



IFIs' Rhetorical Gender & Climate Promises



Colophon

Published by:
Gender Action
January 2023

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Cover Photo: Civil Society World Bank Action Day 2022. Demonstration outside the World Bank headquarters in Washington DC, during its October Annual Meeting, organized by the Big Shift Global, For People for Planet, and other coalitions.
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List of acronyms and abbreviations

ADB	Asian Development Bank
AfDB	African Development Bank
AIIB	Asian Infrastructure Investment Bank
BOAD	West African Development Bank
CDB	Caribbean Development Bank
CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
ESF	Environmental and Social Framework
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards
FI	Financial Intermediary
FPIC	Free, Prior, and Informed Consent
GE	Gender Equality
GERs	Gender Equal Rights
GM	Gender Mainstreaming
GP	Gender Policy
IDB	Inter-American Development Bank
IFC	International Finance Corporation
IFI	International Financial Institution
IMF	International Monetary Fund
LGBTQ+	lesbian, gay, bisexual, transgender, queer, and more (the + signifies inclusion of intersex, asexual, pansexual, and additional identities within the LGBTQ+ community)
M&E	monitoring and evaluation
NDB	New Development Bank
OP	Operational Policy
PPP	Public-private partnership
RBA	rights-based approach
SEAH	sexual exploitation, abuse, and harassment
SGBV	sexual and gender-based violence
SGM(s)	sexual and gender minorities
SOGI	sexual orientation and gender identity (used by IFIs such as the IDB and World Bank)
TA	technical assistance
WB	World Bank

Executive Summary

Introduction This report assesses, scores and ranks the strength, adequacy or weakness of over a dozen International Financial Institution (IFI) gender policies and the gender sensitivity of their Environmental and Social Frameworks (ESFs).¹ It updates our 2020 report, "[Unmet Gender Promises: making IFI projects and policies deliver on gender-equal rights](#)". Both reports' rationale is that strong gender-sensitive policies are prerequisites for IFI investments that benefit and do not harm men, women, and sexual and gender minorities (SGMs). We emphasize that strong policies alone are insufficient without rigorous implementation and monitoring. What is more, beneficial impacts are hard to realize as long as these policies remain embedded in an IFI paradigm that promotes austerity and privatization of public services in low and middle income countries (LMICs) - from infrastructure, to energy, water and social services. Without the IFIs relinquishing this paradigm, which together with borrower country debt inevitably reduces LMIC's public spending, strong policies only constitute one step toward curbing harmful impacts of IFI-financed operations on women, men and SGMs.

Methodology Our main methodological tool applies an improved version of Gender Action's long-honed ecofeminist gender indicators to analyze IFI gender policies and ESFs. This report applied three updates to these indicators. First, since climate change disproportionately harms women, who in most LMICs predominantly manage natural resources including water, farmland and forests, we decided that two separate indicators are required: one for the gender dimensions of our planetary climate change crisis, and a second for distinct gender roles in using, managing and conserving the environment and biodiversity. Second, we integrated sexual exploitation, abuse, and harassment (SEAH) into our previous sexual and gender-based violence (SGBV) indicator. Third, we added a new ESF indicator on gender and debt to spotlight the gender impacts of the vicious debt cycle that IFI loans trigger.

Rankings Scoring **12 IFI gender policies** ranked the Asian Development Bank (ADB) and European Bank for Reconstruction and Development (EBRD) as strongest and the World Bank and IMF as weakest.² The ADB's is the only gender policy³ that received a Strong score for integrating gender into climate change, environmental, and biodiversity. We could not rank the AIIB, IDB Invest and NDB because they unacceptably still lack standalone gender policies.

Scoring **11 IFI ESFs** ranked the European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (EIB) as strongest and the World Bank and ADB as weakest.⁴

Newer IFI ESFs exhibit a positive trend toward ESF gender-sensitivity although the nearly gender-blind World Bank 2018 ESF belies this momentum. With the exception of the newish EBRD, EIB, and IDB ESFs, other ESFs show sparse progress on gender issues since our 2020 report. All but the aforementioned three IFIs had a majority of Weak scores. Not a single IFI received a Strong score on the gendered impacts of climate change and environmental and biodiversity issues. The 2022 EIB ESF exceptionally mentioned sexual and gender minorities throughout its report. Too few ESFs contain monitoring frameworks requiring all projects to collect gender-disaggregated data at multiple junctures including

¹ The term 'gender policies' in this report refers to IFI gender policies, strategies, action and operational plans. Table 1.2 lists the IFI gender policies and ESFs that we assess.

² Table 2 presents IFIs' gender policies scores by indicator.

³ Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-2024 (2019).

⁴ Table 3 presents IFIs' ESF gender sensitivity scores by indicator. Note that the forthcoming 2023 ADB 2023 ESF is expected to more strongly address gender issues than the current 2009 version. We hope that it will contain a robust standalone gender standard.

prior to, during, and after project implementation. ESFs not only require rigorous monitoring frameworks, but also strong gender-expert staffing and training, gender-responsive consent and redress mechanisms, and so on.

Recommendations The recommendations summarized below reflect many of the themes and patterns that the report identified.

Every IFI must have a robust implemented gender policy. That the AIIB, IDB Invest and NDB lack standalone gender policies and that several existing IFI gender policies are weak is unacceptable in 2023.

IFIs must integrate gender issues fully into their ESFs. Only a handful of IFIs meet this standard.

Debt-based financing is an elephant in the room. Debt-based financing requires governments to repay IFIs, often at a premium. Even IFI concessional loans require paying front-end and closing fees and other surcharges on top of principal and below-market interest rate payments. High-level indebtedness of borrower countries receiving IFI concessional loans over decades reflects that IFIs, together with other creditors, contribute to this problem. To meet IFI payments, many governments resort to cutting basic services that are critical to women's and SGMs' wellbeing.

IFI gender policies and ESFs must require gender equal rights mandates. Only two gender policies and two ESFs scored strongly on the equal rights mandate indicator. Mandates should be a baseline requirement to prevent harm to women, men, and SGMs.

ESFs must acknowledge and address the gendered impacts of climate change. IFIs must identify and protect women's roles managing natural resources and biodiverse ecosystems, and safeguard women from climate change impacts. Our analysis found that current IFI gender policies and ESFs largely fail to address the gender dimensions of climate, the environment and biodiversity. As climate change displaces millions of people around the world, women are bearing this burden most intensely. Women face the highest risk of violence during climate displacement. Women comprise the majority of farmers in much of the world and fishers in several regions, livelihoods directly impacted by climate change. Their disproportionate unpaid care workload prevents them from as easily relocating when climate disturbances occur as can men. IFI policies have largely failed to acknowledge and safeguard against the gendered impacts of climate change. They must do so.

Gender policies and ESFs must incorporate SGMs throughout their policies. While we have seen a steady increase in the number of IFI gender policies and ESFs that discuss SGMs, they mostly mention a commitment to non-discrimination without detailing specifics. SGMs have specific needs such as extra attention to privacy in order to avoid forced "outing". SGMs also face disproportionate risks of violence. IFIs should craft policies that specifically protect SGMs from SGBV and SEAH. Only the EIB's and IDB's policies received Strong scores for addressing SGMs.

Gender policies and ESFs must ensure prevention of all forms of SGBV and SEAH. All IFI gender policies and ESFs should clearly define SGBV and SEAH and require prevention and mitigation measures for all forms, including but not limited to sexual and non-sexual forms of harassment, exploitation, abuse, assault, coercion, trafficking, and intimidation. Policies should also require projects to guarantee compensation and confidentiality. With only slight improvement since the 2020 "Unmet Gender Promises" report, this report found half of IFI gender policies barely or not at all addressed SGBV and SEAH. Four IFIs commendably did so while two did so adequately.

Gender policies must recognize and reward unpaid care work. A growing number of IFIs are acknowledging the unpaid care workload that falls disproportionately on women, exacerbating women's poverty. They must go further by requiring that childcare and housework be spread among all genders and remunerating and compensating all genders for their care work. Implementing these measures is essential to achieving gender equality.

ESFs must ensure full information disclosure and gender-sensitive consultations. Few ESFs scored strongly for requiring disclosure of full available information prior to project design to affected women, men, and SGMs and for robust consultations that permit all genders to accept or reject projects impacting their lives. Not all ESFs require safe spaces to protect LGBTQ+ community needs and child- and elder-care support to allow women to access consultations. All project-affected people must be informed of their rights to initiate grievance redress processes and to terminate them any time. The Free, Prior and Informed Consent (FPIC) framework, usually reserved for Indigenous Peoples, must be extended to all project-affected women and SGMs.

Gender policies and ESFs must collect gender-disaggregated Monitoring & Evaluation (M&E) data. Robust data collection and monitoring is critical to ensure projects do not harm and instead benefit affected people. Only one gender policy, the CDB's, and not a single ESF scored Strong on our M&E indicator. IFIs must ensure M&E data is disseminated widely and transparently, not just to project-affected people but also to IFI management, shareholders and the public.

ESF environmental and social risk assessments must assess gender risks prior to project launch. Gender issues must be a core component of ESF environmental and social risk assessments. Most neither consider how projects place women and SGMs at risk nor require measures to avoid and mitigate gender-based risks.

IFIs can do better incorporating gender into resettlement and compensation policies. Too many IFI projects entail involuntary forced resettlement. After FPIC is provided, if project-affected people of all genders provide consent for resettlement, they must have access to protection and compensation mechanisms. When resettlement happens, women tend to bear the biggest burden, and compensation should not merely be directed to a male head of household since women may not have formal land deeds. Although most policies reviewed recognize that women bear a greater resettlement burden than do men, the EBRD is the only IFI to receive a Strong score on this indicator.

Overarching conclusions First, over two years following "Unmet Gender Promises", this report's detailed analysis and scoring of 12 IFI gender policies and 11 ESFs shows little IFI progress in promoting a more holistic approach to ensuring gender equality. It is easy to pay lip service to gender issues. Many IFIs claim that gender equality is a core value, however, their policies do not live up to it. Based on this report's findings, we urge IFIs to urgently implement this report's above recommendations to create stronger policies. Second, women, men and SGMs can only benefit from, and avoid harm from, IFI projects if IFIs abandon their neoliberal austerity and privatize-everything practices. While these days IFIs quickly adopt civil society rhetoric, they embed it within their harmful decades-old privatization and austerity paradigm that undercuts development. IFIs must commit to leaving communities better off than when they arrived to live up to their boasted roles of "development institutions" and gender-equality proponents.

1. Introduction

This report titled “IFIs’ Rhetorical Gender & Climate Promises” assesses and ranks the strength, adequacy or weakness of about a dozen International Financial Institution (IFI) gender policies⁵ as well as the gender sensitivity of their Environmental and Social Frameworks (ESFs). It updates Gender Action’s 2020 report "[Unmet Gender Promises: making IFI projects and policies deliver on gender-equal rights](#)". The rationale for these assessments is that strong gender-sensitive policies are essential prerequisites for IFI investments that benefit and do not harm men, women, and sexual and gender minorities (SGMs). However, their existence alone is insufficient to avoid and eliminate IFI harms, because even strong policies and frameworks are only effective if they are implemented, what’s more within a new IFI paradigm.

1.1 IFIs’ paradigm

IFIs’ neoliberal framing of all their activities is the deepest source of harms: while many IFIs claim they are reducing poverty and inequality, their procurement contracts and loan policy conditions ensure the private corporate sector benefits while indebting poor countries. Many developing countries are implementing International Monetary Fund (IMF; Fund) loan programs containing policy conditionalities that require public spending cutbacks, which are likely to eat away at public education, healthcare, social protection and other public services (Eurodad 2022). In 2019, “64 countries spent more resources servicing foreign debts than they did on health care expenditure” (Weisbrot 2022). It is often women and SGMs who are disproportionately affected by such public service cutbacks.

There remains a gulf between IFI rhetoric and action. IFI documents, including policies, increasingly use language that many in civil society have been calling for over several decades. However, too often IFI operations continue to promote a privatization-austerity paradigm that reduces poor women’s, men’s and SGMs’ access to public services while rendering privatized services unaffordable to them.

In these circumstances it is important to hold IFIs accountable to try to ensure poor women, men and LGBTQ+ people enjoy their rights to health, education, social protection and a clean stable climate. IFIs strongly influence policies and spending choices of low- and middle-income countries (LMICs) that elevate private finance interests over those of the public sector.

It is this IFI paradigm in which their gender policies and ESFs are embedded and it is these IFI practices that frame this report’s assessment of their rhetorical policies.

1.2 Changes since “Unmet Gender Promises”

We begin this report with a summary of “Unmet Gender Promises”, followed by our analysis of current IFI gender policies and the gender sensitivity of their ESFs. Here we flag a few notable changes revealed by the analysis for this report compared to the findings laid down in our 2020 report.

Indicators - This report expands our previous report’s gender and ESF indicators focusing on gender, climate change, environment and biodiversity by introducing two separate indicators for climate on the one hand and environment and biodiversity on the other hand. It also expands our previous SGBV indicator to include SEAH, and adds a new ESF indicator on gender and debt to spotlight the vicious debt cycle caused by IFI loans.

⁵ The term ‘gender policies’ in this report includes gender policies, strategies, action and operational plans.

Climate and Gender – Climate change is a gender issue since climate destruction disproportionately harmfully impacts women who predominantly manage natural resources including water, farmland and forests in most low-income countries. Disappointingly, our report finds that current IFI gender policies and ESFs are failing to address the intertwined gender dimensions of climate, the environment and biodiversity issues, witnessed by the very poor performance on our two separate gender, climate, environment and biodiversity indicators.

New gender policies and ESFs – This report reviews several new IFI policies approved since the publication of “Unmet Gender Promises”. Most notable is the IMF’s first-ever gender policy which is inevitably framed in the Fund’s macroeconomic stability programs that require low- and middle-income countries to implement fiscal consolidation measures responsible for shrinking public sector spending. Such Fund austerity requirements contribute significantly to the soaring numbers of people in poverty worldwide. Moreover, the Fund’s new gender policy applies a largely instrumental lens to women’s empowerment aimed at increasing economic growth without attention to women’s and LGBTQ+ people’s human rights. An Oxfam study demonstrates that “the IMF is systematically encouraging countries to adopt austerity measures once the pandemic subsides, risking a severe spike in already increased inequality levels...[revealing an] uneven distribution of the burden of austerity, which is more likely to be shouldered by women, low-income households and vulnerable groups, while the wealth of the richest people increases” (Oxfam 2021). If the IMF had an ESF as do other IFIs, we would have applied our ESF debt indicator to the IMF’s austerity programs to assess their harmful impacts. The IMF’s is the sole IFI gender policy not to receive one strong score on any of our 11 indicators.

One Case Study – “Unmet Gender Promises” presented nine still relevant case studies demonstrating harmful gender and environmental impacts of IFI policies and operations on affected communities. This report presents only one older case study, that is, the World Bank-financed South Africa Medupi coal power plant approved in 2010. It powerfully demonstrates enduring climate and gender harms that IFI fossil fuel and other infrastructure projects inflict on future generations.

1.3 Report contents and audience

The remainder of this approximately 50-page report includes: Chapter 2 which summarizes the findings of “Unmet Gender Promises”; Chapter 3 which presents our methodology; Chapters 4 and 5 which analyze and score IFI gender policies and the gender sensitivity of their ESFs; and Chapter 6 which presents conclusions and recommendations. Pages 53 to 86 contain the references and annexes.

The main audience for this report are IFI officials and their government members. We hope that our analysis will trigger traditional IFIs to improve their performance on gender equality and climate, and that new IFIs will be encouraged to adopt first-ever gender policies and all IFIs to end their neoliberal privatization and austerity paradigm. This report should also interest “IFI-watchers”, that is, CSOs and citizen groups who hold the public IFIs accountable for their investment impacts on people and the environment as well as academics who research and teach IFI development activities and impacts.

2. Summary of Unmet Gender Promises

When Gender Action published “Unmet Gender Promises” in 2020, we strove to track how IFIs integrated gender issues into their policies guiding investments. We unpacked the ways in which these policies fell short of expectations, and we ranked each IFI according to the strength of its gender policies and ESFs.

We believe these efforts matter for a simple reason: gender equality in IFI projects cannot be achieved until IFIs build in special protections for women and sexual and gender minorities (SGMs) across all aspects of their projects, from gender-sensitive staff trainings to environmental safeguards to grievance reporting mechanisms to childcare services, to energy/climate activities and more.

In “Unmet Gender Promises”, Gender Action made the case for an intersectional approach to gender issues, urging IFIs to pay special attention to the ways in which climate change, the division of household labor, and staffing decisions uniquely impact women. Gender sensitivity is not a box to check off once, but rather a lens through which IFIs must analyze all of their policy decisions.

“Unmet Gender Promises” identified several key areas in which gender sensitivity was almost entirely neglected across IFI policies and made many recommendations on how they could remedy this hiatus. The analysis conducted for the report showed that very few IFIs acknowledged the disproportionate unpaid care workload that falls on women, for instance. Addressing these care workloads is critical, because they simultaneously add to women’s time poverty and prevent women from participating in project consultations and redress processes to the same extent as men. Further, three-quarters of the IFIs analyzed in “Unmet Gender Promises” made no mention of sexual and gender minorities, an expansive term that comprises what many countries call the LGBTQ+ community. SGMs are at particular risk of violence and other forms of discrimination. IFIs must address the needs of SGMs in their policies, including in their redress, consent, and violence prevention guidelines.

In addition to analyzing IFI policies, “Unmet Gender Promises” further discussed nine field-based case studies that tracked how IFI projects impacted communities, especially women. These case studies included an industrial park in Haiti that, contrary to its funder’s policies, forcibly displaced farmers; a rural roads project in Gujarat, India that provided no safe housing to its workers and required them to sleep in open fields. The case studies indicated to us that policy alone is not enough—IFIs need to be diligent in ensuring that their projects follow their required rules. A hands-off approach to enforcing policy directly places women’s, men’s, and SGMs’ lives in danger.

“IFIs’ Rhetorical Gender & Climate Promises” is an update of the 2020 report “Unmet Gender Promises”, with the goal of showing the progress—or, in some cases, lack thereof—that IFIs have made in integrating gender sensitivity into their policies. We have also added new indicators, including an indicator addressing the impacts of climate change on women. Another key update introduced in “IFIs’ Rhetorical Gender & Climate Promises” is our focus on the debt-based financing model generally favored by IFIs. We added a Gender Dimensions of Debt indicator to call attention to the ways in which debt financing traps governments in cycles of debt, a paradigm that directly harms women and SGMs in project-affected countries. Gender Action advocates for IFIs to move toward an entirely grant-based funding model, especially for low-income countries, so that local populations—particularly women—do not see their basic services cut in order for governments to pay off IFI debt. Finally, throughout this report, as in “Unmet Gender Promises”, we refer to “gender equal rights” (GERs), by which we mean moral rights for women and SGMs. Rather than focusing solely on their economic uplift, we underscore the importance of gender-equal rights because we believe IFIs should also be attentive to an expansive array of social rights, such as access to

sanitation and toilet facilities, protections against violence, and so on, in order to achieve true equity in projects.

Ultimately, by updating “Unmet Gender Promises” two years later, we show too little progress of new IFI gender policies and ESFs in promoting a more holistic approach to ensuring gender equality. A bigger problem, as the Introduction underlines, is that IFIs now quickly adopt civil society rhetoric but keep it embedded within their harmful decades-old neoliberal privatization and austerity paradigm.

3. Methodology

3.1 Overview

Our approach to analyzing the IFIs for this report had a lot in common with our method used in “Unmet Gender Promises”. We detail the methodology in this chapter, including a few key updates and additions.

The report contains two separate analytical sections: the gender policy analysis and the Environmental and Social Framework (ESF) analysis. In chapter 4, we first examine the extent to which each IFI’s gender policy takes an expansive, cross-cutting approach to achieving gender equality. We have selected 12 gender policies to analyze, from 9 IFIs. All are measured using our updated set of 11 ecofeminist indicators (see section 3.2 and Annex 1). Four gender policies have been updated since the publication of “Unmet Gender Promises” (AfDB 2021, EBRD 2021, EBRD 2021, IDB 2021), and one is entirely new (IMF 2022) (see Table 1). The rest of the gender policies are the same as in 2020, but we have re-examined them using our new indicators.

In chapter 5, we turn to analyzing the gender sensitivity of 12 ESF documents from 12 IFIs, using our updated set of 13 ecofeminist indicators (see Annex 2). Five ESFs have been updated since the publication of “Unmet Gender Promises” (AfDB 2022 [draft]⁶, AIIB 2021, EIB 2022, IDB 2020, IFC 2021) and one is new (IDB Invest 2020) (see Table 1). While the rest remain the same, we have re-examined them according to our new indicators.

Our selection of IFIs, as in “Unmet Gender Promises,” includes the two major global World Bank Group facilities (the World Bank (WB) and International Finance Corporation (IFC)), two major Inter-American Development Bank Group facilities (the IDB and IDB Invest), two newer China-headquartered emerging global IFIs (the Asian Infrastructure Investment Bank (AIIB) and New Development Bank (NDB)), and six other significant regional development banks. This report adds the IMF because this tremendously influential international financial institution and lender of last resort just published its first gender policy. Table 1 below identifies which and how many IFIs’ gender policies and ESFs this report analyzes. In three cases, two documents per IFI were selected for review because we felt that they together represent the gender mechanisms in place used by IFI staff.

⁶ Gender Action analyzed the AfDB’s draft updated ESF for this report. Gender Action and other stakeholders submitted written feedback to this draft ESF during the AfDB consultations earlier in 2022, yet the AfDB has not replied yet to the submissions nor mentioned their final publication date.

Table 1: 13 IFIs' gender policies and ESFs analyzed in this paper

IFIs	Gender policies	ESFs
African Development Bank (AfDB)	✓✓(new)	✓(new draft)
Asian Development Bank (ADB)	✓	✓
Asian Infrastructure Investment Bank (AIIB)	(no policy exists)	✓(new)
West African Development Bank (BOAD)	✓	✓
Caribbean Development Bank (CDB)	✓	✓
European Bank for Reconstruction and Development (EBRD)	✓✓(new)	✓
European Investment Bank (EIB)	✓✓	✓(new)
Inter-American Development Bank (IDB)	✓(new)	✓(new)
IDB Invest	(no policy exists)	✓(new)
International Finance Corporation (IFC)	(subject to World Bank policy)	✓
International Monetary Fund (IMF)	✓(new)	(no ESF exists)
New Development Bank (NDB)	(no policy exists)	✓
World Bank	✓	✓

There are a few notable omissions. The AIIB, IDB Invest and NDB still completely lack gender policies, while the IMF lacks an ESF.

Our report only analyzes publicly available IFI information, reflecting publicly-financed IFIs' commitment to transparently publish all information on their websites. Doing so is critical for all relevant stakeholders, especially communities affected by their investments.

We recognize that a desk-based analysis of IFI gender policies and ESFs constitutes only a first step. Once robust gender policies and ESFs exist, their real value derives from implementation, outcomes and impacts on the ground.

This report also contains a single case study, from the Medupi coal power plant in South Africa, which highlights the prolonged damaging gendered impacts of climate change. While "Unmet Gender Promises" contained multiple case studies that were approved more recently than Medupi, we elected to focus only on one case this time in order to draw attention to our new climate change indicator (see section 3.2). As our analysis reveals, IFIs have largely failed to grapple with the ways in which climate change uniquely harmfully impacts women over the long-term. Examining the Medupi coal power plant provides one stark example, among many others, of why it is so urgent that IFIs rectify this oversight.

3.2 Analysis Indicators and Scoring Criteria

To better reflect current challenges related to climate change, debt-based financing, and more, we have made a few important updates to our indicators. These new indicators were used to evaluate all IFI policy documents.

Updated gender policy indicators

First, we have added two new indicators for evaluating how gender policies address climate and environmental concerns. Both the gender dimensions of our planetary climate change crisis and the distinct gender roles on the use, management and conservation of the environment and biodiversity deserve separate indicators. The first indicator therefore evaluates how IFIs address gender and climate change, while the second indicator evaluates how IFIs address gender, the environment, and biodiversity.

Second, we eliminated our indicator for level of gender funding from our gender policy indicators, due to inconsistent and insufficient IFI publication of these data.

Third, we added sexual exploitation, abuse, and harassment (SEAH) to our existing indicator evaluating how gender policies address sexual and gender-based violence (SGBV), for our analysis of both gender policies and ESFs.

Updated ESF indicators

First, whereas “Unmet Gender Promises” had a single indicator for evaluating environmental and climate concerns in ESFs, we have now split this “Gender in Environment and Climate” indicator into two separate indicators, one that analyzes how well the ESF addresses gender issues related to climate change, and another assessing treatment of gender issues related to the environment and biodiversity.

Second, we created a new indicator measuring the extent to which IFIs rely on debt-based financing in order to fund their projects. Gender Action advocates that IFIs move toward a system of grant-based funding, given that debt payments eviscerate country budgets and harm local communities, especially women.

Third, as with the gender policy indicators, we have deepened our previous SGBV indicator so that it includes SEAH.

For the gender policy analysis, the 11 indicators include:

1. Goals
2. Priorities
3. Mandate
4. Gender and Climate Change
5. Gender, Environment and Biodiversity
6. Mechanisms to Engender Operations
7. Staffing
8. Gender Monitoring and Evaluation (M&E)
9. Sexual and Gender Minorities (SGM)
10. Sexual and Gender-Based Violence (SGBV) and Sexual Exploitation, Abuse and Harassment (SEAH)
11. Unpaid Care Work

For the Environmental and Social Safeguards analysis, the 13 indicators include:

1. Gender Mandate/Safeguard
2. Gender in Environmental and Social Risk Assessments
3. Gender Dimensions of Debt
4. Gender Discrimination and Rights
5. Gender and Climate Change

6. Gender, Environment and Biodiversity
7. Gender and Information Disclosure
8. Gender in Consultations and Consent
9. Gender in Resettlement and Compensation
10. Gender Monitoring and Evaluation (M&E)
11. Sexual and Gender Minorities (SGM)
12. Sexual and Gender-Based Violence (SGBV) and Sexual Exploitation, Abuse and Harassment (SEAH)
13. Gendered Labor

Policies were ranked Strong, Adequate, and Weak for each indicator. We created a detailed matrix of the separate scoring criteria for each indicator, with definitions and requirements for each score, and referenced them during the analyses. These full criteria are presented in Annex 1 for gender policies and in Annex 2 for ESFs.

3.3 Ranking the IFI gender policies and ESFs

This report provides an updated ranking of IFI gender policies. The new rankings reflect both the newly published gender policies and ESFs as well as the update to our indicators.

IFI gender policies and ESFs received scores based on how many points match the indicator criteria (for Strong, Adequate, and Weak). To rank the gender policies and ESFs, we provided one point per indicator and tallied final scores. We did this by assigning points to each score. A Strong score received +1 point, an Adequate score received 0 points, and a Weak received -1 point. These scores are compiled in tables presented in Annex 3 for gender policies, and in Annex 4 for ESFs. Points were then gathered and compiled into our rankings. If an IFI has more than one gender policy, we took the average of those two final scores. Finally, if two IFIs received tied scores, we but denoted with an asterisk that the two IFIs received the same overall score.

4. Gender Policies - Analysis & Scores

The IFI gender policies analyzed and scored are: ADB (2019), AfDB (2001), AfDB (2021), BOAD (2012), CDB (2008), EBRD (2021), EBRD (2021), EIB (2016), EIB (2018), IDB (2021), IMF (2022), World Bank (2015). The full titles of the gender policy documents—which include gender policies, strategies, action and operational plans—are provided in Table 2 and in the References. We could not score AIIB, IDB Invest and NDB because they lack gender policies altogether (see Table 1). The IFC is not scored because it is subject to the World Bank’s gender policy.

We scored these 12 policies based on 11 indicators of gender sensitivity, which are listed in Table 2 and discussed in more detail in Annex 1. In this chapter, we present a summary of the gender-sensitivity scores received by each IFI based on these indicators (section 4.1), followed by detailed indicator-by-indicator breakdowns of these scores (section 4.2). We explore the key factors that impacted these scores and include our recommendations for each IFI to improve its score in the future.

4.1 Aggregate Gender Policy Indicator Analysis & Scores

Table 2 summarizes whether each IFI gender policy scored Strong, Adequate, or Weak by indicator. The detailed assessment behind this summary can be found in Annex 1.

The bottom three rows of Table 2 present the number of Strong, Adequate, or Weak in percentages for each IFI. The *primary* score received by each gender policy is color-coded to match the highlighted categories of Strong, Adequate, and Weak.

Alert! Because the AIIB, IDB Invest and NDB lack gender policies altogether they are not included in this analysis and cannot be scored.

Table 2: Gender Policy Indicator Scores

IFI	ADB	AfDB	AfDB	BOAD	CDB	EBRD	EBRD	EIB	EIB	IDB	IMF	World Bank
Gender policy documents	Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-20204 (2019)	Gender Policy (2001)	Gender Strategy 2021-2025 (2021)	Policy of the West African Development Bank in Terms of Gender (2012)	Gender Equality Policy and Operational Strategy (2008)	Equality of Opportunity Strategy 2021-25 (2021)	Strategy for the Promotion of Gender Equality 2021-2025 (2021)	The EIB Group Strategy on Gender Equality and Women's Economic Empowerment (2016)	EIB Group Gender Action Plan (2018)	IDB Environmental and Social Policy Framework, Standard 9 (2021)	IMF Strategy Toward Mainstreaming Gender (2022)	Gender Strategy (FY 2016-2023) (2015)
Goals	Strong	Adequate	Adequate	Adequate	Weak	Weak	Adequate	Strong	Adequate	Strong	Weak	Adequate
Priorities	Strong	Strong	Adequate	Adequate	Weak	Adequate	Weak	Strong	Adequate	Adequate	Adequate	Adequate
Mandate	Weak	Adequate	Strong	Adequate	Adequate	Weak	Adequate	Strong	Weak	Weak	Adequate	Weak
Gender and Climate Change	Strong	Weak	Weak	Weak	Weak	Strong	Adequate	Weak	Weak	Weak	Adequate	Weak
Gender, Environment and Biodiversity	Strong	Adequate	Weak	Weak	Weak	Weak	Weak	Weak	Adequate	Weak	Weak	Weak
Mechanisms	Strong	Strong	Strong	Strong	Strong	Strong	Strong	Adequate	Adequate	Adequate	Adequate	Adequate
Staffing	Adequate	Weak	Adequate	Weak	Strong	Adequate	Strong	Weak	Weak	Weak	Adequate	Weak
Gender Monitoring and Evaluation	Adequate	Adequate	Adequate	Adequate	Strong	Adequate	Adequate	Weak	Adequate	Weak	Adequate	Adequate
Sexual and Gender Minorities	Adequate	Weak	Weak	Weak	Weak	Adequate	Adequate	Weak	Weak	Strong	Weak	Weak
SGBV and SEAH	Strong	Weak	Weak	Weak	Weak	Adequate	Strong	Weak	Adequate	Strong	Weak	Strong
Unpaid Care Work	Strong	Strong	Weak	Adequate	Weak	Strong	Strong	Strong	Strong	Adequate	Weak	Adequate
Percent Strong	64%	27%	18%	9%	27%	27%	36%	36%	9%	27%	0%	9%
Percent Adequate	27%	36%	36%	45%	9%	45%	45%	9%	55%	27%	55%	45%
Percent Weak	9%	36%	45%	45%	64%	27%	18%	55%	36%	45%	45%	45%

Rankings

The IFI rankings below are based on the Strong, Adequate, and Weak scores that their gender policies received, as summarized at the bottom of Table 2 (and elaborated in Annex 3).

1. Asian Development Bank (ADB)
2. European Bank for Reconstruction and Development (EBRD)
3. African Development Bank (AfDB)
4. Inter-American Development Bank (IDB)
5. European Investment Bank (EIB)
6. West African Development Bank (BOAD)
7. Caribbean Development Bank (CDB)*
8. World Bank (WB)*
9. International Monetary Fund (IMF)

We highlighted the two highest-ranking IFIs in green; the two lowest in red.

*Although the World Bank and CDB received the same raw score in our scoring methodology, the CDB ranks higher because it received a higher number of Strong scores than did the World Bank.

Compared to “Unmet Gender Promises”, there are a few significant shifts in the rankings that are worth highlighting. In the 2020 report, EBRD scored in last place in our gender policy rankings, but its updated gender policy from 2021 showed a thoughtful and cross-cutting discussion of gender issues. Here, we rank it second. IDB, meanwhile, dropped from the first rank in the 2020 report to the 4th rank here, due to a 2021 update to its gender policy that was weaker than expected. The only other significant change was the addition of the IMF’s first gender strategy, which placed last based on its weakest overall score.

The aggregate gender policy scores presented above are further dissected in Table 2-A and presented pictorially in Graphs 1 and 2. Table 2-A presents the scores received per each indicator across the nine IFIs in percentage terms, providing a sense of where the IFIs succeeded in their approaches to gender-sensitivity. The bottom line tallies the combined strength of individual indicators across IFIs in percentage terms.

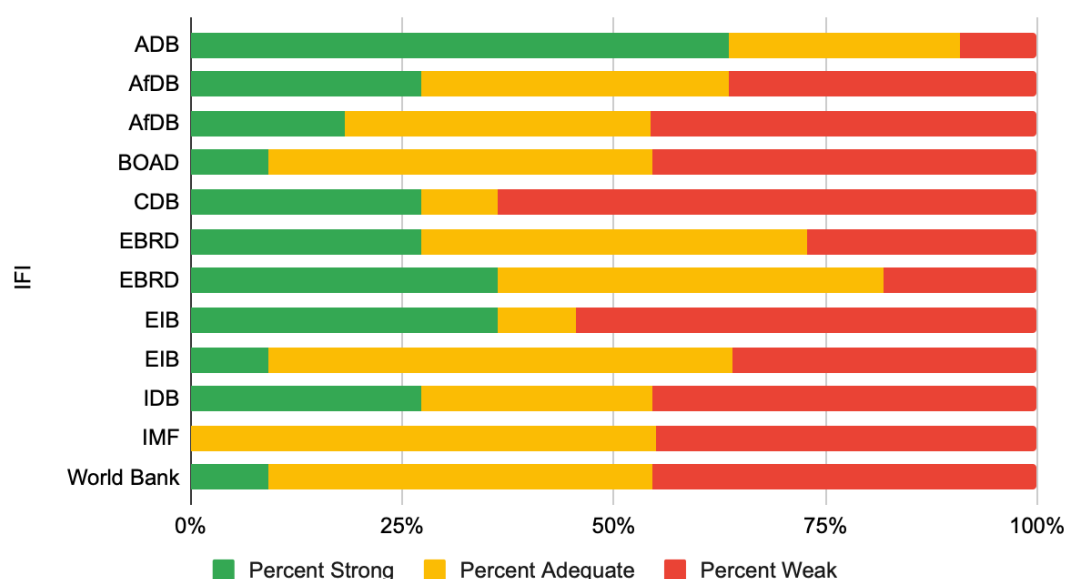
Table 2-A: Gender Policy Indicator Scorecard Across IFIs

Indicator	Percent Strong	Percent Adequate	Percent Weak
Goals	25%	50%	25%
Priorities	25%	58%	17%
Mandate	17%	42%	42%
Gender and Climate Change	17%	17%	67%
Gender, Environment and Biodiversity	8%	17%	75%
Mechanisms	58%	42%	0%
Staffing	17%	33%	50%
Monitoring & Evaluation	8%	75%	17%

Sexual Minorities	8%	25%	67%
Sexual & Gender-based Violence and SEAH	33%	17%	50%
Unpaid Care Work	50%	25%	25%
Percentage of total	24.2%	36.4%	39.4%

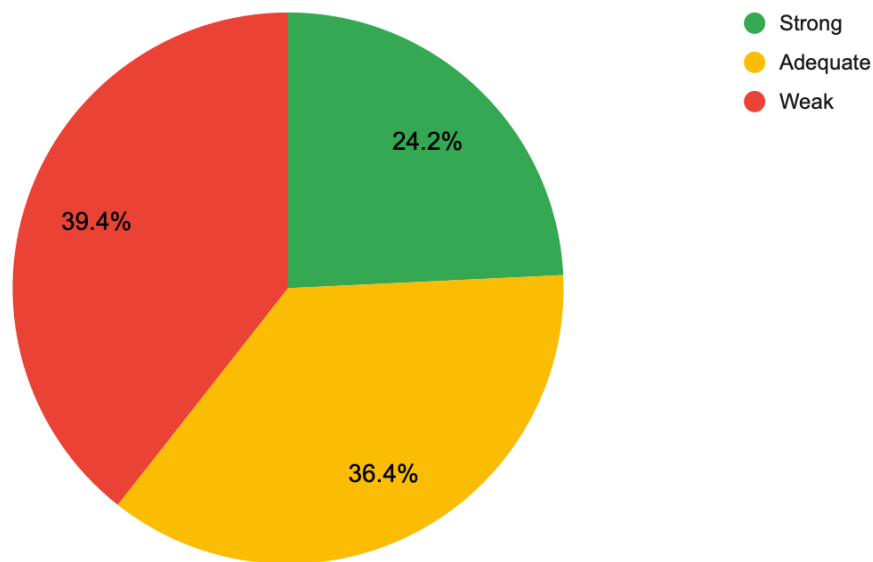
Graph 1 displays the score distribution and overall gender-sensitivity of each IFI's gender policy as presented in Table 2. Only one IFI (ADB) received a majority of Strong scores, while the rest received less than 50% Strong scores. Five IFIs received less than 25% Strong scores, with IMF receiving zero Strong scores. A number of IFIs received roughly equal Adequate and Weak scores.

Graph 1: Aggregate IFI Gender Policy Indicator Scores



Graph 2 below combines the indicator scores from Table 2, presented in Table 2-A, to display the aggregate IFI gender policy scores by degree of strength. Overall, only 24.2 % of the IFIs' gender policies scored Strong, 36.4% scored Adequate, while the highest percentage of gender policies, 39.4%, scored Weak. This is a major shift compared to "Unmet Gender Promises": The overall aggregate dropped from 41% to only 24% Strong in this report because of dismal performance on the two new indicators on the nexus of gender with climate change and the environment. The indicators Mechanisms and Unpaid Care Work score highest in this report, while the M&E indicator's score plummeted.

Graph 2: IFI Gender Policy Aggregate Scores on Gender-sensitivity



4.2 Individual Gender Policy Indicator Analyses & Scores

Having presented the aggregate IFI gender policy scores above, next we explore where those scores came from. Below we will delve into each policy's performance, indicator by indicator, and recommend places of future improvement for all IFIs.

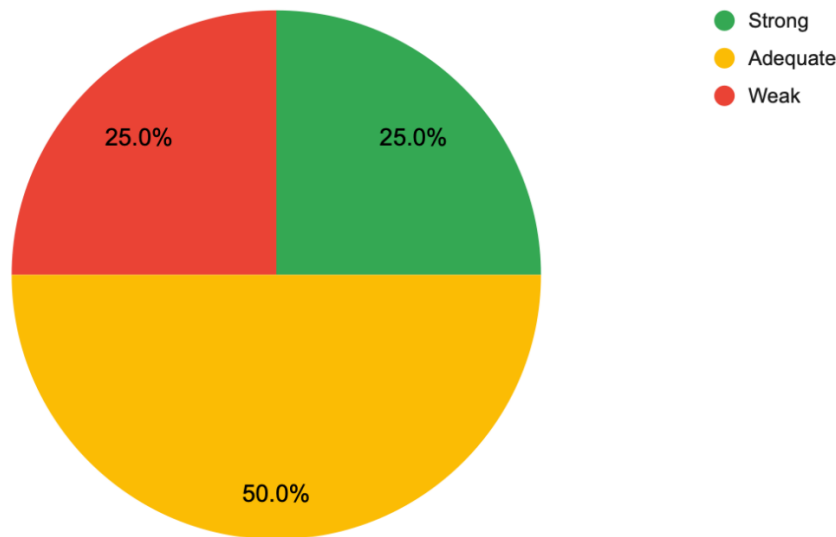
Indicator 1: Goals

Definition: The Goals indicator measures the extent to which IFIs center gender equal rights (GERs) in their approach to each gender policy. GERs should cover multiple spheres, and should be incorporated into broader human, social, and economic rights. A strong gender policy should require that IFI projects promote gender equality not just to achieve economic growth goals, but also to attain GERs in the social and human spheres.

Relevance: Goals shape each IFI's commitment to gender equality and GERs across its operations. A strong Goals section should reflect an IFI's level of commitment to integrating gender sensitivity, not just to increasing women's employment to elevate economic growth, into all aspects of its work.

Scoring: Graph 3 displays combined IFI gender policy scores in percentage terms for the Goals indicator. Three policies scored strongly (ADB 2019, EIB 2016, IDB 2021); six adequately (AfDB 2001, AfDB 2021, BOAD 2012, EBRD 2021, EIB 2018, World Bank 2015); three weakly (CDB 2008, EBRD 2021, IMF 2022) (see Table 2, 2-A and Annex 3). Sadly Strong scores dropped from 40% in the 2020 report to 25% in this report, while Adequate scores hardly changed.

Graph 3: Gender Policy – Goals



Recommendations:

All gender policies should:

- Apply a gender equal rights framework to all project contents and environmental and social risk assessments, in addition to promoting gender-equal economic empowerment. Economics should not be the end-all-be-all of each IFI's goals. Too many IFI gender policies unilaterally promote women's economic empowerment with little or no complementary attention to other critical rights.
- Recognize GERs explicitly within human, social, and economic rights. These GERs should extend to all marginalized identities, including sexual and gender minorities, indigenous people, individuals with disabilities, and more.
- Address cross-cutting goals that extend beyond "traditional" gender issues. These issues include but are not limited to gender in relation to climate change, resource management, land rights, resettlement impacts, wealth creation opportunities, and access to decision-making processes in project worksites, offices and within homes. Many of these issues are often overlooked within a typical gender policy framework, but they are of disproportionate importance to women and SGMs.

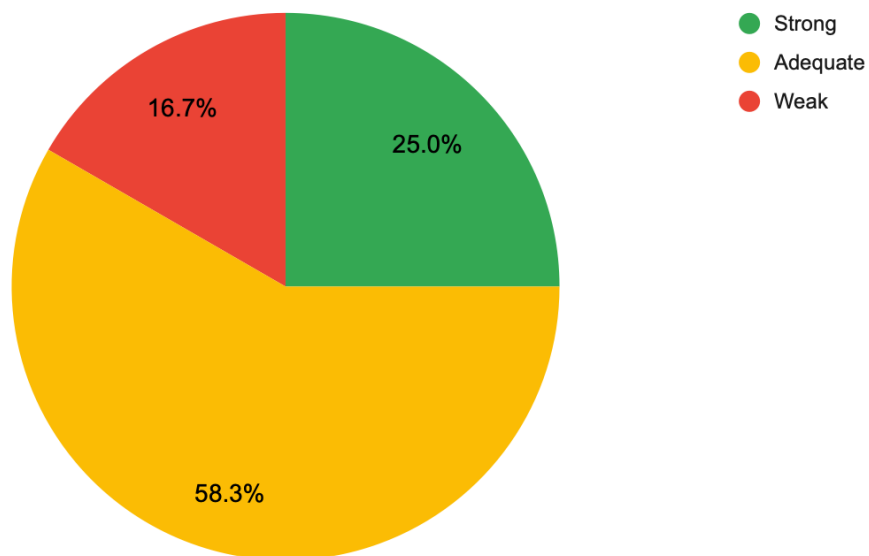
Indicator 2: Priorities

Definition: The Priorities indicator scores the extent to which IFIs prioritize in-depth and transformational change on gender issues. Priorities should take into account how gender relates to climate change, class, caste, race, cultural norms, age and more.

Relevance: Priorities reflect IFI commitments to gender sensitivity in their missions and goals and throughout operations.

Scoring: Graph 4 displays the combined IFI gender policy scores in percentage terms for the Priorities indicator. Three policies scored strongly (ADB 2019, AfDB 2001, EIB 2016); seven adequately (AfDB 2021, BOAD 2012, EBRD 2021, EIB 2018, IDB 2021, IMF 2022, World Bank 2015); two weakly (CDB 2008, EBRD 2021) (see Table 2, 2-A and Annex 3). The contrast with the performance in "Unmet Gender Promises" is highly disappointing as Strong scores plummeted to 25% in this report from 75% in 2020.

Graph 4: Gender Policy – Priorities



Recommendations:

All gender policies should:

- Prioritize key gender issues, such as care work, women’s economic empowerment, leadership roles, social protections, and SGBV and SEAH.
- Integrate gender issues into global priorities such as climate change, resource access, infrastructure, food security, and rural development.
- Promote gender equality and GERs across all investment sectors and project types.

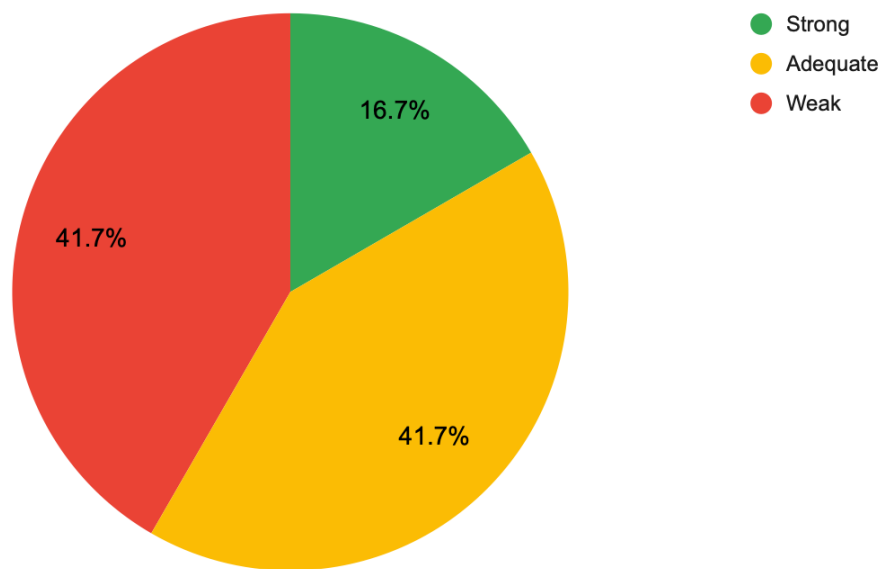
Indicator 3: Mandate

Definition: The Mandate indicator measures whether gender policies require projects to achieve gender equality. Policies are scored on the extent to which they a) incorporate some form of a mandatory gender safeguard to prevent harm to women and SGMs and b) work to improve community living conditions.

Relevance: A strong mandate can often mean the difference between a project that rigorously pursues gender equality and one that does not. Policies without a strong mandate may be received as suggestions and will likely not be implemented as attentively by IFI staff.

Scoring: Graph 5 displays the combined IFI gender policy scores in percentage terms for the indicator Mandate. Two policies scored strongly (AfDB 2021, EIB 2016); five adequately (AfDB 2001, BOAD 2012, CDB 2008, EBRD 2021, IMF 2022); five weakly (ADB 2019, EBRD 2021, EIB 2018, IDB 2021, World Bank 2015) (see Table 2, 2-A and Annex 3). While Adequate scores for this indicator did not change, unfortunately Strong scores dropped from 33% in “Unmet Gender Promises” to 17% in this report and Weak scores increased from 25% to 42%.

Graph 5: Gender Policy – Mandate



Recommendations:

All gender policies should:

- Include a mandatory, freestanding gender safeguard. The safeguard should aim to prevent harm in all cases to women, men, and SGMs as a blanket goal across all project cycle stages. If gender-based harm occurs, the gender safeguard must be subject to thoughtful project grievance and IFI accountability mechanisms, complaints, and redress processes.
- Ensure its mandatory safeguard strictly requires, without caveat, the need to prevent gender-based harms during the course of the project.
- Include mandatory do-good measures to ensure people of all genders benefit from operations.

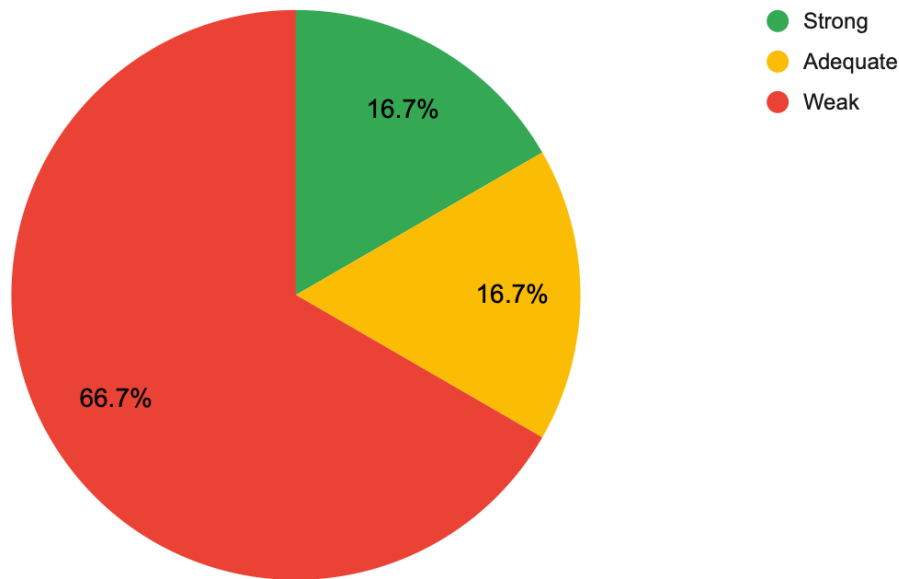
Indicator 4: Gender and Climate Change

Definition: The Gender and Climate Change indicator is primarily concerned with the extent to which each gender policy discusses, and protects against, the wide-ranging, gender-specific impacts of climate change. The ideal policy should relate the global climate crisis back to women’s livelihoods and health, and should include gender-based climate protection mechanisms and responses to harms such as loss and damage funding.

Relevance: Climate change is already having a disproportionate impact on the livelihoods of women and SGMs, who are hit the hardest by climate-based displacement. Women, who are the majority of farmers in many countries, are also seeing their work and access to resources directly harmed by climate change. Policies need to anticipate and protect against the impacts of a rapidly changing climate on women.

Scoring: Graph 6 displays the combined IFI gender policy scores in percentage terms for the indicator Gender and Climate Change. Two policies scored strongly (ADB 2019, EBRD 2021); two adequately (EBRD 2021, IMF 2022); eight weakly (AfDB 2001, AfDB 2021, BOAD 2012, CDB 2008, EIB 2016, EIB 2019, IDB 2021, World Bank 2015) (see Table 2, 2-A and Annex 3). Given our planet’s existential climate crisis that is increasingly wiping out lives and livelihoods, with women bearing the heaviest burden of harms, it is unacceptable that IFIs are still hardly considering this nexus today.

Graph 6: Gender Policy – Gender and Climate Change



Recommendations:

All gender policies should:

- Acknowledge the ways in which a changing climate will—and currently is—exacerbating gender inequities across the world, including by perpetuating the entrenched issue of women’s poverty.
- Discuss the ways in which a rapidly changing climate can heighten otherwise identified project risk factors, especially as it relates to women and SGMs.
- Require climate protection mechanisms targeted towards women and SGMs and harm redressal through loss and damage funding.

Indicator 5: Gender, Environment and Biodiversity

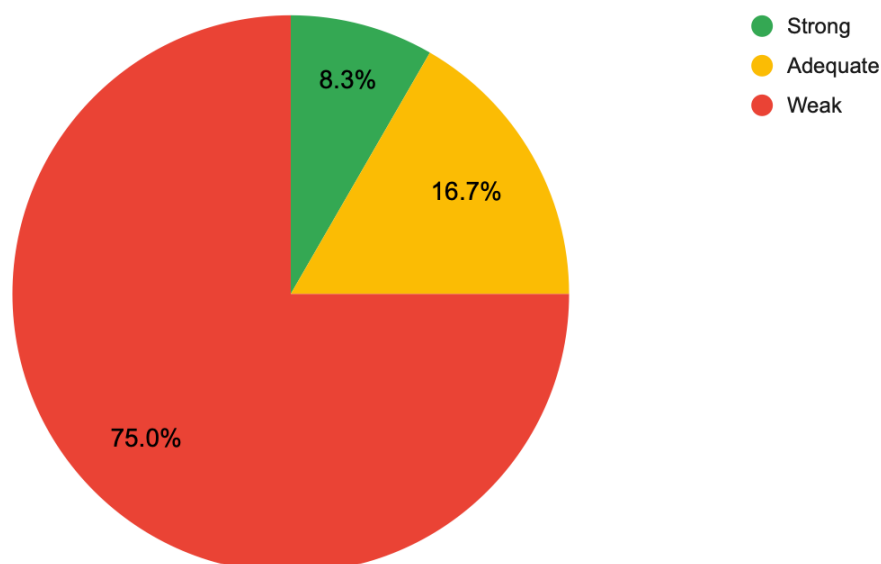
Definition: The Environment and Biodiversity indicator is distinct from our Climate indicator in that it addresses the ways in which women maintain and protect their physical environment on a routine basis. While it has clear intersections with climate change, the Environment and Biodiversity indicator scrutinizes specifically how women handle water, land, and biodiversity in project-affected areas. Strong gender policies should recognize and promote women’s key roles in maintaining biodiversity, and should note the ways in which this environmental labor is often gendered.

Relevance: Women play primary roles in managing natural resources and ecosystems, and are often negatively impacted by project disruptions to these resources and ecosystems. It is therefore critical that gender policies require that projects address the issues that arise at the nexus of gender roles, the environment, and biodiversity. The deepening climate crisis adds an extra layer of urgency and means that IFIs must thoughtfully consider these issues.

Scoring: Graph 7 displays the combined IFI gender policy scores in percentage terms for the indicator Gender, Environment and Biodiversity. Only one IFI scored Strong on this indicator (ADB 2019). A

majority of IFIs, nine out of 12 (75%), scored Weak (AfDB 2021, BOAD 2012, CDB 2008, EBRD 2021, EBRD 2021, EIB 2016, IDB 2021, IMF 2022, World Bank 2015); and only two (16.7%) scored Adequate (AfDB 2011, EIB 2018) (see Table 2, 2-A and Annex 3). Remarkably only one IFI scored Strong despite marked gender differentials since women predominantly manage natural resources and environmental biodiversity.

Graph 7: Gender Policy – Gender, Environment and Biodiversity



Recommendations:

All gender policies should:

- Acknowledge that any disruptions to the local environment during the course of a project will have wide-ranging, gender-specific impacts.
- Require that projects explore how the work of environmental stewardship and the maintenance of natural resources disproportionately falls on women.
- Conduct environment impact assessments which address gender impacts.
- Require environmental and biodiversity protection mechanisms and funding for loss and damage, especially for women who play primary roles managing natural resources and ecosystems in project-affected areas.

Indicator 6: Mechanisms to Engender Operations

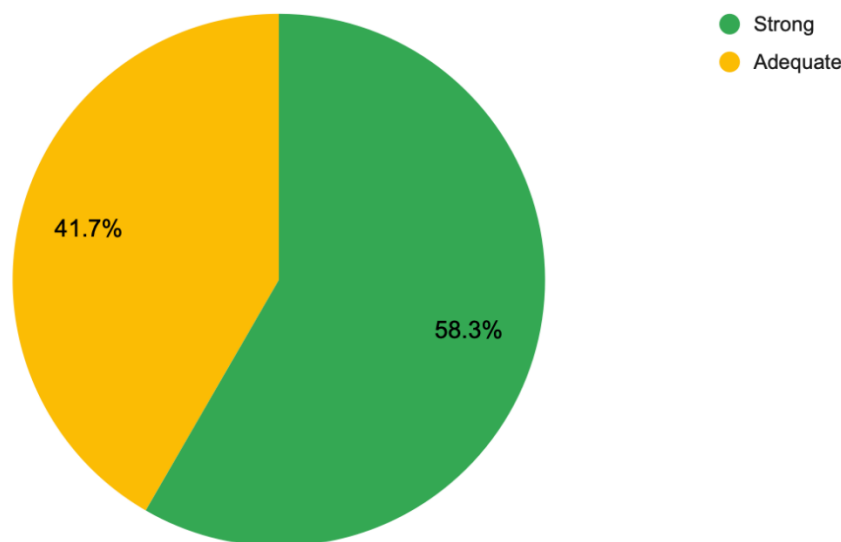
Definition: The Mechanisms to Engender Operations indicator scores each IFI's approach to integrating gender considerations across key activities. It is vital to analyze the mechanisms that IFIs adopt because these can be critical determinants of how IFIs apply a gender-sensitive framework to operations and other activities.

Relevance: Engendering operations is the first step toward ensuring IFIs will carry out their goals, priorities and mandates on gender issues. These mechanisms should include practical steps and tools that allow operations staff to implement overarching project goals, priorities, and mandates on the ground level. The extent to which these mechanisms are made mandatory is also essential to ensuring IFI gender goals are met.

Scoring: Graph 8 displays the combined IFI gender policy scores for the indicator Mechanisms to Engender Operations. Seven policies scored strongly (ADB 2019, AfDB 2001, AfDB 2021, BOAD 2012, CDB 2008, EBRD 2021, EBRD 2021) and five scored adequately (EIB 2016, EIB 2018, IDB 2021, IMF 2022, World Bank 2015).

Not a single IFI scored weakly, making this the highest-scoring indicator for the IFIs we evaluated.

Graph 8: Gender Policy – Mechanisms



Recommendations:

All gender policies should:

- Ensure projects include mechanisms to fully identify and address gender issues in all project stages and across all IFI activities. Doing so demonstrates a clear commitment to ensuring gender equality across operations.
- Require that operations provide specific tools and protocols to incorporate gender into all results tracking. These tools and protocols should be made mandatory whenever possible.
- Ensure Indigenous Peoples' and disabled women are included in these mechanisms, tools and protocols.

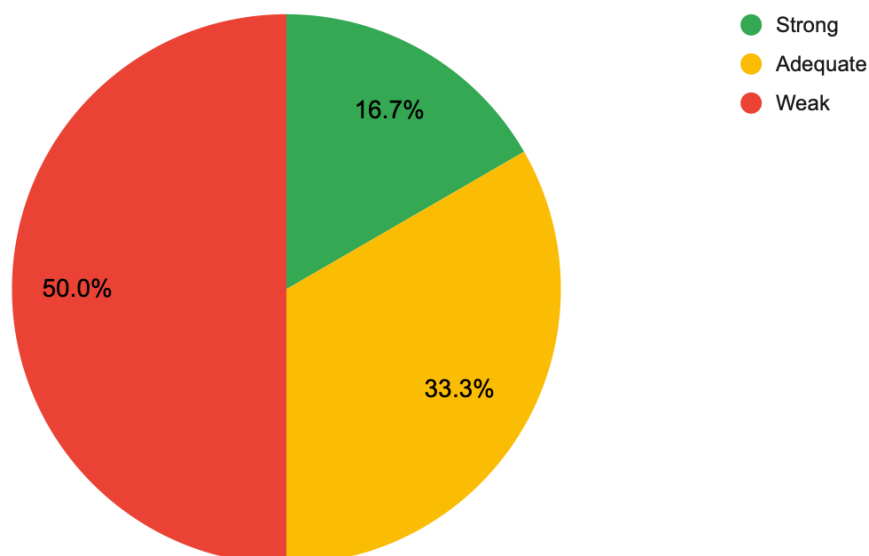
Indicator 7: Staffing

Definition: The Staffing indicator analyzes the extent to which IFIs prepare their project staff to handle gender issues with nuance, care, and awareness of potential obstacles. To score highly, IFIs must include mandatory gender training for its staff. These trainings should be mandatory and incentivized; voluntary training is inadequate. The training should also discuss gender and gender-based discrimination using an intersectional framework. Additionally, career incentives, such as evaluating staff attention to gender issues in performance reviews, are critical toward building a staff that is devoted to gender equality.

Relevance: Gender goals cannot be met without a committed, diverse and knowledgeable staff helping to carry them out. Strong IFI staff practices promoting gender equality are essential to reaching development goals, such as reducing poverty and harmful climate impacts.

Graph 9 displays the combined IFI gender policy scores for the Staffing indicator. Two policies scored strongly (CDB 2008, EBRD 2021); four adequately (ADB 2019, AfDB 2021, EBRD 2021, IMF 2022); six weakly (AfDB 2001, BOAD 2012, EIB 2016, EIB 2018, IDB 2021, World Bank 2015) (see Table 2, 2-A and Annex 3).

Graph 9: Gender Policy – Staffing



Recommendations:

All gender policies should:

- Require that staff orientation and subsequent training focus on how to integrate gender equal rights across all operations.
- Include incentives that reward staff for promoting gender equal rights, with an intersectional lens, throughout operations and other IFI activities.
- Institute policies that can eliminate gender disparities within both IFI staff and project staff, such as by requiring gender parity in staffing and equal pay for equal work.
- Ensure gender champions promote attention to gender issues by all managers and staff.

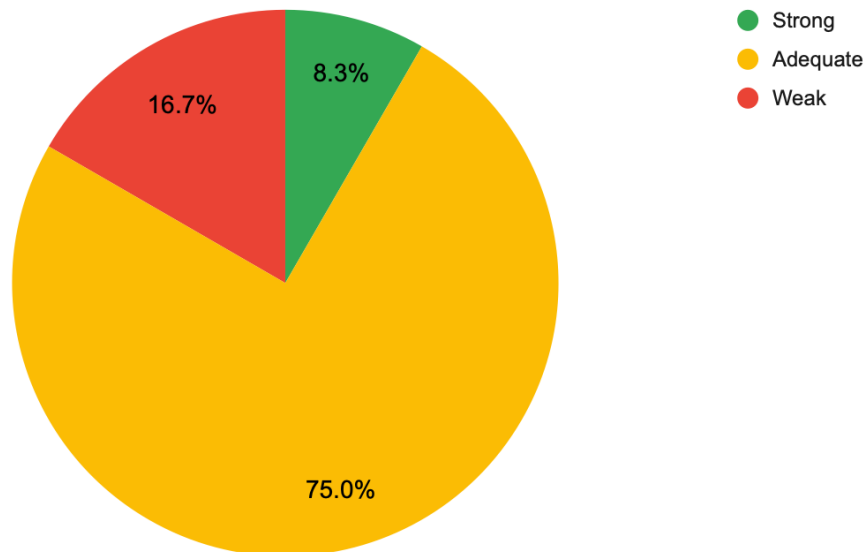
Indicator 8: Gender Monitoring and Evaluation

Definition: The Monitoring and Evaluation indicator looks at how assiduously IFIs are tracking their own progress on gender issues. IFIs should require projects to collect high-quality baseline and subsequent gender-disaggregated data. Strong policies require robust gender-based M&E throughout the project cycle. The information that is collected should also be made as accessible as possible. A strong M&E framework creates a method for transparent publication and submission of M&E gender data and M&E reports to IFI managers, Boards, and the public.

Relevance: The M&E framework is essential for measuring the effectiveness of IFI gender policies. Without collecting high-quality gender-disaggregated baseline and subsequent M&E data, IFIs cannot say with certainty that they have made progress toward achieving gender equality goals.

Scoring: Graph 10 displays the combined IFI gender policy scores for the indicator Monitoring & Evaluation. Only one policy scored strongly (CDB 2008); nine adequately (ADB 2019, AfDB 2001, AfDB 2021, BOAD 2012, EBRD 2021, EBRD 2021, EIB 2018, IMF 2022, World Bank 2015); two weakly (EIB 2016, IDB 2021) (see Table 2, 2-A and Annex 3). The gender M&E scores are weaker in this report than in “Unmet Gender Promises”: in 2020, 50% of IFIs scored Adequate on this indicator and 33% Strong, but this report has only 33% Adequate and 8% Strong scores.

Graph 10: Gender Policy – Monitoring & Evaluation



Recommendations:

All gender policies should:

- Require collection of high-quality, gender-disaggregated baseline and subsequent project data. This data should measure progress based on robust gender indicators and monitoring frameworks.
- Require that staff supervision reports include rigorous gender-specific data. These reports should also include recommendations for how to improve projects in the future based on gender performance findings.
- Require annual independent external M&E gender data and reports.
- Create mechanisms to disseminate the M&E gender data and reports widely and transparently—to IFI managers, Boards, and the public.

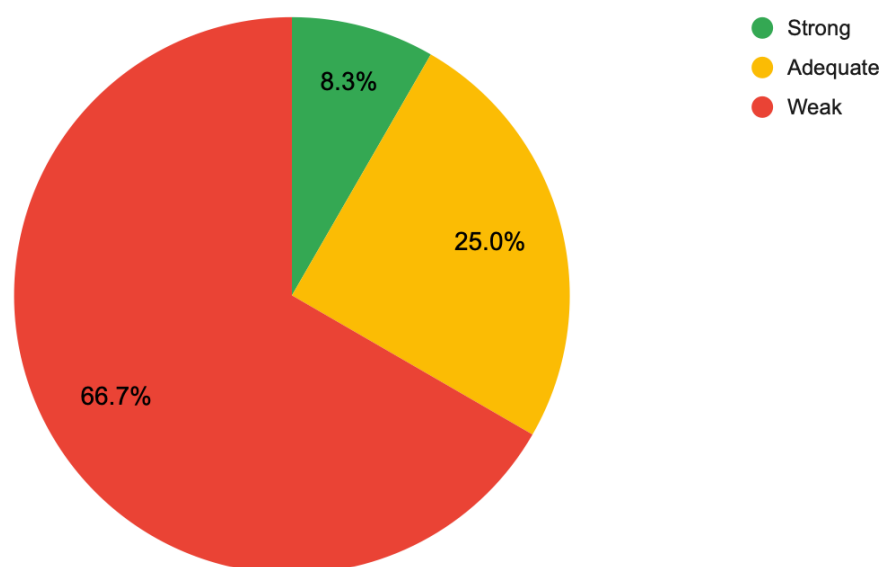
Indicator 9: Sexual and Gender Minorities

Definition: The Sexual and Gender Minorities indicator analyzes whether gender policies include and protect SGMs (also referred to as LGBTQ+ people in many English-speaking countries). Strong policies should outline protections from potential project harm for all SGMs. A non-discrimination mandate is a must-have for IFIs. Additionally, IFIs should explicitly incorporate SGMs into their gender-based programs and protections. Protections for gender-based violence and harassment, for instance, should also include procedures for SGMs, as these communities are also at disproportionate risk of violence and harassment.

Relevance: Unfortunately, SGMs are widely left out of gender-focused programs and initiatives. Burdens of global persecution, exclusionary and punishing legislation, and public stigma have long constrained the safety and ability of SGMs to access and benefit from potential resources. Conscious IFI efforts to include SGMs in all gender equality efforts will contribute to dismantling these disparities.

Scoring: Graph 11 displays the combined IFI gender policy scores for the indicator Sexual and Gender Minorities. Only one policy scored strongly (IDB 2021); three adequately (ADB 2019, EBRD 2021, EBRD 2021); eight weakly (AfDB 2001, AfDB 2021, BOAD 2012, CDB 2008, EIB 2016, EIB 2018, IMF 2022, World Bank 2015) (see Table 2, 2-A and Annex 3). Performance on the SGM indicator showed a little progress as one IFI received a Strong score compared to none in “Unmet Gender Promises”.

Graph 11: Gender Policy – Sexual Minorities



Recommendations:

All gender policies should:

- Define and recognize sexual and gender minorities as vulnerable project-affected groups. Gender policies should be attentive to the full spectrum of identities under this umbrella, including lesbian, gay, bisexual, transgender, and intersex people, among others.
- Grant SGMs explicit do-no-harm protection alongside women and girls, and mandate a policy of non-discrimination for all projects.
- Target SGMs in project benefits and programs that aim to dismantle gender barriers and disparities.
- Address possible harassment, discrimination, abuse, exploitation, and sexual and gender-based violence affecting SGMs, as well as make grievance and redress mechanisms available to—and responsive to—SGMs.

Indicator 10: Sexual and Gender-Based Violence and Sexual Exploitation, Abuse and Harassment

Definition: The SGBV and SEAH indicator scores a) how well IFIs work to avoid and eliminate instances of gendered violence and harassment during projects and b) how responsive IFIs are if such instances do occur. Strong policies must include a clear and extensive definition of the many forms of SGBV and SEAH

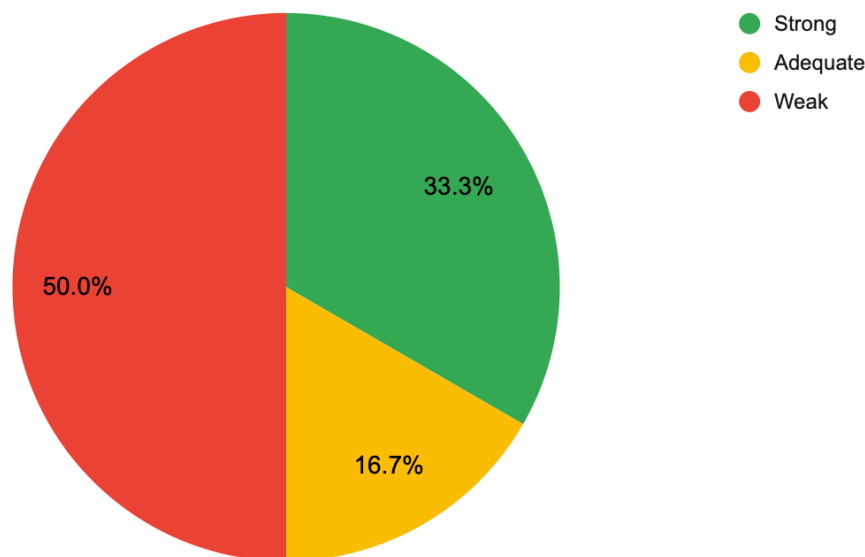
and set out elimination as a goal. In order to reach a goal of elimination, IFIs should require that SGBV and SEAH be considered as a risk during project identification, design, and implementation. Furthermore, IFIs must respond swiftly to all instances of SGBV and SEAH, including by providing assistance and redress to those who report SGBV and SEAH, whether they are project-affected individuals, IFI or project staff, or third-party contractors.

Relevance: SGBV and SEAH permeates all parts of the globe, and it can only be mitigated and prevented across projects if IFIs pay special attention to risks of violence from the beginning. Eliminating SGBV and SEAH should be a core consideration in the design of each project. Should SGBV and SEAH occur, IFIs must be responsible and accountable to survivors, including by offering them access to healing processes and by providing financial reparations.

Scoring: Graph 12 displays the combined IFI gender policy scores for the indicator Sexual and Gender-Based Violence and Sexual Exploitation, Abuse and Harassment. Four policies scored strongly (ADB 2019, EBRD 2021, IDB 2021, World Bank 2015); two adequately (EBRD 2021, EIB 2018); five weakly (AfDB 2001, AfDB 2021, BOAD 2012, CDB 2008, EIB 2016, IMF 2022) (see Table 2, 2-A and Annex 3).

Overall, these scores are slightly worse than the same indicator in “Unmet Gender Promises,” in part because of the addition of SEAH to our indicator (see section 3.2). Whereas “Unmet Gender Promises” had 41.6% Strong scores, here we only found 33.3% Strong scores; while Weak scores went up from 41.6% to 50%.

Graph 12: Gender Policy – SGBV and SEAH



Recommendations:

All gender policies should:

- Recognize SGBV and SEAH as a serious risk to project-affected individuals, IFI and project staff, and third-party contractors.
- Include a clear and extensive definition of the many forms of SGBV and SEAH, including but not limited to harassment, any form of sexual coercion, sexual assault, sex trafficking, sexual

exploitation, sexual abuse, and violence against women and SGMs on the basis of gender identity or sexual orientation.

- Require measures to assess and mitigate the risk of SGBV and SEAH during the identification, design, consultation, and implementation phases of each project. Eliminating SGBV and SEAH must also be a core goal across all other project activities and within IFIs institutionally.
- Prevent working conditions that may result in SGBV and SEAH. This requires project protocols that provide guidance on logistical methods to prevent and deter SGBV, such as adequate lighting outdoors at night, sex-separate secure sleeping quarters, and well-lit sex-separate sanitation facilities.
- Ensure all project staff are attentive to the privacy of sexual and gender minorities, including by creating policies against “outing” members of the LGBTQ+ community and thereby opening them up to violence.
- Ensure the existence of avenues for justice for victims and survivors of all forms of SGBV and SEAH, including through project grievance and IFI accountability mechanisms. All project staff and affected peoples should be informed how to report an incident of violence, and they should be told upfront their confidentiality rights, grievance filing procedures, the expected redress timelines, and their rights for discontinuity of the process.

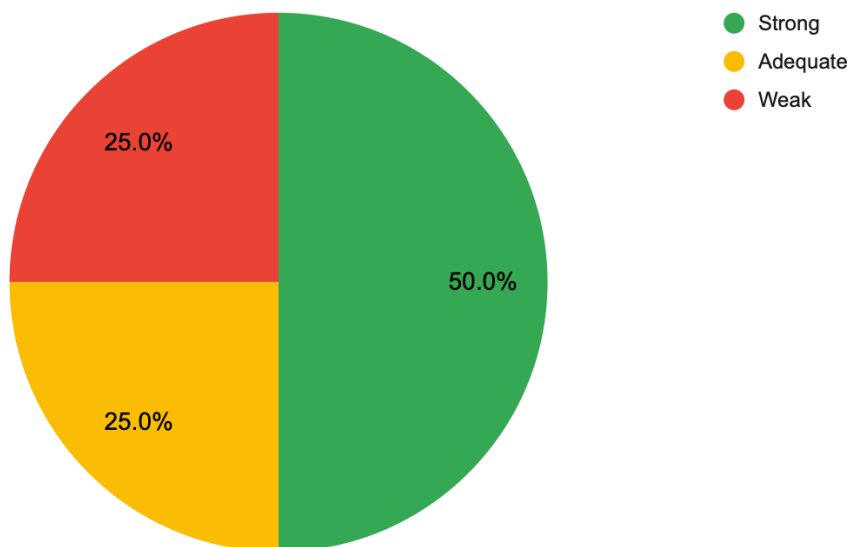
Indicator 11: Unpaid Care Work

Definition: The Unpaid Care Work indicator measures how attentive IFIs are to the gendered division of labor, especially when it comes to childcare and elder-care work. IFIs should recognize, value, and compensate women for their care work. They should also strive to distribute care work equally among people of all genders, so the workload doesn’t fall disproportionately on women. Unpaid care work includes childcare and elder care, household labor such as fetching water or firewood, and community activities that are classified outside of economically compensated work.

Relevance: Unpaid care work, especially household labor, often restricts women in both their social and economic mobility. Unpaid care work contributes to women’s “time poverty,” and is a significant reason why women disproportionately live in poverty. Women across the globe perform labor that, while necessary, is largely unrecognized and uncompensated. When IFIs attempt to provide economic opportunities to women, they must recognize that participation may depend on whether their project offers provisions for childcare, water, and other basic needs and that unpaid care work must become paid work.

Scoring: Graph 13 displays the combined IFI gender policy scores for the indicator Unpaid Care Work. Of the 12 IFI gender policies, six scored strongly (ADB 2019, AfDB 2001, EBRD 2021, EBRD 2021, EIB 2016, EIB 2018); three adequately (BOAD 2012, IDB 2021, World Bank 2015); and three weakly (AfDB 2021, CDB 2008, IMF 2022) (see Table 2, 2-A and Annex 3). Notably “Unmet Gender Promises” and this report had the exact same scores on Unpaid Care Work.

Graph 13: Gender Policy – Unpaid Care Work



Recommendations:

All gender policies should:

- Acknowledge that women's ability to participate in projects often depends on their access to childcare.
- Facilitate women's participation in project-related activities—including consultations, jobs, and trainings—by providing childcare and transportation services.
- Invest in technologies to reduce women's unpaid drudgery, such as harvesting and transporting firewood and fetching water from remote locations.
- Provide gender role training that aims to spread care work among all genders.
- Promote remuneration for vital unpaid care work transforming it into paid care work accompanied by paid benefits including parental leave, health, pension and other essential benefits, thereby incentivizing men to take up care work and distribute it more equitably among genders
- Promote universal public financing of quality care services.

5. Environmental and Social Frameworks - Analysis & Scores

IFI Environmental and Social Frameworks analyzed and scored: ADB (2009), AfDB (2022), AIIB (2021), BOAD (2015), CDB (2014), EBRD (2019), EIB (2022), IDB (2020), IDB Invest (2020), IFC (2012), NDB (2016), World Bank (2018). The full titles of these documents are provided in Table 3 and in the References. IFIs generally call these documents either Environmental and Social Safeguards (ESSs) or Environmental and Social Frameworks (ESFs). For clarity, we will refer to them generically as ESFs throughout this report.

ESFs provide specific environmental and social safeguards and/or standards that intend to prevent and offset harm to and/or benefit project-affected areas, communities, and individuals. ESFs should address issues of harassment, discrimination, violence, resettlement, displacement, environmental impacts, and resource depletion. Similar to gender policies, adherence to and impact of these safeguards and standards are dependent on project-level implementation. Ideally, ESFs should include extensive safeguards and benefits for women and LGBTQ+ people in the face of our planet's changing climate.

To analyze the extent to which the above 12 IFI ESFs provide the mandated protection of gender equal rights and gender equality, Gender Action developed 13 ESF indicators on gender sensitivity (see section 3.2 and Table 3 for the list of indicators and Annex 4 for their scoring criteria).

In the following section, we will first summarize our aggregate IFI scores using each of our indicators (section 4.1). Then, we will present detailed, indicator-by-indicator ESF analyses (section 4.2) to explain how each IFI was scored. These analyses and scores are depicted in tables and graphs, and they are followed by recommendations for how all IFIs can more rigorously enforce and prioritize gender sensitivity and gender equality in the future.

5.1 Aggregate ESF Indicator Analysis & Scores

Table 3 presents the raw score of each of the 12 ESF documents against Gender Action's gender-sensitivity indicators. The bottom three rows of Table 3 summarize the share of Strong, Adequate, and Weak scores that each IFI received in percentage terms. As we will see, in general, the percentage of Strong scores was much weaker in the ESF analyses than in the gender policy analyses (see Annex 4 for the scoring of each indicator's criteria).

Table 3: Environmental & Social Framework (ESF) Gender-sensitivity Indicator Scores

IFI	ADB	AfDB	AIIB	BOAD	CDB	EBRD	EIB	IDB	IDB Invest	IFC	NDB	WB
ESF documents	Safeguard Policy Statement (2009)	Updated Integrated Safeguards System (2022)	Environmental and Social Framework (2021)	Environment and Social Management in the Financing of Projects (2015)	Environmental and Social Review Procedures (2014)	Environmental and Social Policy (2019)	Environmental and Social Standards (2022)	Environmental and Social Policy Framework (2020)	Environmental and Social Sustainability Policy (2020)	Performance Standards (2012)	Environmental and Social Framework (2016)	Environmental and Social Framework (2018)
Gender Mandate/ Safeguard	Adequate	Adequate	Weak	Weak	Weak	Adequate	Strong	Strong	Weak	Weak	Weak	Weak
Gender in Environmental and Social Risk Assessments	Weak	Weak	Weak	Adequate	Adequate	Strong	Adequate	Strong	Adequate	Weak	Adequate	Weak
Gender Dimension of Debt	Weak	Weak	Weak	Weak	Weak	Adequate	Weak	Weak	Weak	Weak	Weak	Weak
Gender Discrimination and Rights	Weak	Adequate	Weak	Weak	Adequate	Strong	Strong	Adequate	Weak	Weak	Weak	Weak
Gender and Climate Change	Weak	Weak	Weak	Weak	Weak	Adequate	Adequate	Weak	Weak	Weak	Weak	Weak
Gender, Environment and Biodiversity	Weak	Weak	Adequate	Weak	Weak	Weak	Weak	Weak	Weak	Adequate	Weak	Weak
Gender and Information Disclosure	Weak	Adequate	Adequate	Adequate	Weak	Strong	Adequate	Strong	Adequate	Adequate	Weak	Adequate
Gendered Consultations and Consent	Weak	Weak	Adequate	Weak	Adequate	Adequate	Strong	Adequate	Adequate	Weak	Adequate	Weak
Gender in Resettlement	Weak	Adequate	Adequate	Adequate	Weak	Strong	Adequate	Adequate	Weak	Adequate	Adequate	Adequate

and Compensation												
Gender Monitoring and Evaluation	Adequate	Weak	Weak	Adequate	Adequate	Adequate	Adequate	Weak	Weak	Weak	Weak	Weak
Sexual and Gender Minorities	Weak	Weak	Weak	Weak	Weak	Adequate	Strong	Strong	Weak	Weak	Weak	Weak
SGBV and SEAH	Weak	Adequate	Adequate	Weak	Adequate	Strong	Strong	Strong	Weak	Weak	Weak	Weak
Gendered Labor	Weak	Adequate	Weak	Weak	Weak	Strong	Strong	Strong	Weak	Weak	Weak	Adequate
Percent Strong	0%	0%	0%	0%	0%	46%	46%	46%	0%	0%	0%	0%
Percent Adequate	15%	46%	38%	31%	38%	46%	38%	23%	23%	23%	23%	23%
Percent Weak	85%	54%	62%	69%	62%	8%	15%	31%	77%	77%	77%	77%

Rankings

The ranking of IFIs below is based on the percentages of Strong, Adequate, and Weak scores that their ESFs received, as depicted in Table 3. As discussed in chapter 3, we created these rankings by assigning +1 point for a Strong score, 0 points for Adequate, and -1 for Weak.

Unfortunately, most IFIs scored negatively, and several of the IFIs received the same raw score. The tied scores are noted with single or double asterisks (*) below. Among IFIs that received the same score, the order in which they appear in the ranking is arbitrary. We highlighted the two highest-ranking IFIs in green; the two lowest in red.

1. European Bank for Reconstruction and Development (EBRD)
2. European Investment Bank (EIB)
3. Inter-American Development Bank (IDB)
4. African Development Bank (AfDB)
5. Asian Infrastructure Investment Bank (AIIB)*
6. Caribbean Development Bank (CDB)*
7. West African Development Bank (BOAD)
8. IDB Invest**
9. International Finance Corporation (IFC)**
10. New Development Bank (NDB)**
11. World Bank (WB)**
12. Asian Development Bank (ADB)

*AIIB and CDB received the same scores; neither received Strong scores.

**IDB Invest, IFC, NDB, and WB received the same scores; none received Strong scores.

When comparing this ranking to our previous ranking in “Unmet Gender Promises,” several important trends become visible. First, IDB has jumped significantly from its previous place in our rankings, when its ESF lacked a single Strong score and came in last place overall. IDB’s newly updated ESF showed significant improvements in gender sensitivity, catapulting it to third place here. Second, BOAD fell a few places in our rankings, from fourth place in the 2020 report to seventh here, mostly due to the arrival of four new ESFs (EIB, IDB, AfDB, AIIB), which now score better than BOAD’s. Otherwise, these rankings largely mirror those in “Unmet Gender Promises”: the top two places remain the same, with EBRD and EIB in first and second, and the other IFIs that released ESFs did not significantly gain or lose ground.

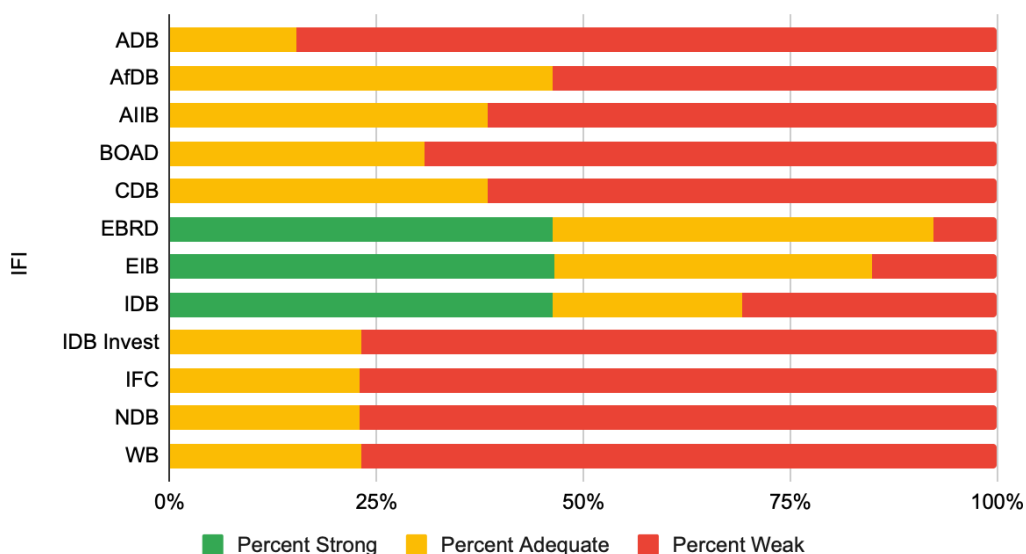
Table 3-A: ESF Indicator Scorecard Across IFIs

Indicator	Percent Strong	Percent Adequate	Percent Weak
Gender Mandate/ Safeguard	17%	25%	58%
Gender in Environmental and Social Risk Assessments	17%	42%	42%
Gender Dimension of Debt	0%	8%	92%
Gender Discrimination and Rights	17%	25%	58%
Gender and Climate Change	0%	17%	83%

Gender, Environment and Biodiversity	0%	17%	83%
Gender and Information Disclosure	17%	58%	25%
Gendered Consultations and Consent	8%	50%	42%
Gender in Resettlement and Compensation	8%	67%	25%
Gender Monitoring and Evaluation (M&E)	0%	42%	58%
Sexual and Gender Minorities (SGM)	17%	8%	75%
SGBV and SEAH	25%	25%	50%
Gendered Labor	25%	17%	58%
Percentage of total	11.5%	30.8%	57.7%

Graph 14 offers a visual representation of the scores detailed in Table 3-A. Below, we see how few IFIs scored strongly for gender-sensitive ESFs, with the exceptions of EBRD, EIB, and IDB, and how nine ESFs scored overwhelmingly Weak. It is worth noting that the EBRD, EIB, and IDB ESFs, which scored strongest, are among the newest documents; some of the poor-performing ESFs, such as ADB's, are over a decade old, and will soon be replaced.

Graph 14: Aggregate IFI ESF Policy Indicator Scores

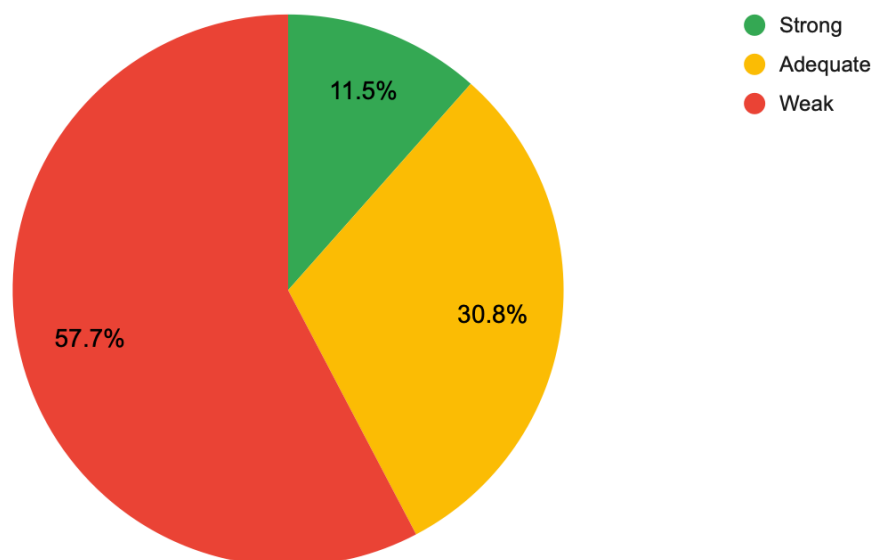


Graph 15 summarizes the overall gender scores of all 12 ESFs, showing that only 11.5% of the ESFs scored Strong, 30.8% scored Adequate, and 57.7% scored Weak.

Comparing Graph 15 to Graph 2 in chapter 4, which shows aggregate scores for IFI gender policies, it is clear that the ESFs are weaker in gender-sensitivity performance than the gender policies. That

discrepancy has eased slightly since our last report, due to slight improvements in the gender-sensitivity of ESF policies, but the overall progress remains sparse.

Graph 15: IFI ESF Aggregate Scores on Gender-sensitivity



5.2 Individual ESF Indicator Analyses & Scores

Having presented aggregate IFI ESF gender-sensitivity scores, we will now look at where they came from—and how each ESF’s gender performance holds up according to our indicators.

Indicator 1: Gender Mandate/Safeguard

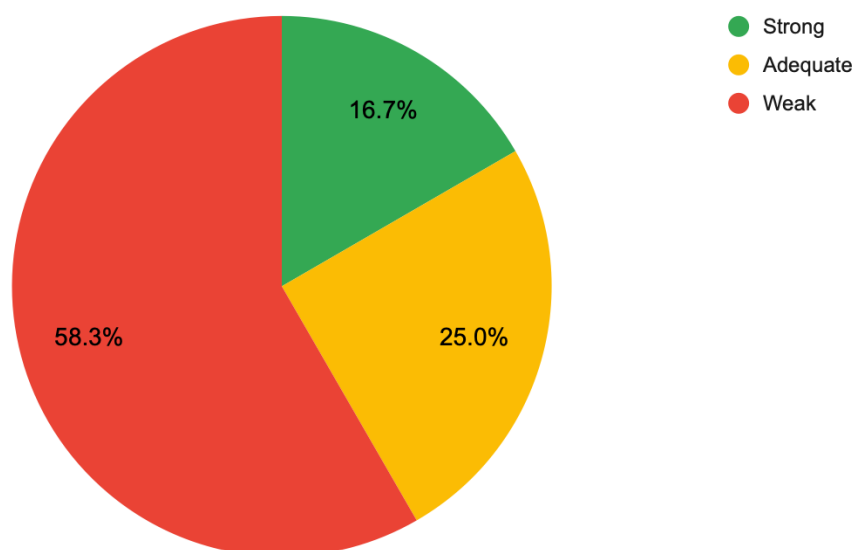
Definition: The Gender Mandate/Safeguard indicator scores the extent to which ESFs include specific safeguards that guarantee protection for the livelihoods of women and SGMs. To score highly, Gender Action expects all ESFs to include a detailed do-no-harm safeguard for women and LGBTQ+ people.

Relevance: A gender safeguard is foundational to a gender-sensitive IFI. Without strong safeguards, there is no backstop to prevent harm. Strong policies mandate a do-no-harm safeguard that lays out a plan to prevent gender discrimination and other forms of harm. Ideal safeguards should also include redress mechanisms. If harm does happen, IFIs must take complaints and commit to resolutions and reparations for aggrieved project-affected people.

Scoring: Graph 16 displays the combined ESF scores for the indicator Gender Mandate/Safeguard. Two IFIs scored strongly (EIB 2022, IDB 2020); three adequately (ADB 2009, AfDB 2022 [draft], EBRD 2019); seven weakly (AIIB 2021, BOAD 2015, CDB 2014, IDB Invest 2020, IFC 2012, NDB 2016, WB 2018) (see Table 3, 3-A and Annex 4).

Compared to “Unmet Gender Promises,” these scores show little improvement. While two IFIs scored Strong, as opposed to zero in 2020, slightly more IFIs here have Weak scores, that is, 57.7% compared to 50% in the 2020 report.

Graph 16: ESFs - Gender Mandate/Safeguard



Recommendations:

All ESFs should:

- Include a mandatory, standalone do-no-harm gender safeguard. While some ESFs currently incorporate gender issues into their general safeguards, only two committed to strongly address them. A mandatory, freestanding gender safeguard gives IFIs a chance to outline the specific circumstances and needs of women and SGMs. Importantly, it also calls special attention to IFIs' commitment to gender equality.
- Acknowledge how gender-based harms can stem from other harms, such as climate change and environmental issues. While most ESFs mention the need for protecting women, those protections should be discussed systematically throughout the ESF. Gender intersects with numerous issues: environmental and social risk assessments and environmental resource and climate change protection measures should include women and LGBTQ+ people throughout.

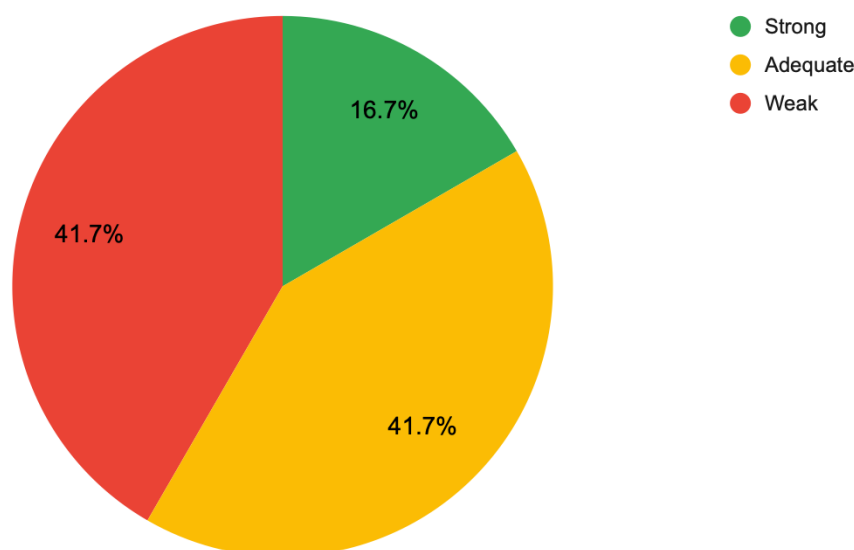
Indicator 2: Gender in Environmental and Social Risk Assessments

Definition: The Environmental and Social Risk Assessments indicator analyzes whether—and to what extent—ESFs require that gender issues be included in risk assessments for their projects. The strongest policies meet a relatively simple goal: ESFs should require that gender be addressed across all of its risk assessments, including climate, environmental, and social risk analyses.

Relevance: Risk assessments measure the many ways that a project might negatively impact local communities and environments. Identifying risks early is critical to avoiding and mitigating harm. If gender is not required across all risk assessments, then IFIs leave their investments open to potentially harming women and LGBTQ+ people. Integrating gender into environmental and social risk assessments enhances the likelihood of differentially protecting women, men, and SGMs from environmental, climate and social harms.

Scoring: Graph 17 displays the combined ESF scores for the indicator Gender in Environmental and Social Risk Assessments. Two IFIs scored strongly (EBRD 2019, IDB 2020); five adequately (BOAD 2015, CDB 2014, EIB 2022, IDB Invest, NDB 2016); five weakly (ADB 2009, AfDB 2022 [draft], AIIB 2021, IFC 2021, WB 2018) (see Table 3, 3-A and Annex 4).

Graph 17: ESFs - Gender in Environmental and Social Risk Assessments



Recommendations:

All ESFs should:

- Require that projects systematically integrate gender issues into all environmental and social risk assessments.
- Mandate in-depth follow-up assessments and detailed plans to avoid gender risks, so that potential risks are acknowledged and addressed throughout and even beyond project cycles since project impacts continue after IFI involvement ends.
- Specify that all project risk assessments include consultations with women and LGBTQ+ people on the ground, through setting up women-only consultations that ensure women have a space to directly share their concerns.

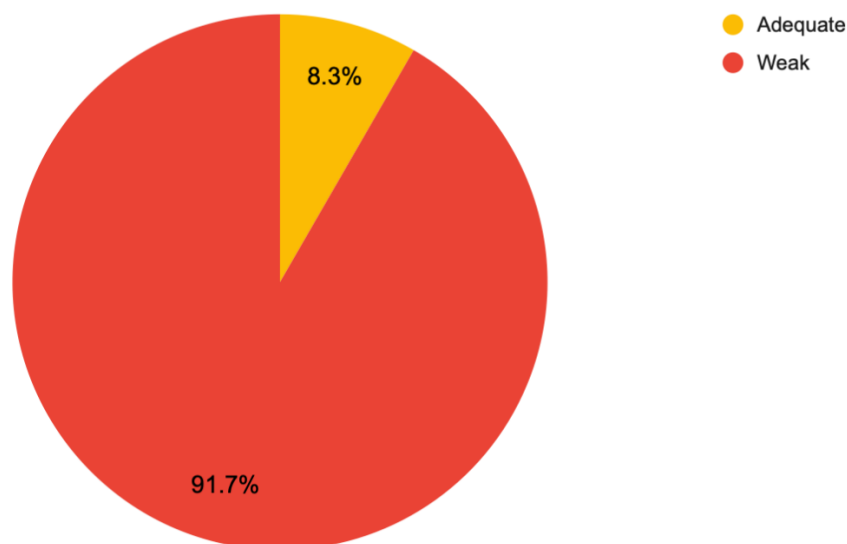
Indicator 3: Gender Dimension of Debt

Definition: The Gender Dimension of Debt indicator measures the types of financial products that IFIs use to fund their development projects. In particular, this indicator analyzes the extent to which IFIs use debt-based loans to finance projects. The ideal ESF provides for entirely grant-based project funding to avoid trapping country budgets and taxpayer residents in cycles of indebtedness.

Relevance: Debt-based financing is not a neutral policy. It ensures that governments and residents need to spend their already limited resources paying back IFIs. Debt-based financing impacts a government's ability to spend on basic services, a shift that has a disproportionate impact on women, who make up the majority of the world's poor and the majority of farmers in many countries. This is evident in recent massive education and health cuts by low- and middle-income countries as their debts skyrocket (Oxfam 2022).

Scoring: Graph 17 displays the combined ESF scores for the indicator Gender Dimension of Debt. Not a single IFI scored strongly, and only one (EBRD 2019) scored adequately on this measure. The other IFIs all scored weakly (ADB 2009, AfDB 2022 [draft], AIIB 2021, IFC 2021, World Bank 2018, BOAD 2015, CDB 2014, EIB 2022, IDB Invest, NDB 2016, IDB 2020), meaning their ESFs do not address debt-based lending tools and do not apply gender-sensitive debt risk mitigation measures. We know that some of these IFIs provide some grants but they constitute a small portion of IFIs' total funding portfolio.

Graph 18: ESFs - Gender Dimension of Debt



Recommendations:

All ESFs should:

- Minimize, and ideally eliminate, the use of debt-based loans in the funding of projects, given that debt-based financing traps local residents in cycles of poverty that disproportionately impact women. To show their commitment to gender equality and sound resident and country finances, IFIs should use grant-based financing as much as possible.
- Acknowledge the harms of debt-based financing and build safeguards to ensure project spending on the poor will not be diluted, as IFIs work to eliminate debt financing entirely.

Indicator 4: Gender Discrimination and Rights

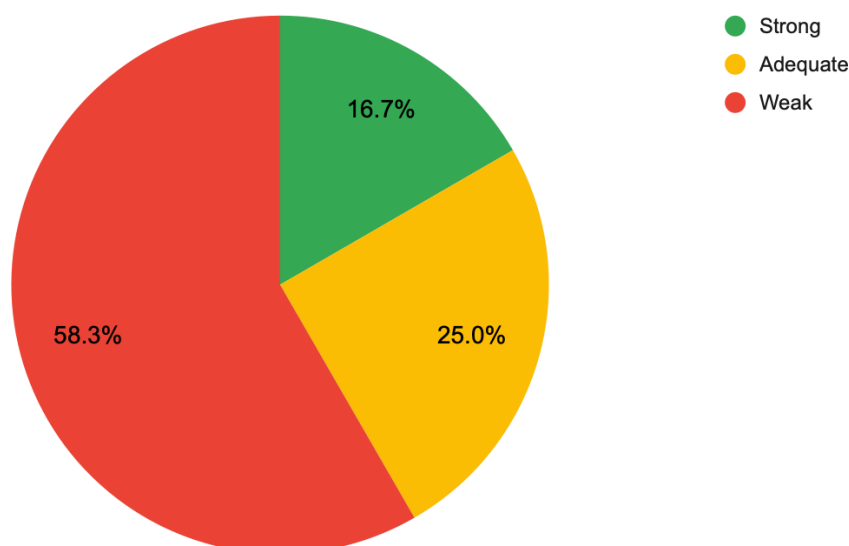
Definition: The Discrimination and Rights indicator scores the extent to which ESFs require protection against gender discrimination and promotion of gender equal rights across all operations and activities. The best ESFs explicitly mandate gender non-discrimination and require that all staff be trained on gender issues.

Relevance: ESFs should enshrine each IFI's commitment to gender equal rights, requiring that all staff make it a top priority. Specific protection against discrimination is not always guaranteed in all operations and activities, especially for women and SGMs.

Scoring: Graph 19 displays the IFI aggregate ESF scores for the indicator Gender Discrimination and Rights. Two IFIs scored strongly (EBRD 2019, EIB 2022); three adequately (AfDB 2022 [draft], CDB 2014,

IDB 2020); seven weakly (ADB 2009, AIIB 2021, BOAD 2015, IDB Invest 2020, IFC 2012, NDB 2016, World Bank 2018) (see Table 3, 3-A and Annex 4). This report has one more Strong and one more Weak score on the Gender Discrimination indicator than did “Unmet Gender Promises”.

Graph 19: ESFs - Gender Discrimination and Rights



Recommendations:

All ESFs should:

- Define and require explicit protection against gender discrimination and promote gender equal rights in all operations. IFIs should mandate protections for both project staff and project-affected people against all forms of harassment, exploitation, and abuse (see ESF Indicator 12). This definition should apply to all ESF protective mechanisms, and should explicitly include SGMs.
- Require that all project staff attend mandatory training on preventing harassment and discrimination and on ensuring gender equal rights. Extensive training ensures that staff will be as knowledgeable about and responsive as possible to gender issues.

Indicator 5: Gender and Climate Change

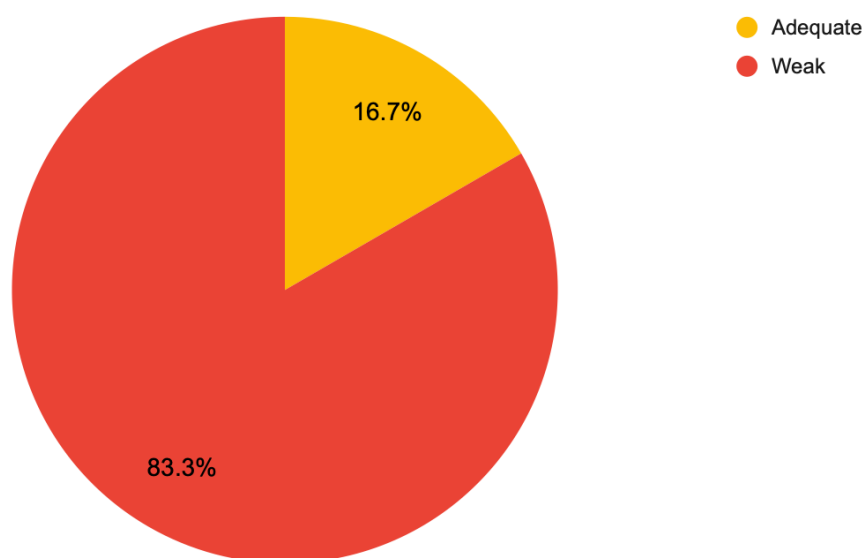
Definition: The Gender and Climate Change indicator measures the extent to which the specific needs of women and SGMs are incorporated into each ESF’s climate change focus. ESFs should enumerate protections that acknowledge the many communities that a changing climate impacts, including in particular, women and Indigenous Peoples.

Relevance: Though rarely discussed as such, climate change is a gender issue.⁷ The havoc that climate change is wreaking on local environments has a disproportionate impact on women and sexual and gender minorities. Women suffer the most from climate-related displacement and from the loss of access to farmland and other natural resources. Therefore, climate change policies must directly address and acknowledge women and LGBTQ+ people.

⁷ While there is increasing recognition of the connection between gender and climate change by some global think tanks and UN agencies, this important connection still mostly fails to receive recognition in IFI EFs as well as in mainstream media.

Scoring: Graph 20 displays the IFI aggregate ESF scores for the indicator Gender & Climate Change. Not a single IFI scored strongly, and only two (EBRD 2019, EIB 2022) scored adequately. The other IFIs all scored weakly (ADB 2009, AfDB 2022 [draft], AIIB 2021, BOAD 2015, CDB 2014, IDB 2020, IDB Invest 2020, IFC 2012, NDB 2016, WB 2018), meaning they failed to add any sort of gendered lens into their discussions of climate change.

Graph 20: ESFs - Gender and Climate Change



Recommendations:

All ESFs should:

- Require climate protection mechanisms targeted towards women and LGBTQ+ people.
- Acknowledge the disproportionate impacts that climate change—and the displacement and environmental shifts that it causes—will have on women and LGBTQ+ people, and devote resources to their mitigation.

Case study: Medupi coal plant, South Africa

Because our climate-specific indicator is a new addition since the 2020 “Unmet Gender Promises” report, this report presents a single case study in Box 1 to underline why gender-sensitivity on climate issues is so essential for IFIs. We focus on the Medupi coal power plant in South Africa although it is not a recent World Bank project because it highlights the enduring devastation of fossil project-induced climate change, SGBV, SEAH and debt-based financing on women.

While reading this case study, we urge policymakers to consider the ways in which weak policies and projects—a lack of required consultations, no attempt to achieve gender parity in project hiring, and so on—led to devastation for project-affected women. What IFIs choose to require in their ESFs, as well as what they choose not to require, can have lasting impacts on the livelihoods of women.

The following case by written by Gender Action and Oxfam South Africa slightly adapts the Medupi case included in “[Investing in Climate Disaster](#),” a report by The Big Shift (Big Shift Global 2022).

Box 1. Case study: Enduring harmful impacts caused by the Medupi coal plant, South Africa

In 2010, the World Bank approved a loan of US \$3.73 billion to South Africa to contribute finance towards construction of the Medupi coal power plant. This plant has 4800MW generating capacity, making it the world's fourth biggest coal-fired power plant, when fully operational. It also emits more than 25MtCO₂ per year, making the single plant a larger climate polluter than 115 countries, including Kenya, Burma and Croatia. Clauses in the 2010 loan contract emphasized that the project should adopt cleaner technologies such as more efficient boilers, but they have yet to be installed.

As well as its climate impacts, the coal power plant's impacts on local people and society have been devastating, as found in workshops conducted by Gender Action, groundWork and Oxfam South Africa in 2013 and 2022. Since the project outset, community members have continuously experienced air and water pollution and land degradation, harming their health. Women, who compose the majority of the cleaning staff at Medupi, and men who built and work at the plant, are routinely exposed to chemicals that harm their health.

An influx of male workers who constructed and operate the plant transformed the local ratio of men to women to 6:5, propelling demand for sex work, increasing rates of sexually transmitted diseases, HIV/AIDS, sexual and gender-based violence, high school dropouts, teenage pregnancies, orphaned children (due to maternal mortality and disappearing fathers) and divorces. One female can "service" multiple men. "Blessers" who buy women's and girls' sexual services also spread alcohol and drug dependency amongst them. HIV/AIDS has become the leading cause of death amongst youth. External patriarchy and money have eroded and replaced household structures and other social bonds. The coal plant's heavy water consumption caused women, who are primarily responsible for water collection, to travel farther to collect clean water or buy unaffordable bottled or privately supplied water. The coal plant and neighboring coal mines are polluting one of the area's last remaining clean water sources, the Waterberg Biosphere Reserve, further reducing women's access to clean water.

The vast majority of affected women were neither consulted nor compensated for forced resettlement which destroyed their livelihoods. Although plant jobs mostly bypassed women, the project did not provide them training and skills development for alternative employment. Farm and forest destruction to construct Medupi power plant eliminated plants and animals used for nutritional and medicinal purposes, including the Mopani worm and Kgwaga tree, sources of food and nutrition; the Baobab tree, used to prepare food and heal skin ailments; and local aloe species used to treat high blood pressure and boost immune systems. Women's time devoted to taking care of the sick increased, while their livelihoods from collecting medicinal and nutritional plants and animals collapsed, increasing their financial stress.

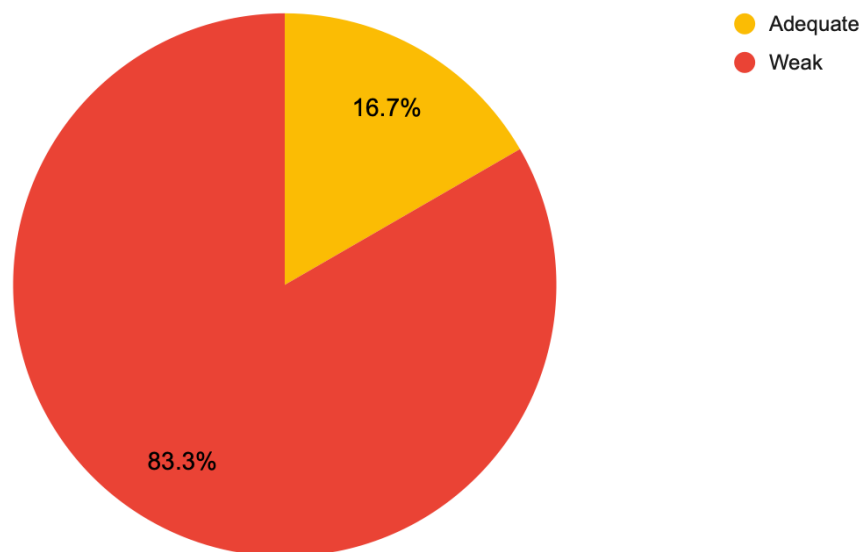
Indicator 6: Gender, Environment and Biodiversity

Definition: The Environment and Biodiversity indicator analyzes how well ESFs acknowledge women's agency in handling water and land and maintaining regional biodiversity in project-affected areas. Strong ESFs recognize and promote women's key roles as environmental stewards, and acknowledge that local changes to the environment and biodiversity will have a particular impact on women's lives.

Relevance: Women play primary roles in managing natural resources and ecosystems and are often negatively impacted by IFI project disruptions to these ecosystems. Ideal ESFs should institute environmental and biodiversity protections that insulate women and SGMs from local changes to their physical environment.

Scoring: Graph 21 displays aggregate ESF scores for the indicator Gender, Environment and Biodiversity. No IFI scored Strong on this new indicator despite women’s predominant role in managing natural resources in IFI borrower countries. A strong majority of IFIs scored Weak (EBRD 2019, EIB 2022, ADB 2009, AfDB 2022 [draft], BOAD 2015, CDB 2014, IDB 2020, IDB Invest 2020, NDB 2016, WB 2018), and only two (16.7%) scored Adequate (AIIB 2021, IFC 2012) (see Table 3, 3-A and Annex 4). “Unmet Gender Promises” had only one joint indicator for Climate and Environment which scored: 75% weak, 25% adequate, 0% strong. This report scores even worse with 83.3% Weak scores on both separate indicators, that is, on the Environment and Biodiversity, and on the Climate Change indicators (see above).

Graph 21: ESFs - Gender in Environment and Biodiversity



Recommendations:

All ESFs should:

- Require gender-sensitive environmental and climate change impact assessments that strive to preserve natural resources in project-affected areas. While some ESFs conduct gender-sensitive environmental assessments in relation to potential displacement and resettlement processes, few do so for broader environmental and climate issues.
- Acknowledge and protect against the disproportionate harms that changes in the physical environment will have on the livelihoods of women.
- Require the inclusion of women, who are primary natural resource managers, in project consultations (see ESF Indicator 8) and environmental assessments (see ESF Indicator 2).
- Ensure projects uphold and empower women’s agency as natural resource managers.

Indicator 7: Gender and Information Disclosure

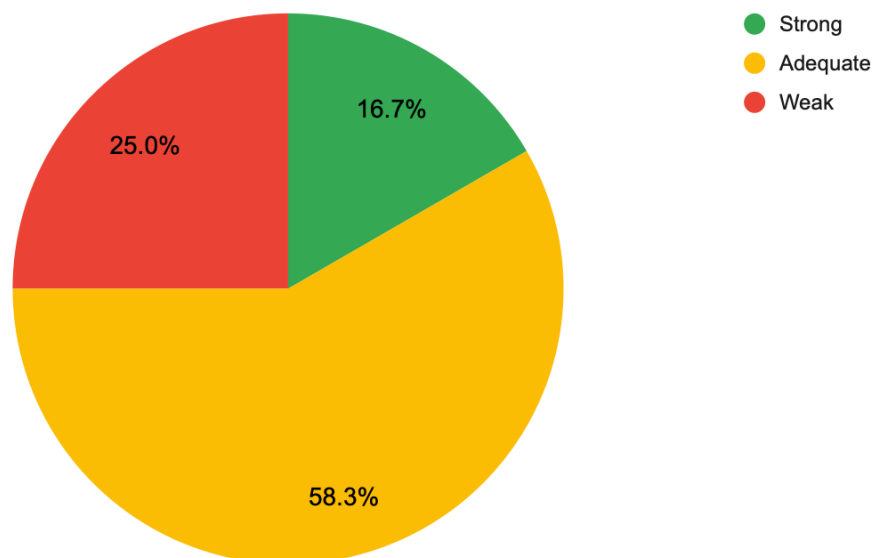
Definition: The Information Disclosure indicator analyzes the extent to which IFIs disclose full available project information to all project-affected people including women, men and SGMs throughout the project cycle. Notably IFIs must commit to full information disclosure prior to project design, and they should build in effective mechanisms that allow them to reach vulnerable populations. That includes outlining disclosure mechanisms that reach illiterate populations, who are disproportionately women. Direct, women-only consultations are also necessary to reach women and SGMs.

Relevance: Without full, advanced information disclosure, project-affected women, men and SGMs cannot adequately consent to, or refuse, projects. Only with detailed disclosure can they evaluate whether a project will adversely impact their livelihoods. Advanced disclosure is therefore critical to ensuring that any project begins from a place of equity and harm reduction. Detailed, advanced disclosure also ensures that project-affected people will have awareness of, and access to, accountability mechanisms should a project have negative consequences on their lives.

Scoring: Graph 22 displays the combined ESF scores for the indicator Gender and Information Disclosure. Two IFIs scored strongly (EBRD 2019, IDB 2020); seven adequately (AfDB 2022 [draft], AIIB 2021, BOAD 2015, EIB 2022, IDB Invest 2020, IFC 2012, WB 2018); three weakly (ADB 2009, CDB 2014, NDB 2016).

These scores show a notable improvement from “Unmet Gender Promises.” While in 2020 the majority (58.3%) of IFIs scored weakly on this indicator, here only a quarter of IFIs scored Weak. Instead, most IFIs now scored adequately, which is a steady, if not earth-shattering, gain.

Graph 22: ESFs - Gender and Information Disclosure



Recommendations:

All ESFs should:

- Require that all known information be disclosed prior to project design in a manner that is accessible to all project-affected women, men and SGMs.

- Provide specific mechanisms that ensure people will receive appropriate disclosures regardless of illiteracy, lack of access to media, cultural, gender, sexuality, and other potential barriers.

Indicator 8: Gender in Consultations and Consent

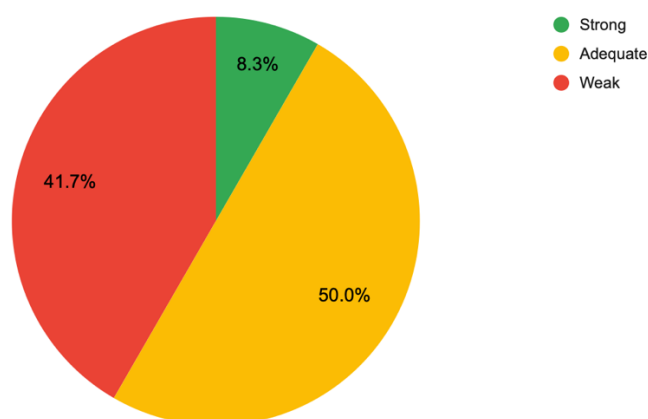
Definition: The Consultations and Consent indicator analyzes the method through which ESFs require that project workers strive for, and receive, consent from project-affected people. Whereas the previous indicator measures the information that IFIs disclose, this indicator tracks whether and how they achieve buy-in from project-affected people. The ideal ESF should build safe consultation venues through which women, SGMs, and other vulnerable groups can either give their consent to a project or refuse consent. These consultations should also anticipate barriers to the participation of women and other groups, including by providing childcare, elder-care services and transportation to ensure that women are able to attend.

Relevance: Any gender-sensitive project requires, on the most fundamental level, direct buy-in from project-affected peoples. Timing is also critical. Presenting affected people with a pre-designed project is too late to respond to requests on projects people desire. Consultations must be held that permit communities to identify projects prior to design. Besides the need to present affected women, men and SGMs the opportunity to determine what projects they want, they must be informed if IFI projects will indebted them and their countries (see ESF Indicator 3). Potential indebtedness may eliminate any imagined project benefits.

IFIs need to be thoughtful in how they solicit consent, and they need to respect when that consent is withheld. Gender Action urges IFIs to follow the framework of Free, Prior and Informed Consent (FPIC), a policy that requires communities' consent prior to a project to actions that affect their land and resource rights. While FPIC is traditionally reserved for Indigenous Peoples, Gender Action believes IFIs must apply FPIC to all project-affected people, including women and SGMs.

Scoring: Graph 23 displays the combined ESF scores for the indicator Gender Consultations and Consent. Only one IFI scored strongly (EIB 2022); six adequately (AIIB 2021, CDB 2014, EBRD 2019, IDB 2020, IDB Invest 2020, NDB 2016); five weakly (ADB 2009, AfDB 2022 [draft], BOAD 2015, IFC 2012, WB 2018) (see Table 3, 3-A and Annex 4). "Unmet Gender Promises" had no Strong scores while this report has one. However, Weak scores escalated from 17% in Unmet to 42% in this report.

Graph 23: ESFs - Gendered Consultations and Consent



Recommendations:

All ESFs should:

- Require gender-sensitive and women-only consultations prior to project design and in subsequent project stages, to ensure that vulnerable populations have a safe space through which to give honest feedback.
- Mandate that these consultations anticipate the specific needs of women and SGMs. This includes organizing the consultations at times convenient to women's schedules, such as during school hours, facilitating transportation and advertising free, on-site childcare and elder-care services to ensure that women can attend.
- Extend the FPIC framework, which traditionally focuses on the specific needs of Indigenous Peoples, to all project-affected people, including women and SGMs.
- Require that project staff maintain a detailed log of gender-disaggregated participation data and the concerns of project-affected women and SGMs.

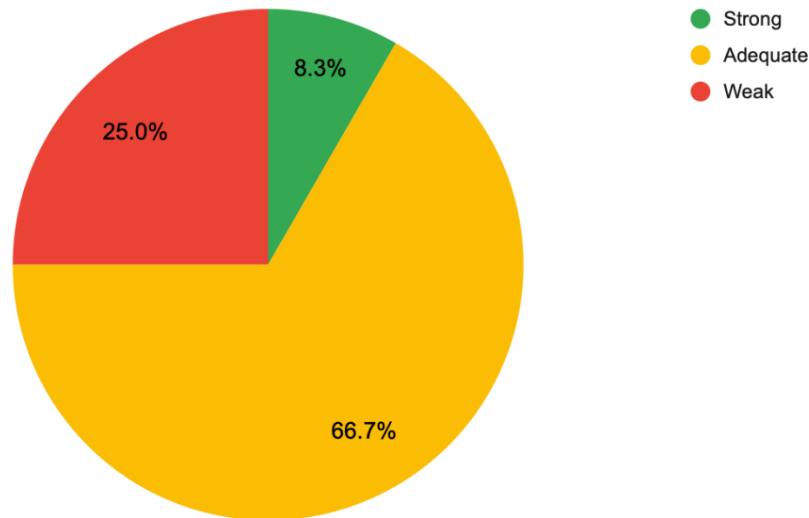
Indicator 9: Gender in Resettlement and Compensation

Definition: The Resettlement and Compensation indicator assesses the gender-sensitivity of ESFs policies governing resettlement. First and foremost, ESFs should explicitly require that project-affected women, men and SGMs give their consent to all resettlement and compensation as well as their terms. IFIs must also provide generous compensation to displaced and resettled individuals who agree to it, ensuring new housing, land and other amenities that are equal to or better than a project-affected person's prior living conditions. Women and SGMs should receive special attention, given the risks of violence and economic harm that could impact them during a poorly handled resettlement case and loss of usually irreplaceable social networks.

Relevance: Resettlement causes inevitable cultural, social, and economic disruptions, especially to women's lives. Incorporating women in the resettlement and compensation process ensures that they are not overlooked in the design, planning and implementation stages. The consent of women and SGMs must be prioritized, and they should receive robust compensation given the dislocating effects of resettlement. IFIs must also be cognizant of the fact that women may not have formal titles for the land they own because of local laws or customs prohibiting women's legal property ownership. These women should not be left out of compensation mechanisms.

Scoring: Graph 24 displays the combined ESF scores for the indicator Resettlement and Compensation. One IFI scored strongly (EBRD 2019); eight adequately (AfDB 2022 [draft], AIIB 2021, BOAD 2015, EIB 2022, IDB 2020, IFC 2012, NDB 2016, WB 2018); three weakly (ADB 2009, CDB 2014, IDB Invest 2020) (see Table 3, 3-A and Annex 4). Unexpectedly since IFIs tend to discuss resettlement's gender dimensions, the 50% Strong scores on this indicator in "Unmet Gender Promises" tumbled to 8%, while Weak scores rose from 17% to 25% in this report.

Graph 24: ESFs - Gender in Resettlement and Compensation



Recommendations:

All ESFs should:

- Agree to resettlement only after all affected women, men and SGMs consent to be resettled.
- Require projects to organize women-only discussions around resettlement and compensation needs.
- Require that projects treat women, men and SGMs equally in resettlement hearings, and take special care to receive feedback from women and SGMs, given that local gender roles may inhibit participation of women and SGMs.
- Require that all displacement, resettlement, and compensation processes address gender issues. Special attention should be paid to ensure that compensation goes to all household members, rather than just to the (usually male) head of household.
- Ensure compensation benefits are dispersed equally to women and men and that women's labor in any consented resettlement is accounted for and compensated.
- Outline and address the specific risks that resettlement could have on SGMs, who might be dislocated from LGBTQ+ communities, networks, and queer-specific healthcare services.
- Mandate that projects recognize women's land rights based on usage, especially in areas where women may not—and may not be allowed to—own property. Gender-inclusive pre-resettlement consultations should identify women's land rights and usage in both indigenous and non-indigenous areas, including collective land use, and provide gender equal compensation.
- Require additional assistance to divorced or widowed female headed households with dependents and low income, in the resettlement/relocation, compensation and livelihood restoration process.
- Ensure additional support to reduce women's child burden such as assured access to water sources and livelihoods.

Indicator 10: Gender Monitoring and Evaluation

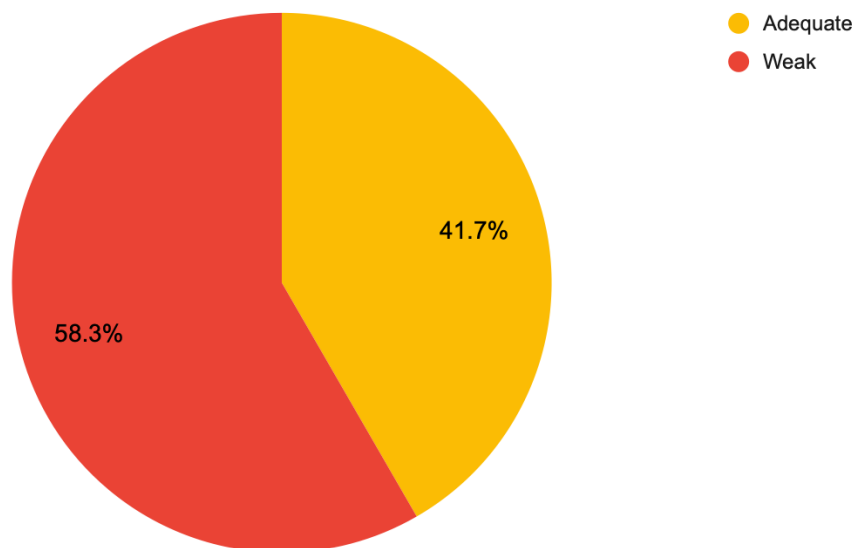
Definition: The Monitoring and Evaluation indicator assesses the extent to which ESFs require the collection and monitoring of gender-disaggregated data. This data is essential because it offers the most direct look into whether or not IFIs are making progress toward achieving their goals on gender equity

issues. Data should be collected both as a baseline before the start of the project and then subsequently throughout the project cycle.

Relevance: Monitoring and evaluation is critical to ensuring and refining implementation of project gender equality commitments and avoiding gender discrimination and other harmful impacts. Without data, there is no way to know whether or not projects are making progress on gender issues. Further, data and data analysis are critical to ensuring that IFI policies and projects improve in the future, so that each subsequent project can be more attentive to the impacts on women and SGMs than the last.

Scoring: Graph 22 displays the combined ESF scores for the indicator Monitoring and Evaluation. No IFI scored strongly; five scored adequately (ADB 2009, BOAD 2015, CDB 2014, EBRD 2019, EIB 2022); seven weakly (AfDB 2022 [draft], AIIB 2021, IDB 2020, IDB Invest 2020, IFC 2012, NDB 2016, WB 2018) (see Table 3, 3-A and Annex 4). Scoring in this report disappointingly mirrors the performance in Unmet Gender Promises with no Strong scores in either.

Graph 25: ESFs - Gender Monitoring and Evaluation



Recommendations:

All ESFs should:

- Require the collection of gender-disaggregated baseline and subsequent M&E data for all components. This data should be collected prior to the start of the project, as well as successively throughout a project's life cycle.
- Mandate that this gender-disaggregated data be cross-cutting and relates to all project indicators, so that IFIs will have robust data on the gender impacts of the environmental and climate changes, SGBV and SEAH, and more during the project.
- Require that project data be incorporated into transparently published project progress reports that are available to IFI management, boards of directors and the general public.

Indicator 11: Sexual and Gender Minorities

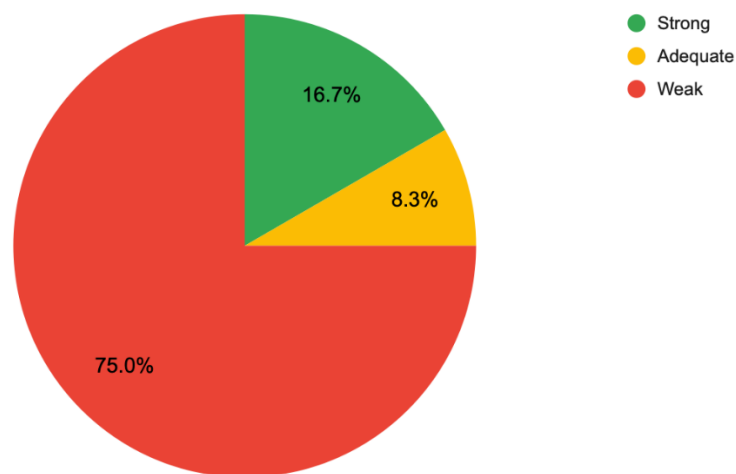
Definition: The SGM indicator analyzes the extent to which ESFs promote the rights of sexual and gender minorities throughout multiple policy sections. A growing number of ESFs state a commitment to non-discrimination against SGMs. The ideal ESF should go deeper. SGM targeting means creating specific safeguards for SGMs across each ESF, including by providing protections for SGMs in redress mechanisms, SGBV safeguards, resettlement and compensation, and more. Sensitivity to SGMs should also be a part of mandatory staff training, to ensure that SGMs have their chosen gender respected and that staff know to avoid “outing” a member of the LGBTQ+ community.

Relevance: SGMs have long been neglected within global gender equality efforts and initiatives, but they face multi-layered risks of harm from IFI projects, from violence to forced “outing” to a loss of access to their community in cases of resettlement. All IFIs should be attentive to, and safeguard against, these risks.

Scoring: Graph 26 depicts the combined ESF scores for the indicator Sexual and Gender Minorities. Two IFIs scored strongly (EIB 2022, IDB 2020); one adequately (EBRD 2019); nine weakly (ADB 2009, AfDB 2022 [draft], AIIB 2021, BOAD 2015, CDB 2014, IDB Invest 2020, IFC 2012, NDB 2016, WB 2018) (see Table 3, 3-A and Annex 4).

This is a slight improvement from our last report “Unmet Gender Promises”, when the same 75% of IFIs scored weakly, yet none scored strongly compared to 17% Strong scores in this report

Graph 26: ESFs - Sexual and Gender Minorities



Recommendations:

All ESFs should:

- Define gender identities to include SGMs and explicitly identify the vulnerabilities of SGMs.
- Integrate SGMs into all gender equality and gender equal rights frameworks. Protections against women should also be applied to all SGMs, especially in cases of SGBV and SEAH or resettlement.
- Ensure a policy of non-discrimination against SGMs, and incorporate protections for SGMs into harassment policies, grievance and accountability mechanisms, and staff training.
- Require that projects gender-equally address issues that may arise among or between project staff and project-affected individuals due to their sexual orientation and gender identity.

- Outline the specific needs of SGMs, such as correct pronoun use and gender identification by staff and the need to ensure privacy around identities and avoiding “outing.”

As in our 2020 report, the World Bank ESF gets a special mention here because immediately following its ESF approval, its President released a directive that bears on gender issues, especially on protecting SGMs (see Box 2).

Box 2: World Bank ESF Directive⁸

The World Bank Directive on ‘Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups’ (August 2016) mandates that project staff apply due diligence on behalf of disadvantaged and vulnerable groups. It explicitly aims to ensure projects do not adversely affect individuals and groups based on their sexual orientation and gender identity (SOGI). It directs project staff to assess project risks and impacts and engage with stakeholders to prevent discrimination against individuals and groups based on SOGI. The Directive links to Environmental and Social Standard 1 (ESS1). This World Bank ESF standard, “Assessment and Management of Environmental and Social Risks and Impacts” includes the explicit obligation of “non-discrimination”. Although the Directive links to the ESF, it was *not included* in the original ESF. Nevertheless, requiring project inclusivity of LGBTQ+ people and other vulnerable groups, it represents an important ESF addition.

Indicator 12: Sexual and Gender-Based Violence and Sexual Exploitation, Abuse and Harassment

Definition: The Sexual and Gender-Based Violence (SGBV) and Sexual Exploitation, Abuse and Harassment (SEAH) indicator analyzes the commitment each ESF makes to preventing SGBV and SEAH against project-affected women, men, and SGMs. Strong ESFs facilitate victim reporting and incorporate grievance and accountability processes. ESFs should also require staff training on SGBV and SEAH, and they should be sure to incorporate homophobic and transphobic violence into its larger SGBV protections.

Relevance: SGBV and SEAH are widely underreported globally. It is critical that IFI operations take preemptive measures to prevent and mitigate harm, while also creating environments that are supportive and hospitable to victims who come forward and are in need of support. IFIs must also take an expansive understanding of SGBV, one that acknowledges homophobic and transphobic violence and harassment.

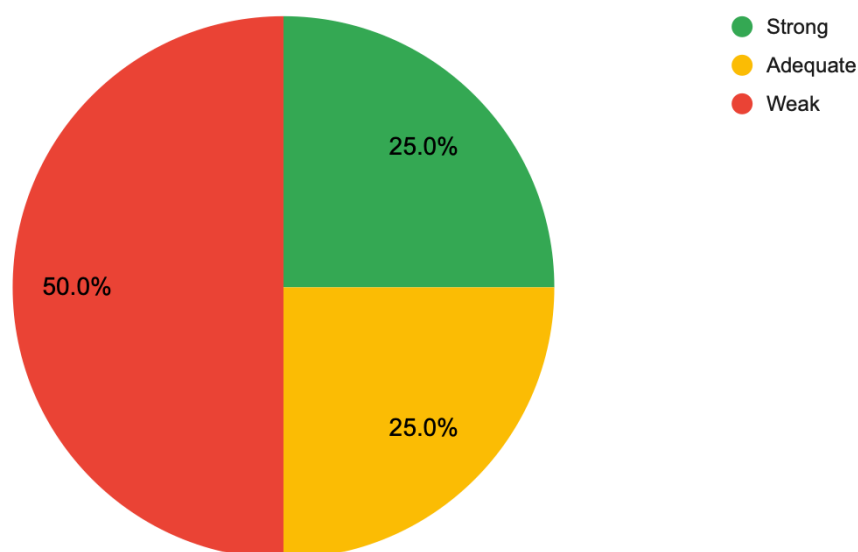
Scoring: Graph 27 displays the combined ESF scores for the indicator SGBV and SEAH. Three IFIs scored strongly (EBRD 2019, EIB 2022, IDB 2020); one adequately (AfDB 2022 [draft]); eight weakly (ADB 2009, BOAD 2015, AIIB 2021, CDB 2014, IDB Invest 2020, IFC 2012, NDB 2016, WB 2018) (see Table 3, 3-A and Annex 4).

Although 50% of ESFs scored weakly on this indicator it is a slight improvement from 58% of ESFs that scored weakly in “Unmet Gender Promises”, as is the increase of 25% Strong scores compared to 17% in

⁸ All ESF components and Directives are listed in this report’s endnotes. Only a World Bank ESF Directive (see Box 2) bears directly on gender issues.

“Unmet Gender Promises”. This is because of increasing worldwide attention to SGBV and SEAH as well as World Bank dissemination to other IFIs of lessons learned from widespread rape and harassment of women and girls by contractors in road projects in Uganda and the Democratic Republic of the Congo (World Bank Inspection Panel).

Graph 27: ESFs - SGBV and SEAH



Recommendations:

All ESFs should:

- Define SGBV and SEAH clearly and require prevention and mitigation measures. A complete definition should include but not be limited to sexual and non-sexual forms of harassment, exploitation, abuse, assault, coercion, trafficking, and intimidation.
- Require that project staff receive training on SGBV and SEAH, with a specific emphasis on rights, reporting, and confidentiality procedures.
- Require projects to establish grievance mechanisms for SGBV and harassment victims.

Indicator 13: Gendered Labor

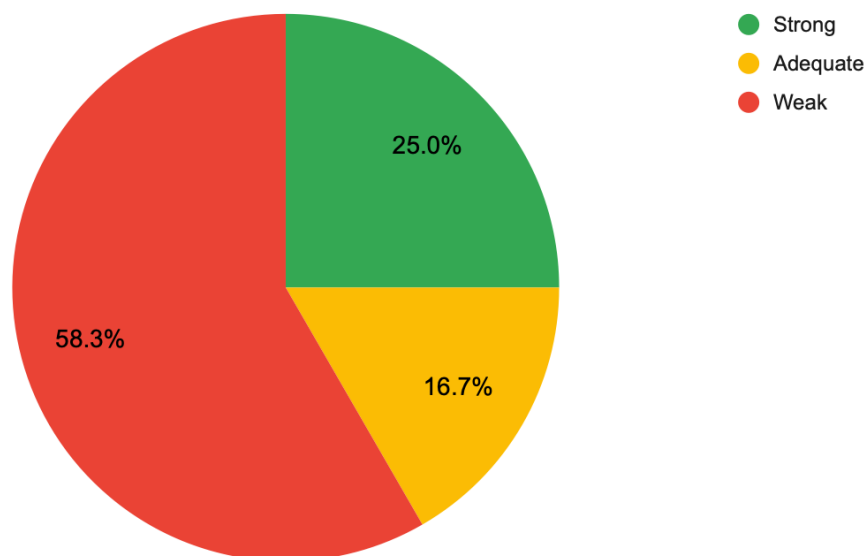
Definition: The Gendered Labor indicator analyzes the extent to which ESFs promote measures to eliminate gender-unequal labor conditions (hiring practices, salaries, contracts, occupational health and safety, care work and protection from harassment and discrimination) and require gender-sensitive labor training (on GERs, gender-equal working conditions, etc.) for project staff and contractors.

Relevance: Gender dimensions of labor rights and practices in workplaces are often excluded from workplace protections, whether intentional or not. IFI projects must ensure women, men, and SGMs have equal access to hiring, contractual and reporting practices and provision of care services.

Scoring: Graph 28 depicts the combined ESF scores for the indicator Gendered Labor. Three IFIs scored strongly (EBRD 2019, EIB 2022, IDB 2020); two scored adequately (AfDB 2022 [draft], WB 2018); seven scored weakly (ADB 2009, AIIB 2021, BOAD 2015, CDB 2014, IDB Invest, IFC 2012, NDB 2016) (see Table

3, 3-A and Annex 4). The IFIs' Strong scores on Gendered Labor escalated from 8% in “Unmet Gender Promises” to 25% in this report.

Graph 28: ESFs - Gendered Labor



Recommendations:

All ESFs should:

- Require projects to use hiring practices, salary negotiation procedures, contract renewals, and other employment-related procedures in a gender equal manner, to ensure staffing parity and pay parity.
- Ensure worksite labor protections reduce risks of sexual-related injury, harassment, exploitation, abuse and assault, especially of women and SGMs. Ensure projects provide staff with clear information and training on gender equal labor protection policies and grievance procedures.
- Ensure that project occupational health and safety protocols include workplace accommodations for women and SGMs.
- Require projects hiring laborers to provide facilities such as adequate lighting outdoors at night, sex-separate secure sleeping facilities, and well-lit sex-separate sanitation facilities to protect all genders from potential harm.
- Include a mechanism for adequate project participation of care workers who are mostly women
- Ensure protection of care workers' rights for example to receive adequate pay and benefits for work, thereby transforming unpaid into paid care.

6. Conclusions and recommendations

While not the end all and be all, gender-sensitive policies are the critical first step toward ensuring gender equality in development projects. In this report, we have directed so much attention to the guidelines and regulations that IFIs place on their projects because we have seen that gender equality in IFI projects cannot be achieved without strong IFI mandates on staffing, data & monitoring,

resettlement, and more. Bridging gender-based inequalities requires a holistic set of policies that understand gender discrimination as a complex, multi-faceted system that touches all aspects of the lives of women, men, and sexual and gender minorities (SGMs).

Policy documents including IFI gender policies and ESFs cannot achieve gender equality on their own. IFIs must also ensure that policies are first robust and second implemented fully on the ground, and that there is recourse if projects do not follow IFI policies. They cannot be effective if an overarching IFI paradigm promoting austerity and privatization policies reduces public spending. Still, strong policies constitute a first step toward curbing harmful impacts of IFI-financed operations on women, men and SGMs.

In this report, we have attempted, where possible, to distinguish between *requirements* and *recommendations* in IFI policies, knowing that gender-sensitive procedures must be required in order to make real impacts on the ground. Voluntary guidelines are insufficient. Many ESFs and gender policies, for example, nod to the possibility of training staff members on gender issues, but few say outright that their gender-based training programs are mandated for all staff. Similarly, many IFIs lack a simple do-no-harm gender safeguard requiring that projects commit to a policy of non-discrimination. Unless policy guidelines are turned into mandates, we are concerned that their commitments to gender equity are too ineffectual to be consistently implemented in practice.

This report analyzed and scored 12 gender policy documents as well as the gender-sensitivity of 12 Environmental and Social Frameworks, covering a total of 13 IFIs. Not every IFI had a gender policy; we analyzed only the ESFs of the AIIB, IDB Invest and NDB because these IFIs have never published a standalone gender policy. The IFC adheres to the World Bank gender policy. The IMF lacks an ESF.

A few patterns emerged from our analyses. Overall, **on the gender policies**, ADB, EBRD, and AfDB scored most highly. Meanwhile, the IMF, which released its first gender strategy in 2022, did not receive a single Strong score. In general, some IFIs made commendable improvements in certain areas, including a marked increase in the number of IFIs mentioning sexual and gender minorities (SGMs) in their gender policies. Meanwhile, integrating gender into a climate change, environmental, and biodiversity analysis remains a challenge for the IFIs, with the exception of ADB, whose 2019 gender policy was the only one to score strongly on these measures.

While many IFIs scored highly on the Goals and Priorities indicators, which shows that they generally do make a written commitment to gender equality, the comparatively mediocre performances of their evaluation mechanisms and staffing procedures shows weaknesses in their ability to ensure their projects actually achieve those goals. An IFI is unlikely to conduct a truly gender-sensitive project without staff trained on gender issues. Neither can an IFI say it has achieved victories on women's and SGMs' rights without a sophisticated monitoring framework that requires all projects to collect gender-disaggregated data at multiple junctures prior, during—and after—a project's implementation. Achieving gender equality should be a wide-ranging goal, one that requires rigorous monitoring frameworks, gender-sensitivity in staffing and training, gender-responsive consent and redress mechanisms, and so on.

Continuing a trend we first identified in “Unmet Gender Promises” in 2020, we found that gender policies fared far better on issues of gender sensitivity than did **the Environmental and Social Frameworks**. This is unsurprising at face value, but it underscores a larger issue in the ways IFIs approach gender issues: too often, gender is shunted into its own category, separate from the rest of

the work of each IFI. In reality, gender and sexuality touch all aspects of IFI work, and policymakers should integrate a gender framework throughout all of their policies going forward. Newer IFI ESFs generally indicate a positive trend in this direction although the nearly gender-blind World Bank 2018 ESF belies this momentum, tying in least gender-sensitive second place with the NDB.

With the exception of the newer ESFs of the EBRD, EIB, and IDB, which had slightly under half of their indicators rated as Strong, the ESFs showed sparse progress on gender issues across the board. All but the aforementioned three IFIs had a majority of Weak scores. The strongest ESF gender-sensitivity scores were for Resettlement and Compensation, with two-thirds of ESFs scoring adequately on this indicator. Meanwhile, not a single IFI received a Strong score on its approach to the gendered impacts of climate change and environmental and biodiversity issues, showing a continued failure to integrate an intersectional understanding of gender. There were some notable improvements. The 2022 EIB ESF, for instance, mentioned sexual and gender minorities throughout its report, including by making explicit reference to “non-binary or gender non-conforming persons.”

The general failure of IFIs to integrate gender into their ESFs in the same detail as in their gender policies remains, as in our “Unmet Gender Promises” report, a critical area for improvement going forward. If there is a single overarching lesson of this report, in fact, it is that IFIs must think of gender as a lens through which to understand all aspects of their work. Their projects will not promote gender equality and gender equal rights until they think about the gendered impacts of *all* aspects of their work, and avoid treating gender as a standalone issue that can be tackled in isolation.

We will now highlight conclusions and recommendations based on patterns that emerged from the individual indicator assessments for gender policies and ESFs. The conclusions and recommendations below are not presented in a priority order.

Every IFI must have a robust implemented gender policy. We analyzed only the ESFs of the AIIB, IDB Invest and NDB because these IFIs have never published a standalone gender policy. It is unacceptable for three IFIs to lack gender policies in 2023. The AIIB and NDB cannot legitimately argue they are only seven years old. Since they opened their doors at the beginning of 2016, Gender Action met their senior managers many times to convince them they must adopt and implement strong gender policies but they failed to respond. Since these newer IFIs rapidly adapted traditional IFIs’ environmental and social policies they have no excuse to lack gender policies. It is also inexcusable that IDB Invest, which has existed for many decades, still lacks a gender policy.⁹

IFIs must integrate gender fully into their ESFs. As discussed above, there is a clear dissonance between gender policies and ESFs. While the gender policies overall tend to present big ideas or commitments for ensuring gender equality, in the ESFs, we do not see that same attentiveness to gender issues. The negligence of the ESFs seems to undermine intended IFI gender equality outcomes. This comment might not apply to the ADB which currently demonstrates the largest disconnect between its gender policy and ESF because the ADB’s forthcoming ESF is expected to be gender-sensitive. But those IFIs having strong gender policies but ESFs with weak gender requirements will not have real-world impact unless their tenets are also incorporated into the ESF and other key project-development documents and the IFIs abandon their neoliberal austerity and privatization crusade which reduces poor women’s, men’s and SGM’s access to goods and services.

⁹ IDB Invest, formerly called the Interamerican Investment Corporation, was established in 1989.

Debt-based financing remains an elephant in the room. Perhaps one of the most critical weaknesses across all IFI policy documents is a systematic failure to reconcile the ways in which IFI lending policies can, and do, have adverse impacts on project-affected communities—including, in particular, on women and SGMs. While it is commendable that many IFIs are beginning to talk more explicitly about the need to prioritize gender non-discrimination and the promotion of gender equal rights in their projects, gender equality cannot truly be achieved until IFIs themselves understand how their own fiscal policies are entrenching gender inequalities. Debt-based financing ensures that local governments need to pay back IFIs, often at a premium. Even IFI concessional loans require paying front-end and closing fees and other surcharges on top of principal and below-market-interest rate payments. High-level indebtedness to IFIs of countries receiving IFI concessional loans over decades underlines this problem (Global Development Policy Center 2022). To meet IFI payments, many governments resort to cutting basic services that are critical to the lives of women and SGMs. Debt-based financing therefore entraps these communities in cycles of poverty, and it is women and SGMs who often bear its brunt.

IFIs must, at the very least, create safeguards that insulate communities from the ramifications of debt-based financing—but ultimately, it is the view of Gender Action that the only way to achieve gender equality in project-affected regions is for IFIs to adopt grant-based funding across all of their projects.

IFI gender policies and ESFs must require gender equal rights mandates. Only two gender policies and two ESFs scored strongly on the Mandate indicator. Mandates should be a baseline requirement of any gender-sensitive project policy. All gender policies and ESFs must require that projects prevent harm to women, men, and SGMs. They should further facilitate the process for affected individuals and communities to file complaints and seek redress from gender-sensitive project grievance and IFI accountability mechanisms.

Going forward, IFIs should include mandatory provisions that commit all of their projects not just to doing no harm, but that also set out a goal of improving the position of project-affected women and SGMs. IFIs should commit to leaving these communities better than when they arrived to live up to their boasted role of “development institutions.”

ESFs must acknowledge and address the gendered impacts of climate change. Climate change is already displacing millions of people around the world, and women are bearing this burden most intensely. Women face the highest risk of violence during displacement, and their disproportionate unpaid care workload means they cannot as easily afford to relocate when environmental disturbances arise as men can. Women also comprise the majority of farmers in much of the world and fishers in several regions, livelihoods directly impacted by changes to the climate and the environment. Yet few IFIs acknowledge and safeguard against gendered impacts of climate change.

In this report, Gender Action added two indicators to drive home the importance of climate as well as environmental and biodiversity protections for women. In our analysis, however, we discovered that IFIs largely failed to discuss the gendered impacts of climate change and environmental shifts. Among the gender policies, 66.7% of IFIs scored weakly on the Gender and Climate Change indicator, while 75% scored weakly on the Gender, Environment and Biodiversity indicator. Not a single ESF, meanwhile, received a Strong rating for its policies governing gender as it relates to both the environment and climate change.

Gender Action recommends that all gender policies and ESFs require gender-sensitive environmental and climate change impact risk assessments in project-affected areas. IFIs must identify and safeguard

women's specific roles in managing natural resources and biodiversity ecosystems, and they must also safeguard women specifically against the fallout from a changing climate.

Gender policies and ESFs must incorporate SGMs throughout their policies. While we have seen a steady improvement in the number of IFIs that discuss SGMs in their gender policies and ESFs, these references include few specifics. Gender Action expects them to go further than merely mentioning a commitment to non-discrimination. SGMs have a specific set of needs, for instance extra attention to their privacy in order to avoid forced "outing" and a commitment to referring to SGMs by their chosen gender. SGMs also face disproportionate risks of violence, and IFIs should craft policies that specifically protect them from SGBV and SEAH.

All IFI gender policies and ESFs must take a cross-cutting approach to SGM protections. They must expand anti-discrimination and harassment policies, grievance and accountability mechanisms, and staff training to counter discrimination against SGMs. They must also ensure SGMs benefit from projects.

Gender policies and ESFs must ensure prevention of all forms of SGBV and SEAH. Only a third of gender policies and a quarter of ESFs received strong scores on their protections against SGBV and SEAH. This is highly inadequate. Women, men, and SGMs face a disproportionate risk of violence during projects. IFIs should define SGBV and SEAH clearly and require prevention and mitigation measures for all forms, including but not limited to sexual and non-sexual forms of harassment, exploitation, abuse, assault, coercion, trafficking, and intimidation.

IFIs should strive not only to adopt a strong stance against SGBV and SEAH, but they also need to create detailed mitigation mechanisms that take into account lighting in project areas, bathroom access, the "outing" of SGMs, and more, in order to ensure that risks of SGBV and SEAH are as minimal as possible. Further, IFIs need to create compensation mechanisms for survivors of SGBV and SEAH, including a detailed grievance reporting and confidentiality process that is explained to project-affected people before the start of a project.

Gender policies must recognize and reward unpaid care work. A growing number of IFIs are acknowledging the unpaid care workload that falls disproportionately on women. Women are often saddled with childcare, elder-care, and other forms of unpaid household care work, a set of responsibilities that exacerbates women's poverty, not to mention their ability to participate in projects.

Acknowledging these disparities is an important first step, but IFIs must go further and commit to alleviating this unpaid care workload. This should include requiring gender-role training that emphasizes the need to spread the work of care work and housework to people of all genders, as well as offering childcare services to women to ensure they can participate in project consultations. Most importantly, IFIs should promote policies that remunerate and compensate women and other genders for their care work. Gender equality cannot be achieved until women's care work is recognized, spread around more equally, and compensated.

ESFs must ensure full information disclosure and gender-sensitive consultation sessions. Consent is the basis for any gender-sensitive project, and IFIs must commit to robust policies of disclosure and consent in order to ensure that their projects will have positive impacts for project-affected women, men and SGMs. While around half of ESFs scored adequately on our information disclosure (58.3% adequate) and consent (50% adequate) indicators, very few scored strongly on either measure, suggesting that IFIs are hardly meeting the bar on information disclosure and consent policy.

IFIs must require that all operations provide full available information to project-affected women, men and SGMs prior to the project design. IFIs must explicitly state that these disclosures should happen prior to the start of a project and that they must include complete available project information. Consent cannot be obtained unless project-affected people are notified well in advance of the project start.

Further, IFIs must also work to ensure that women and SGMs are given safe spaces through which to discuss the project. IFIs must provide childcare and elder-care support to allow women, who have a disproportionate care workload, to access consultation sessions. These consultations should also be sex-segregated, and they should address the specific needs of the LGBTQ+ community. Further, project-affected people should be informed of their rights at the start, including their right to initiate a grievance redress process, as well as their right to terminate such a process at any time.

Gender policies and ESFs must collect gender-disaggregated Monitoring & Evaluation (M&E) data. A robust system of data collection and monitoring is critical to ensuring that IFI projects are actually improving the lives of women and SGMs, rather than exacerbating harms against them. Without data, IFIs cannot know the extent to which they may in fact be making gender issues on the ground worse. Yet IFIs continue to offer weak provisions for monitoring and evaluation during the course of each project.

Only one gender policy and not a single ESF scored Strong under our M&E indicator. These weak performances are due to the fact that very few IFIs require the collection of baseline and subsequent gender-disaggregated data throughout the project cycle. Without this data it is impossible to identify, analyze and apply lessons to strengthen gender achievements and prevent setbacks. Going forward, IFIs must require gender-disaggregated data collection throughout the life cycle of a project, and they must also analyze that data and produce recommendations for how to improve the gender sensitivity of their projects in the future. Further, IFIs must ensure the data that projects do collect is disseminated widely and transparently, not just to project-affected people but also to IFI management and board members and the general public.

ESF environmental and social risk assessments must assess gender risks prior to project launch. Many IFIs omit a key provision in their ESF policies: their risk assessments do not consider how their work might put women and SGMs at risk. Gender-sensitive risk assessments should be a staple of IFI policies, since they carve out an opportunity for IFIs to consider—and, importantly, *prevent*—any burdens that might exacerbate gender inequalities. Gender issues must be a core component of environmental and social risk assessments.

Prior to embarking on a project, IFIs must not only study how their actions might particularly impact the lives of women and SGMs, but they should also require that projects develop plans to mitigate and avoid gender-based risks. Further, while the first risk assessment should be conducted prior to the project start, it should not be the only risk assessment produced. IFIs must conduct in-depth follow-up interviews with impacted women and SGMs, to ensure they remain attentive to gender-based impacts and quickly modify their projects as needed. Otherwise, gendered harms may fester, unnoticed.

IFIs can do better incorporating gender into resettlement policies. While resettlement is an unfortunate reality of many IFI projects, asking people to leave behind their homes is immensely difficult financially, emotionally, and socially. First and foremost, IFIs must ensure that the tenets of the Free, Prior and Informed Consent (FPIC) framework, which is often reserved for Indigenous Peoples, are also

extended to women and SGMs. If they provide consent for resettlement, projects must include material protections and compensation mechanisms. The IFIs have generally shown an acceptable, if not outstanding, amount of care on questions of displacement and resettlement, often committing to ensure that locals consent to resettlement and that they are provided with money, housing, and work equal to, if not better than, what they had experienced in their previous homes.

While it is heartening that IFIs have mostly adequate resettlement policies in some areas, IFIs continue to leave gender issues as an afterthought. When resettlement happens, women tend to bear the biggest burden. They are often the caretakers of their family and local environment, and they are more likely to live in poverty and face the greater risk of sexual violence in an unsafe new living setting. SGMs, meanwhile, risk losing access to their communities, and could be at risk of violence in a new environment that might tolerate them less. Even with consent to resettle, rebuilding women's and SGMs' lost social networks requires thoughtful compensation.

Because of gender-unequal resettlement impacts, IFIs should ensure that the voices of women and SGMs are heard throughout the resettlement process. They should create women-only dialogues both before and after resettlement happens. Further, IFIs need to build in protections that guarantee compensation for resettlement is dispersed equally to all genders. Compensation shouldn't merely be directed to a male head of household; projects must ensure that an equal share of the money goes to the women in the household. IFIs should not let entrenched legal discrimination against women get in their way. They must stay cognizant of the fact that women may not have deeds for their land, and they must require projects to compensate women for their land, whether or not they have a formal deed for it.

In conclusion, while our "Unmet Gender Promises" report first exposed the inadequacies in IFI gender policies and ESF documents, "IFIs' Rhetorical Gender & Climate Promises" has shown how these policies are still failing to strive for gender equity in projects. It is not all bad news, and we do not mean to dismiss the progress IFIs have made in some key areas. The Gender & Information Disclosure policies have become significantly more robust, for instance, in the last two years. In "Unmet Gender Promises," 58.33% of IFIs scored weakly on our Information Disclosure indicator; in this report, only 25% of the IFIs scored weakly. On the flip side, IFIs showed a slight decline on the Consultations & Consent indicator of the ESFs. Whereas in "Unmet Gender Promises" the vast majority (83.33%) of IFIs scored adequately on consultations, without a single Weak score present, here a full 41.7% scored weakly. That is thanks in part to the relatively poor performance of new ESFs on this measure.

Further, the sparse progress we have outlined here is partially attributable to the fact that few IFIs have updated their gender policies and ESFs in the two years since "Unmet Gender Promises" was published. But the urgency of gender equality means that IFIs should be more proactive in updating their policies. Many IFIs claim that gender equality is a core value, but in their policy documents we are able to see exactly how committed each IFI is to gender equal rights. It is easy to pay lip service to gender issues, but Gender Action expects IFIs to adopt policies that reflect strong commitment to women and SGMs. If they are not measuring up, they should swiftly rework their rules.

Finally, women, men and SGMs can only benefit from and avoid harm from IFI projects if IFIs abandon their neoliberal austerity and privatization-of-everything practices.

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Annexes

Annex 1: Gender Policy Indicator Scoring Criteria

Indicator	Weak	Adequate	Strong
1. Goals (human rights and/or economic: see Table II)	<ul style="list-style-type: none"> - Only espouses an economic view of gendered issues - Lacks gender equal rights perspective 	<ul style="list-style-type: none"> - Mentions a gender equal rights perspective, but does not center it or follow through 	<ul style="list-style-type: none"> - Upholds a robust gender equal rights perspective in all efforts - Centers a broad range of gendered issues
2. Priorities (extent to which policies focus on transformational, in-depth social impacts)	<ul style="list-style-type: none"> - Focuses solely on private sector empowerment 	<ul style="list-style-type: none"> - Orients priorities around traditional “women’s” areas of health, education, and agricultural development 	<ul style="list-style-type: none"> - Prioritizes key gender issues (e.g. SGBV) - Crosscuts gender with global priorities such as combating climate change, class inequalities and patriarchy - Emphasizes public and private sector gender equal leadership
3. Mandate (extent to which the policy is mandatory or voluntary)	<ul style="list-style-type: none"> - Voluntary or no mandate - Certain types of lending exempt 	<ul style="list-style-type: none"> - Mandatory without a do-no-harm safeguard - Voluntary with solid compliance mechanisms 	<ul style="list-style-type: none"> - Incorporates a mandatory gender safeguard to prevent harm and facilitate taking complaints to Independent Accountability Mechanisms
4: Gender and Climate Change (extent to which the policy relates the climate crisis to women’s livelihoods and health)	<ul style="list-style-type: none"> - No mention of the disproportionate impact of climate change on women and LGBTQ+ people and no protections against this impact 	<ul style="list-style-type: none"> - Mentions but does not require targeting women and LGBTQ+ people with climate protection measures 	<ul style="list-style-type: none"> - Requires climate protection mechanisms targeted towards women and LGBTQ+ people
5: Gender, Environment, and Biodiversity (extent to which the policy addresses gender roles in handling water, land, and biodiversity in project-affected areas)	<ul style="list-style-type: none"> - No mention of the disproportionate impact of environmental harm on women and LGBTQ+ people and no protections against this impact 	<ul style="list-style-type: none"> - Mentions but does not require targeting women and LGBTQ+ people with environmental and biodiversity protection measures 	<ul style="list-style-type: none"> - Requires environmental and biodiversity protection mechanisms, especially for women and LGBTQ+ people who play primary roles managing natural resources and ecosystems in project-affected areas

6. Mechanisms to Engender Operations <i>(tools to carry out goals and priorities effectively)</i>	<ul style="list-style-type: none"> - Prioritizes gender dialogue with partners without having a gender policy - Provides little detail on implementation strategies -Emphasizes private sector interventions; does not address public or community partners 	<ul style="list-style-type: none"> - Pilots gender programs - Sets strong goals but lacks tools for implementation 	<ul style="list-style-type: none"> - Policy mainstreams gender considerations consistently in operations, country, and public sector strategies, etc. - Develops strong gender macroeconomic policy frameworks - Details implementing strategy
7. Staffing <i>(training and awareness, incentives in gender policies)</i>	<ul style="list-style-type: none"> - Provides voluntary trainings/workshops or none at all 	<ul style="list-style-type: none"> - Commits to building up gender specialists/staff - Provides mandatory trainings 	<ul style="list-style-type: none"> - Includes incentives for staff to mainstream gender (e.g. gender in annual performance reviews)
8. Gender Monitoring and Evaluation <i>(extent to which the policy requires baseline gender-disaggregated data, subsequent M&E, and other indicators)</i>	<ul style="list-style-type: none"> - Produces progress reports not made publicly available - Conducts no M&E - Collects gender-disaggregated data on countries but not Bank operations -Fails to collect gender-disaggregated data at all 	<ul style="list-style-type: none"> - Schedules M&E reports - Incorporates gender considerations into existing frameworks 	<ul style="list-style-type: none"> - Requires M&E in all project phases - Collects and applies baseline and M&E gender-disaggregated data - Transparently shares M&E gender data
9. Sexual and Gender Minorities <i>(extent to which LGBTQ+ people are included as beneficiaries and protected from harm)</i>	<ul style="list-style-type: none"> - Not mentioned 	<ul style="list-style-type: none"> - Acknowledges LGBTQ+ people -Contains few to no initiatives, programs, or operational initiatives to protect and promote LGBTQ+ rights 	<ul style="list-style-type: none"> - LGBTQ+ people are provided safeguarded protections from potential project harm - Sexual and gender minorities are benefited within program areas
10. Sexual and Gender-Based Violence and SEAH <i>(extent to which projects avoid and prevent SGBV and SEAH)</i>	<ul style="list-style-type: none"> - No mention of guidelines, funding, or initiatives for SGBV and SEAH - Mentions SGBV or SEAH only as an economic barrier 	<ul style="list-style-type: none"> - Promotes campaigns, counseling, advisory services, or dialogue with partners - Commits to addressing SGBV and SEAH only in fragile states - Includes internal safeguarding mechanisms against sexual harassment 	<ul style="list-style-type: none"> - Considers risk in project design - Supports response, protection, and prevention mechanisms - Promotes legal reforms - Requires compensation and services for survivors
11. Unpaid Care Work <i>(extent to which it is recognized, valued and distributed among genders)</i>	<ul style="list-style-type: none"> - Not mentioned - Invests in road projects and technology to save women's productive time 	<ul style="list-style-type: none"> - Promotes household labor division in frameworks - Identifies care work as a priority investment area 	<ul style="list-style-type: none"> - Invests in paying for unpaid care economy activities - Funds child- and elder-care -Does not privatize basic services such as health which increases women's unpaid care workload

Annex 2: Environmental and Social Framework (ESF) Indicator Scoring Criteria

Indicator	Weak	Adequate	Strong
1. Gender Mandate/Safeguard (contains a 'do no harm' gender safeguard)	- No mention	- Mentions do no harm gender safeguards and/or principles, includes/specifies gender as a focus within social safeguards	- Mandates a do no harm gender safeguard which prevents discrimination and facilitates taking complaints to project grievance and/or IFI international accountability mechanisms
2. Gender in Environmental and Social Risk Assessments (extent to which ESF incorporates gendered issues into environmental and social project risk assessments)	- No mention	- Suggests gendered risk assessments, or incorporates gender into a few (not all) risk assessments - Requires gender assessments/analyses for projects categorized as high-risk	- Requires that gender be incorporated into all risk assessments
3: Gender Dimensions of Debt (type of project financing provided)	- Provides debt-based financing and includes no safeguards to ensure project spending on poor will not be diluted	- Provides some debt-based financing and some grant-based financing	- Provides all grant-based financing and does not cause indebtedness for project-affected country or residents
4. Gender Discrimination & Rights (extent to which ESF requires protection against gender discrimination and promotes GERS in all operations through mechanisms, policies, and staff training)	- No mention	Promotes or includes statements on gender non-discrimination and GERS; offers voluntary training for project staff on gender non-discrimination and GERS	- Requires that all operations protect against gender discrimination and promote GERS - Requires training for all project staff on gender non-discrimination and GERS
5. Gender and Climate Change (extent to which ESF relates the climate crisis to women's livelihoods and health)	- No mention	- Mentions but does not require targeting women and LGBTQ+ people with climate protection measures	- Requires climate protection mechanisms targeted towards women and LGBTQ+ people
6. Gender in Environment and Biodiversity (extent to which ESF addresses gender roles in handling water, land, and biodiversity in project-affected areas)	- No mention	- Mentions but does not require targeting women and LGBTQ+ people with environmental and biodiversity protection measures	- Requires environmental and biodiversity protection mechanisms, especially for women and LGBTQ+ people who play primary roles managing natural resources and ecosystems in project-affected areas
7. Gender & Information Disclosure	- No mention	- Discloses partial project information to reach affected women, men, and SGMs	- Discloses all known project information by requiring effective, gender-sensitive mechanisms

<i>(extent to which ESF requires borrowers, project staff and contractors to gender-sensitively disclose full information, prior to project design, to all project-affected people)</i>		<ul style="list-style-type: none"> - Fails to use effective mechanisms to reach the illiterate and unconnected who are more often women than men - Discloses information only after project design 	<ul style="list-style-type: none"> to reach affected women, men, and SGMs prior to project design - Addresses the need to incorporate specific mechanisms to reach illiterate, unconnected, and vulnerable individuals
8. Gendered Consultations and Consent (FPIC a priori) <i>(extent to which ESF requires Free Prior and Informed Consent (FPIC), which traditionally requires consent from indigenous communities prior to project actions that affect their land and resource rights, gender-sensitively applies to all project-affected people)</i>	- No mention	<ul style="list-style-type: none"> - Suggests information be shared with women, men, and SGMs and mentions FPIC 	<ul style="list-style-type: none"> - Requires separate gender-sensitive consultations with project-affected women, men, and SGMs after providing them with all known project information prior to project design and approval - Explicit, informed consent is required
9. Gender in Resettlement & Compensation <i>(extent to which ESF includes gender equal resettlement and compensation measures based on project-affected women, men and SGMs consenting to resettlement and compensation terms, and provides guidance on land rights)</i>	- No mention	<ul style="list-style-type: none"> - Acknowledges women's, men's and SGMs differential losses from resettlement and proposes compensation 	<ul style="list-style-type: none"> - Requires seeking gendered voices on consent to resettle or not; if so, provides full compensation ensuring new housing and land that is equal to or better than pre-settlement - Addresses cultural, social and economic disruption to women's and SGMs' lives - Grants compensation to women who may not be recognized landowners in their region, whether due to local, national, tribal, or customary law
10. Gender Monitoring and Evaluation <i>(extent to which ESF requires baseline and regular collection of gender-disaggregated data on all key project components)</i>	- No mention	<ul style="list-style-type: none"> Suggests collecting project baseline and subsequent gender-disaggregated monitoring data 	<ul style="list-style-type: none"> Requires collecting project baseline and subsequent gender-disaggregated monitoring and evaluation data
11. Sexual and Gender Minorities <i>(extent to which ESF incorporates specific language promoting protection for SGMs / LGBTQ+ people)</i>	- No mention	<ul style="list-style-type: none"> - Mentions LGBTQ+ as a vulnerable population - Acknowledges that SGMs need specific project protection and benefits 	<ul style="list-style-type: none"> - Requires protective practices and targets benefits for SGMs
12. SGBV and SEAH <i>(extent to which ESF requires measures to prevent SGBV, as</i>	- No mention of SGBV or SEAH, or solely defines SGBV and SEAH without any safeguards against	<ul style="list-style-type: none"> - Defines SGBV and SEAH - Suggests prevention of SGBV and SEAH training for staff and/or contractors 	<ul style="list-style-type: none"> - Requires project measures to prevent SGBV and SEAH including staff and contractor training - Includes victim reporting, grievance and

<i>well as sexual and non-sexual forms of harassment against project-affected people; facilitates victim reporting; incorporates grievance and accountability processes and training for project staff)</i>	it		accountability processes
13. Gendered Labor <i>(extent to which ESF defines protection for women and SGMs in relation to unequal and inequitable labor conditions (salaries, contracts, harassment, discrimination, and safety); provides gender-sensitive labor training for project staff and contractors (GERs, GE working conditions, awareness, etc.)</i>	- No mention of GE labor condition protections	- Provides definitions, or acknowledges GE labor protections	- Requires strong GE standards for staff and contractors in their recruitment/ hiring/ management/ treatment/ payment of workers - Prevents gender inequality among project hires (salaries, gendered hiring discrimination, SGBV, etc.)

Annex 3: Comparative Analysis & Ranking: 12 gender policies assessed against 11 indicators

Due to page size limitations, the table is broken into four parts:

Part I contains the first six policies (ADB 2019, AfDB 2001, AfDB 2021, BOAD 2012, CDB 2008, EBRD 2021) and the first five indicators.

Part II continues these six policies with the final five indicators.

Part III contains the last six policies (EBRD 2021, EIB 2016, EIB 2018, IDB 2021, IDB 2021, World Bank 2015) and the first five indicators.

Part IV continues the last six policies with the final five indicators.

[Annex 3] Part I

IFI	ADB	AfDB	AfDB	BOAD	CDB	EBRD
Policies (1-6) / Indicators (1-5)	Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-20204 (2019)	Gender Policy (2001)	Gender Strategy 2021-2025 (2021)	Policy of the West African Development Bank in Terms of Gender (2012)	Gender Equality Policy and Operational Strategy (2008)	Equality of Opportunity Strategy 2021-25 (2021)
Goals	<u>Strong</u> - Upholds a robust gender equal rights perspective - Centers a broad range of gendered issues - Commits to eliminating gender biases and inequalities	<u>Adequate</u> - Promotes gender mainstreaming in all projects, programs, and policies to foster human/economic development - Supports efforts to attain GE	<u>Adequate</u> -Includes some human-rights framing for gender equality but focuses primarily on gender equity as economic inclusion -Plans to reduce gender inequalities across Africa by increasing access to finance and technical assistance	<u>Weak</u> -Frames primary motivation for addressing gender inequality as a way to advance economic development - Fails to fully incorporate a gender equal rights framing	<u>Weak</u> - Primarily frames gender equality as an economic rather than human rights imperative - Focuses primarily on gender mainstreaming and staff training, targeting only a narrow range of gendered issues	<u>Weak</u> -Lacks gender equal rights framing approach
Priorities	<u>Strong</u>	<u>Strong</u> - Applies cross-	<u>Adequate</u>	<u>Adequate</u>	<u>Weak</u>	<u>Adequate</u>

	<ul style="list-style-type: none"> - Includes detailed priority pillars, with gender achievement indicators - Prioritizes cross-cutting, intersectional gender issues, including resilience-building for vulnerable people - Emphasizes gender leadership across sectors and improvement in quality of life, skills, and access to gender equal justice 	<p>cutting gender issues</p> <ul style="list-style-type: none"> - Prioritizes GE in the areas of education, governance, health, poverty, agriculture, and rural development 	<ul style="list-style-type: none"> -Includes a strong description of the state of gender inequality in Africa during the Covid-19 pandemic -Remains primarily focused on gender equity in the economy and ignores gender gaps in health, housing, and food 	<ul style="list-style-type: none"> - Prioritizes key, traditional gender issues (agriculture, energy, etc.) -Fails to integrate an intersectional lens throughout policy priorities, fully excluding 	<ul style="list-style-type: none"> - Prioritizes internal changes such as staff training, without addressing in-depth operational gender issues -Excludes LGBTQ+ people from policy priorities 	<ul style="list-style-type: none"> -Focuses primarily on increasing women's economic participation in the private sector in policy priorities but also aims to reduce women's care workload and improve women's access to transit through policy priorities
Mandate	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Voluntary 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Mandatory - Lacks safeguard and complaints mechanism 	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Does not include a mandatory gender safeguard to prevent harm includes a risk response strategy to prevent potential risks posed by the Gender Strategy implementation process 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Mandatory - Lacks safeguards and complaint mechanisms 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Mandatory; applies to all Bank activities - Lacks a gender safeguard and gender-sensitive complaint mechanisms 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Voluntary
Gender and Climate Change	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Includes a section on climate change with recommendations for how the ADB 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Does not include any mention of climate change in the policy -Ignores how women and 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Includes very little mention of climate change or how women are disproportionately affected 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Ignores how women and LGBTQ+ people are disproportionately at risk of harm, 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Ignores how women and LGBTQ+ people are disproportionately affected by 	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Integrates climate goals throughout policy -Acknowledges how women and LGBTQ+ people are

	<p>projects should address the intersection of climate and gender</p> <ul style="list-style-type: none"> -Will help Borrowers analyze gender-differentiated climate change and disaster impacts and expand green job opportunities for women 	<p>LGBTQ+ people are disproportionately at risk of harm, violence, and displacement due to climate change impacts and fails to protect against these impacts</p>	<p>-Provides no mechanisms to ensure women and LGBTQ+ people are equitably integrated into climate change response efforts</p>	<p>violence, and displacement due to climate change impacts and fails to protect against these impacts</p>	<p>climate change and fails to protect against these impacts</p>	<p>disproportionately at risk of harm and attempts to address these disproportionate impacts</p> <ul style="list-style-type: none"> - Promotes increasing women's leadership in green energy activities
Gender, Environment and Biodiversity	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Includes a section on climate change with recommendations for how the ADB projects should address the intersection of environment, biodiversity and gender 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> -Recognizes women's unique role in stewarding the environment and biodiversity -Ignores how harms to the environment and biodiversity disproportionately harm women 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Ignores women's, particularly indigenous women's, role in stewarding the environment and biodiversity and does not attempt to protect or uplift this role -Ignores how harm to the environment and biodiversity disproportionately harm women 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Makes little mention of the environment in the gender policy 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Ignores women's, particularly indigenous women's, role in stewarding the environment and biodiversity and does not attempt to protect or uplift this role -Ignores how harm to the environment and biodiversity disproportionately harm women 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Ignores women's, particularly indigenous women's, role in stewarding the environment and biodiversity and does not attempt to protect or uplift this role -Ignores how harm to the environment and biodiversity disproportionately harm women
Mechanisms to Engender Operations	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Consistently mainstreams gender operations across country and public sector strategies 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Promotes gender macro-economic policy framework - Incorporates GE into operations manual, country policy, and 	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Includes a Pillars Action Plan in Annex 2 that details actions, lead departments, implementation partners, and 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Integrates GE considerations in macroeconomic activities and sectoral strategies - Includes implementation 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Requires policies, loans, projects, and strategies to undergo a gender analysis - Includes detailed implementation and 	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Creates a table with specific actions, deliverables, and timetables for policy implementation

	<ul style="list-style-type: none"> - Details implementation strategy, including multifaceted approaches across sectors and themes - Includes tracking and monitoring for gender results, and suggestions for addressing gender issues in project design 	<p>institutional assessments</p> <ul style="list-style-type: none"> - Requires that country departments create gender plans of action 	<p>timelines for each Strategy pillar</p> <ul style="list-style-type: none"> - Provides a Theory of Change approach that describes the impact of the Gender Strategy within an African context 	<p>strategy with specific gender responsibilities for member countries and organizational units</p>	<p>accountability strategies</p> <ul style="list-style-type: none"> - Sensitizes all staff to GE dimensions 	<ul style="list-style-type: none"> -Evaluates existing gender equity components in existing Bank activities and presents findings -Requires evaluation of gender equity in future Bank activities
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[Annex 3] Part II

IFI	ADB	AfDB	AfDB	BOAD	CDB	EBRD
Policies (1 – 6) / Indicators (6 – 10)	Operational Plan for Priority 2: Accelerating Progress in Gender Equality, 2019-20204 (2019)	Gender Policy (2001)	Gender Strategy 2021-2025 (2021)	Policy of the West African Development Bank in Terms of Gender (2012)	Gender Equality Policy and Operational Strategy (2008)	Equality of Opportunity Strategy 2021-25 (2021)
Staffing	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Commits to supporting skill-upgrading for female staff and employees - Creates a dedicated gender team for private sector operations, as well as female quotas/targets for leadership positions 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Provides gender training, materials, and guides - Does not require gender equity in project staffing - Does not indicate that projects will be required to hire gender experts 	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Plans to include gender experts in Gender Strategy implementation process, and hold gender bias trainings -Excludes LGBTQ+ inclusion in gender-focused staffing initiatives 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Develops voluntary GE reference guides, training programs, and materials - Does not require gender parity in project staffing 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Outlines GE responsibilities for all levels of staff - Commits to hiring two GE specialists and consultants - Proposes integrating GE as a core competency in job descriptions and annual assessments 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> -Creates many training opportunities for women attempting to enter the workforce -Plans to train staff on implicit bias, but it is unknown whether it may include gender bias and anti-LGBTQ+ bias

	- Provides leadership training for women; yet fails to require gender training for all staff					-Does not confirm whether projects will hire gender experts
Gender Monitoring & Evaluation	<u>Adequate</u> - Includes strong monitoring mechanisms but fails to specify a timeline for monitoring - Plans to improve the quality of of sex-disaggregated baseline data	<u>Adequate</u> - Implements yearly progress reports - Plans to create gender impact indicators related to gender equality goals - Collects gender-disaggregated data when possible	<u>Adequate</u> -Collects gender-disaggregated data when possible -Notes that a gender M&E specialist will support project M&E processes - Fails to include any M&E mechanisms or indicators measuring inclusion of LGBTQ+ people	<u>Adequate</u> - Schedules yearly M&E reports that provide GE information on project/Bank beneficiaries - Commits to developing a project evaluation system to measure and mitigate environmental and gender impacts	<u>Strong</u> - Includes strong monitoring framework - Prioritizes integrating gender analysis and data collection in all project phases - Develops capacity to collect and analyze sex-disaggregated data	<u>Adequate</u> -Lays out a detailed monitoring and evaluation plan -Fails to require publicly-available progress reports on the implementation of the policy -Lacks requirement for sex-disaggregated data collection for every policy implementation indicator
Sexual and Gender Minorities	<u>Adequate</u> - Discusses the importance of intersectionality including sexual orientation and gender identity - Lacks specific protection for SGMs	<u>Weak</u> - Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Weak</u> -Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Weak</u> - Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Weak</u> - Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Adequate</u> -Mentions LGBTQ+ people multiple times throughout policy but fails to integrate the needs of this population
Sexual & Gender-based Violence and SEAH	<u>Strong</u> - Addresses gender roles in SGBV and states the importance of including men and boys in anti-SGBV work through	<u>Weak</u> - Reflects CEDAW, which names SGBV as a critical area of concern - Lacks guidelines, initiatives, and funding for SGBV	<u>Weak</u> -Does not integrate prevention of SGBV and SEAH throughout the Strategy -Does not note whether survivors	<u>Weak</u> - Defines SGBV as an issue facing women - Lacks guidelines, initiatives, and funding for SGBV	<u>Weak</u> - Cites the need to improve responses to gendered rights violations - Lacks guidelines, initiatives, and funding for SGBV	<u>Adequate</u> -Includes “tackling SGBV” as a policy goal but does not provide much description on what this will entail

	<p>education, skills training, and public campaigns</p> <ul style="list-style-type: none"> - Includes SGBV risk in project design, including trafficking and exploitation - Promotes law and policy reforms, and institutional capacity building to address SGBV - Commits to investing in women's personal security and safety measures, education, and health in relation to SGBV 		<p>of SGBV and SEAH will have access to a gender-sensitive Grievance Redress Mechanism</p>		<p>and SEAH prevention and redress</p>	
Unpaid Care Work	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Acknowledges that childcare is an accessibility issue for mothers attending consultations - Commits to investments and initiatives that reduce the time poverty burden and household labor disparities, including campaigning for men's role in 'domestic work' - Proposes that social protection operations address 	<p><u>Strong</u></p> <ul style="list-style-type: none"> - Division of household labor considered in Gender Analytical Framework - Prioritizes establishing child-care and preschools 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Fails to make reduction of women's care workload a goal of the Gender Strategy and does not include mechanisms to prevent the worsening of this workload through Bank projects 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Acknowledges uneven distribution of household labor due to gender roles - Commits to supporting initiatives aimed at reducing this workload 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Lacks commitment to address unpaid care work 	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Recognizes that most unpaid care work falls on women and that the Covid pandemic worsened this care workload - Promotes equal opportunities legislation (e.g. flexible work, care leave, child care) without specifying whether care leave and child care will be paid and whether it would apply to all parents.

	early childhood development and unpaid care work					
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[Annex 3] Part III

IFI	EBRD	EIB	EIB	IDB	IDB	World Bank
Policies (7 – 12) / Indicators 1-5	Strategy for the Promotion of Gender Equality 2021-2025 (2021)	The EIB Group Strategy on Gender Equality and Women's Economic Empowerment (2016)	EIB Group Gender Action Plan (2018)	IDB Environmental and Social Policy Framework, Standard 9 (2021)	IDB ESPF Guidelines Standard 9 (2021)	Gender Strategy (FY 2016-2023) (2015)
Goals	<u>Adequate</u> -Incorporates some gender equal rights framing, such as gender equal access to public infrastructure and social services	<u>Strong</u> - Frames gender mainstreaming as a cross-cutting issue in all activities - Protects women's human rights - Embeds GE in its business model	<u>Adequate</u> - As an Action Plan, builds on the bank's Strategy of embedding GE in business models - Aims to embed GE framing within relevant operations	<u>Strong</u> -Centers a broad range of gendered issues in the Standard's goals -Integrates an intersectional lens in the Standard's goals	<u>Strong</u> -Centers a broad range of gendered issues in the Standard's goals -Integrates an intersectional lens in the Standard's goals	<u>Adequate</u> - Focuses on GE as a sound economic policy - Acknowledges GE reproductive and land ownership rights - Lacks GER in other areas
Priorities	<u>Weak</u> -Focuses on gender equal representation in the private sector but less so in the public Sector except for regarding elected positions	<u>Strong</u> - Promotes GE in all project phases - Invests in broad GE issues, such as employment opportunities, social infrastructure, and the care economy	<u>Adequate</u> - Adds institutional development on gender to existing EIB pillars - Updates GE content for staff capacity-building -Excludes LGBTQ+ people from policy priorities	<u>Adequate</u> -Prioritizes key gender issues including SGBV risk, unpaid care work, equal pay, and access to resources -Describes the need to advance gender equity in the private sector but not the	<u>Strong</u> -Aims to achieve gender equity in project participation and benefits and prevent gender harms -Integrates an intersectional lens throughout Standard priorities	<u>Adequate</u> -Aims to remove barriers to women's employment and asset ownership- Includes a detailed description of the state of gender inequality globally

				public sector		
Mandate	<u>Adequate</u> - Voluntary - Includes clear and detailed mechanisms to support the scaling up of gender activities across the EBRD - Sets inadequate gender goals	<u>Strong</u> - Voluntary - Ensures GE in due diligence - Incorporates GE considerations into Environmental and Social Principles and Standards	<u>Weak</u> - Voluntary - Contains accountability mechanisms within the ESP	<u>Weak</u> - Explains that the applicability of the Standard will be established “during the environmental and social risk and impact identification process,” indicating that some projects may not be required to adhere to the Standard	<u>Weak</u> - Voluntary - Requires that Borrowers only conduct Gas if their project screening finds risks	<u>Weak</u> - Voluntary - Expands requirements for gender inclusion in operations
Gender and Climate Change	<u>Adequate</u> - Includes many objectives and indicators focused on better including women in the green economy - Ignores how women and LGBTQ+ people are disproportionately at risk of harm due to climate change impacts and fails to protect against these impacts	<u>Weak</u> - Ignores how women and LGBTQ+ people are disproportionately affected by climate change - Provides no mechanisms to ensure women are and LGBTQ+ people are equitably integrated into climate change response efforts	<u>Weak</u> - Ignores how women and LGBTQ+ people are disproportionately affected by climate change - Provides no mechanisms to ensure women are and LGBTQ+ people are equitably integrated into climate change response efforts	<u>Weak</u> - Does not include any mention of climate change in Standard - Ignores how women and LGBTQ+ people are disproportionately at risk of harm, violence, and displacement due to climate change impacts and fails to protect against these impacts	<u>Weak</u> - Does not include any mention of climate change in Standard - Ignores how women and LGBTQ+ people are disproportionately at risk of harm, violence, and displacement due to climate change impacts and fails to protect against these impacts	<u>Weak</u> - Ignores how women and LGBTQ+ people are disproportionately affected by climate change - Recognizes the need to integrate gender into climate change in future
Gender, Environment and Biodiversity	<u>Weak</u> - Ignores women’s, particularly indigenous women’s,	<u>Weak</u> - Ignores women’s, particularly	<u>Adequate</u> - Requires that projects assess environmental	<u>Weak</u> - Ignores women’s, particularly indigenous	<u>Weak</u> - Ignores women’s, particularly indigenous	<u>Weak</u> - Ignores women’s, particularly

	role in stewarding the environment and biodiversity -Ignores how harms to the environment and biodiversity disproportionately harm women	indigenous women's, role in stewarding the environment and biodiversity -Ignores how harms to the environment and biodiversity disproportionately harm women	risks using a gender lens -Ignores women's, particularly indigenous women's, role in stewarding the environment and biodiversity	women's, role in stewarding the environment and biodiversity -Ignores how harms to the environment and biodiversity disproportionately harm women	women's, role in stewarding the environment and biodiversity except during discussions of resettlement	indigenous women's, role in stewarding the environment and biodiversity -Ignores how harms to the environment and biodiversity disproportionately harm women
Mechanisms	<u>Strong</u> -Includes clear and detailed mechanisms to engender operations -Lays out a detailed implementation strategy, including a timeline for each of the implementation components	<u>Adequate</u> - Disseminates good practices - Proposes M&E practices including data collection and monitoring "as appropriate" but lacks a firm commitment	<u>Adequate</u> - Provides an in-depth and detailed list of activities under consideration, but does not provide tools or work plans - Sets goals for data collection, management, and results monitoring - Lacks tools for implementation	<u>Adequate</u> -Provides a detailed description of GA implementation strategy -Fails to require that all Borrowers complete Gas and gender harm mitigation strategies Provides no timeline or targets for implementation of strategy activities	<u>Weak</u> -Provides a detailed description of the GA implementation strategy but does not require all projects include Gas and gender harm mitigation strategies -Provides no timeline or targets for implementation of Strategy activities	<u>Adequate</u> - Develops GE frameworks, best practices, partnerships, and capacity-building - States that the Country Management Units will oversee GE operations as part of the Bank's country-driven strategy - Emphasizes working with public and private sectors

[Annex 3] Part IV

IFI	EBRD	EIB	EIB	IDB	IDB	World Bank
Policies (7 – 12) / Indicators 6-10	Strategy for the Promotion of Gender Equality 2021-2025 (2021)	The EIB Group Strategy on Gender Equality and Women's Economic Empowerment (2016)	EIB Group Gender Action Plan (2018)	IDB Environmental and Social Policy Framework, Standard 9 (2021)	IDB ESPF Guidelines Standard 9 (2021)	Gender Strategy (FY 2016-2023) (2015)

Staffing	<p><u>Strong</u></p> <ul style="list-style-type: none"> -Requires that all Bank staff attend Gender Academy -Provides a sufficient description of the Gender Academy structure, format, themes, and assessments 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Promotes analytical tools, guidance, and trainings for GE - Lacks dedicated gender staff and staff incentives 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Provides staff with tools and resources for gender mainstreaming - Delivers capacity-building program for staff and senior management - Lacks incentives for staff to engage with GE efforts 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Provides no timeline or targets for implementation of strategy activities -Does not indicate that projects will hire gender experts 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Does not require gender equity in project staffing -Does not indicate that projects will hire gender experts except where SGBV risk is high -Fails to require any gender equity training for project staff except on SGBV issues 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - Offers voluntary tools and training - Lacks clear language on gender training, staff requirements, and incentives
Gender Monitoring & Evaluation	<p><u>Adequate</u></p> <ul style="list-style-type: none"> -Includes crucial gender indicators in M&E description -Encourages collection of gender-disaggregated data - Does not specify how often indicators will be measured 	<p><u>Weak</u></p> <ul style="list-style-type: none"> - M&E only lightly mentioned by calling for the development of a system for sex-disaggregated data collection, results measurement, and monitoring - Lacks tools or frameworks to support these efforts 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Suggests developing a system for sex-disaggregated data collection, results measurement and monitoring “whenever possible and relevant” - Plans to complete an evaluation of policy implementation in 2021, but does not make this evaluation publicly available on EIB website 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Includes no description of monitoring and evaluation mechanisms to oversee Standard implementation - Does not specify whether initial baseline and subsequent monitoring and evaluation gender-disaggregated data will be collected by projects except in cases of resettlement 	<p><u>Weak</u></p> <ul style="list-style-type: none"> -Fails to include any monitoring and evaluation mechanisms for gender equity in projects that do not complete Gas -Fails to require publicly-available monitoring and evaluation progress reports on implementation of the Standard 	<p><u>Adequate</u></p> <ul style="list-style-type: none"> - Collects sex-disaggregated data - Creates partnerships for GE data - Focuses on data collection to monitor countries but not Bank operations

Sexual and Gender Minorities	<u>Adequate</u> -Acknowledges discrimination against LGBTQ+ I -Fails to fully integrate LGBTI people into the Gender Strategy objectives, implementation strategy, or monitoring framework	<u>Weak</u> - Mentions that sexual orientation can exacerbate gender-based vulnerability and exclusion - Lacks guidelines, initiatives, and funding	<u>Weak</u> - Fails to mention LGBTQ+ people, or sexual and gender minorities	<u>Strong</u> -Integrates particular needs of LGBTI people throughout the Standard -Integrates particular needs of LGBTI people throughout the Standard	<u>Strong</u> -Integrates particular needs of LGBTI people throughout the Standard -Integrates particular needs of LGBTI people throughout the Standard	<u>Weak</u> - References a staff resource guide concerning “sexual and gender minority women” but proposes the Bank address sexual orientation and gender identity going forward
Sexual & Gender-based Violence and SEAH	<u>Strong</u> -Includes multiple objectives that focus on reducing GBVH and integrates reduction of GBVH throughout	<u>Weak</u> - Acknowledges SGBV as an issue - Lacks guidelines, initiatives, and funding for SGBV - Includes no measures to prevent harm to LGBTQ+ people who are at disproportionate risk of SGBV and SEAH	<u>Adequate</u> - Prioritizes recognizing and addressing SGBV and SEAH as a negative gendered result of projects - Revises due diligence frameworks to mitigate potential SGBV risks	<u>Strong</u> -Requires that Borrowers assess and prevent risks of project-related SGBV, define and implement measures to prevent and address SGBV, and respond promptly and appropriately to incidents of SGBV	<u>Strong</u> -Requires that Borrowers assess and prevent risks of project-related SGBV, define and implement measures to prevent and address SGBV, and respond promptly and appropriately to incidents of SGBV	<u>Strong</u> - Supports SGBV response interventions, and integrates SGBV components across sectors - Creates SGBV staff resources
Unpaid Care Work	<u>Strong</u> -Repeatedly calls attention to women’s disproportionate responsibility for unpaid care work -Includes multiple objectives that focus	<u>Strong</u> - Invests in projects related to care economy enterprises - Supports social infrastructure that benefits women participating in care work	<u>Strong</u> - Prioritizes investing in the care economy - Outlines steps to begin supporting care infrastructure	<u>Adequate</u> -Recognizes women’s care workload, but does not attempt to lessen the unpaid care workload on women, such as	<u>Adequate</u> -Recognizes that most unpaid care work falls on women and requires that projects consider women’s unpaid	<u>Adequate</u> - Acknowledges that women are disproportionately responsible for care work and plans to scale up the supply of care centers for young children

	on addressing women's unpaid care workload and integrates alleviating this workload throughout			through investments in child and elder-care	care workload when assessing project gender risks -Does not require measures to lessen the workload of unpaid care on women, such as through investments in child and eldercare	
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Annex 4: Comparative Analysis & Ranking: 12 ESFs assessed against 13 indicators

Due to page size limitations, the table is broken into four parts:

Part I contains the first six ESFs (ADB 2009, AfDB 2022 [draft], AIIB 2021, BOAD 2015, CDB 2014, EBRD 2019) and the first eight indicators.

Part II continues these six ESFs with the final five indicators.

Part III contains the last six ESFs (EIB 2018, IDB 2020, IDB Invest 2020, IFC 2012, NDB 2016, World Bank 2018) and the first eight indicators.

Part IV continues the last six ESFs with the final five indicators.

[Annex 4] Part I

IFI	ADB	AfDB	AIIB	BOAD	CDB	EBRD
ESF Documents (1-6)/ Gender sensitivity Indicators (1-8)	Safeguard Policy Statement (2009)	Updated Integrated Safeguards System (2022)[draft]	Environmental and Social Framework (2021)	Environmental and Social Management in the Financing of Projects (2015)	Environmental and Social Review Procedures (2014)	Environmental and Social Policy (2019)
Gender Mandate/ Safeguard	<u>Adequate</u> - Requires gender issues be addressed in the three SPS safeguard priority areas (environment, involuntary resettlement, and indigenous peoples) - Lacks a do no harm gender safeguard	<u>Adequate</u> -Lacks a standalone gender safeguard that requires Borrowers to promote gender equity in all projects	<u>Weak</u> -Lacks a mandatory gender standard -Encourages but does not mandate that projects identify gender-specific impacts	<u>Weak</u> - Directs all projects to the Bank's gender mainstreaming policy - Lacks a do no harm gender safeguard	<u>Weak</u> - Lacks a do no harm gender safeguard	<u>Adequate</u> - Suggests clients identify potential disproportionate adverse gender impacts and develop mitigation measures to reduce them - Lacks a do no harm gender safeguard
Gender in Environmental and Social Risk Assessments	<u>Weak</u> - Fails to require that gender be incorporated into environmental and social risk assessments	<u>Weak</u> -Requires that projects complete an in-depth Social Assessment, which involves a more in-depth gender risk assessment, only	<u>Weak</u> -Encourages but does not require projects to incorporate gender into all risk assessments -Fails to set any measures or	<u>Adequate</u> - Suggests gendered risk assessments for some project categories - Fails to require that gender be incorporated into	<u>Adequate</u> - Fails to require that gender be incorporated into environmental and social risk assessments - Requires gender analyses that include	<u>Strong</u> - Incorporates gender throughout the risk assessment process - States that clients will conduct additional risk assessments when there are worker

		when “the screening process determines that potential adverse impacts on vulnerable groups are present”	requirements to ensure that a gender-lens is incorporated into the risk assessment process	environmental and social risk assessments	collection of gender-disaggregated data in projects pre-screened to be high-risk	gender and health issues
Gender Dimensions of Debt	<u>Weak</u> -Ignores how ADB debt-based financing to governments dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how AfDB debt-based financing to governments dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing for projects inevitably dilutes spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing for projects inevitably dilutes spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing for projects inevitably dilutes spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Adequate</u> -Does not recognize how debt-based financing for projects inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people
Gender Discrimination and Rights	<u>Weak</u> - Lacks protective mechanisms against gendered discrimination although GRMs exist to resolve project complaints - Fails to require training for project staff on GERs and non-discrimination	<u>Adequate</u> -Requires that Borrower manages the risks and adverse impacts of projects on vulnerable individuals and groups -Requires that projects complete an in-depth Social Assessment, which involves a more in-depth gender risk assessment, only	<u>Weak</u> -Requires that projects identify the risk of discrimination for vulnerable groups, which includes women but not LGBTQ+ people, and incorporate mitigation measures “as necessary” -Fails to integrate a gender rights framework into the ESF	<u>Weak</u> - Lacks protective mechanisms against gendered discrimination - Fails to require training for project staff on GERs and non-discrimination	<u>Adequate</u> - Ensures that employment practices require non-discrimination on the grounds of sex, as well as measures to prevent harassment, intimidation, and/or exploitation, especially in regard to women - Lacks staff training on gender non-discrimination and GERs	<u>Strong</u> - States that employment decisions cannot be made on the basis of sexual orientation or gender identity - Requires protection from harassment, exploitation, abuse, and gendered violence - Requires project staff training on ES safeguards

		when “the screening process determines that potential adverse impacts on vulnerable groups are present”				
Gender and Climate Change	<u>Weak</u> -Ignores how women and LGBTQ+ people are disproportionately impacted by climate change -Fails to integrate a gender-lens into climate protection and adaptation measures	<u>Weak</u> -Does not acknowledge or account for the disproportionate impact of climate change on women, particularly indigenous women, and LGBTQ+ people	<u>Weak</u> -Mentions climate change numerous times but fails to discuss its particularly harmful impacts on poor women and LGBTQ+ people - Fails to integrate a gender-lens into climate protection and adaptation measures	<u>Weak</u> -Mentions climate change just three times in the ESF, which is particularly alarming as climate change is an issue that has disastrous impacts for all people, especially poor women, and LGBTQ+ people	<u>Weak</u> -Ignores how women and LGBTQ+ people are disproportionately impacted by climate change -Ignores how women and LGBTQ+ people are disproportionately impacted by climate change	<u>Adequate</u> -States that gender ‘aspects and risks’ caused by climate change ‘shall be considered throughout the assessment process but provides no further details
Gender, Environment and Biodiversity	<u>Weak</u> -Fails to require targeting women and LGBTQ+ people with environmental and climate protection measures	<u>Weak</u> -Treats environmental and gender risks as separate issues, ignoring the intersection and compounding effects of these risks	<u>Adequate</u> -Notes that Indigenous Peoples and women play an essential role in “managing and protecting the environment” -Does not acknowledge or account for the disproportionate impact of environmental harm on women,	<u>Weak</u> -Fails to address gender in relation to environmental protection or biodiversity	<u>Weak</u> -Fails to integrate any gender-lens into efforts to improve environmental quality and ecological services and promote biodiversity protection -Ignores women’s unique role in protecting biodiversity and the environment	<u>Weak</u> -Includes a Performance Requirement about biodiversity conservation but fails to mention gender whatsoever

			particularly indigenous women			
Gender and Information Disclosure	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Adequate</u> -Explains that project information must be accessible and culturally appropriate for vulnerable groups, which includes women and LGBTQ+ people -Fails to set gender-sensitive requirements about project information outreach	<u>Adequate</u> -Requires that projects provide relevant information about environmental and social risks to project-affected people and states that this dissemination process should be gender-inclusive -Fails to set detailed, gender-sensitive requirements about project information outreach	<u>Adequate</u> - Requires informing women and other vulnerable people of project details related to resettlement - Fails to specify gender-sensitive information disclosure requirements when projects do not cause resettlement - States that projects must make intentional efforts to include vulnerable and rural groups – including women – who are often difficult to reach	<u>Weak</u> - Fails to require that project staff disclose all known project information to affected women, men and LGBTQ+ people	<u>Strong</u> - Requires that information be disclosed in an accessible manner prior to project start with regard to gender, language, literacy, and other vulnerability factors but only in resettlement situations
Gendered Consultations and Consent	<u>Weak</u> - Requires that all consultations are “gender inclusive and responsive” but lacks specifics - Fails to specify that consultations take place during project	<u>Weak</u> -Fails to specify accommodations to ensure the inclusion of LGBTQ+ people in consultations -Fails to require consent from all project-affected	<u>Adequate</u> -Requires that projects provide forums for meaningful public consultations, that are ‘gender-inclusive, accessible, responsive’	<u>Weak</u> - Requires FPIC but only for indigenous people in some circumstances - Includes gender-specific consultations at project preparation and	<u>Adequate</u> - Requires that borrower conducts meaningful consultations that are “gender inclusive and responsive” - Highlights the interests of both women and men in	<u>Adequate</u> - Provides consultation and outreach plan, which must be tailored to gender needs - Includes specific characteristics for engaging vulnerable groups, including women

	identification prior to project design	women, men and LGBTQ+ people	-Requires free, prior and informed consent only in territories where the law mandates consent -Fails to require accommodations to ensure inclusion of LGBTQ+ people in consultations	implementation stages	resettlement consultations in selecting compensation options, development packages and mitigation measures - Fails to require projects obtain explicit consent let alone by gender	- Fails to require consultations prior to project design
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[Annex 4] Part II

IFI	ADB	AfDB	AIIB	BOAD	CDB	EBRD
ESF documents (1-6)/ Gender sensitivity Indicators (8-13)	Safeguard Policy Statement (2009)	Updated Integrated Safeguards System (2022)[draft]	Environmental and Social Framework (2021)	Environmental and Social Management in the Financing of Projects (2015)	Environmental and Social Review Procedures (2014)	Environmental and Social Policy (2019)
Gender in Resettlement and Compensation	<u>Weak</u> - Requires compensation at full replacement cost and tries to improve standards of living to at least minimum standards for “displaced poor and other vulnerable groups, including women” - Ensures that displaced persons without titles or legal	<u>Adequate</u> -Requires that Borrower “pays particular attention to gender impacts” when designing a project that may cause resettlement -Does not require that resettlement processes take sexuality into account even though	<u>Adequate</u> -States that resettlement processes should take “gender into account” -Does not require that resettlement processes take sexuality into account -Does not require that resettlement processes take	<u>Adequate</u> - Requires that women, including landless women, are represented and thus able to express concerns throughout resettlement planning and implementation - Includes mechanisms for women to communicate	<u>Weak</u> - Suggests that projects ‘pay particular attention to the interests of both men and women in resettlement’ - Fails to address the issue of land rights in regions where women are not legally recognized landowners	<u>Strong</u> - Requires gender assessments, surveys, and monitoring within resettlement processes - Outlines mechanisms for women to participate in resettlement processes - Requires clients to analyze women’s land ownership and co-ownership to determine compensation - Allows women and

	rights to land are eligible for compensation, but fails to connect this issue to predominantly women's lack of legal land rights - Lacks requirement for gendered consent on resettlement	LGBTQ+ people often face legal discrimination and may have less access to formal land tenure	sexuality into account	concerns to project authorities - States that social and economic compensation benefits for Indigenous Peoples should be gender-inclusive		men to request alternatives to land and/or cash compensation - Requires consent from all project-affected individuals
Gender Monitoring and Evaluation (M&E)	<u>Adequate</u> - Lacks requirement for gender-disaggregated baseline and subsequent M&E data collection - Requires gender-disaggregated data only for economic and socio-cultural conditions of displaced persons in resettlement social impact assessments	<u>Weak</u> -Fails to create clear gender-disaggregated standards for project assessments -Lacks gender-specific mechanisms for M&E	<u>Weak</u> -Lacks gender-specific mechanisms for M&E and fails to mention gender whatsoever in the ESF M&E requirements section	<u>Adequate</u> - Lacks requirement for non-resettlement gender-disaggregated baseline data	<u>Adequate</u> - Requires that resources be allocated to conduct analyses (such as gender analyses) that includes the collection of sex-disaggregated data in projects pre-screened to be risky - Fails to require gender-disaggregated baseline data, lacks gender-specific M&E guidance	<u>Adequate</u> - Fails to require gender-disaggregated baseline data for project activities except resettlement - Requires client to conduct socio-economic surveys that identify gender issues and collect gender-disaggregated baseline data, during resettlement
Sexual and Gender Minorities (SGM)	<u>Weak</u> - Fails to mention SGMS - Lacks protective mechanisms for SGMS	<u>Weak</u> -Includes LGBTQ+ people in their definition of vulnerable groups, meaning the Bank recognizes that this group is more at risk of harm and exclusion from project benefits	<u>Weak</u> -Fails to mention LGBTQ+ people at any point, despite the fact that many LGBTQ+ people live in project-affected areas	<u>Weak</u> - Fails to mention SGMS - Lacks protective mechanisms for SGMS	<u>Weak</u> - Fails to mention SGMS - Lacks protective mechanisms for SGMS	<u>Adequate</u> - Defines vulnerability as being affected by "gender, gender identity [...] and sexual orientation" - States that employment decisions cannot be made on the basis of sexual orientation or gender identity

		-Fails to meaningfully engage with issues faced by LGBTQ+ people or account for the particular vulnerabilities of this population				- Lacks additional protective mechanisms for SGMs
SGBV and SEAH	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for SGBV and harassment victims, as well as SGBV and harassment training for project staff	<u>Adequate</u> -Requires that the Borrower ensures that “women, girls and children, in particular, are protected from SEAH and GBV” -Requires Borrowers to protect all project workers against SGBV and SEAH -Ignores the disproportionate impacts of SVSH on LGBTQ+ people -Fails to require that all project staff undergo training about SVSH prevention	<u>Adequate</u> -Notes the need to assess and manage the risk of SVSH caused by the influx of workers -Requires that project GRMs are equipped to deal with instances of SVSH -Ignores the disproportionate impacts of SVSH on LGBTQ+ people	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff	<u>Adequate</u> - Requires that borrowers implement measures to prevent harassment, intimidation, and/or exploitation, especially in regard to women in employment - States that occupational health and safety screenings should give attention to specific risks for women’s safety, including safety from sexual and gender-based violence - Lacks survivor reporting, grievance, and accountability processes specific to SGBV and SEAH survivors	<u>Strong</u> - Requires that clients develop mitigation and prevention measures to reduce sexual harassment, exploitation and abuse, gender-based violence, bullying, and intimidation - Acknowledges the risk of SGBV from outside workers on local communities - Guarantees confidential reporting processes and support mechanisms for those reporting abuse
Gendered Labor	<u>Weak</u> - Lacks labor protection for women and SGMs	<u>Adequate</u> -Notes that Borrowers must “protect project workers, including	<u>Weak</u> -Notes that project GRMs should be equipped to deal with “gender-	<u>Weak</u> - Lacks labor protection for women and SGMs	<u>Weak</u> - Fails to require gender-specific protections for hiring	<u>Strong</u> - Includes explicit labor protections for women - Requires intrahousehold analysis

	- Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	vulnerable workers such as women” -Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	related workplace concerns” -Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	- Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	practices and contractors -Provides weak non-discrimination standards	to assess labor divisions in the home - Specifies gender hiring standards for contractors - Requires reducing potential health and injury risks, especially for women identified by risk assessments
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[Annex 4] Part III

IFI	EIB	IDB	IDB Invest	IFC	NDB	WB
ESF documents (7-12) / Gender sensitivity Indicators (1-8)	Environmental and Social Standards (2018)	Environmental and Social Policy Framework (2020)	Environmental and Social Sustainability Policy (2020)	Performance Standards (2012)	Environmental and Social Framework (2016)	Environmental and Social Framework (2018)
Gender Mandate/ Safeguard	<u>Adequate</u> - Includes a Standard on the Rights and Interests of Vulnerable People that focuses primarily on women - Fails to mention gender within additional social standards	<u>Strong</u> -Notes that the ESPF has a stand-alone gender equality standard -Connects Gender Equality Standard to other standards -Includes “fostering gender equality” as a key priority	<u>Weak</u> -Lacks a standalone gender standard	<u>Weak</u> - Lacks direct mention of and protection for women and SGM - Fails to include a do no harm gender safeguard	<u>Weak</u> - Lacks a do no harm gender safeguard	<u>Weak</u> - Lacks a do no harm gender safeguard
Gender in Environmental and Social Risk Assessments	<u>Weak</u> - Fails to require gender be incorporated into impact assessments	<u>Strong</u> -Includes a gender lens in the Assessment and Management of	<u>Adequate</u> -Requires that clients identify and address gender-related risks	<u>Weak</u> - Fails to incorporate gender into environmental and social risk assessment	<u>Weak</u> - Expects all impact assessments to address gender issues but fails to	<u>Weak</u> - Fails to require that gender be incorporated into risk assessments

		Environmental and Social Risks and Impacts Standard, requiring borrowers to assess risk of gender-based exclusion, gender-based violence, and “potential discrimination risks based on gender and sexual orientation”	-Explains that IDB Invest carries out a gender risk screening assessment as part of the environmental and social due diligence for investments with potential gender-based risks	processes	specify further what that should incorporate - Suggests ensuring that the risk assessment process consider women’s equality in employment	- Overlooks women and SGMs within the social risk assessments’ definition of a ‘vulnerable group’
Gender Dimension of Debt	<u>Weak</u> -Ignores how debt-based financing to governments, requiring repayment, inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Indicates that the IDB provides a variety of financing options, including policy-based loans (PBLs) but most PBLs are excluded from the ESPF -Ignores how debt-based financing to governments, requiring repayment, inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing to governments, requiring repayment, inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing to governments, requiring repayment, inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing to governments, requiring repayment, inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people	<u>Weak</u> -Ignores how debt-based financing to governments, requiring repayment, inevitably dilutes public spending on the poor composed disproportionately of women and LGBTQ+ people
Gender Discrimination and Rights	<u>Weak</u> -Requires non-discrimination based on gender grounds	<u>Adequate</u> -Requires that clients assess and address gender	<u>Weak</u> -Requires that clients assess and address gender	<u>Weak</u> - Prohibits discrimination on the basis of sex or gender	<u>Weak</u> - Lacks clear definitions, protective	<u>Weak</u> - Mentions women within discrimination and equal opportunity

		risks for all projects -Recommends that Borrowers consider gender equal rights training for contractors	risks for all projects but does not provide details -Fails to integrate a gender rights framework into the ESF	yet fails to provide compliance mechanisms and guidance - Lacks protective mechanisms and staff training on discrimination and GERS	mechanisms, and staff training on discrimination and GERS	procedures - Lacks protective mechanisms and staff training on discrimination and GERS
Gender and Climate Change	<u>Weak</u> -Fails to mention gender in relation to climate change -Ignores the disproportionate impact of climate change on women and LGBTQ+ people	<u>Weak</u> -Fails to mention gender in relation to climate change -Ignores the disproportionate impact of climate change on women and LGBTQ+ people	<u>Weak</u> -Notes that climate change poses a particular threat to vulnerable populations -Does not account for the disproportionate impact of climate change on women and LGBTQ+ people	<u>Weak</u> -Fails to integrate a gender-lens into this assessment process -Fails to require a gender-lens in environmental and climate change adaptation efforts	<u>Weak</u> -Fails to integrate a gender-lens into climate assessments processes -Fails to address the need to include a gender-lens in proposed environmental and climate change adaptation efforts	<u>Weak</u> -Fails to integrate a gender-lens into climate assessments processes -Fails to address the need to include a gender-lens in proposed environmental and climate change adaptation efforts
Gender, Environment and Biodiversity	<u>Weak</u> -Fails to mention gender in relation to the environment, biodiversity, and land stewardship	<u>Weak</u> -Includes one mention of gender in the Biodiversity Conservation and Sustainable Management of Living Natural Resources Standard - Fails to require a gender-lens in environmental protection efforts	<u>Weak</u> -Does not account for the disproportionate impact of environmental harm on women, including indigenous women	<u>Weak</u> -Promotes gender inclusive land and natural resource assessments and consideration of women's role in their management -Does not account for the disproportionate impact of environmental harm on women and LGBTQ+ people	<u>Weak</u> -Does not account for the disproportionate impact of environmental harm on women, including indigenous women	<u>Weak</u> -Does not account for the disproportionate impact of environmental harm on women, including indigenous women - Fails to mention gender in relation to resource and land and biodiversity stewardship except with regard to Indigenous Peoples

Gender and Information Disclosure	<u>Weak</u> -Fails to outline specific gender-inclusive mechanisms for all project disclosure processes	<u>Strong</u> -Describes strong methods to ensure women and LGBTQ+ people are included in information disclosure process	<u>Adequate</u> -Requires that clients undertake “meaningful stakeholder engagement, disclosure, outreach and communication to affected communities” that is “equitable and non-discriminatory, and free of intimidation” -Fails to set detailed, gender-sensitive requirements about project information outreach	<u>Adequate</u> - States that women should be informed and consulted during planning, implementation, monitoring, and evaluation of resettlement compensation - Fails to incorporate gender requirements into other project disclosure processes	<u>Weak</u> - Fails to require disclosure of all known project information prior to project design in ways that take into account illiteracy and access to media which usually disadvantages women more than men	<u>Adequate</u> -Includes a specific community engagement process for indigenous people, with a requirement to be gender-inclusive -Fails to set detailed, gender-sensitive requirements about project information outreach
Gendered Consultations and Consent	<u>Weak</u> -Mentions FPIC only in relation to the indigenous peoples’ safeguard; fails to require FPIC for all genders who are not indigenous -Does not include mechanisms to ensure inclusion of LGBTQ+ people in consultations	<u>Adequate</u> -Notes that Free, Prior and Informed Consent (FPIC) is required from indigenous peoples but does not require consent from all project-affected people -Requires project consultations to occur at accessible times but makes no other gender accommodations	<u>Adequate</u> -Requires that clients ensure the inclusion of all genders in the consultation processes -Requires FPIC only when a project is likely to “generate potential significant adverse impacts on Affected Communities”	<u>Weak</u> - Requires gender-sensitive consultations only for resettlement processes - Fails to require project consent from women, men and SGMs prior to project design	<u>Adequate</u> - States that consultations must be gender-inclusive and responsive - Requires meaningful consultation but Fails to require consultations prior to project design	<u>Weak</u> -Fails to require FPIC for all project-affected people who must have the opportunity to accept or deny a project -Fails to require accommodations to ensure the inclusion of LGBTQ+ people in consultations

[Annex 4] Part IV

IFI	EIB	IDB	IDB Invest	IFC	NDB	WB
ESF documents (7-12) / Gender sensitivity Indicators (8-13)	Environmental and Social Standards (2018)	Environmental and Social Policy Framework (2020)	Environmental and Social Sustainability Policy (2020)	Performance Standards (2012)	Environmental and Social Framework (2016)	Environmental and Social Framework (2018)
Gender in Resettlement and Compensation	<u>Strong</u> -States that in cases where national law fails to recognize women's property rights, 'measures should be considered to provide women as much protection as possible' -Includes compensation benefits for women (skills training, access to credit, and job opportunities) -Includes compensation benefits for women (skills training, access to credit, and job opportunities)	<u>Adequate</u> -Requires that consultation processes in instances of resettlement are gender-inclusive -Includes some gender-sensitive recommendations for resettlement but fails to require these provisions	<u>Weak</u> -Indicates vaguely that the resettlement and compensation processes will be gender-sensitive - Does not require that resettlement processes take sexuality into account even though LGBTQ+ people often face legal discrimination and are less likely to have access to formal land tenure	<u>Adequate</u> - Stipulates that the resettlement consultation process should ensure that 'women's perspectives are obtained, and their interests factored into all aspects of resettlement planning and implementation' - Does not require that resettlement processes take sexuality into account	<u>Adequate</u> - Requires a gender-sensitive social impact assessment during resettlement planning processes - Specifies that clients must pay particular attention to women, including those without legal land titles -Does not require that resettlement processes take sexuality into account	<u>Adequate</u> - States that in cases where national law fails to recognize women's property rights, 'measures should be considered to provide women as much protection as possible' - Includes compensation benefits for women (skills training, access to credit, and job opportunities) - Suggests that women's preferences for compensation mechanisms (such as land replacement or alternative access to natural resources) should be explored
Gender Monitoring and Evaluation (M&E)	<u>Weak</u> - Fails to mention gender, women, LGBTQ+ people or gender-disaggregated	<u>Weak</u> -Does not include a gender lens in the description of the IDB's M&E practices	<u>Weak</u> -Lacks gender-specific mechanisms for M&E and fails to mention gender	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and	<u>Weak</u> - Lacks requirement for gender-disaggregated baseline and

	baseline and subsequent tracking data in M&E mechanisms or guidance		whatsoever in descriptions of project monitoring efforts -Fails to require the collection of any gender-disaggregated data	subsequent M&E data collection	subsequent M&E data collection	subsequent M&E data collection
Sexual and Gender Minorities	<u>Weak</u> -Fails to mention SGMs; lacks protective mechanisms for LGBTQ+ people	<u>Strong</u> -Uses gender-inclusive language throughout the framework -Integrates particular needs of LGBTQ+ people throughout the framework	<u>Weak</u> -Includes LGBTQ+ people in its definition of 'vulnerable populations' but fails to meaningfully address the needs of LGBTQ+ people	<u>Weak</u> - Fails to mention SGMs except in employment non-discrimination - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs - Lacks protective mechanisms for SGMs	<u>Weak</u> - Fails to mention SGMs; lacks protective mechanisms for SGMs ¹⁰
SGBV and SEAH	<u>Weak</u> -Fails to mention SGBV, or protect against violence in offices, worksites, and project sites	<u>Strong</u> -Includes addressing SGBV against women and LGBTQ+ people as a priority in the framework -Notes that Borrowers must create a grievance mechanism for project-related workers that is equipped to deal with instances of SGBV and SEAH	<u>Weak</u> -Requires that clients identify and address risks of SGBV and SEAH but provides no further detail on what these processes will entail -Fails to require that GRMs are gender-sensitive or equipped to deal with instances of SVSH	<u>Weak</u> - Requires that clients take measures to prevent and address harassment, intimidation and exploitation -Lacks protection for SGBV in all project-affected areas - Lacks additional protection for SGBV, such as grievance and accountability processes and	<u>Weak</u> - Fails to require protection against SGBV and harassment - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff	<u>Weak</u> - Fails to mention SGBV, or protect against violence in offices, worksites, and project sites except with regard to children - Lacks grievance and accountability processes for project-affected people, as well as SGBV and harassment training for project staff ¹¹

¹⁰The World Bank SOGI Good Practice Note also incorporates guidance on preventing harm to SGMs.

¹¹Complementing the ESF the WB provides a Sexual Orientation and Gender Identity (SOGI) Good Practice Note (GPN) to help Bank staff support borrower implementation of ESFs. The thorough SOGI GPN recognizes the LGBTQI+ spectrum multiple areas where additional protections(s) are needed for transgender people; and protection against SGBV and harassment of SGMs.

				training for project staff		
Gendered Labor	<u>Adequate</u> -States that Borrowers must “provide appropriate measures of protection and assistance for women project workers” but excludes LGBTQ+ workers -Fails to outline specific protection mechanisms for women and LGBTQ workers	<u>Strong</u> -Mandates that Borrower prevents gender discrimination in employment for workers -Suggests that Borrowers will hold trainings on gender non-discrimination and sensitivity for project staff and collect gender-disaggregated employment data	<u>Weak</u> -Makes no mention of gender in the Labor, Health and Safety section and lacks specific labor protections for women and LGBTQ+ people	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Weak</u> - Lacks labor protection for women and SGMs - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols	<u>Adequate</u> - States that Borrowers must ‘provide appropriate measures of protection and assistance’ for women project workers - Fails to mention gender in relation to hiring practices, occupational health, and safety protocols