant	Despite Gender Policy’s call for regular monitoring of policy compliance at the country level, the AfDB does not have regular	Gender equality is in fact included in the EBRD’s 2011 annual report, as well as its 2011 Sustainability Report (EBRD 2012a:68, EBRD	IDB’s monitoring focus on both project design <i>and</i> execution reflects strongest mechanism of IFIs.	Challenge remains that most of gender assessments evaluate gender sensitivity at project planning stage, rather than in execution, and longer-term

	<p>recommendations, such as the need for more gender specialists. The gender guide appendices crucially promote gender considerations, like women’s decision making roles and equal participation, throughout project implementation.</p>	<p>monitoring and compliance reports publically available on its website. Because of this, but there is no evidence that the AfDB has sufficiently monitored gender over the past decade</p>	<p>2012b), but gender analysis and data collection is minimal (EBRD 2012a:68, EBRD 2012b).</p>		<p>outcomes and impacts. Additionally, the new “gender-informed lending” assessment is flawed because it classified projects as “gender-informed” if they minimally meet one of three superficial criteria. Such an assessment might preclude robust monitoring and evaluation that forces the Bank to assess gender weaknesses.</p>
<p>Missed Opportunities</p>	<p>In depth analysis of five IFI’s gender policies and strategies uncovered common “missed opportunities:”</p> <ol style="list-style-type: none"> 1) IFI gender policies urgently need to promote men’s and women’s equal rights as a core development objective. The IDB, ADB, and AfDB acknowledge women’s rights, while the WB promotes women’s “agency”. 2) All IFI gender policies should address the gender implications of broader policy-based lending or macroeconomic reforms, which have distinct and often harmful impacts on women’s health, education, and social and economic wellbeing. The AfDB Gender Policy, ADB GAD Policy, and IDB Operational Gender Policy all at least reference the need to integrate gender dimensions into macroeconomic policies. 3) Most IFI gender policies fail to address women’s unpaid care work or other gendered barriers that limit equal project participation. Only the IDB’s Operational Gender Policy explicitly identifies the importance of accounting for care work, time constraints, and life cycle needs in project design and implementation. 4) Most IFI gender policies miss the opportunity to address outcomes of gender inequality, such as high rates of gender based violence. The AfDB and IDB Gender Policies alone acknowledge the need to address gender based violence and its impact on women and men’s wellbeing. 5) Except for the IDB’s Operational Gender Policy, none of the other IFI gender policies/strategies identify specific tools or specific mechanisms to monitor women’s and men’s equal project participation, as well as projects’ gender impacts, <i>beyond</i> initial project planning stage. 6) Across the IFIs, staff participation in gender trainings is minimal. Unless IFIs incentivize staff to participate in gender trainings, staff gender capacity will remain low within less “traditionally” gendered sectors, like other infrastructure, employment, trade and finance. 7) The vast majority of gender policies fail to incorporate a gender safeguard to explicitly guard against and proactively address negative gender impacts. Only the IDB includes “preventive” measures to hold projects accountable for harmful gender impacts. 				

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