



MAINTAINING A ROLE FOR WOMEN'S ORGANIZATIONS IN INTERNATIONAL DEVELOPMENT FINANCE

A GUIDE ON HOW TO EFFECTIVELY ENGAGE WITH
INTERNATIONAL FINANCIAL INSTITUTIONS IN THE MENA
REGION ON GENDER EQUALITY AND CIVIC SPACE

This production has been financed by Sida, the Swedish International Development Cooperation Agency. Responsibility for the content rests entirely with the creator. Sida does not necessarily share the expressed views and interpretations.

This report provides an overview of selected International Financial Institution (IFI) policies that are focused on gender equality and civic space, with a particular focus on the MENA region. The report sets out how IFIs interact with gender equality and civic space (in particular in Egypt, Jordan and Tunisia); summarizes how they contribute to gender equality; and sets out concrete recommendations for those stakeholders involved in the landscape on how to, jointly, maximize IFIs impact on gender equality and civic space.

Author: Floor Knoote, Dimes Consultancy

The Kvinna till Kvinna Foundation

Editors: Charlotte Pruth, Monica Erwér, Ane Birk

Reference group: Marie Wikström, Rebecca Sonntag, Linda Säll, Sahar Yassin, Amani Rizq

Design: Johanna Lingaas Türk

TABLE OF CONTENTS

ABBREVIATIONS	4
GLOSSARY OF TERMS	6
1. INTRODUCTION AND SCOPE	10
A. JUSTIFICATION FOR STUDY.....	11
B. SCOPE	12
INSTITUTIONAL FOCUS	12
C. METHODS AND LIMITATIONS	13
D. UTILITY OF DOCUMENT.....	15
2. IFI MANDATES AND WORK IN THE MENA REGION.....	16
A. IFI MANDATES AND OPERATIONAL MECHANISMS	17
THE INTERNATIONAL MONETARY FUND AND THE WORLD BANK GROUP	17
EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT AND THE EUROPEAN INVESTMENT BANK	19
THE AFRICAN DEVELOPMENT BANK AND ISLAMIC DEVELOPMENT BANK	21
NOTE ON POLICY VERSUS PROJECT LENDING	21
A NOTE ON THE FINANCIAL ACTION TASK FORCE.....	23
B. FINANCIAL COMMITMENTS OF IFIS TO THE MENA REGION AND TO EGYPT, JORDAN AND TUNISIA	24
3. IFIS, GENDER AND CIVIL SOCIETY – AN ANALYSIS OF POLICY, RHETORIC AND PRACTICE	27
A. GENERAL: WHERE DO IFIS GENDER AND CIVIL SOCIETY INTERSECT?	28
B. OVERVIEW OF SPECIFIC STRATEGIES AND POLICIES APPLICABLE TO GENDER AND CIVIL SOCIETY	30
C. HOW IFI POLICIES WORK IN PRACTICE	33
MACRO-ECONOMIC POLICIES	33
COUNTRY FRAMEWORKS AND LOAN AGREEMENTS	34
GENDER EQUALITY STRATEGIES	36
MONITORING, RESEARCH, DATA COLLECTION AND INFORMATION DISCLOSURE PROCEDURES.....	43
OPERATIONALIZING CSO AND CIVIL ENGAGEMENT THROUGH OUTREACH DEPARTMENTS.....	48

SOCIAL FRAMEWORKS, SAFEGUARD AND ACCOUNTABILITY MECHANISMS.....	50
FINANCIAL INTEGRITY (CFT AND AML) POLICIES.....	52
D. IFI EFFECTS ON GENDER GLOBALLY	53
<u>4. HOW IFIS WORK FOR GENDER AND CIVIC SPACE IN EGYPT, JORDAN AND TUNISIA.....</u>	<u>56</u>
A. ANALYSIS OF IFI INVOLVEMENT WITH GENDER AND CIVIL SOCIETY IN MENA	57
REGIONAL GENDER ACTION PLANS.....	57
ENGAGEMENT AND AWARENESS OF LOCAL STAKEHOLDERS IN THE MENA REGION	60
SHRINKING CIVIC SPACE.....	63
B. OVERVIEW AND ANALYSIS OF IFI CONTRIBUTIONS TO GENDER IN EGYPT, JORDAN AND TUNISIA.....	65
EGYPT.....	65
JORDAN.....	68
TUNISIA	72
<u>5. RECOMMENDATIONS</u>	<u>75</u>
RECOMMENDATIONS TO IFIS	76
MACRO-ECONOMIC POLICY LEVEL:	76
COUNTRY FRAMEWORKS AND LOAN AGREEMENTS:	76
GENDER POLICIES AND STRATEGIES:	77
MONITORING:	77
SAFEGUARDS:.....	78
FINANCIAL INTEGRITY POLICIES (AML/CFT)	78
CSO ENGAGEMENT AND CONSULTATION.....	78
To CSOs BASED IN THE MENA REGION	80
To CSOs BASED IN THE NORTH	81
INTERNATIONAL ORGANIZATIONS (UN AGENCIES)	81
To NORTHERN GOVERNMENTS	82
<u>ANNEX 1: IFI FOCUS PER COUNTRY</u>	<u>83</u>
<u>ANNEX 2: WORLD BANK GENDER STRATEGY RESULTS FRAMEWORK.....</u>	<u>84</u>
<u>ANNEX 3: INTERVIEW GUIDE</u>	<u>85</u>
<u>ANNEX 4 SELECTION OF IFI ACTIVITIES IN EGYPT, JORDAN AND TUNISIA</u>	<u>90</u>

Abbreviations

AFDB	African Development Bank
AML	Anti-Money Laundering
CFT	Countering the Financing of Terrorism
CIDA	Canadian Development Agency
CPIA	Country Policy and Institutional Assessment CPF Country Partnership Framework
CPF	Country Partnership Framework (WB)
CPR	Country Performance Rating
CSO	Civil society organizations
CSW	Commission on the Status of Women (UN)
DPF	Development Policy Financing
DPL	Development Policy Lending
DPO	Development Policy Operations
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EFF	Extended Fund Facility (IMF)
ENI	European Neighbourhood Instrument
ENP	European Neighbourhood Policy
EU	European Union
EIB	European Investment Bank
FATF	Financial Action Task Force
FCS	Fragile and Conflict Affected Situations
FDI	Foreign direct investment
FSA	Financial Sector Assessments
GBV	Gender Based Violence
IBRD	International Bank for Reconstruction and Development
ICR	Implementation Completion and Results Report
IDA	International Development Association I
IDB	Islamic Development Bank
IEG	Independent Evaluation Group of the World Bank
IEO	Independent Evaluation Report
IFC	International Finance Corporation
IFI	International financial institutions
IMF	International Monetary Fund
IPF	Investment Project Financing
ISR	Implementation Status and Results Report
MENA	Middle East and Northern Africa
MoU	Memorandum of Understanding
ODA	Official Development Assistance
OECD	Organization for Economic Co-operation and Development
OP	Operational Policy

PRSP Poverty Reduction Strategy Papers
PSI Policy Support Instrument
SAP Structural Adjustment Programmes
SCD Systematic Country Diagnostic (WB)
SEA Sexual Exploitation and Abuse
SEMED Southern and Eastern Mediterranean Countries
SIDA Swedish Development Cooperation Agency
SME Small and Medium-sized Enterprises
UN United Nations
USAID United States Agency for International Development
WB World Bank
WBG World Bank Group
WEE Women's Economic Empowerment

Glossary of Terms

Term	Explanation
Bretton Woods Institutions	Collective name for World Bank Group and the International Monetary Fund (IMF), institutions established in 1944 at Bretton Woods, New Hampshire, USA.
Conditionality	Practice of requiring members to adopt changes in their domestic economic policies as a condition for receiving balance of payments loans from the fund. Economic policies or structural reforms that [borrowing] members agree to follow as a condition for the use of IMF and World Bank resources [loans] often called performance criteria or benchmarks.
Correspondent Bank	A bank, located in one geographic area, that accepts deposits from a bank in another region and provides services on behalf of this other bank. Internationally, many banks maintain one account with a correspondent bank in each major country so as to be able to make payments in all major currencies. Correspondent banks are usually established on a reciprocal basis, with the two banks maintaining local currency accounts with each other.
Country Assistance Strategy	Outlines the programme of policy reforms and projects for which the World Bank provides loans. The CAS document describes the Bank Group's strategy based on an assessment of priorities in the country, and also indicates the level and composition of assistance to be provided based on the strategy and the country's portfolio performance.
Covenant	Agreement in a syndicated loan or bond contract concerning the borrower's future conduct. Such a covenant may involve, for example, the agreement to maintain a given balance sheet ratio in the future, or the agreement to adhere to an IMF program/World Bank program.
Cross Conditionality	Practice of including World Bank-related programme conditions in IMF programmes and vice-versa. Such actions should be reduced

	under new guidelines on streamlining conditions.
European Bank for Reconstruction and Development (EBRD)	The EBRD is a multilateral bank founded in 1991 and promotes the development of the private sector and entrepreneurial initiative in 38 economies across three continents. The Bank is owned by 68 countries as well as the EU and the EIB. EBRD investments are aimed at making the economies in its regions competitive, inclusive, well-governed, green, resilient and integrated .
European Investment Bank (EIB)	A regional development bank focusing on intra-EC development, established in 1958 by the members of the European Community.
European Neighborhood Policy (ENP)	The EU's general policy framework for interaction with its immediate neighbors.
European Neighborhood Instrument	The financial arm of the European Neighbourhood Policy, the EU's foreign policy towards its neighbours to the East and to the South.
International Finance Corporation (IFC)	Part of the World Bank Groups established to make equity investments and development loans to the private sector in developing countries, in forms which can be sold to other investors and/or converted into equity.
International Monetary Fund (IMF)	An international institution created to provide a forum in which nations can jointly examine each other's economic policies, discuss the operation of the international monetary system, and negotiate revisions in international monetary relations. The objectives of the Fund include supervising the exchange market intervention of member nations, providing the financing needed by members to overcome short-term payments imbalances, and encouraging monetary cooperation and international trade among nations.
IMF Letter of Intent	Letter from a government to the IMF outlining planned economic reforms to be made in relation to receiving an IMF loan. It includes a matrix of conditions that must be implemented in order to access the IMF's resources.

Independent Evaluation Office	Independent office to carry out independent evaluation of IMF activities, operations and programs.
Inspection Panel	Office that addresses the concerns of populations affected by the World Bank's operations and ensures they adhere to the institution's operational policies and procedures regarding the design, preparation and implementation of a project.
International Financial Institutions	Financial institution that has been established (or chartered) by more than one country, and hence are subjects of international law. Its owners or shareholders are generally national governments, although other international institutions and other organizations occasionally figure as shareholders.
Middle Income Countries	Middle Income Countries (MICs) are a diverse group by size, population, and income level. They are defined as lower middle-income economies - those with a GNI per capita between \$1,006 and \$3,955; and upper middle-income economies - those with a GNI per capita between \$3,956 and \$12,235 (World Bank definition, 2018).
Structural Adjustment Loans	Large loans made by the World Bank or IMF to developing countries which may carry strict financial and budgetary obligations or required reforms intended to open recipient countries to private investment and increase the recipient's competitiveness in the global economy. Reforms are usually orientated towards liberalization, privatization and reduction in government expenditure.
World Bank (International Bank for Reconstruction and Development)	A creation of the Bretton Woods negotiations in July 1944, the bank began operations in June 1946. The original intent of the bank was to make postwar reconstruction loans, a role soon supplanted by the Marshall Plan. The bank consequently shifted its attention to development lending. Funds for lending are obtained from the paid-in capital subscriptions of member nations, from borrowings in the world's capital markets, and from net earnings.

World Bank Group	The World Bank Group consists of five different organizations. The International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA) primarily provide financing, policy advice and technical assistance to governments. IDA's mandate is to focus on poorer countries, while the IBRD assists middle-income and creditworthy poorer countries.
-------------------------	--

World Development Report	WDR is the World Bank's major analytical publication, printed annually.
---------------------------------	---

A photograph of three women in a meeting or workshop. One woman in the foreground is wearing a patterned red and blue top. Another woman in the middle is wearing glasses and a patterned top. A third woman in the background is wearing a beige hijab and a white top, looking down at a document. There are water bottles and a whiteboard in the background.

1. INTRODUCTION AND SCOPE

a. Justification for Study

International Financial Institutions (IFIs) have increasingly recognized that gender equality is a precondition to sustainability and poverty reduction and that they need to increase efforts to close the gender gap through development lending, investment projects and research. Over the last few years, most IFIs have thus developed policies and strategies to address gender inequality at global, regional and national levels, which could potentially have great impact on priorities in individual countries through their cooperation mechanisms. Simultaneously, IFIs formally implement the “ownership principle” (as set out in the Paris Declaration on Aid Effectiveness¹) emphasizing the need for country ownership and the critical role of e.g. parliaments and civil society organizations (CSOs) in ensuring ownership of and feeding into development processes. In order to ensure the latter, IFIs have each set up dedicated CSO and citizen engagement strategies, through which (and other avenues) they engage in information sharing, policy dialogue, strategy consultation, and institutional partnerships.

However, during the past years, the world has seen a backlash in the areas of democracy and civic space and increasing attacks on human rights defenders. This backlash has been shown to impact women’s (rights) organizations disproportionately, demonstrated by security as well as financial concerns – the latter demonstrated by the decreased financial operating space of organizations due to CSO laws and countering the financing of terrorism (CFT) regulations.² **To counteract the impacts on CSOs, women’s active participation** in policy domains – including voicing and monitoring the effects on the ground

¹ OECD (2005) The Paris Declaration on Aid Effectiveness and the Accra Agenda for Action (2008). <http://www.oecd.org/dac/effectiveness/34428351.pdf> The Paris Declaration on Aid Effectiveness emphasizes the need for more country ownership in the context of international aid. It defines ownership as a situation in which “partner countries exercise effective leadership over their development policies and strategies and co-ordinate development actions”. It also states that donors should “base their overall support on partners’ national development strategies” and “draw conditions from these strategies”.

² See e.g.: Duke University and WPP (2017). <https://law.duke.edu/sites/default/files/humanrights/tighteningpursestrings.pdf>

and being able to firmly be part of developing solutions – **is crucial, also in the case of IFI policies.**

A strategic approach for women's organizations to make use of existing IFI policies, strategies and cooperation criteria in supporting them to respect and promote civic space, gender equality, and women's economic opportunities, needs to be based on a solid understanding of the current policy landscape, of (selected) country efforts, and of relevant international and national stakeholders to engage within this process. Following the launch of the World Bank Gender Action Plan for the Middle East and Northern Africa (MENA) region, this report aims to provide an overview of this landscape for MENA; to set out how IFIs interact with gender equality and civic space in the region (with a particular focus on Egypt, Jordan and Tunisia); show how they contribute to gender equality; and set out concrete recommendations for those stakeholders involved in the landscape on how to, jointly, maximize their positive impact on gender equality and civic space. The report has as a primary purpose to build the understanding of CSOs in the Kvinna till Kvinna network on IFI policy in the region.

b. Scope

Institutional Focus

The World Bank (IBRD), International Monetary Fund (IMF), International Finance Corporation (IFC), European Investment Bank (EIB) and European Bank for Reconstruction and Development (EBRD) are the main focus of this report as these institutions represent the biggest financial proportion of IFIs operating in the three focus countries. Extensive attention is given to the World Bank³ because a) the availability of data and information on the WB gender strategy b) the availability of a WB Regional Gender Action Plan for MENA and c) as the first IFI

³ Also based on the finding that: more information is available for the World Bank; the World Bank has a specific explicit action plan for the MENA region in place; and based on Kvinna till Kvinna's preference

it has long set the example on gender and CSO engagement that the other IFIs have more or less followed.⁴

The following institutions that play a role in the region have fallen beyond the scope of this study but will be briefly mentioned: the African Development Bank, the Islamic Development Bank, the European Union (EU) Investment Instrument, and the Financial Action Task Force (of which all three countries are members). The African Development Bank has not taken taken priority in this report as it is not operational in Jordan. Its Gender Policy, however, is included for the purpose of comparison throughout the report. The Islamic Development Bank invests heavily in the region, however, does not have a stand-alone gender strategy and its lack of transparency on efforts led the author to decide to exclude it.

Figure 1: International Financial Institutions in Focus



c. Methods and Limitations

A qualitative and investigative approach was taken to compile this report, basing the analysis on as many primary and secondary sources the writer could find within the timeframe. A range of academic research, policy

⁴ As stipulated by numerous IFI and gender publications and by gender advocates (e.g. Gender Action, Bretton Woods Project)

documents and CSO reports were studied. **The researcher interviewed a total of 55 key informants**, consisting of women's organizations, researchers and journalists in Egypt, Jordan and Tunisia, country offices of the IFIs, institutional gender and CSO departments of IFIs, experts globally, regionally and nationally. She conducted these interviews either over Skype or in person (in Jordan and Egypt). The researcher used a set of guiding questions to conduct the interviews, with ample room for adaptation to stakeholder expertise. Annex 3 provide the Guiding Questions.

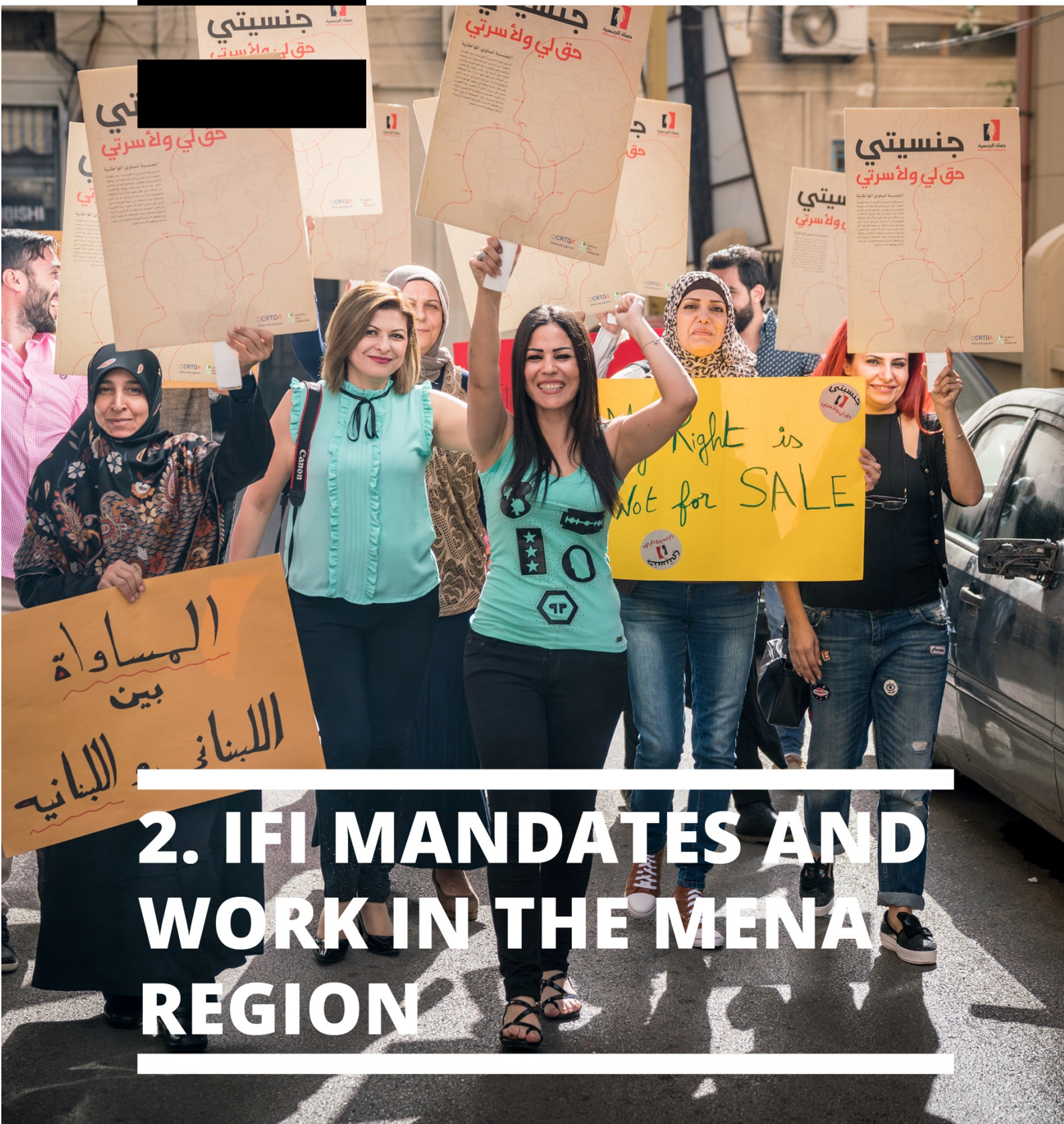
Limitations of this study include that:

- There is limited data available on impacts of IFI policies on gender and civic space in the region and it was beyond the scope of this evaluation to conduct an impact evaluation of such policies. A qualitative approach was taken to assess the contributions of IFIs to gender equality in the MENA region, so positive and negative impacts cannot be derived from this study. More research is needed to confirm the findings on impact;
- The researcher did not talk to all relevant bilateral donors or CSOs that could be relevant to this topic, but chose a selected sample to build on, while considering factors such as gender balance, diversity in location and including both non-governmental, governmental and independent research institutions;
- The researcher did not manage to get in touch with the World Bank's CSO department or with the MENA World Bank regional office, in spite of numerous emails and outreach attempts. The author's aim to ensure these institutions receive a chance to provide a commentary on the final version of the publication;
- Due to the shrinking space to operate for civil society in the region and the risk that some relevant CSOs are facing, not all relevant local CSOs were interviewed considering security concerns.

d. Utility of Document

The author envisions this document to serve the following purpose:

- A **provision of an overview of current IFI efforts** in the MENA region;
- A **“Toolkit” for (women’s) rights organizations** in the MENA region;
- A **starting point for dialogue** with IFIs on gender and civic space in the MENA region.



2. IFI MANDATES AND WORK IN THE MENA REGION

CRTD.A, demonstrating for equal citizenship rights. Lebanon. Photo: Christopher Herwig

This chapter provides an overview of the mandates of the five IFIs (World Bank, International Finance Corporation, International Monetary Fund, European Bank for Reconstruction and Development, European Investment Bank), how these get involved on a country level, what their priorities are in the three focus countries and what kind of financial commitments they have given to them.

a. IFI Mandates and Operational Mechanisms

The International Monetary Fund and the World Bank Group

Both the World Bank and International Monetary Fund were established in 1944 at the Bretton Woods Conference in the United States. The IMF and World Bank frequently employ **cross-conditionality**, meaning that a government is required to be in compliance with one institution's conditions in order to access funds from the other. From its initiation, both institutions provide loans to countries that experienced economic crises, called **Structural adjustment programs (SAPs)**. In the 1990's, these programs were often criticized for implementing generic free-market policy and for their lack of involvement from the borrowing country, so through the main instruments currently offered, country engagement is more encouraged as they operate under different names.⁵

The IMF's primary and best-known role is that of a lender, while it also conducts research and engages with member countries to provide **advice on macroeconomic policies**. The **Extended Fund Facility** (EFF) is the main mechanism that has provided funds to the MENA region. Extended arrangements are normally approved for periods not exceeding three years, with a maximum extension of up to one year where appropriate. When a country borrows from the IMF, it commits to undertake policies to overcome its

⁵ To increase the borrowing country's involvement, countries are now encouraged to draw up Poverty Reduction Strategy Papers (PRSPs) by the World Bank, which essentially take the place of SAPs. The content of PRSPs has turned out to be similar to the original content of bank-authored SAPs. Within the IMF, the Enhanced Structural Adjustment Facility was succeeded by the Poverty Reduction and Growth Facility, which is in turn succeeded by the Extended Fund Facility.

economic and structural problems. Under an Extended Fund Facility, these commitments, including specific **conditionality**⁶ are expected to have a strong focus on structural reforms to address institutional or economic weaknesses, in addition to policies that maintain macroeconomic stability. The Fund remains a strong promoter of deregulation, low inflation targets, and **constrained public expenditure**.

The World Bank is made up of several institutions, including the **International Development Association (IDA)**, the **International Bank for Reconstruction and Development (IBRD)** and the **International Finance Corporation (IFC)** which together comprise the “World Bank Group.” Poor countries are eligible to receive grants and discounted loans from International Development Association, while middle-income countries receive loans at near-market interest rates from International Bank for Reconstruction and Development. As they are considered middle income countries, in the MENA region, few countries are therefore eligible to access funds by the International Development Association. Egypt, Jordan and Tunisia graduated from the International Development Association in 1999, 1978 and 1977 (respectively), meaning they were no longer eligible⁷ to borrow from this institution. Instead, they now borrow from the International Bank for Reconstruction and Development under different interest rates.

The two major financing instruments of the World Bank Group are **Investment Project Financing (IPF)** and **Development Policy Financing (DPF)**. The first instrument

⁶ When a country borrows from the IMF, its government agrees to adjust its economic policies to overcome the problems that led it to seek financial aid. These policy adjustments are conditions for IMF loans and serve to ensure that the country will be able to repay the IMF. This system of conditionality is designed to promote national ownership of strong and effective policies.

⁷ To be eligible, a country has to have the following requirements: 1) Relative poverty defined as GNI per capita must be below an established threshold (updated annually). In fiscal year 2019, this was \$1,145 & 2) Lack of creditworthiness to borrow on market terms and therefore have a need for concessional resources to finance the country's development program.

is for projects in the area of physical or social infrastructure, and also serves as a vehicle for sustained, global knowledge transfer and technical assistance. The second is a form of budget support to the national government or a subnational division for a program of policy and institutional actions to help achieve sustainable, shared growth and poverty reduction⁸. The highest decision-making body of the World Bank Group is its Board of Governors, made up of two representatives from each of the 189 member countries. The **World Bank Group shareholder** system ensures that power within the Board of Governors rests securely with the economically most powerful countries – with the US effectively holding veto power over major decisions given its 16 per cent quota.

The International Finance Corporation provides loans and equity financing, advice and technical services to **businesses investing** in developing and “transition” countries.⁹ An equity investment is the purchase of shares in a company or project. **Providing advice** is a critical part of IFC’s strategy to create markets and mobilize private investment. Through this work, they help establish conditions that will attract the most private capital, enabling the private sector to grow.¹⁰ The International Finance Corporation is striving to address economic issues in the MENA region by supporting the region’s private sector, helping to create jobs and drive sustainable growth while it earns profit on its own private investments.¹¹

European Bank for Reconstruction and Development and the European Investment Bank

In the context of the renewed approach to the **European Neighborhood Policy (ENP)** by the European Union, the

⁸ <http://projects-beta.worldbank.org/en/projects-operations/products-and-services>

⁹ A transition economy or transitional economy is an economy which is changing from a centrally planned economy to a market economy. None of the Arab (Spring) States fall in this category as they are considered “middle income” countries

¹⁰ https://www.ifc.org/wps/wcm/connect/CORP_EXT_Content/IFC_External_Corporate_Site/Solutions/Products+and+Services/Advisory

¹¹ https://www.ifc.org/wps/wcm/connect/region_ext_content/ifc_external_corporate_site/middle+east+and+north+africa/priorities

new financial instrument, namely the **European Neighborhood Instrument (ENI)**, is the key financial instrument for 16 partner countries to the East and South of the EU's borders (Algeria, Armenia, Azerbaijan, Belarus, Egypt, Georgia, Israel, Jordan, Lebanon, Libya, Moldova, Morocco, Occupied Palestinian Territory, Syria, Tunisia and Ukraine). It provides EUR **15 billion in funds** (not loans) (dedicated for 2014-2020) to programs in the region, focusing on issues such as human rights, justice reform, and gender.¹²

The European Investment Bank (EIB) is the in-house bank of the European Community and therefore **the lending arm** of the European Union. With more than EUR 50 billion of approved loans per year the European Investment Bank is also the biggest international public financial institution operating globally. The Bank is headquartered in Luxembourg with an increasing number of regional offices set up in recent years.¹³ The Bank should meet European Union objectives through its loans, and thus **promote sustainable development** inside the Union and out. In addition, the Bank should ensure **the additionality of its loans**, to arrange loans for projects that although financially and socially viable make them unappealing to more commercial lenders. The Bank is financed by the **EIB shareholders** – the member states of the European Union – that jointly provide the Bank's capital through their respective contributions reflecting their economic weight within the Union. With regards to the MENA region, the EIB involvement has been evident for several decades. The launch of the **Euro – Mediterranean Investment and Partnership Facility (FEMIP)** in 2002 represents an important intensification of a more than 30-year financial partnership between the region and the EIB.¹⁴

¹² <https://www.euneighbours.eu/en/policy/european-neighbourhood-instrument-eni>

¹³ <https://www.eib.org/en/about/governance-and-structure/index.htm>

¹⁴ <https://www.eib.org/en/projects/regions/med/trust-fund/index.htm>

The European Bank for Reconstruction and Development is owned by 68 countries from five continents, as well as the European Union and the European Investment Bank.¹⁵ The European Union, the European Investment Bank and EU Member States collectively own 62.8 per cent of the capital of the European Bank for Reconstruction and Development. Since 2011 it has extended its operations to the Southern and Eastern Mediterranean (SEMED) countries. Since it began working in the region, donors and shareholders have contributed more than €250 million in **technical cooperation** (TC) and **non-TC instruments** to support specific investments. Its focus has been on making the economies of the southern and eastern Mediterranean region more competitive and resilient, fostering expansion of the private sector **and promoting policy dialogue**.¹⁶ Figure 2 provides a visual overview of the 5 IFI mandates and focus areas. In Annex 1 priority focus areas of each of the 5 IFIs for Egypt, Jordan and Tunisia are summarized.

The African Development Bank and Islamic Development Bank
The **African Development Bank** aims to spur sustainable economic development and social progress in its regional member countries. In the MENA region they focus only on Tunisia and Egypt, mostly on infrastructure projects. The **Islamic Development Bank** on the other hand is focused primarily on bringing together the public and private sectors through Public Private Partnerships. US\$49.4 billion has gone to the MENA region, mainly in the energy sector.¹⁷

Note on Policy versus Project lending

In reading this document, **it is important to distinguish between policy and project loans and investments**. On the one hand, policy lending and financing provides financing to help a borrower address actual or anticipated development financing requirements. It is a form of budget

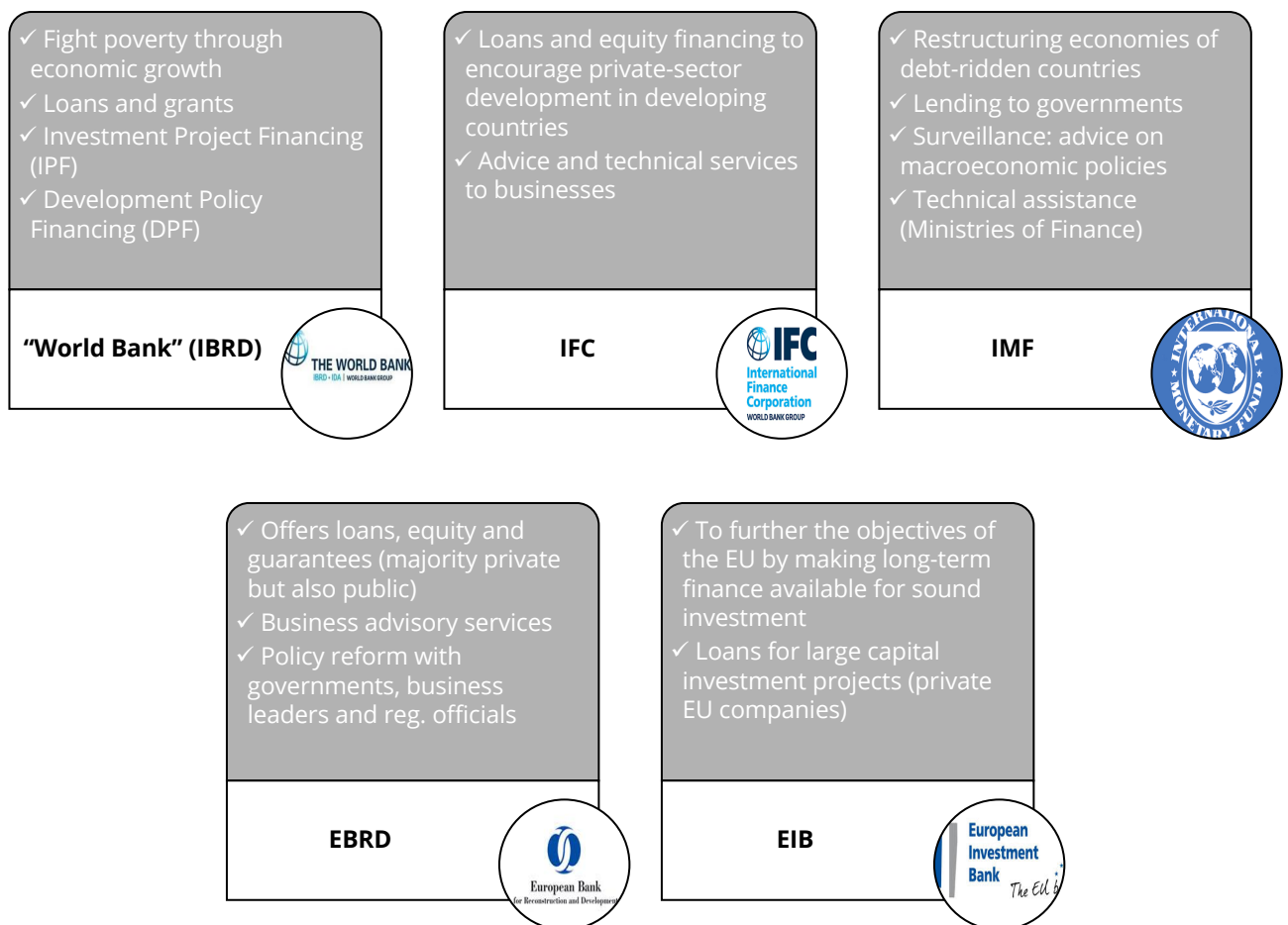
¹⁵ <https://www.ebrd.com/shareholders-and-board-of-governors.html>

¹⁶ <https://www.ebrd.com/the-EBRD-and-the-SEMED.html>

¹⁷ Egypt: 3.6 billion, 473 projects (Mostly Energy and Mining); Jordan: 219 million, 231 projects (Health, Agriculture, Trade); Tunisia: 36 million, 188 projects (Finance and Trade)

support to the national government or a subnational division. It aims to support the borrower in **achieving sustainable development through a program of policy and institutional actions**, for example, strengthening public financial management, improving the investment climate, addressing bottlenecks to improve service delivery, and diversifying the economy. On the other hand, project financing targets projects in the area of physical or social infrastructure. Private and public sector sponsors of infrastructure, industrial and other commercial projects in countries are looking increasingly to the project finance structure to fund these operations. IFIs have an array of financial instruments to support these projects as well. Throughout this document, we will make clear which gender and accountability policies apply to which type of financing.

Figure 2: IFI Mandates Summary



A Note on the Financial Action Task Force

While not an IFI, the **Financial Action Task Force (FATF)** is an organization worth mentioning due to its potential impact on both IFIs and national financing mechanisms as well as CSOs in the MENA region. The FATF is an “independent inter-governmental body that develops and promotes policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction,”¹⁸ with its Secretariat housed at the headquarters of the Organization for Economic Cooperation and Development (OECD) in Paris, France. It is comprised of 35 Member States, two regional bodies (the European Commission and the Gulf Co-operation Council), and several associate members. In addition, more than twenty international organizations including the International Monetary Fund (IMF) and the World Bank have observer status.¹⁹ Established in 1989 by The Group of 7 (G-7) countries, the Financial Action Task Force was initially mandated to focus on the prevention of money laundering through its 40 Recommendations. One FATF Recommendation, No. 8 (103) (**Recommendation 8**) on “Non-profit organisations” (NPOs) until its revision on June 27, 2016 had characterized NPOs as being “particularly vulnerable” to terrorist financing abuse²⁰ which has had direct implications for civil society.

While the Recommendations are technically non-binding, they “have been endorsed by over 180 countries, and are universally recognized as the international standard for anti-money laundering and countering the financing of terrorism”.²¹ The FATF Standards have been incorporated in

¹⁸ <http://www.fatf-gafi.org/about/fatfsecretariat/>

¹⁹ <http://www.fatf-gafi.org/about/membersandobservers/>

²⁰ For previous text of Recommendation 8 prior to revisions, see FATF Report, Risk of Terrorist Abuse in Non-Profit Organisations ¶ 1 (2014), <http://www.fatf-gafi.org/media/fatf/documents/reports/Risk-of-terrorist-abuse-in-non-profit-organisations.pdf> [hereinafter Typologies Report], in Duke & WPP (2017).

²¹ FATF Recommendations, *supra* note 84, at 7: <http://www.fatf-gafi.org/publications/fatfrecommendations/documents/fatf-recommendations.html#UPDATES>

multilateral instruments, including U.N. Security Council resolutions²² and are utilized by entities such as the World Bank and International Monetary Fund.²³ At the domestic level, countries' progress in implementing the FATF Recommendations are monitored through mutual evaluations and countries deemed non-compliant **face various adverse consequences, including isolation from global financial markets.**²⁴ All three focus countries are members of Financial Action Task Force, Jordan's mutual evaluation is planned in 2020 and a preliminary discussion on assessment of Egypt in 2020.²⁵

b. Financial Commitments of IFIs to the MENA region and to Egypt, Jordan and Tunisia

A budget is allocated by IFIs to each country framework, plan or strategy. Table 1 below summarizes what each of the five IFIs (have) dedicate(d) in funding to the region. This table is based on the most recent numbers found in public documents and websites of the IFIs.

Table 1: IFI Financial Commitments to MENA region (based on most recent loan periods)

Institution	MENA	Egypt	Jordan	Tunisia
World Bank	USD 6.3 billion in new	19 projects, total	DPL: USD 1,45 billion	USD 349 million

²² In Duke & WPP (2017) S.C. Res. 1617, ¶ 7, U.N. Doc. S/RES/1617 (2005); S.C. Res. 2129, ¶ 17, U.N. Doc. S/RES/2129 (2013); S.C. Res. 2195, ¶ 5, U.N. Doc. S/RES/2195 (2014); S.C. Res. 2199,

Preamble, U.N. Doc. S/RES/2199 (2015); S.C. Res. 2253, ¶¶ 16–17 U.N. Doc. S/RES/2253 (2015). See also The United Nations Global Counter-Terrorism Strategy, G.A. Res 60/288, II ¶ 10, U.N. Doc. A/RES/60/288 (Sept. 20, 2006)

²³ FATF Recommendations, *supra* note 84, at 8 (the FATF standards are accessed rigorously “through the assessment processes of the International Monetary Fund and the World Bank – on the basis of the FATF’s common assessment methodology.”)

²⁴ Kathryn L. Gardner, *Fighting Terrorism the FATF Way*, 13 *Global Governance* 325, 333 (2007), In Duke & WPP (2017).

²⁵ [http://www.fatf-gafi.org/calendar/assessmentcalendar/?hf=10&b=0&s=asc\(document_lastmodified_date\)&table=1](http://www.fatf-gafi.org/calendar/assessmentcalendar/?hf=10&b=0&s=asc(document_lastmodified_date)&table=1)

	commitments to region in 2018 ²⁶	commitment of USD 7.8 billion ²⁷	total commitment to Jordan to USD 2.78 billion ²⁸	commitment for 2019 ²⁹
IFC	More than USD 2 billion investment with 83 active advisory projects to region ³⁰	N/A	N/A	N/A
IMF	N/A	Outstanding purchases and loans: USD 7 billion ³¹	3-year extended arrangement under the EFF: USD 723 million ³²	Outstanding purchases and loans USD 1.3 billion ³³
EBRD	EUR 9.4 billion in 222 projects in the region to date ³⁴	93 projects: EUR 5 billion ³⁵	42 projects: EUR 1,05 billion ³⁶	40 projects; EUR 8,5 billion ³⁷
EIB	2017: EUR 1.9 billion EUR loan to the Southern Neighborhood countries ³⁸	25% of 2017 loan & USD 15 million for	6% of 2017 loan + planned extended EUR 870	EUR 2.1 billion in financing to Tunisia since 2011. 2018 new financing

²⁶ <https://www.worldbank.org/en/news/press-release/2018/07/31/world-bank-support-to-middle-east-and-north-africa-reaches-record-us63-billion-in-2018>

²⁷ <https://www.worldbank.org/en/news/press-release/2017/12/08/world-bank-and-egypt-sign-us-dollars-1-5-billion-loan-to-boost-economy-create-jobs>

²⁸ <https://www.worldbank.org/en/news/press-release/2018/06/27/supporting-jordans-economic-growth-through-job-creation-and-social-safety-nets>

²⁹ <https://www.worldbank.org/en/country/tunisia/overview>

³⁰ https://www.ifc.org/wps/wcm/connect/REGION_EXT_Content/IFC_External_Corp_orate_Site/Middle+East+and+North+Africa

³¹ <https://www.imf.org/en/News/Articles/2016/11/11/PR16501-Egypt-Executive-Board-Approves-12-billion-Extended-Arrangement>

³² <https://www.imf.org/en/News/Articles/2016/08/25/PR16381-Jordan-IMF-Executive-Board-Approves-US-723-million-Extended-Arrangement>

³³ <https://www.imf.org/en/News/Articles/2015/09/14/01/49/pr16238>

³⁴ <https://www.ebrd.com/the-EBRD-and-the-SEMED.html>

³⁵ <https://www.ebrd.com/egypt.html>

³⁶ <https://www.ebrd.com/jordan.html>

³⁷ <https://www.ebrd.com/tunisia.html>

³⁸ https://www.eib.org/attachments/country/access_to_finance_in_the_eu_neighborhood_and_enlargement_countries_en.pdf

Economic Resilience Initiative: EUR 1.8 billion investments + 19 projects in Egypt, Jordan, Lebanon, Morocco and Tunisia ³⁹	Egypt Mid-Cap fund ⁴⁰	million during 2019-20	operations EUR 205 million approved ⁴¹
--	----------------------------------	------------------------	---

³⁹ <https://www.eib.org/en/press/all/2018-173-the-eib-reinforces-its-support-to-the-mediterranean-region.htm>

⁴⁰ <https://www.eib.org/en/press/all/2017-233-eib-provides-usd-15-million-for-egypt-mid-cap-fund.htm>

⁴¹ <https://www.eib.org/en/press/all/2018-329-forse-mobilisation-de-la-bei-en-tunisie.htm>



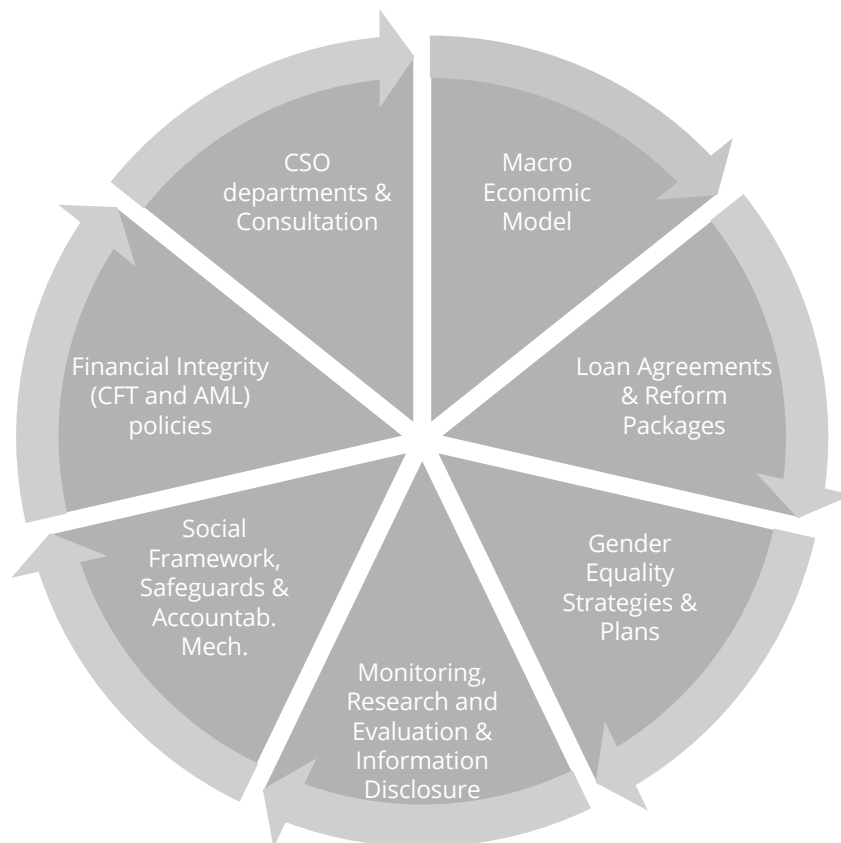
3. IFIs, GENDER AND CIVIL SOCIETY – AN ANALYSIS OF POLICY, RHETORIC AND PRACTICE

Closing ceremony of the project Political Academy for Women 2017 run by Aswat Nissa. Tunisia. Photo: Aswat Nissa

This chapter sets out in what ways international financial Institutional *policies* intersect with both gender and civil society and why it is important to be informed about these policies (3a).⁴² Chapter 3b provides an overview of the specific strategies and policies where gender and CSOs are mentioned and/or targeted in the five focus IFIs. Chapter 3c provides an analysis of how these strategies and policies work in practice, based on available research and documentation and on several interviews.

a. General: Where do IFIs Gender and Civil Society Intersect?

Figure 3: Where IFIs, Gender and Civil Society intersect



⁴² This based on an analysis and categorization created by the author.

Table 2: Summary of Intersection areas: IFIs gender and CSOs

Intersection Area	Description
Macro-economic Policies	<p>IFIs are normsetters of what is acceptable macroeconomic policy. The type of macro-economic policies that are implemented by IFIs can impact women in varying ways. Research has shown that IFI policy-based loans and advice can disproportionately harm poor women, who often become “shock absorbers” for neoliberal economic reforms like trade liberalization and privatization.</p> <p>Recognition of e.g. progressive means to create the fiscal space needed to invest in social welfare and recognition of the informal or care economy in these policies can impact women positively.</p>
Loan Agreements	<p>The country loan agreements based on country strategies that IFIs implement stipulate how much the institution is prepared to lend during that timeframe, what projects or policies it intends to support, and what non-lending activities it will pursue. These can include a gender focus or not. CSOs can play a role in flagging country priorities.</p>
Gender Equality Strategies	<p>IFIs have developed policies and strategies to address gender inequality and leverage the untapped potential of women in emerging markets. These strategies are often the main point of reference for any IFI gender focused work or impacts. They describe how IFIs aim to include gender into loan agreements and investments, how gender is monitored and whether gender risk assessments are conducted before disbursement of loans or start of projects.</p>
Monitoring, Research and Evaluation, and Information Disclosure Policies	<p>IFIs produce a huge number of research outputs every year: some flagship publications shape global opinions; data collection findings serve to design loan conditionalities in countries; and monitoring data aims to assess IFIs own progress on impacts. These studies are thus key to follow. In addition, each of the IFIs have recognized the right to information by establishing information disclosure policies. Understanding these policies and understanding the information databases will help civil society demand access to IFI documents and data when needed. In addition, each IFI has an independent evaluation group which is an institutional channel that CSOs can use: these regularly evaluate different areas of IFI policy or operations.</p>
Social Frameworks, Safeguard and Accountability Mechanisms	<p>Social and environmental standards, “safeguard policies,” establish mandatory procedures that the IFI and their clients must follow when preparing and implementing the projects they finance. They are designed to provide minimum protections to the environment and vulnerable populations (such as women) from the negative effects of these operations, and also provide important opportunities for civil society participation and access to information. IFIs also have internal accountability mechanisms to which affected communities can appeal when IFIs fail to comply. CSOs can and do play a big role in flagging lack of compliance and in filing complaints.</p>

Financial Integrity (CFT and AML) policies	IFIs have financial integrity policies and departments which provide their client countries with tools for increasing transparency including Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) initiatives (e.g. asset-disclosure tools. As FATF Standards have been incorporated in multilateral instruments (IMF/WBG) these are worth paying attention to as they might, inadvertently, impact civil society funding at a national level.
CSO and Consultation Policies	IFIs have dedicated policies towards engagement and consultation with civil society to ensure their voices are included in policy and country strategy development. Most IFIs have a dedicated team for stakeholder engagement and serve as a main contact point for CSOs on policy change, consultation moments and engagement events.

b. Overview of Specific Strategies and Policies applicable to Gender and Civil Society

Table 3. IFI Strategies applicable to Gender and CSOs

IFI	Strategy	Note on applicability
World Bank	Country Partnership Frameworks & Systematic Country Diagnostics	✓ sets out and determines national constraints to reducing poverty and increasing shared prosperity
	Operational policy & Bank Procedures 4.20: Gender & Dev	✓ applicable to Investment projects (IPF), explicitly not to development policy loans (DFP)
	WBG Gender strategy FY 2016 – 2023	✓ focus on human endowments, economic opportunity, voice and agency
	Regional Gender Action Plan for MENA Region, FY17-FY20	✓ focus on “country programs” and championing dialogue
	Environmental and Social Framework and Safeguard Policies	✓ manage social risks of projects; stakeholder engagement is safeguard, women in 1, 2, 5 and 7
	CSO Department and Forum	✓ fosters relationships with CSOs
	Global Partnership for Social Accountability	✓ enhancing citizens’ voice and support capacity of governments to respond effectively to their voice
	Strategic Framework for Mainstreaming Citizen Engagement In World Bank Group Operations	✓ to capture the diverse experiences, assess lessons learned, and outline methods and entry points to provide a more systematic and results-focused approach for the WBG

IFC	WBG Gender strategy FY 2016–2023	✓ focus on women’s access to opportunities in entrepreneurship, employment, insurance, corporate leadership, and digital economy
	Social and Environmental Sustainability Framework (IFC Performance Standards)	✓ define IFC clients' responsibilities for managing their social risks, “public consultations to capture both men’s and women’s views”.
	“Banking on Women”	✓ helps financial institutions provide high-quality services to women customers (Egypt, Tunisia)
IMF	Extended Fund Facility (EFF) Agreement Summary and Reviews	✓ summarizes agreement under EFF and reviews its progress (respectively)
	Letter of Intent, Memorandum of Economic and Financial Policies, and Technical Memorandum of Understanding, and IMF Conditionality	✓ describes the policies that country x intends to implement in the context of its request for financial support from the IMF. Conditionality covers the design (of macroeconomic and structural policies) – and tools used to monitor progress toward goals outlined in MOUs
	2015 Guidelines on the IMF Staff Engagement with CSOs	✓ provide staff with the tools to further develop and maintain meaningful relationships with CSO
	Guidance Note on IMF Engagement on Social Safeguards in Low-Income Countries	✓ provides operational guidance to staff on how to engage on social safeguard issues with low-income countries in both program and surveillance contexts
	Guidance Note for Surveillance Under Article IV Consultations, 2016	✓ highlights effective two-way communication with the authorities and the public and other stakeholders (to gain support for necessary policy adjustments)
	Note “How to Operationalize Gender Issues in Country Work”	✓ an overview of good practices and resources available to staff
EIB	Project Loan documents	✓ describes loan purpose and conditions, “project must be in line with lending objectives and must be economically, financially, technically and environmentally sound”

	The EIB Group Strategy on Gender Equality and Women's Economic Empowerment 2016–2021	✓ focuses on i) the protection of women's rights in the Bank's due diligence framework; ii) increasing operations' positive impact iii) the promotion of women's economic empowerment
	EIB GROUP GENDER ACTION PLAN 2018-2019 - I	✓ to guide and support the EIB Group in delivering on its vision
	Environmental and Social principles and standards & Approach to social safeguard issues	✓ outlines the standards that the Bank requires of the projects that it finances (incl. labor standards, minority rights (incl women) public consultation
	Civil society engagement framework (web page)	✓ dimension of the EIB accountability framework
EBRD	EBRD country strategy document	✓ sets out priorities for engagement per country
	Strategy for the promotion of Gender equality 2016-2020	✓ Mandate to promote behaviors, through its operations, which contribute to building equitable and sustainable economies. (women's economic empowerment and opportunities)
	Economic Inclusion Strategy 2017-2021	✓ to accelerate the transition towards inclusive market economies through private sector to create economic opportunities for all
	Access to Information Policy (into effect from 1 Jan 2020 currently known as Public Information Policy)	✓ sets out the framework for the Bank's information disclosure and institutional consultations with civil society
	Project Accountability Policy (into effect from 1 Jan 2020 currently Project Compliant Mechanism and Rules of Procedures)	✓ which defines the rules for access to the Independent Project Accountability Mechanism (namely the grievance mechanism – to be used a mean of last resort)
	CSO engagement roadmap and Guide for CS Department	✓ roadmap on interactions with CSOs (consultations on draft policies under review, discussions on local projects)
	Environmental and Social Policy	✓ policy and related Performance Requirements outlining how the Bank will address the environmental and social impacts
ENI	EC Country Strategy Paper & Nat Indicative Programs (NIPs)	✓ gender issues identified in CSP and reflected in National Indicative Programs

AfdB	Bank Group Gender strategy 2014-2018	✓	“strengthening women’s legal and property rights, promoting women’s economic empowerment and enhancing capacity building
	CSO Engagement Framework and Action Plan	✓	aims to maximize opportunities for developing partnerships with CSOs at the corporate, country, and project levels

c. How IFI Policies Work in Practice

The following subchapter provides an analysis on how the above-mentioned policies, mechanisms and strategies work in practice, based on IFI documentation, research and interviews with the IFI relevant departments. It also aims to provide direction on *how to start engaging with IFIs and what to engage on*. Extensive attention is given to the World Bank because as the first IFI working on gender it has long set the example on gender and CSO engagement that the other IFIs “have more or less followed”.^{43 44}

Macro-economic Policies

The International Monetary Fund and the World Bank Group are key shapers of macro-economic policy at the global, regional and national level. The type of macro-economic policies that are implemented by IFIs can impact women in varying ways. For example, research has shown that IFI policy-based loans disproportionately harm poor women, who often become “shock absorbers” for neoliberal economic reforms like trade liberalization and privatization.⁴⁵ Recognition of progressive means to create the fiscal space needed to invest in social welfare and recognition of the informal or care economy in these policies can impact women positively.⁴⁶ Even though the **rhetoric of IFIs has increasingly moved towards gender equality**, critics mention that “...incorporation of feminist ideas has taken place **without a fundamental rethinking**

⁴³ As concluded in Both Ends (2018). A Guide to Women’s Rights and Environmental Justice Advocacy on International Financial Institutions.

⁴⁴ Also because more information is available for the WB, the WB has a specific explicit action plan for the MENA region in place and based on Kvinna till Kvinna’s preference.

⁴⁵ Bretton Woods Project (2017). The IMF and Gender Equality: A Compendium of Feminist Macroeconomic Critiques.

⁴⁶ Ibid.

of the neoliberal economic agenda of commodification, privatization and austerity, resulting in a “neo-liberalization of feminism” or “neoliberalism with a feminist face”.⁴⁷ In line with this, **a critique of** the World Development Report of 2012 stated that it fails to acknowledge the damage that the International Monetary Fund and World Bank austerity programs inflict on wellbeing (as demonstrated by rich feminist literature on impacts of SAPs); it fails to acknowledge the need for expansionary fiscal and monetary policies to achieve the stated gender equality goals on the Bank’s “Global Agenda for Gender Equality”; it is silent on how trade and investment liberalization policies endorsed by the Bank may be associated with rise and persistence of gender wage gaps.⁴⁸ In addition, the International Monetary Fund’s gender work, for example, “relies heavily on pointing out gender gaps in labour force participation, which comprises only one element of gender equality and will not necessarily lead to increased gender equality if considered in a vacuum”.⁴⁹

Country Frameworks and Loan Agreements

For each country of operation, IFIs prepare a country-specific plan. This plan typically outlines the institutional strategy indicating how much it is prepared to lend during that time, what projects or policies it intends to support, and what non-lending activities it will pursue.

In loan agreements with the International Monetary Fund the member country has primary responsibility for selecting, designing, and implementing policies to make the Fund-supported program successful. The program is described in a **letter of intent**, which often has a **memorandum of economic and financial policies** attached. Through country **surveillance**, each member country agrees to let the Fund examine its economic and financial policies, an assessment that is

⁴⁷ Prugl, E. (2017) Neoliberalism with a Feminist Face: Crafting a new Hegemony at the World Bank, *Feminist Economics*, 23:1, 30-53,

⁴⁸ Berik, G. (2017) Beyond the rhetoric of gender equality at the World Bank and the IMF, *Canadian Journal of Development Studies / Revue canadienne d'études du développement*, 38:4, 564-569

⁴⁹ Bretton Woods Project (2017), *Gender -Just Macroeconomics*

usually conducted annually and is called an **Article IV Consultation** where a team of economists visits a country to draft a review report.⁵⁰

The World Bank Group makes its selection of projects to be funded based on the **Country Partnership Framework (CPF)**, which is negotiated with each borrower country for a five-year period and defines **prior actions** (triggers)⁵¹ that the borrowers need to take before they receive money.⁵² **Systematic Country Diagnostic (SCD)** informs each new Partnership Framework. The aim of the diagnostic is to identify the most important challenges and opportunities a country faces in advancing towards the Bank's twin goals (see chapter 2) and proposes a selective program of indicative World Bank interventions for this purpose (including which investment or policy-based loans will be disbursed). The World Bank claims to operate a large number of public consultations with mostly a national scope for the completion of the Framework.

The International Finance Corporation does not publish its own formal country-specific strategies, though their activities are supposed to be consistent with the priorities identified in the Bank.

The European Bank for Reconstruction and Development works with **country strategies**, based on **country diagnostics** which identify the main obstacles to entrepreneurship and private sector development and to help shape the Bank's strategic priorities in new country strategies. It also works with sectoral strategies, which indicate the specific investment criteria for each sector (e.g. Agribusiness, Energy, Transport, etc). Proposed institutional

⁵⁰ <https://www.imf.org/external/about/econsurv.htm>

⁵¹ Prior actions are a set of mutually agreed policy and institutional actions that are deemed critical to achieving the objectives of the program supported by a development policy operation and that a country agrees to take before the Board approves a loan (credit or grant). Prior actions are legal conditions for disbursement. Triggers are the planned actions in the second or later year of a program that are deemed critical to achieving the outcomes of the program and that will be the basis for establishing the prior actions for later operations.

⁵² <http://siteresources.worldbank.org/PROJECTS/Resources/40940-1244732625424/Q&Adplrev.pdf>

and operational policies as well country strategies are made available for public comment. The Bank's management reviews all public comments and advises the Board of Directors accordingly. The Bank takes this consultation into account in shaping its assessments and decisions on policies and strategies, alongside feedback by shareholder governments, clients and other interested parties, and draft policies and strategies may be amended accordingly.

Much like the International Finance Corporation, the European Investment Bank does not publish country-specific strategies to guide its investments. Instead, it responds to loan requests from companies and the interests of its member governments. It's operations are supposed to be aligned with the **European Union's own priorities** for a country. It organizes sporadic consultations on specific lending mechanisms, such as recently on the Energy Lending Policy (2019).⁵³

Overall, gender and women's rights are not explicitly included in the text of these country frameworks and if they are "no explicit targets are linked to these statements".⁵⁴

Gender Equality Strategies

Mainstreaming

When the World Bank introduced gender policies in the 1990s, they called for all operations to 'mainstream' gender.⁵⁵ Since then IFIs have done so in various ways. In October 2015 the Evaluation Department at the EBRD produced a review of IFI experience in mainstreaming

⁵³ <https://www.eib.org/en/about/partners/cso/consultations/item/public-consultation-energy-lending-policy.htm>

⁵⁴ Interview with IFC Egypt

⁵⁵ "The World Bank adopted gender mainstreaming, as a strategy to address inequalities, following the 1995 United Nations Fourth World Conference on Women. Many other organisations ranging from the Ford Foundation to Oxfam also began mainstreaming gender into their operations. Over time mainstreaming achieved notoriety." In Zuckerman, E. (2018). A Guide to Women's Rights and Environmental Justice Advocacy on International Financial Institutions. A Both Ends Guide.

gender.⁵⁶ This report concluded that “IFIs increasingly seek gender results at the level of specific sectors rather than focusing more generally on gender mainstreaming across all operations at once”. It found that a few aspects are key for results including “that progress depends on **committed and engaged senior management, visibility in resource allocations** and accountability throughout project and HR systems; that **quantified corporate commitments** on gender results upon exit (as well as entry) make a difference; that **gender focal points** work within operations; and to use **qualitative impact stories** (and the business case) and documentation and dissemination of results to inform gender responsive investments both with operations teams and clients”.⁵⁷

World Bank Group

The overriding theme in recent World Bank documents continues to be gender equality and growth (or efficiency of markets) as a win-win pair, but over time the conceptual frameworks have evolved and the topics of concern have expanded to include women’s agency, empowerment and voice. Prugl (2017) notes that the bank “has made efforts to establish a positive relationship between gender equality and growth, as their focus on institutions has enabled engagement with core feminist concerns (e.g. equality in the family) and the Bank’s research moved away from emphasizing equality of opportunity as sufficient for gender equality in outcomes towards recognition of the need to address institutional (legal) barriers to gender equality in both markets and the household”.⁵⁸ Incorporating notions of women’s empowerment and agency has made possible a focus on domestic violence.

Operational Policy 4.20 on Gender and Development – aims to help member countries address gender inequalities

⁵⁶

<file:///Users/Anne/Downloads/EvD%20Synthesis%20Note%20Review%20of%20IFI%20experience%20in%20mainstreaming%20gender.pdf>

⁵⁷ EBRD (2015). SYNTHESIS NOTE Review of IFI experience in mainstreaming gender October 2015 EBRD EVALUATION DEPARTMENT

⁵⁸ Prugl (2017)

in World Bank investment projects. It requires Bank staff to include gender concerns in all investment projects but is **applicable only to Investment Projects (IPF)**, explicitly not to Development Policy loans (DFP), which are loans that could be particularly influential on women.

Alongside this, World Bank's latest **Gender Strategy**, updated in 2016 following consultations with more than 1,000 stakeholders in 22 countries,⁵⁹ applies to all Group entities, including the private sector arm IFC. Main activities concentrate on defining activities to scale-up good practice results-based interventions in relevant core business lines; develop and strengthen diagnostic tools; improve the evidence base for results; collecting better and sex-disaggregated data; support Gender Innovation Labs (which use impact evaluation to explore evidence on critical gender gaps); and, importantly, emphasize monitoring of corporate commitments.⁶⁰ The Strategy also explicitly includes the care economy and gender based violence (GBV), after extensive lobby of women's organizations.⁶¹ The Strategy states it is "building a growing evidence base in the area of care, it is implementing and piloting a substantial program of support for women victims of GBV in conflict situations and activities to improve GBV outcomes are included in 12 projects".⁶² Last, it recommends that unanimous agreement needs to be in place on addressing gender disparities in fragile and conflict affected areas (FCS). Still, the **Gender Action Plans** and strategies that provide guidance to staff about implementation of this Gender Strategy are not mandatory. In the Strategy itself, the WB recommends a mainstreaming of capacity in country offices. A final challenge is that the WB gender strategy largely does not recognize the macro-

⁵⁹ <https://consultations.worldbank.org/consultation/update-world-bank-group-gender-strategy-consultations>

⁶⁰ World Bank Group Gender Strategy 2016-2023, page 66

⁶¹ E.g. Gender Action

⁶² WBG Gender Strategy

economic dimensions of the Bank's work "leaving out an important piece of the gender equality puzzle."⁶³

It is worth mentioning that the World Bank has created a GBV Task Force⁶⁴ which has released an Action Plan on strengthening the World Bank's capacity to identify, prevent and mitigate against GBV in World Bank supported projects.⁶⁵ While the Task Force consists of 'external experts', such as representatives from the Anglican Church, there were no women's rights groups represented or CSOs specialising in GBV in the context of development, while there were two current and one former Bank staff members. In light of this set up, Bank Information Centre staff assesses the Task Force as being a glass half full: "If implemented, the task force recommendations make progress in preventing the next Uganda⁶⁶ but do not go far enough to address all sources of GBV and SEA risk related to World Bank projects".⁶⁷

International Monetary Fund

The inter-departmental Fund's **Gender Advisory Group** was created in 2015, to provide analytical and operational support to pilot country teams, build and share knowledge and expertise on gender issues, and facilitate external collaboration. In 2017, the International Monetary Fund took a prominent stance on the importance of gender equality for achieving economic growth through high profile conferences. Lagarde (2017) stated that the Fund's research, country surveillance work and programs aimed to increase women's labour force participation, claiming "[we]

⁶³ Bretton Woods Project (2017) Gender-Just Macroeconomics

⁶⁴ <http://www.worldbank.org/en/news/press-release/2016/10/13/world-bank-launches-global-task-force-to-tackle-gender-based-violence>

⁶⁵ <http://www.worldbank.org/en/news/press-release/2017/11/08/new-action-plan-addresses-gender-based-violence-in-world-bank-operations>

⁶⁶ Referring to sexual assault of school girls by highway construction workers within a IFC funded project in Uganda in 2015.

⁶⁷ According to Elana Berger from Bank Information Center, in "Will World Bank Global Gender-Based Violence Task Force recommendations have a discernible impact? <https://www.brettonwoodsproject.org/2017/09/will-world-bank-global-gender-based-violence-task-force-recommendations-discernible-impact/>

practice what we preach". However, some critics state that "the rhetorical shift of the Fund towards acknowledging the importance of gender equality is disconnected to policy practice, which is shown to often undermine gender equitable opportunities and outcomes".⁶⁸ "Fund documents are silent on the relevance of gender wage gaps to economic growth ... [and the institution views] policies that increase women's labor force participation (and tax incentives) view gender wage gaps as a problem to be tackled by anti-discrimination policies".⁶⁹ In addition, it has been said that "Fund gender expertise and awareness is limited to a small number of policy papers and staff working papers"⁷⁰ and loan programs do not reflect gender awareness.⁷¹ More recently, the Fund has produced an issues paper that looks at female gender gap and the impact on growth, most notably towards the need to improve female labor participation and conducive policies such as facilitating part-time employment and enhancing access to child care facilities.

Through recent efforts, the Fund claims it puts its gender agenda into action through "**contributions to the economic literature** through country-level and cross-country analytical studies, confirming the **macro-criticality of gender issues**; through gender becoming an integral part of capacity development through technical assistance and training and through **gender pilots**—encompassing both surveillance and Fund-supported programs".⁷² To illustrate what this shift means in practice, to date, the IMF has explicitly incorporated gender components into three of its lending programmes (Egypt, Jordan and Niger), and is

⁶⁸ Elson, D. and N. Catagay (2000) "The Social Content of Macroeconomic Policies." World Development Vol. 28, No. 7, pp. 1347-1364, 2000.

⁶⁹ Elborgh-Woytek, et al. (2013) "Women, Work, and the Economy: Macroeconomic Gains from Gender Equity," IMF Staff Discussion Note, SDN 13/10.

⁷⁰ Beyond the rhetoric of gender equality at the World Bank and the IMF, Canadian Journal of Development Studies / Revue canadienne d'études du développement, 38:4, 564-569

⁷¹ Elson, D., and T. Warnecke. 2011. "IMF Policies and Gender Orders. The Case of the Poverty Reduction and the Growth Facility." In Questioning Financial Governance from a Feminist Perspective, edited by B. Young, I. Bakker, and D. Elson, 110-131. London: Routledge

⁷² IMF (2018). How To Operationalize Gender Issues In Country Work, June 2018.

increasingly incorporating it in surveillance advice, with latest counts showing inclusion in about 1 in 5 surveillance reports in 2016. With one exception in Argentina, in its lending and surveillance work IMF does not address how its conventional policy advice, like cutting social services and restricting labour rights, overwhelmingly undermines gender equality, and can therefore be called “gender blind” rather than “gender neutral”. Practically, even though gender is becoming more institutionalized, only some of the recommendations made in IMF research have been used a handful of surveillance reports and lending programmes.⁷³ Still, the IMF has now acknowledged the ‘macro-criticality’ of gender in some countries and that some of its own policies can exacerbate gender inequality. It has provided guidance to staff that in those cases, they should consider alternative policy advice.

European bank for Reconstruction and Development

The European Bank for Reconstruction and Development has an **Economic Inclusion Strategy**, focusing on participation in the economy for groups who could be disadvantaged and a **“Strategy for the promotion of Gender equality”**, *the latter is put* into action through “contributing to the creation of an enabling environment that can address the constraints which gender inequality places on transition (policy dialogue); through capacity building and a focus on leveraging its partnerships where possible and introduce an important element to the reporting and evaluation of progress”.⁷⁴ The Bank used to have two separate teams that were each responsible for a strategy but their work overlapped in the area of women’s economic empowerment.⁷⁵ In April 2018, the two teams merged and both strategies are now under one roof. The Bank’s gender department states that “areas for improvement within their gender work include a) how they

⁷³ Bretton Woods Project (2017). Gender-Just Macroeconomics: Engaging the WB and IMF

⁷⁴ <https://www.eib.org/en/infocentre/publications/all/eib-group-strategy-on-gender-equality.htm>

⁷⁵ Interview with EBRD Gender Department

as an institution can advise on the care economy and b) on putting efforts into removing legal barriers for labour participation (in which they were recently successful in Kyrgyzstan and Kazakhstan)".⁷⁶ Regarding the inclusion of women's voices in their gender work they share "to only consult civil society on a case to case basis for their gender work as their main focus is with private sector".⁷⁷

European Investment Bank

The European Investment Bank Gender Strategy focuses on the "**Protect' route** (taking gender into account in the due diligence of EIB operations), **the "Impact" route** (embedding a gender perspective throughout an investment cycle, identifying opportunities within operations and disseminating best practice) and an "**Invest" route** (Identifying targeted opportunities to invest in women's economic empowerment)."⁷⁸ "Protect is the biggest chunk of the gender work so far, through increased attention on gender in due diligence efforts. On the impact lending side [we] focus mostly on SME and finance for women. Where we have blending mechanisms we can offer capacity building".⁷⁹ "We are now at a stage to translate the strategy into action and achieve tangible actions through the **creation of an action plan** which will happen next year (2020-2021). Gender work is implemented by teams that are made of gender specialists (directorate). They can advise in first instance and are sometimes part of project team or investment teams to help nudge operations the right way. As part of 2018's exercises many departments were trained in owning the Bank's theory of change better in their lines of work. More due diligence training will be coming up on conflict and gender. The Bank comments that "As we are very young in this field, we need to give the teams the time to get familiar with the topic and get it embedded in procedures as we are still working to

⁷⁶ Ibid

⁷⁷ Ibid

⁷⁸ <https://www.eib.org/en/infocentre/publications/all/eib-group-strategy-on-gender-equality.htm>

⁷⁹ Interview with EIB gender department

effectively integrated gender in procedures”.⁸⁰ However, the Gender Department has been conscious in collaborating with CSOs on gender through consultations, workshops and through women’s lobby in the EU. As part of this process Bankwatch was consulted on the gender action plan.⁸¹

Even though all IFIs’ gender strategies have evolved over the years, the level of gender **mainstreaming in practice in country offices** is still a challenge for all IFIs – partially linked to lack of gender capacity in country offices.⁸² The current level of implementation may best be summarized by a quote of one of the country offices in Jordan: “Yes, we have gender champions in each office, but mainstreaming does not yet happen as they are bankers, what do you expect?”⁸³

Monitoring, Research, Data Collection and Information Disclosure Procedures

Gender analysis, risk assessment and monitoring systems play a big role in helping gender mainstreaming approaches achieve results, ensuring that gender is captured not only at design stage but also to ensure accountability for the commitments that are made in the gender strategies throughout the implementation process and for creating accountability. Table 4 provides a selection of monitoring activities of how the European Bank for Reconstruction and Development, The European Investment Bank and World Bank have designed their gender monitoring mechanisms. The World Bank Group has, by far, invested the most effort into monitoring and evaluation efforts.

Table 4: selection of IFI Monitoring mechanisms

⁸⁰ Ibid

⁸¹ Ibid

⁸² As stipulated by numerous interviewees including bilateral donors, CGD and Bretton Woods Project

⁸³ Interview with EBRD Jordan Country office (Economic Inclusion and Gender Focal Points)

Measurement Mechanisms



Gender Analysis before loan is granted	Guidelines for inclusion of gender in diagnostic tools and country partnership docs. + gender analysis as gender tag (see below) (Some done in Egypt & Jordan)	gender gap assessments of access to services of women's participation in decision making	"Increasingly used" – Gap 1 (2016)
Gender as factor in Risk Assessments	Mentions gender as "vulnerable groups" in ESF Note Women in social safeguards 1,2,5 and 7	"Expects its clients to identify any potential gender-specific and disproportionate, adverse impacts"	Integrating gender in risk assessments and d.d. – Gap 1 2 gender matrices in ESF
Monitoring Mechanisms: how to track	"gender tag". incl. 3 components: gender analysis, gender action, and M&E.	Performance Monitoring Framework, Corp Scorecard & Country Results framework	Committed to sex-dis data, gender-spec results & indicators. Eval. of strategy 2021
Research or Impact Evaluations	Index. Women Business and the Law, Boost Initiative, Entrepreneurship Database, Multiple Country Gender Studies	No impact evaluations yet. Several studies on e.g. agency, legal barriers, and transport	No impact evaluation nor studies on gender
Independent Evaluation Bodies	WB IEG, Inspection panel & Gender Innovation Lab	EBRD Evaluation dep	EIB Operations Evaluation dep

The World Bank Group

The World Bank **Independent Evaluation Group (IEG)**

evaluates the work of the Bank by topic and gender is one of them.⁸⁴ In 2017, it concluded that that Bank's monitoring and evaluation systems face significant problems that cannot be quickly resolved and that "the Bank's tick-box approach to gender integration did not lead to meaningful and substantial integration".⁸⁵ Based on this, since 2017, a **new gender "tag" system** was launched to strengthen links between country-level and/or sector gender equality objectives and World Bank Group operations and identify those operations that meaningfully narrow gaps between males and females in the four key pillars of the strategy. It identifies those projects that have a clear results chain (e.g., links analysis, actions, and monitoring and evaluation). In addition, the World Bank has set a new target for at least

⁸⁴ <http://ieg.worldbankgroup.org/topic/gender>

⁸⁵ As interpreted from this report by Bretton Woods Project: <https://www.brettonwoodsproject.org/2016/06/ieg-2015-results-report/>

55% of operations to fulfil the tag criteria.⁸⁶ Some critics state that “the scoring system is limited as it only specifies female beneficiaries or whether a project is disaggregated by gender”.⁸⁷ From a transparency perspective, however, the World Bank is far ahead of its counterparts discussed in this report, as they are the first to track gender this way. For a copy of the World Bank Gender Results Framework, see Annex 2.

In the World Bank Gender Strategy is stated that “(Objectives stated in the) **Regional Gender Action Plans (RGAPs)**, provide a means for tracking commitments and country performance on gender.”⁸⁸ At a country level, at a minimum, Country Management Units (CMUs) should map the alignment between gender gaps highlighted in the Country Partnership Framework and the Systematic Diagnostic, and the portfolio. This mapping also would have to benefit from wide consultation with government and civil society.⁸⁹ World Bank gender staff share that “country plans (CPFs) take a higher level results approach, as we never know what projects will happen or not. Within these we focus on what is gender specific in the regional strategy.”⁹⁰ Some challenges include that “on country level, **collecting gender data is difficult**, especially as it is qualitatively problematic. We don’t have direct respondent questionnaires especially in women’s economic empowerment and no intra household breakdown of data. Acquiring this data would require statistics capacity building at a national level”.⁹¹

⁸⁶

<http://documents.worldbank.org/curated/en/207481489888852225/pdf/Strategy-Update-to-the-Board-2-17-17Final-02172017.pdf>

⁸⁷ Kenny, C. and O'Donnell, M. (2016). "Do the Results Match the Rhetoric? An Examination of World Bank Gender Projects." CGD Policy Paper 077. Washington DC: Center for Global Development

⁸⁸ WB (2016). Gender Strategy 2016-2023, p66.

⁸⁹ WB (2016). Gender Strategy 2016-2023, p66.

⁹⁰ As stated by WB gender staff

⁹¹ As stated by WB gender staff

International Finance Corporation developed a **new gender Advisory Services flag** in February 2016 that tightens the definition of a gender flagged project, e.g., includes a gender analysis, linked implementation and, where possible, measured outcomes. It has rolled out an Investment Services flag in 2017 and is exploring how to integrate gender issues in project completion reports. Additionally, a new indicator tracks the gender composition of fund management teams.⁹²

A last component worth mentioning is **World Bank's research that aims to make the investment case** through a focus on measurable results. Relevant gender publications including the TCdata360 portal which provides open data on trade and competitiveness, **Women, Business and the Law 2018** provides unique data on laws and regulations constraining women's economic advancement, 2017 Global Findex database offers a wealth of information on the gaps between men's and women's financial inclusion and Gender Innovation Labs from which work to ensure conceptual and methodological consistency on interventions to help females access employment. In addition, the World Bank Group disbursed, for example, more than US\$1 million to advance **evidence-based interventions to prevent and respond to GBV** in low- and middle-income countries in 2018.⁹³

Other IFIs

The European Investment Bank gender action plan aims to take into account in its design, implementation and monitoring the potential gender impact of its operations, thereby increasing social and economic returns on investment.⁹⁴ On results the Gender Strategy makes a

⁹²

<http://documents.worldbank.org/curated/pt/20748148988852225/pdf/Strategy-Update-to-the-Board-2-17-17Final-02172017.pdf>

⁹³ <https://www.worldbank.org/en/news/press-release/2018/07/09/world-bank-sexual-violence-research-initiative-launch-2018-call-for-proposals-for-innovation-in-addressing-gender-based-violence>

⁹⁴ <https://www.eib.org/attachments/strategies/eib-group-gender-action-plan-2018-2019-en.pdf>

commitment to develop “a system for ongoing sex disaggregated data collection, results measurement and monitoring, as appropriate”.⁹⁵ Alongside this, **means of monitoring and assessing progress will be developed to ensure accountability**. Regular stocktaking will identify bottlenecks, challenges and necessary adjustments. An evaluation will take place in 2021, so as to inform next steps beyond 2022.⁹⁶

The monitoring framework of the European Bank for Reconstruction and Development gender strategy outlines a focus on analysis (equal opportunities audits, gender gap assessments of access to services, assessments of women's participation in decision making) and tracking measurable indicators of short-and longer term changes triggered by the Bank's activities that help to monitor progress in effectively achieving economic equality of opportunity between men and women. The **outcome tracking indicators** would be tracked through Country Strategy Results Framework under the theme “Promoting Economic Inclusion” for relevant countries only and will be used in reporting to illustrate results. Setting targets is deemed key in this process. The Bank's Gender Department illustrates the latter with: **“We have green targets, why not gender targets?”**⁹⁷ A progress evaluation is to be measured in 2020,⁹⁸ but the research component is not so strong as it stands, as there are no impact evaluations conducted yet.⁹⁹

As most of the above mentioned activities apply to project lending, the IMF is excluded from this table. It is important to note, however, that the Fund's Article IV consultations **do not monitor impact or progress of loan programmes as such and staff are not expected to monitor gender**, nor

⁹⁵ <https://www.eib.org/attachments/strategies/eib-group-gender-action-plan-2018-2019-en.pdf>

⁹⁶

https://www.eib.org/attachments/strategies/eib_group_strategy_on_gender_equality_en.pdf

⁹⁷ EBRD Gender department regional

⁹⁸ <https://www.eib.org/en/infocentre/publications/all/eib-group-strategy-on-gender-equality.htm>

⁹⁹ Interview EBRD Gender Department

is analysis of gender data necessary before loans are granted at the Fund. There are few monitoring systems in place for gender, including country-level monitoring of specific loan programmes (usually through quarterly reports) as well as 5-yearly comprehensive surveillance reviews, specific IEO reports – but any/all of these are only relevant to the degree they look at gender issues, which is very sporadic. The IMF is strengthening its results-based management framework to facilitate systematic planning and improved monitoring through **a new common evaluation framework**. Evaluation will help determine, for example, the degree to which technical assistance has improved macro-economic stability, public finance management systems, the quality of economic statistics as well as whether training has improved job performance of government officials.¹⁰⁰ Nothing specific on gender is mentioned in IMF monitoring documentation.

Operationalizing CSO and Civil Engagement through Outreach Departments

IFIs formally implement the “ownership principle” (as set out in the Paris Declaration on Aid Effectiveness)¹⁰¹ emphasizing the need for country ownership and the critical role and responsibility of e.g. parliaments and CSOs in ensuring ownership of and feeding into development processes. Civil society, citizens and local communities have the right to engage with IFIs on its efforts for their country. General engagement with CSOs (including gender) has meant huge public relations exercises for IFIs and especially the World Bank, including setting up a civil society department responsible for arranging various CSO-Bank meetings and through civil engagement efforts.

¹⁰⁰ <https://www.imf.org/en/About/Factsheets/imf-capacity-development>

¹⁰¹ OECD (2005) The Paris Declaration on Aid Effectiveness and the Accra Agenda for Action (2008). <http://www.oecd.org/dac/effectiveness/34428351.pdf> The Paris Declaration on Aid Effectiveness emphasizes the need for more country ownership in the context of international aid. It defines ownership as a situation in which “partner countries exercise effective leadership over their development policies and strategies and co-ordinate development actions”. It also states that donors should “base their overall support on partners’ national development strategies” and “draw conditions from these strategies”.

Citizen and CSO **consultation for World Bank Group investment projects is mandatory**. The Bank has a dedicated team within the **World Bank's Stakeholder Engagement Unit**. It is the main contact point for CSOs and can coordinate relations with other parts of the World Bank Group – e.g. transmitting advocacy letters to the most appropriate department, and securing a response, or providing contact details for specific staff. A dedicated civil society website, managed by the team, provides information to CSOs, relevant weblinks and support for participation at the Annual and Spring Meetings. As stated by Eurodad: “The World Bank CSO team walks a fine line. While on the one hand it should ensure CSO inclusion and participation, it also serves a public relations function for the World Bank and is supposed to protect it from trouble and criticism. For substantial affairs affecting the World Bank it is often more effective to address the decision-maker level directly: for example, CSO-requested changes to the way the Civil Society Policy Forum (CSPF) is conducted were only addressed after a CSO coalition sent a letter straight to President Kim.”¹⁰² The Bank also **engages in consultations for development policy lending, even though this is not mandatory**.¹⁰³ World bank guidance explains that “in some cases, engaging with stakeholders goes beyond consultations to include collaborative processes - such as third-party monitoring, social audits, citizen report cards, and community score cards to help increase the effectiveness of World Bank Group interventions and improve the implementation of the program”¹⁰⁴

For the **European Bank for Reconstruction and Development, CSO consultation is mandatory** as part of their compliance mechanism. The European Bank for Reconstruction and Development engagement with civil society is coordinated and facilitated by the dedicated Civil Society Engagement (CSE) Unit and involves a wide range of

¹⁰² Eurodad (2017). A toolkit for advocacy at the World Bank Group

¹⁰³ <http://projects-beta.worldbank.org/en/projects-operations/country-strategies>

¹⁰⁴ World Bank Group Guidance Note on “Country Partnership Framework Products” dated July 1, 2014

mechanisms and tools for information disclosure, dialogue, consultation and cooperation with civil society. Through the Civil Society Capacity Enhancement Framework, the Bank also builds skills and knowledge of local civil society groups and partnerships with CSOs to promote jointly strategic priorities.

For the European Investment Bank CSO consultation is also mandatory as part of their compliance mechanism.

The European Investment Bank does not have a dedicated CSO department but engages with its stakeholders by inviting civil society stakeholders to participate in a seminar with its Board of Directors; organizes public consultations on its key policies; hosts events to explain what it is doing, to explore emerging issues and to benefit from the feedback and ideas of civil society.

CSO and citizen consultation for IMF loans is not mandatory. The Fund does not have an explicit CSO department, but has a CSO Team as part of the Communications Department. A **new civil society manager**, is increasingly organizing meetings between the Fund and CSOs.¹⁰⁵ There are a number of structural CSO engagements that take place, at the international and national level. For instance, CSOs can reach out to engage with country teams on surveillance and lending. That mostly happens today with trade unions in particular (especially in the MENA region). There are also regular reviews, like on conditionality and surveillance, that aim to structurally include CSO consultation.

Social Frameworks, Safeguard and Accountability Mechanisms
Social and environmental standards, “safeguard policies,” establish **mandatory procedures that the IFI and their clients must follow** when preparing and implementing **the projects they finance** (and thus do not apply to policy lending) These safeguards are designed to provide minimum protections to the environment and vulnerable

¹⁰⁵ As shared by the Arab watch Coalition

populations (such as women) from the negative effects of these operations, and also provide important opportunities for civil society participation and access to information. IFIs also have internal accountability mechanisms to which affected communities can appeal when IFIs fail to comply. Overall, all IFIs **fail to incorporate a specific gender safeguard to explicitly guard against and proactively address negative gender impacts** (such as for example, the IDB does, including “preventive” measures to hold projects accountable for harmful gender impacts) nor do they use language pertaining to women’s rights.

The World Bank’s **safeguards** apply mainly to project financing (not policy based lending).¹⁰⁶ In spite of intense lobbying by women’s groups, the World Bank’s new approved Social and Environmental Framework does not have an explicit focus on gender, but instead mentions the terms gender, women, and SOGI (sexual orientation and gender identity) within strings of vulnerable groups in a separate presidential directive. Gender is mentioned in safeguards 1 , 2 , 5 and 7. An Environmental and Social Framework Gender Good Practice note to guide borrower implementation is on its way.¹⁰⁷ A criticism of the recent change in World Bank Safeguard Policies has included that it is weakening crucial existing social and environmental protections for the most vulnerable in Bank projects and operations as the WB “allows borrower *countries to monitor own* projects in terms of social impacts and compliance with national legislation. Increasing restrictions on civil society puts a big question mark on the effects that safeguard policies will deliver on the ground”.¹⁰⁸

The European Bank for Reconstruction and Development’s Environmental and Social Policy requires tools and guidance to be revised so as to include a specific focus on adverse gender impacts and gender discrimination –

¹⁰⁶ Ibid

¹⁰⁷ Zuckerman, E. (2018). A Guide to Women’s Rights and Environmental Justice Advocacy on International Financial Institutions. A Both Ends Guide

¹⁰⁸ Both Ends (2017)

among both the workforce and affected communities.¹⁰⁹ In principle, financial instruments with EU as a main shareholder, as well as its in-house bank, the EIB **should adhere to EU law**. The Bank's Environmental and Social principles and standards acknowledge core labor standards including "Equal treatment and equal opportunity: no discrimination based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation, or age; no sexual harassment". This is the only note in the principles regarding gender equality.¹¹⁰

Most notably, IFIs have so-called **Independent Accountability Mechanisms (IAM)** which were created to hold the IFIs and their clients accountable to the IFIs' own policies and to provide access to remedy for individuals and communities that are adversely affected by IFI projects. These vary in their structure, functions and procedures. In 1993, the Inspection Panel of the World Bank was the first such mechanism created, and the first complaint was filed in 1994. Today, there are more than a dozen.¹¹¹ Over ten years ago, the mechanisms formed a network¹¹² and since then, there have been several efforts to evaluate the effectiveness of one or more of the mechanisms. These IAMs are sometimes the most powerful way for affected communities to engage with IFIs and receive redress. In 2014, the World Bank Inspection Panel agreed to take gender discrimination cases without a gender safeguard policy in place.¹¹³

Financial Integrity (CFT and AML) policies

IFIs have financial Integrity policies and departments which provide their client countries with tools for increasing

¹⁰⁹ As shared by the EBRD office in Jordan.

¹¹⁰ EIB Environmental and Social principles

¹¹¹ Including The Complaints Mechanism of the European Investment Bank, The Project Complaint Mechanism of the European Bank for Reconstruction and Development, The Independent Review Mechanism of the African Development Bank, The Compliance Advisor Ombudsman of the International Finance Corporation and Multilateral Investment Guarantee Agency

¹¹² While it is unclear which IAMs officially belong to the network, a non-exhaustive list of IAMs can be found here: <http://www.iadb.org/en/mici/partners,8163.html>

¹¹³ Zuckerman, E. (2018). A Guide to Women's Rights and Environmental Justice Advocacy on International Financial Institutions. A Both Ends Guide

transparency including Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) initiatives such as asset-disclosure tools. As **FATF Standards have been incorporated in multilateral instruments** (IMF/WBG); these are worth paying attention to as they might also, inadvertently, impact civil society funding at a national level. Research shows that CFT policies have resulted in multiple impacts “on the partners, programs, and beneficiaries of women’s rights organizing and organizations, resulting partially from a growing donor preference for larger, well-known international organizations with greater absorption capacity and compliance resources, as well as toward making larger and fewer grants, all to the detriment of grassroots women’s civil society. As a result, female civilians and activists in these areas, often victims of terrorism themselves, are neglected and may be accused of providing support to terrorists even when under duress.”¹¹⁴ From the five IFIs at hand, only the **World Bank has explicitly spoken out about contradiction between financial integrity policies and financial inclusion** of those that are most vulnerable, such as migrants and women as well as CSOs.¹¹⁵ This includes a project within the financial integrity unit called Financial Access for NPOs led by one person. In 2017 they organized a roundtable (with the Federal Reserve, Treasury and CSOs).¹¹⁶

d. IFI Effects on Gender Globally

Alongside the numerous reports and mechanisms that IFIs themselves have created on how to tackle gender inequality (as stipulated above), several studies have been conducted about the **factual contributions** of IFIs on gender equality, of which many have targeted the World Bank and the International Monetary Fund. A few identify slight changes in IFI policy, most notably that there is some evidence of

¹¹⁴ Duke and WPP (2017) Tightening the Purse Strings

¹¹⁵ <https://blogs.worldbank.org/psd/de-risking-impedes-access-finance-non-profit-organizations> and <http://fatfplatform.org/wp-content/uploads/2015/02/Derisking-Final.pdf>

¹¹⁶ Interview with Lia van Broekhovenm HSC and <http://fatfplatform.org/derisking-banks/>

greater gender mainstreaming across World Bank projects – at least at the level of ‘what gets measured gets done’ in the areas of analysis, action, and monitoring and evaluation.¹¹⁷ Moreover, there is a range of qualitative and quantitative studies that have analyzed the potential negative contributions of these institutions to gender equality. We summarize the key criticisms of these below.

A first criticism stated is regarding the limited integration of gender in IFI projects and the limited impacts of gender efforts. In a recent analysis of World Bank projects, researchers concluded that “**Gender Integration has been limited** as they found only 70 gender themed projects (where gender equality is a priority) out of a total of World Bank 1,666 projects, of which 41 have either gender-equality indicators or published results, and of these, only 52.9 per cent had achieved or surpassed their results.”¹¹⁸

A second criticism is regarding the macro-economic policy and loan models. “... the deflationary bias of Structural Adjustment Policies that cut public employment and encouraged privatization and commodification disproportionately hurt low-income women by increasing their unpaid labor burdens”.¹¹⁹ “It is particularly the **cumulative impact of the combination of austerity, regressive taxation and labor flexibilisation policies that is so detrimental to women’s rights** and gender equality, and mitigating and addressing each of these individual policy measures in specific ways misses the point”.¹²⁰ “Many poor and landless women in the countryside, who used to work as subsistence farmers, nowadays find themselves in temporary, informal jobs because of the IFI policies”.¹²¹

¹¹⁷ Kenny and O’Donnell (2016)

¹¹⁸ See Kenny and O’Donnell (2016) and <https://www.brettonwoodsproject.org/2016/06/ieg-2015-results-report/>

¹¹⁹ Elson and Çağatay (2000)

¹²⁰ Bretton Woods Project (2017)

¹²¹ Jan Breman (2012), Oxford University press.

A third criticism is regarding the potential negative impacts of privatization efforts. The majority of this criticism is targeted towards the World Bank. The World Bank implements its “gender equality is smart economics” agenda **through private sector initiatives** (International Finance Corporation). United Nations Special Rapporteur on Extreme Poverty and Human Rights has stated about this that “This widespread privatization of public goods in many societies is systematically eliminating human rights protections and further marginalizing those living in poverty”¹²². The World Bank Gender Agenda emphasizes public investment in infrastructure to promote maternal health and public health, but overlooks the funding requirements as well as how the privatization programs required by the Bank set back the attainment of these goals.¹²³ “The large-scale investments by IFIs often change not only entire economies, but society too: communal living is replaced by commercialized forms of agriculture, which has particularly harsh effects on women.”¹²⁴ Linked to this, a fourth criticism entails that infrastructure projects funded by the World Bank are increasingly reported to **violate women’s human rights**. Examples include forced and child labour in agriculture projects funded by the World Bank such as in Uzbekistan in 2016,¹²⁵ and sexual assault of school girls by highway construction workers such as reported in Uganda in 2015.¹²⁶ In order to mitigate these impacts, the World Bank has established the Compliance Advisor Ombudsman, an independent accountability mechanism for the International Financial Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA) (the Bank’s private-sector arm and investment insurance facility). Complementing this is the work of the the Word Bank Inspection Panel.

¹²² Philip Alston, UN Special Rapporteur on extreme poverty and HR, 2018

¹²³ Berik (2017)

¹²⁴ Both Ends (2017)

¹²⁵ See <https://www.hrw.org/report/2017/06/27/we-cant-refuse-pick-cotton/forced-and-child-labor-linked-world-bank-group>

¹²⁶ See e.g. <https://www.theguardian.com/global-development/2016/jan/12/world-bank-cancels-uganda-road-sexual-assault-claims>



4. HOW IFIs WORK FOR GENDER AND CIVIC SPACE IN EGYPT, JORDAN AND TUNISIA

Drama therapy session in Shatila camp, Lebanon. Photo: Christopher Herwig

This chapter provides an overview of the gender and CSO related work that International Financial Institutions implement in the MENA region as a whole and in Egypt, Jordan and Tunisia specifically. The analysis is based on IFI documentation, on information provided by IFI gender departments and country offices and – most importantly - on input from external experts and organizations based in the countries of focus.

a. Analysis of IFI involvement with Gender and Civil Society in MENA

Regional Gender Action Plans

Among the selected IFIs the World Bank is the only institution with a dedicated (and/or public) Gender Action Plan for the MENA region, called the **MENA Regional Gender Action Plan (RGAP)**. The Plan for 2013-2016 is public, the 2017-2020 Plan is not. Table 5 presents an overview of the gender commitments made for the region.

The World Bank comments that “The Gender 2017-2020 Plan stems out of the Gender Strategy and is a commitment to our [World Bank] stakeholders. It indicates a big step from mainstreaming gender to a more narrow focus which is linked to context and regional specific gaps. We worked with colleagues from all sectors to identify what to focus on; **‘Women’s Economic Empowerment’ and ‘Gender and Conflict’; with Voice and Agency’** as a cross-cutting issue. We focus on promoting evidence-based policy making and use the Plan as an internal roadmap for diagnostics and country programs with links to the MENA regional strategy. We use the Plan as an internal roadmap for diagnostics and country programs and have made links to the MENA regional strategy. In addition, we report back on progress to internal management and [this way] aim to keep people accountable on all levels”.¹²⁷

¹²⁷ As stipulated by a Gender Expert at the World Bank who was involved in the creation of the MENA Gender Action Plan

Table 5: World Bank – Summary of MENA Regional Action Plan FY 2013-2016 Commitments

Prong 1: Country Programs	How? ¹²⁸
Strengthening diagnostic and analytical work in priority areas	<ul style="list-style-type: none"> - 1 gender-related diagnostic per country assistance strategy cycle programmed in country strategy document - 1 piece of analytical work in priority sector per year - To be monitored by sector gender focal point
Bolstering data collection, data access, monitoring and evaluation	<ul style="list-style-type: none"> - Access to nationally representative sex-disaggregated data in 40% of countries - Launch at least 3 rigorous impact evaluations (Sector Gender Focal points responsible) - 100% of WB supported survey data made publicly available in micro data catalogue within 1 year of completion
Informing country assistance strategy	<ul style="list-style-type: none"> - 100% of country assistance strategies are gender informed with analysis combined with either actions or monitoring and evaluation – ensure gender diagnostic or analytic work is available
Deepening gender across the portfolio	<ul style="list-style-type: none"> - Operations with gender-informed design by including gender expert at design stage and for implementation support and clinics for technical training on use of the gender flag - All financing with identified need for gender-responsive interventions to collect sex-disaggregated data (Sector Gender Focal Points)
Prong 2: Championing Dialogue	How? ¹²⁹
Regional analytical work on priority areas	<ul style="list-style-type: none"> - Actively disseminate its innovative analytical work across different sectors - Analytical focus on Gender dimensions of inequality of opportunity and Gender norms and their influences on agency and voice, legal impediments to decision-making, mobility, and empowerment and making the case for women as economic agents. Efforts will be made to make analytical work available online and in Arabic - MENA Gender Innovation Lab; is being set up¹³⁰
Forging strategic partnerships with traditional and nontraditional	<ul style="list-style-type: none"> - External partnerships will be a key element of the Region’s work (draw on the expertise of NGOs such as the Economic Research Center, Center for Arab Women Training and Research and the Institute for State Effectiveness)

¹²⁸ As per MENA Regional Action Plan 2013–2016 – confirmed by WB that 2017 ~Plan does not differ substantially

¹²⁹ As per RGAP 2013-2016 text

¹³⁰ This is not made explicit in the RGAP but was mentioned by Gender Expert at the World Bank

	- Partnerships with other IFIs on survey work (e.g. Life in Transition Survey with EBRD)
Leveraging the Bank's convening Power	- Regional workshops that promote south-south evidence-based learning and knowledge exchange - Conduct (joint) activities to fill gaps in data: Life in Transition Survey, Women as Entrepreneurs Data and Create Harmonized gender data portal and integrating gender more effectively into national strategies

On the leverage that the Gender Strategy and Action Plan have on country loan agreements in the region the World Bank comments that “[even though] the team looks at projects on all decision-making points before country loan agreements are signed, the loan is owned by the government. It is limited what we can provide to government, especially on “softer side interventions”. They [government] still need to buy into the agenda [before they would include these items in an agreement]”.¹³¹ “Our mandate is limited: we struggle with what we want to do and what we should do; this becomes particularly evident in gender. Even in the Mashreq Gender Facility case we need to find a niche to provide value added”.¹³² The World Bank highlights the relevance of having **Country gender action plans (CGAPs) in place in all countries, as they believe it helps the implementation of gender work**. CMUs take different approaches to their strategic and programmatic engagement in the countries depending on a series of factors. For example, so far a country gender action plan has been created for the Palestinian territories, through a consultative process also allowing for monitoring on a country level. We need these processes on country level in place. However, different contexts and needs allow for different approach”.¹³³ Critical CSO stakeholders in the region, however, reiterate that in the creation process of these action plans “it will be key to assure inter-ministerial buy in, which current action plans are often missing.”¹³⁴

¹³¹ Ibid

¹³² Ibid

¹³³ Ibid

¹³⁴ Interview Oxfam Jordan

Aside from the challenges in monitoring the action plans, stakeholders share that **a gap in expertise** on gender within the **IFI country offices is an issue**. Where, for example, the World Bank regional office has increased its capacity on gender over the years, the country offices lack both gender staff and resources, often falling back on safeguard specialist for gender issues. The European Bank for Reconstruction and Development states that they have as a goal to have regional gender focal points in all regional offices in the future but have not yet achieved this.¹³⁵ The European Investment Bank offices are currently too small to have gender focal points. A recent country implementation note of the International Monetary Fund states that “the Fund has begun training and capacity building through workshops in IMF regional technical assistance centers”.¹³⁶

Engagement and Awareness of Local Stakeholders in the MENA region

As described in Chapter 3, IFIs claim they deem engagement and consultation with civil society an important aspect of their work which is also made explicit in the creation of gender strategies. Indeed, both the World Bank and International Monetary Fund **share to have organized a wide range of opportunities for engagement** in the region, including Egypt, Jordan and Tunisia, aimed to include a vast range of local CSOs in order to provide an open dialogue.

Still, only a handful of our respondents in the region reported to have engaged with IFIs personally, and **none of the respondents were familiar with any of the IFI gender strategies** or action plans. Based on discussions with civil society organizations in the MENA region, CSOs have little interaction with the International Monetary Fund and World Bank. “For World Bank projects on decentralization in the MENA region, their main partner is the local government, with whom they have significant

¹³⁵ EBRD Gender Department

¹³⁶ IMF (2018). How To Operationalize Gender Issues In Country Work. June 2018 IMF Policy Paper.

interaction, but little interaction is seen with CSOs. [In contrast], the EU has more formal structures for consultation processes with CSOs.”¹³⁷

This lack of engagement is partially attributed to the negative perception of IFIs by CSOs in the region. Based on our interviews it becomes clear that there is **very little understanding by local (women’s) organizations – especially the smaller ones - of the (potential consequences of) IFI policies** and that IFIs appear to not be perceived as a real target for advocacy.¹³⁸ This lack of engagement is illustrated by an example of the European Bank for Reconstruction and Development: “Everyone can submit written comments to our consultation rounds. We do targeted research on CSOs as well. However, there are very few [CSOs] that have strong advocacy skills. In our consultation round in Tunisia we received two sets of comments.”¹³⁹ This lack of advocacy capacity is confirmed by others. “In order to have gender aware policies, you need capacity. If women’s organizations reach out to parliament or to IFIs, they need to be more strategic and more diplomatic”.¹⁴⁰

Even though capacity for engagement with IFIs indeed seems low in the region, those that have tried to engage with IFIs share that they **perceive multiple challenges in the approach that IFIs take in their outreach** attempts. The International Monetary Fund, for example, has consulted with think tanks and bigger CSOs such as Oxfam and the Phenix Centre in Jordan. Those that have participated share that “there is a **top down approach** to the consultation processes organized by the IFIs. Yes, CSOs are invited to consultation meetings, but they are there to discuss items that seem, in fact, already pre-decided and pre-determined”.¹⁴¹ A response to this criticism by IFIs is

¹³⁷ Interview Sarah Yerkes – Carnegie Endowment for international Peace

¹³⁸ Confirmed by Open Society Foundations, SADAQA, Al Hayat, SIGI, Hivos, Center for Global Development and Oxfam

¹³⁹ EBRD CSO department

¹⁴⁰ Zein el Khalil, Consultant Jordan (Hivos and UNWomen report)

¹⁴¹ Interview with Oxfam Jordan

that there is in fact an open agenda when meeting with CSOs and that “they welcome CSO concerns while trying to explain what recommendations they are making to the government”.¹⁴²

Moreover, those that have attended World Bank consultations in the region shared that the approach chosen did not match the realities of stakeholders on the ground. Examples of this mismatch include that invite letters for meetings were sent too late to make travel arrangements to come to the meeting; that the announcement only appeared in the newspaper (and not at the location where the investment was applicable); that the meeting was held in the Four Seasons Hotel in the capital; that some materials that were presented were in English (and not Arabic) and the language was too technical to understand what the risks of the loan at hand could be for them.¹⁴³ Moreover, those organizations that were consulted by the World Bank, share that there **was no follow up** on how their feedback was eventually integrated into policy or loan agreements.¹⁴⁴

Local stakeholders do understand the potential of leverage that, for example, the World Bank could have over government and help put a sensitive gender issue on the agenda.¹⁴⁵ For example, “**IFIs contributed to create a momentum regarding violence against women** by investing in several projects and programs but also with efficient advocacy work”.¹⁴⁶ Women’s groups therefore emphasize the importance of involvement of CSOs exactly at that policy and program development stage. There seems to be a consensus that the **dialogue needs to be tripartite** (CSOs, IFIs, Government) as the World Bank “loses the arguments” when they sit alone with government due to the fact that they do not know the details of the

¹⁴² As stated by for the CSO department of the IMF

¹⁴³ Based on examples shared by the Arab Watch Coalition

¹⁴⁴ Shared by e.g. UN Women Egypt, SADAQA

¹⁴⁵ As shared by three local stakeholders interviewed for this study

¹⁴⁶ Interview TAMSS in Tunisia

issue or because they are blackmailed with “cultural” arguments.¹⁴⁷ Vice versa, perception is that the programs IFIs implement in the region are not contextualised enough and needs to capitalize on what exists. In doing so, “the World Bank needs to discuss with the private sector and the civil society in order to be more efficient and comprehensive.”¹⁴⁸

Regarding the mandate and existing capacity of IFIs to engage with all (large and small) civil society, IFI responses are frank. “We really do want to engage with CSOs to get a better idea of their views, but for us it remains **a big question how to best engage with them**. Is it our task to come in to [existing forums] to involve women’s rights organizations? What do we bring to the table that others do not already? We need to trust that organizations such as UN Women and bi-lateral donors do engage with all relevant parties and get their views across.”¹⁴⁹ ¹⁵⁰ The European Bank for Reconstruction and Development complements that any time there is a bank strategy consultation, the CSO department aims to attend in country and engages CSOs. However, “bankers’ first objective is to make a deal; they are aware of issues such as gender and CSOs but are not always aware on how to instrumentalize these to make a project better. We are trying to build capacity on this”.¹⁵¹

Shrinking Civic Space

On the issue of shrinking civic space, few public IFI statements can be found. However, the World Bank has **explicitly recognized the shrinking civic space** in the region and the threats that organizations may face. “The bank does recognize the shrinking space. This is a challenge, especially when World Bank partners and clients

¹⁴⁷ As posed by two women’s organisations interviewed for this study.

¹⁴⁸ Egyptian Centre for Economic and Social Rights

¹⁴⁹ World Bank Gender MENA expert

¹⁵⁰ The CSO department of the World Bank did not respond to the interviewer’s request for an interview so we can not take into account their views on how they tackle this issue

¹⁵¹ EBRD CSO department

are implicated in the creation of conditions that are antithetic to CSO progress.”¹⁵² Regarding solutions the World Bank poses that “the issue of civic space is larger than any one institution so a multi-agency response is key so that institutions can play to their comparative strengths”¹⁵³ and “we are trying to find entry points without being politically insensitive.”¹⁵⁴ Human Rights Watch emphasizes that IFIs need to make better use of **the analysis of civil space as part of the creation of country engagement frameworks**. “If it [civic space] is not analyzed within partnership framework it will not be taken up by the bank in projects. We want to see that IFIs analyze environment of freedom of association in all country diagnostics. If the World Bank will not know if there is no space to speak up they will continue to finance projects that harm CSOs. In addition, within the Environmental and Social Frameworks and safeguards IFIs need to consider CSO space when analyzing risks of projects, this needs to include something in the loan covenants which provides space for people to complain and participate safely.”¹⁵⁵ Some IFIs are starting to consider CSO safety by “**trying to create safe spaces** by having discussions around topics that are openly acceptable in public forums and politically sensitive topics offline”.^{156 157}

¹⁵² As quoted by Jeff Thindwa is currently the Program Manager for the Global Partnership for Social Accountability (GPSA) in the Governance Global Practice at the World Bank, at the Freedom house moderated – “Twin goals and shrinking space” panel at World Bank in 2016.

<https://www.youtube.com/watch?v=O10bmfLUk4&feature=youtu.be>

¹⁵³ *ibid*

¹⁵⁴ World Bank Gender MENA expert

¹⁵⁵ Human Rights Watch, during “Twin goals and shrinking space” panel at World Bank in 2016.

<https://www.youtube.com/watch?v=O10bmfLUk4&feature=youtu.be>

¹⁵⁵ *ibid*

¹⁵⁶ EBRD CSO department

¹⁵⁷ The Coalition for Human Rights in Development. They collect evidence on the rising number of attacks on human rights defenders in IFI projects – especially the IFC – and including in the MENA region – and support advocacy efforts towards the IFIs to protect them and their space.

<https://accountabilityproject.org/work/policy/coalition-human-rights-development/>

b. Overview and Analysis of IFI contributions to Gender in Egypt, Jordan and Tunisia

Below we provide an overview of IFIs gender and CSO engagement activities for Egypt, Jordan and Tunisia, including an analysis of local stakeholders' perspectives on this work in which we highlight some of the challenges in IFI dynamics and some promising efforts around gender and civic space with IFIs. Annex 4 provides a selection of activities that are currently being implemented by the IFIs in the respective countries (this list is non-exhaustive).

Egypt

In Egypt, respondents share mixed stories on the contribution of IFI interventions to gender. On the one hand, the National Council for Women shares to have a productive relationship with them (particularly the European Bank for Reconstruction and Development and the World Bank) and that “their studies do help us in our work and campaigns to change attitude of actors.”¹⁵⁸ In addition, UN Women appears to have one of the strongest working relationships with the World Bank. They collaborate on gender data (where they will conduct an assessment of the policy, legal and operational environment for the production of gender statistics that will hopefully inform the development of the national statistics plans); on advocacy efforts on Women’s Economic Empowerment issues through support for a women’s observatory; and collaborate with the International Finance Corporation to promote uptake of a business model that was used for an agribusiness project focused on women.¹⁵⁹ Practically, in Egypt, the Ministry of Social Solidarity appears to have the most influence on the topic of gender, in addition to the Ministry of Investment who has worked closely with the World Bank on a Women’s Economic Empowerment study (see more below).

¹⁵⁸ Interview National Council for Women

¹⁵⁹ UN Women Egypt

Other respondents share that at best, they are not aware of any positive contributions to gender equality,¹⁶⁰ and at worst that they have perceived that their work is negatively affecting gender equality, especially when asked about the International Monetary Fund.¹⁶¹ Several critiques are shared by local stakeholder that contribute to lack of impact. First, stakeholders perceive that **IFIs do not focus on the right topics** to have real impact on gender. “If institutions working on economic rights do not pair their programs up with the care economy, there will likely be little impact.”¹⁶² In addition, a disproportionate focus on entrepreneurship is perceived. “Most donors [including World Bank and the European Bank for Reconstruction and Development] are channeling funding for women through SME’s (such as through MSMEDA) which is good. However, what is needed in addition is attention to non-financial services and to technical assistance with a focus on supporting women to build their confidence and ability to take a decision and how to overcome social barriers. Money per se is not the question, but accessibility to money, society and systems are”.¹⁶³ Several respondents share that donors - including IFIs - are fighting over the low hanging fruits that are perceived as less challenging to tackle. In line with this, World Bank’s local staff perceive work on **changing certain cultural norms to be the biggest challenge**, alongside the challenges they face in work on the implementation of law. “We have, however, had success in new investment law and in the inheritance law, which we work on influencing through our “Women, Business and the Law study.”¹⁶⁴

A second critique is focused on internal IFI processes, including the lack of building on what already exists in country,¹⁶⁵ **lack of research and sex-disaggregated**

¹⁶⁰ As shared by UN Women, Egyptian Centre for Economic and Social Rights.

¹⁶¹ Shared by for example Egypt Initiative for Personal Rights and in their critical notes on the IMF in: <https://eipr.org/en/publications/eye-debt-iii>

¹⁶² UN Women

¹⁶³ Egyptian Center for Women's Rights (ECWR)

¹⁶⁴ World Bank Egypt office

¹⁶⁵ As stated by, e.g. ECES

data,¹⁶⁶ lack of gender expertise and lack of quality assurance,¹⁶⁷ and lack of gender targets.¹⁶⁸ In spite of the increase in social spending, journalists who are engaged in shadow reporting of particularly the International Monetary Fund interventions in Egypt state to “see the disproportionate effects of these reforms on women in terms of access to health and food and that eight of the reforms that IMF has supported – including budget tightening through inequitable fiscal policy – were judged to have a broadly adverse impact on citizens and economic development.”¹⁶⁹

A last critique is regarding lack of attention towards **the closing space in Egypt** which has shown to impede **interaction with relevant CSOs**. “The space for CSOs is very limited at the moment, but if IFIs would take a more active stance on that the voice of CSOs is key to them they could potentially open that space up.”¹⁷⁰ UN Women is mentioned as a key partner to maintain the debate on women’s rights with the government in Egypt as “the government is used to working with them on sensitive issues”.¹⁷¹ Part of lack of engagement, however, is attributed again to lack of capacity of local CSOs. “There is not much involvement of IFIs with CSOs here as these institutions rely on experts. Also, CSOs have **no capacity to talk to them**. We need to tackle IFIs more like we did with the UN, for example to follow CEDAW implementation in 1999, the UN conducted capacity building exercises for CSOs to show how to produce evidence and shadow reports.”¹⁷² In line with this reasoning, Bank Information Centre (BIC) worked from June 2014 until November 2015 with CSOs to produce a set of practical recommendations for a meaningful and participatory process of the World Bank Country

¹⁶⁶ EIPR, IFC Egypt and USAID

¹⁶⁷ IFC Egypt

¹⁶⁸ IFC Egypt

¹⁶⁹ EIPR, Eye on Debt

¹⁷⁰ As shared by a bilateral donor

¹⁷¹ Ibid

¹⁷² Egyptian Center for Women's Rights (ECWR)

Partnership Framework. Ultimately, these Egyptian CSOs submitted a 'shadow' framework to espouse their priorities for the development of their country with a multi-phase consultation process in several regions, which included the limits on civil society space in the country.¹⁷³

Some positive remarks were made about the **space for engagement on gender based violence in the country**, even if for a undesirable reason. "More money goes towards women's issues now as all other politically sensitive rights topics are off limits".¹⁷⁴ In addition, in 2018 the WB produced the Women's Economic Empowerment Report at the request from H.E. Dr. Sahar Nasr, Minister of Investment and International Cooperation; and H.E. Dr. Maya Morsy, President of the National Council for Women. The report outlines the factors contributing to the persistently low economic participation of Egyptian women and to identify "gender smart" policies and solutions to boost economic growth while at the same time, narrowing relevant gender gaps. Still, it is not made explicit in the report how the World Bank will use this research as base for their policy dialogue and development. The National Council for Women, however, shares that an action plan will come out of this study, in collaboration with the Ministry of Investment.

Jordan

In Jordan, only those CSOs that have been involved with IFIs at a national level appear to have a good understanding on how IFIs work or how they can influence gender.

Perceptions of IFIs and particularly of the International Monetary Fund and World Bank have become mostly negative after the tax law changed.¹⁷⁵ One institution that is conducting impact assessments on these policies attributes this negative perception to the negative effects of International Monetary Fund policies over the years. "The Fund has had 6 programs in Jordan, and we are paying the

¹⁷³ Bank information Centre (2017). Influencing bank projects before they happen

¹⁷⁴ As stated by a bilateral donor

¹⁷⁵ As observed by multiple CSOs such as Phenix Centre and Al Hayat Centre

price: we see the negative consequences in living conditions where women pay a bigger price due to unfair tax policies. This is because the poorest families are often headed by women.”¹⁷⁶

A main criticism from stakeholders in Jordan is, similar to Egypt, **that local priorities are not explicitly included** in debates and policy. As one institution puts it: “As they do not do any outreach nor do they explain their policies in understandable language they appear to be the invisible hand. Where is their social responsibility scheme? These funds are not funding priorities of Jordanian women.”¹⁷⁷ This is partially caused by the fact that, within the debate, gender is generally mentioned as a social justice issue and not as a broader systemic issue. “We perceive IFIs to take the easy road as they solely focus on finance and microfinance for women [instead of the systems that prevent access to finance]”.¹⁷⁸

A second critique comes from **the lack of research and data and lack of transparency on this data**, especially regarding national IFI led gender strategies. The Jordanian Commission for Women states that “there needs to be a country level analysis (including fiscal policies) for the gender action plan, as we do not receive data about this from the government”.¹⁷⁹ Because of this “there is no monitoring on whether funds are contributing to the local economy or helping women.”¹⁸⁰ Sharing relevant research and data collected by IFIs is particularly important as several respondents state that if they do have IFI research available, it can significantly help their advocacy work and has, in fact, opened up channels in some instances.¹⁸¹

¹⁷⁶ Phenix Centre

¹⁷⁷ Al Hayat centre

¹⁷⁸ As stated by a local stakeholder interviewed for this study

¹⁷⁹ Jordanian National Commission for Women

¹⁸⁰ Al Hayat Centre

¹⁸¹ Based on interviews with for example, Open Society Foundations, SADAQA and SIGI

A third criticism is **on level of engagement of stakeholders in consultation**. “These IFIs can and should play a key role in involving CSO voices and consider them as equal partners”.¹⁸² Even in those instances where CSOs were consulted “World Bank started with good will in terms of mainstreaming gender within the government, but ended up paying lip service to them as CSOs did not have a seat at the table.”¹⁸³ “There are not enough consultations, and when they happen they do not always feed back to the relevant government entities involved. This can be easily resolved by reporting back. **The lack of consultation results sometimes in choosing superficial issues to focus on rather than expand vertically to solve issues from their roots**. If they [IFIs] choose to target sociocultural or gender role issues they have to listen to CSOs”.¹⁸⁴ The UN Women Jordan Country Office does provide policy expert views to IFIs including the World Bank, on plans and initiatives to enhance women’s access to the labor market and women’s economic empowerment. They are part of technical meetings on barriers to women’s access to employment, specifically on gender responsive transportation and child care facilities. In addition, they are strengthening their bilateral relationship with IFIs in a number of areas including undertaking gender analyses.¹⁸⁵ A recommendation from local stakeholders is for IFIs to engage CSOs in the agreement processes with the government in order to be more transparent. This is particularly relevant as several bi-lateral donors shared that the shrinking space is influencing their choices and affects direct contribution to CSOs.¹⁸⁶

Last, it is mentioned that in those instances where local views are taken into account on gender in policy development, **insufficient budget is allocated**. For example, the World Bank managed to link the public transport issue (which has proven to be a main obstacle for

¹⁸² Ibid

¹⁸³ Shared by two organisations interviewed for this study

¹⁸⁴ SADAQA

¹⁸⁵ UN Women Jordan

¹⁸⁶ GIZ

participation of women in Jordan) to the Development Policy Loan as a key gender issue, due to consultation with CSOs. However, in the end and according to parties on the ground, not enough budget was allocated towards this part of the loan to have considerable impact. Both in government and within the IFIs “there is no gender responsive budgeting. They commissioned and trained focal points in IFIs in Jordan, but these people are too junior so they cannot have real influence. The current government budget does not include gender nor does it include the [United Nations] sustainable development goals”.¹⁸⁷

One promising new avenue that is being developed in Jordan is **the Mashreq Gender Facility**, government-led, World Bank-facilitated initiative with initial funding from the Governments of Canada and Norway. The World Bank will work closely with the Governments of Iraq, Jordan and Lebanon to ensure that a 100 percent of Mashreq Facility projects apply the gender lens in these countries, through identifying and addressing gender gaps effectively and will encourage wide inclusion and equitable participation of women and men in country-level consultative processes.¹⁸⁸ Gender gaps that will be addressed however will continue to include gaps for women entrepreneurs and in access to finance (rather than addressing macroeconomic or structural gaps, such as unpaid care work). The Women’s Economic Empowerment Action Plans will guide national implementation of countries’ priorities, the Facility will provide technical assistance funding for its implementation (for which funds are currently being raised), and other organizations (NGOs, private sector, academia etc.) may be contracted through competitive processes to support the implementation of the workplan. The Steering Committee of the Mashreq Gender Facility includes the three governments, Governments of Canada and Norway, World Bank and IFC, and UN Women.

¹⁸⁷ Consultant to Hivos UN Women study

¹⁸⁸ Beirut Communique” from the First High-Level Mashreq Conference On Women’s Economic Empowerment: <https://www.worldbank.org/en/news/press-release/2019/01/19/beirut-communique>

Tunisia

In Tunisia, only those interviewees that had the opportunity to directly collaborate with IFIs in a frame of a program or to receive direct funding proved to be familiar with the work of these institutions.¹⁸⁹ Some state that “IFIs in Tunisia **have created a momentum on gender via advocacy.**

Their work has coincided with the vote of Law 58 adopted in Tunisia (which is fighting violence against women) and they have thus been able to support the adaptation and evolution of this regulatory framework in Tunisia”.¹⁹⁰

According to stakeholders interviewed in the frame of this research, IFIs especially collaborate with Ministries of Women and Family Affairs, Youth and Sports and Social Affairs in these efforts. The World Bank also collaborates with UN Women through the pilot project Empower Her (promoting rural women entrepreneurship) and through the launch of a recent project on sustaining peace through social cohesion focusing on youth within the WB’s “Pathway for Peace” program.¹⁹¹

The respondents acknowledge the fact the IFIs are mainly financially supporting women entrepreneurship and women financial inclusion, but via different projects and programmes. Generally, the programs and projects developed and implemented by IFIs are considered to be “well-tailored to the Tunisian context.”¹⁹² However, IFIs are not sufficiently **taking into account local actors' perspective,** according to several interviewees.¹⁹³ Indeed, it is flagged that because IFIs are collaborating with the government and ministries there is no direct collaboration with local CSOs or only the ones who are always involved in work done by the Ministries. There is not enough clarity on “how to collaborate directly with the IFIs or even to know that program exists, for example in the frame of the

¹⁸⁹ Interview with POMED

¹⁹⁰ Interview with TAMSS

¹⁹¹ Based on information provided by UN Women Tunisia

¹⁹² As stated by PCPA, POMED and TAMSS

¹⁹³ As stated by PCPA, POMED and TAMSS

European Bank for Reconstruction and Development programs that are currently taking place”.¹⁹⁴

The **lack of long-term evaluation on the impact of the programs** is a second critique, which is attributed to switch of staff on projects after funding stops.¹⁹⁵ Third, interviewees state that too little focus of IFIs is on change of mindsets, or the underlying causes for inequality. “The question of women economic empowerment is closely linked to entrepreneurship, but, in the case of a country like Tunisia supporting women entrepreneurship should mean working towards a change of mentalities.”¹⁹⁶

The **lack of advocacy regarding the question of civic space was a last critique**. In the case of Tunisia, this means the relevance for IFIs to support Decree 88 which is, according to some local actors¹⁹⁷, a solid framework. Some stakeholders state that “IFIs are able to have more an impact in Tunisia than in Jordan and Egypt because the government is less hostile. Still, also in Tunisia, overall the local international community (including IFIs) is perceived to be taking a stronger stance on gender issues (raising awareness) than on the problematic linked to civic space”.¹⁹⁸

An example of successful advocacy towards IFIs in Tunisia, is that of the work of Bank Information Centre with CSO partners before the World Bank Country Partnership Framework was created. Together, they engaged closely with the World Bank Country Office in order to advocate towards the World Bank to elevate local proposals to the international level in Washington DC. It resulted in the addition of six more consultations on the Framework throughout the country and a comprehensive information portal on the World Bank website. Also, it gave the

¹⁹⁴ Interview with TAMSS

¹⁹⁵ Ibid

¹⁹⁶ Ibid

¹⁹⁷ Interview of POMED

¹⁹⁸ Based on interview with a local stakeholder

opportunity for Tunisian CSOs to organize around the process discussing the role of the World Bank in Tunisia and **consolidating a working group to push the Bank to be more accountable.**¹⁹⁹

¹⁹⁹ Bank Information Centre (2017). Influencing World Bank Projects Before They Happen: A Beginner's Guide To Advocacy On Country Partnership Frameworks.



5. RECOMMENDATIONS

Azraq refugee camp, Jordan. Photo: Christopher Herwig

Below we summarize, per intersection area, the opportunities that IFIs (World Bank Group, International Monetary Fund, European Investment Bank and European Bank for Reconstruction and Development) could take to have a greater effect on gender and civic space through a set of recommendations. Some are general, others are MENA specific. We also formulate a range of recommendations for other stakeholders.

Recommendations to IFIs

Macro-economic Policy level:

- There is a need to include gender implications of broader policy-based lending or macro-economic reforms - which have distinct and often harmful impacts on women's health, education, and social and economic wellbeing – in the IFI gender strategies. The African Development Bank's Gender Policy and the Inter-American Development Bank's Operational Gender Policy reference the need to integrate gender dimensions into macro-economic policies, which can be used as an example.
- The International Monetary Fund and World Bank must support its member states to develop efficient and progressive ways of collecting sufficient tax to create the fiscal space needed to invest in social welfare; protect the fiscal space created by the focus on increased revenue generation through progressive and equitable means to invest in women's human rights and must formally recognize that women are concentrated in the informal economy (the World Bank and IMF have recognized the latter).

Country Frameworks and Loan Agreements:

- IFIs must attach a "price tag" to gender benchmarks and hereby encourage governments to reallocate spending (as e.g. done by the International Monetary Fund for nurseries in Egypt) on gender efforts, ensuring budget allocation. This can be done, for example, in the updates of the country frameworks.

- IFIs need to ensure that gender policies apply to all of the work they do. For example, this means that the World Bank must ensure that their gender strategy and safeguard policy also cover the activities and outcomes of development policy loans.
- IFIs must include the analysis of the civil space environment and freedom of association as part of the creation of country engagement frameworks and it must be part the risk assessments in environmental and social frameworks and safeguards. Part of this documentation needs to include threats against human rights defenders, unionists, and repressive legislation against CSOs.

Gender Policies and Strategies:

- IFI gender policies should always include rights-based language in their documents and include men's and women's equal rights as a core development objective.
- All IFIs need to include gender relevant topics in their gender strategies and country work, also those topics that could be perceived as "sensitive". For example, the World Bank Gender Strategy now acknowledges the need to address gender-based violence and its impact on women's and men's wellbeing.

Monitoring:

- IFI gender policies/strategies need to identify specific tools or specific mechanisms to monitor women's and men's equal project participation, as well as projects' gender impacts, beyond initial project planning stage. Data and research on gender is often the only way to convince both private sector and government on why investing in relevant gender issues is important (an example that can be used is the Inter-American Development Bank's Operational Gender Policy).
- The recently launched MENA Gender Innovations Lab needs to be well resourced to fill the large gender data and impact assessment gap in the region. Priority should be given to ensure sufficient funding is available.

Safeguards:

- The IFIs in this report fail to incorporate a specific gender safeguard to explicitly guard against and proactively address negative gender impacts. They need to, instead, include “preventive” measures to hold projects accountable for harmful gender impacts (such as for example, the Inter-American Development Bank does).
- Within the Environmental and Social Framework and safeguards IFIs need to consider CSO space when analyzing risks of projects, this needs to include a recognition of the crucial role of women’s rights organizing and women’s organizations in ensuring stable, safe, and peaceful societies. In addition, investment and loan agreements need to include language on providing space for people to complain and participate safely in these procedures.

Financial Integrity policies (AML/CFT)

- IFIs need to support the development of an inclusive banking system, including through enhanced guidance and support to countries and financial institutions in ensuring that the design and implementation of CTF measures is consistent with ensuring financial inclusion, including to address gendered financial exclusion gaps.²⁰⁰
- IFIs need to provide detailed guidance to international, regional, and national bodies on how to identify existing, and anticipate future, adverse impacts in the implementation of CTF policies (the debate that the World Bank has started on this could be used as a base).

CSO Engagement and Consultation

- Especially in the MENA region, IFIs need to consider the implications that a shrinking civil space has on impacts and ability to engage effectively with civil society.
- IFIs need to ensure that consultation is conducted in an inclusive manner:

²⁰⁰ As based on Duke and WPP (2017) recommendations

- Avoid the tendency to treat civil society organizations and their activities as homogenous: ensure that a diverse set of women's organizations are represented in consultations through targeted outreach. You could, however, appoint one party to coordinate engagement through their networks.
- Lessons from Egypt and Tunisia in 2014 and 2015 show that having a civil society point person who is well-connected among local groups, but can also liaise with in-country Bank officials, is key for achieving relevant results both ways. Be proactive in establishing this CSO point.
- Be proactive in sharing information about engagement and consultation moments (the CSO departments' response rates are low and often unknown to local parties). Send invitations far in advance and ensure that announcements are included not only on newspapers but also in the locations where projects may have an impact (city halls etc.).
- Create safe spaces for civil society organizations to engage offering offline and non-public engagement moments, especially in regions where civic space is shrinking.
- Ensure that the location where CSO meetings are held are (perceived as) accessible and appropriate.
- Ensure that the materials shared during the consultations are in the national language and are in accessible (and not too technical) language so that the potential consequences of a loan or investment are understandable to the audience.
- Provide CSOs and those populations that they represent, with sufficient information about the pros and cons of certain investment projects and DPLs and provide them with the opportunity to consent (to decline or accept).²⁰¹

²⁰¹ As proposed by Elaine Zuckerman, Gender Action

To CSOs based in the MENA region

- Lessons from Tunisia and Egypt show that continuous engagement with the World Bank country office through partners on the ground is crucial. Having a civil society point person who is well-connected among local groups, but can also liaise with in-country Bank officials, was a huge asset for getting the multiregional consultation in Egypt and Tunisia.²⁰² Ensure greater capacity within your organizations appointing a designated person that can speak the language of economics and finance and can effectively engage with IFIs when the opportunity arises
- Participate in consultation rounds with the IFIs. Lists of ongoing and upcoming consultation processes are available online.²⁰³
- At the national level, find out what IFIs are saying to your government in its – for example – Article IV report (IMF) or country partnership framework (WB and EBRD). IMF resident representatives in countries and World Bank country offices are responsible for engaging with civil society and are your first point of contact for concerns about national policy advise.
- Partner with and build on the resources of those organizations that have already embarked upon successful advocacy with IFIs (even if not in the MENA region), including Bank Information Centre, Bretton Woods Project Bank Watch and Gender Action.
- Get to know the Country Directors and Gender Focal Points of each IFI. Engage with them as well as with the Ministry of Finance (who appoints the Country Directors) to gain more information on country level activities.
- IFIs listen to their shareholders. Ensure to gain access to and align with your local governmental institution that

²⁰² Bank Information Centre (2017). Influencing World Bank Projects Before They Happen: A Beginner's Guide To Advocacy On Country Partnership Frameworks.

²⁰³ <https://consultations.worldbank.org>
<https://www.ebrd-consultations.com/consultations/>
<https://www.imf.org/en/About/Partners/Civil-society>
<https://www.eib.org/en/about/partners/cso/events/index.htm>

has the oversight mandate on IFIs. They have influence with their votes. The institutions with oversight mandate has a representative on the Board of Directors and/or Governors of the IFI.²⁰⁴

To CSOs based in the North

- Engage local CSOs more in your efforts with IFIs in order to build their capacity and to bring their views across at potential engagement moments with IFIs.
- IFIs listen to their shareholders. Ensure to gain access to and align with your local governmental institution that has the oversight mandate on IFIs. They have influence with their votes. The institutions with oversight mandate has a representative on the Board of Directors and/or Governors of the IFI.²⁰⁵
- Reach out to the media. The IMF and World Bank keep track of how they are reported on and are keen to present positive public profiles.

International Organizations (UN agencies)

- Ensure that the work and policies of IFIs on gender and civil society takes a stronger position on your (advocacy) agenda.
- Use your strategic position to engage relevant women's organizations that may otherwise not take part in consultations. Engage local CSOs more in your efforts with IFIs in order to build their capacity: by representing their views and feeding back information to them.

²⁰⁴ World Bank:

<http://pubdocs.worldbank.org/en/627731541108831255/BankGovernors.pdf>
<http://pubdocs.worldbank.org/en/241041541103873167/BankExecutiveDirectors.pdf>,

IMF: <https://www.imf.org/external/np/sec/memdir/eds.aspx>

EBRD: <https://www.ebrd.com/shareholders-and-board-of-governors.html>

EIB: https://www.eib.org/en/about/governance-and-structure/statutory-bodies/board_of_directors/

²⁰⁵ World Bank:

<http://pubdocs.worldbank.org/en/627731541108831255/BankGovernors.pdf>
<http://pubdocs.worldbank.org/en/241041541103873167/BankExecutiveDirectors.pdf>

IMF: <https://www.imf.org/external/np/sec/memdir/eds.aspx>

EBRD: <https://www.ebrd.com/shareholders-and-board-of-governors.html>

EIB: https://www.eib.org/en/about/governance-and-structure/statutory-bodies/board_of_directors/

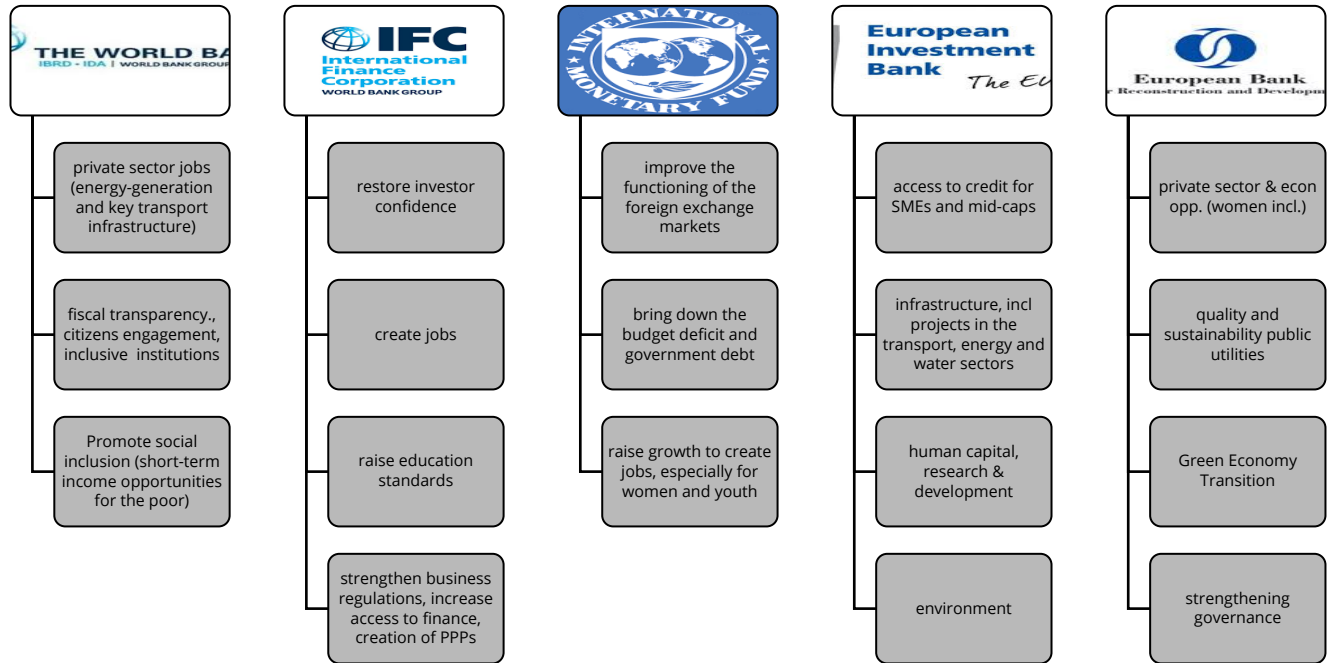
- Build further on the work of feminist economist networks to provide more evidence on the relationship between effective macro-economic policies and gender.
- Use the UN Gender Result Group (led by UN Women) strategically to ensure the effective participation of IFI gender focal points on gender activities at a national and international level (this is not implemented yet).

To Northern Governments

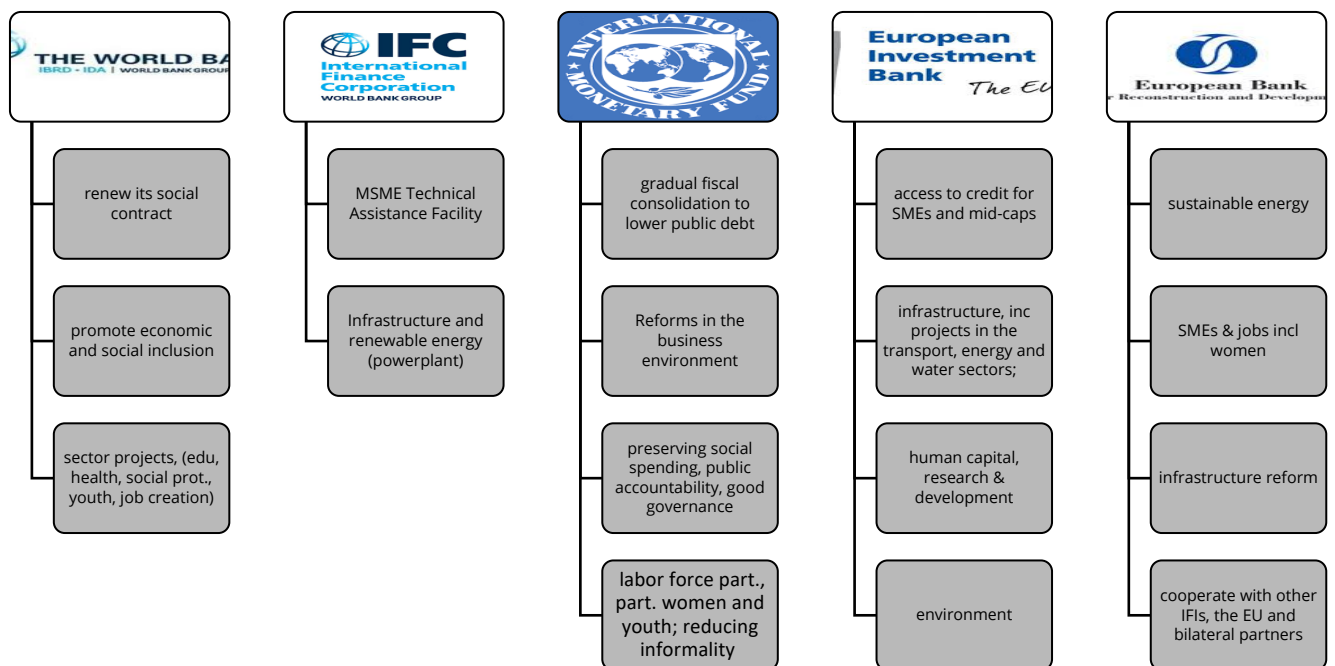
- As shareholders to the IFIs, build on this leverage to include gender and civil society focused issues on the agenda in both the international (Spring and Annual) meetings and national engagement moments (donor meetings and working groups, especially gender working group in country).
- Gender, development and aid ministries and departments of Northern governments should more actively reach out to their treasuries and IFI departments in development ministries to develop policy coherence.
- Coordinate efforts with IFIs on gender through e.g. donor working groups. In addition, coordinate internally (with the separate departments who deal with IFIs and gender) inside donor structures and through donor working groups to cross-reference considerations.
- The recently launched MENA Gender Innovations Lab needs to be well resourced to fill the large gender and impact data gap in the region but seeking long term funding for impact assessment is challenging. Consider support for the Lab.

Annex 1: IFI Focus per country

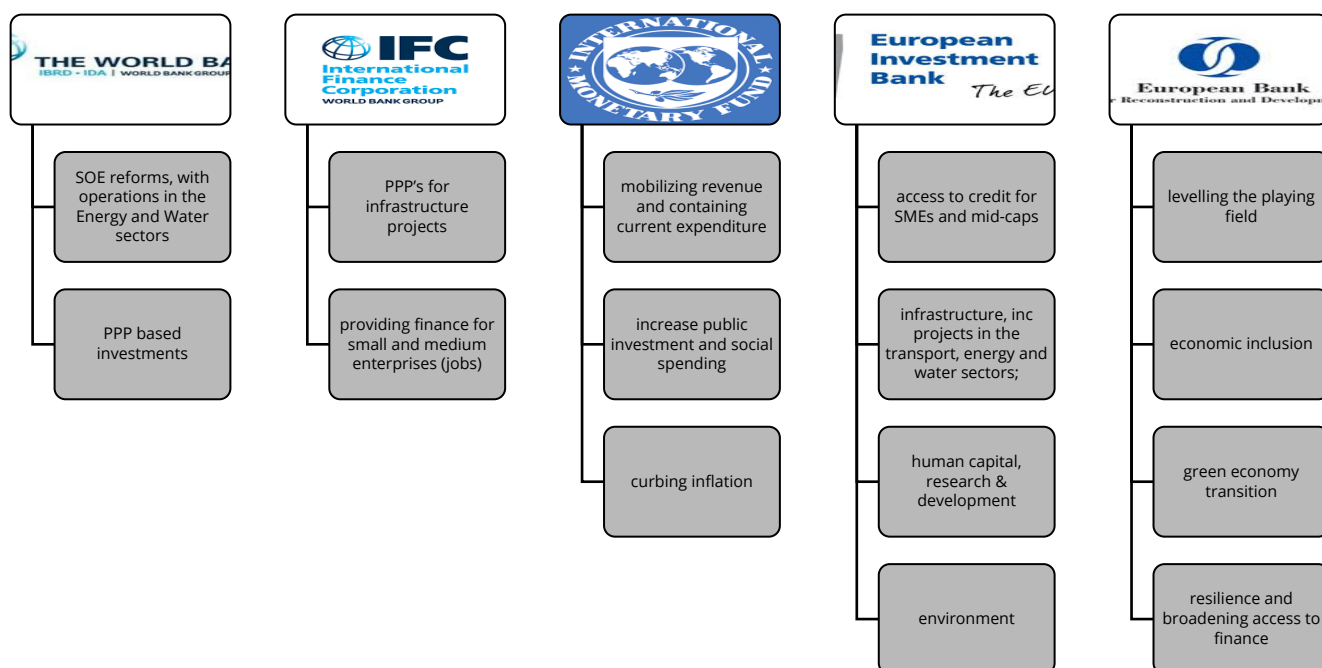
IFI Focus in Egypt



IFI Focus in Jordan



IFI Focus in Tunisia



Annex 2: World Bank Gender Strategy Results Framework²⁰⁶

OUTPUTS	ACTIVITIES	END-FY16	STATUS	END-FY17	STATUS
The monitoring framework for the Bank and the IFC signals the importance of results and allows the achievement of results to be evaluated.	The identification of outcomes is undertaken at the design stage of projects and tracked throughout the project lifespan.	Guidelines for the new monitoring system are issued	Completed	The new monitoring system is piloted, revised, and a baseline established.	On track
	Progress on results is tracked during implementation and at project completion.	New guidelines for ISRs and ICRs are established (World Bank). New guidelines for PCRs, PSRs, CRMs, IRM, QAE are established (IFC).	Ongoing	The guidelines are applied in ISRs for projects approved in FY 17.	Delayed

²⁰⁶ Source:

<http://documents.worldbank.org/curated/en/207481489888852225/pdf/Strategy-Update-to-the-Board-2-17-17Final-02172017.pdf>

	Project-level monitoring and Tier 2 CSCI is supported by better project-level data.	Guidelines for project-level data are issued, including provision for all person-level data to be sex-disaggregated.	Ongoing	Review of a sample of projects to assess whether guidelines are being implemented.	On track
--	---	--	---------	--	----------

Annex 3: Interview Guide

INTERVIEW QUESTIONS INTERNATIONAL EXPERTS

Explanation to Interviewee:

We are aiming to explore international financial institutions' and development banks' strategies and policies, and how the topics of gender and civic space are included in them and what are their impacts.

1) Introduction

- a. Share a little bit about your work on gender equality or civic space and in the region

2) Policies and their impact

Instruction:

- *Make sure you have an overview of all institution's policies nearby when you talk to them so you can remind or refer to them. (World Bank, EU, IMF etc.)*
- *Goal of this component: We are aiming to explore international financial institutions' and development banks' strategies and policies, how gender and civic space are included in them and what their impacts are. We are seeking to find strategies and policies that target gender equality, economic empowerment and civic space, so ask for all three topics.*
- *You can use the questions below to get to these answers, but you may also improvise.*

- a. Looking within the scope of gender equality, which international financial institution or development bank does the most work on gender equality in the region you think? (probe: FATF, World Bank, IFC, EU)
- b. And on civic space?
- c. Can you name specific policies or frameworks or action plans of these institutions that are relevant for the region? (probe: Worldbank Gender Action Plan, EU action Plan, etc.)
- d. In your experience, or to your knowledge, in **what way** have these policies and action plans contributed to:
 - i. gender equality, economic empowerment and/or
 - ii. civic space?

Probe:

*Which policies (by which institution) do you consider to have **the most impact** (either positive or negative) on gender equality in the MENA region?*

*Which policies (by which institution) do you consider to have **the most impact** (either positive or negative) on civic space in the region?*

- e. To your knowledge, do these IFIs (WB, IMF etc) **monitor or measure their progress** on these topics?

Probe: How? Is their measurement sufficient? What kind of measurement would be better?

- f. Would you be able to direct me towards any **studies** that either your institution or external institutions have conducted on the impact of these policies.

3) Adverse and Contradictory policies

- b. *Instruction: Here we aim to double check if there are any adverse, negative or unexpected outcomes and impacts coming from the IFIs policies (and any contradictory policies now that counter terrorism*

regulation has become so strong). Make sure you probe for FATF's recommendation 8 here, whether they know of it and whether they come up with any examples of de-risking and the shrinking of civil space.

- a. Would you be able to share if IFI policies have had any **unintended /adverse** consequences in the region that you know of regarding gender equality or civic space?
- b. Have you seen any **policy contradictions** between the institutions' financial inclusion and CTF policies and goals?

For example: "Some of the [previous research](#) that I supported points out that, recently, international counterterrorism regulations have negatively impacted the financial space for (women's) organizations to operate effectively due to the financial sector's reaction to "de-risk" their portfolios. Have you, as the XX, experienced the impact of such counterterrorism regulation in your own work? For example, have you experienced new challenges in implementing financial inclusion programs, implementing cash transfer programs or funding local women's organizations' work, due to these developments?"

4) Knowledge by local institutions

Instruction: Here we aim to identify key stakeholders in the region that work on some of these issues, find out if local stakeholders are even aware that these policies exist and find out if any local stakeholders already lobby and advocate towards IFI policies. We also aim to find out who could be our potential partners in advocacy efforts.

- a. Are local actors (women's organizations, think tanks etc.) **aware** of these region focused and gender focused policies of development banks and financial institutions?

- b. Have you seen any local institutions **actively build on or use** any of these frameworks? If so, in what way do these policies “work” for them and in what way do they not?

5) Policy change recommendations

Instruction: Here we aim to find out what needs to change in policy land in order to have a bigger impact.

- a. Would you be able to suggest any **changes to current policies and action** that would help further achieve these goals/strengthen these issues (both gender equality and civil space)? How can IFIs help to move these issues along?

Probe: Where does the improvement from their side need to take place?

- *Better measurement/data?*
 - *Stricter conditionalities to loans?*
 - *Better policies?*
 - *Accountability?*
 - *More committed staff?*
 - *Etc?*
- b. Based on your knowledge, what kind of new policies and action plans by international financial institutions **could help local actors** achieve gender equality and economic opportunities?
 - c. Based on your knowledge, what kind of policies and action plans by international financial institutions **could help local actors** maintain a strong civic space?

6) Avenues and Stakeholders to influence

- a. *Instruction: Here we aim to find out avenues for advocacy and pressure points. To identify avenues where women's rights organizations can influence stakeholders and such policies and strengthen the*

gender-perspective. We also aim to find out who could be our potential partners in advocacy efforts.

- b. What **advocacy avenues** do you use or did you find are successful in advocating for gender equality/civic space? (Probe: international orgs like UN/ministries)
- c. Could you help us identify **other key actors in the MENA region** working on advocacy on women's economic empowerment?
- d. **Which institutions, development banks and governments** might be relevant stakeholders to move an "effective" policy agenda along on gender equality and civic space? *Which could be the strongest allies?*
- e. Linked to IFI policies and work in the region, where do you think the "pressure points" lay for **governments** to respect and promote civic space, gender equality, and women's economic opportunities? *In what way can the IFI have real influence over government on gender?*
Or:
- f. Would you be able to suggest ways of making use of **existing policies**, strategies and cooperation criteria, in advocating financial institutions and development banks **to put pressure on governments** to respect and promote civic space, gender equality, and women's economic opportunities.

Annex 4 Selection of IFI activities in Egypt, Jordan and Tunisia

Selection of IFI activities Egypt



- Promoting Innovation for Inclusive Financial Access Project 64,035 women reached
- \$200m to Micro, Small, and Medium Enterprise Development Agency (MSMEDA) (requires 1/3 women focus)
- Nearly 10 million individuals have received cash transfers under the Takaful and Karama Program
- Emergency Labor intensive Investment project: 120,800 direct jobs created, 35 percent benefited women
- Egypt Gender Assessment (2010); Mapping Gendered Pathways to Inclusion Note (2011); Women Economic Empowerment report (2018)



- IFC works with clients on investment with a focus on women's employment
- Together with WB focus is on changing legislation to allow this
- Fostering Women's Economic Empowerment Through Special Economic Zones Comparative Analysis of Eight Countries and Implications for Governments, Zone Authorities and Businesses



- IMF aims to raise growth to create jobs, especially for women and youth and to help women join the labour force, the 2016/17 budget included EGP 250 million to improve availability of public nurseries;
- The authorities are also planning to implement gender budgeting starting in 2018/19.



- Egypt Women in Business Technical Cooperation Programme
- Women Entrepreneurs' Access to Justice in Egypt and Jordan
- Policy dialogue with the governments of Egypt and Jordan to support women entrepreneurs in dispute resolution



- EIB signs EUR 375 million financing agreement with National Bank of Egypt to support SMEs (part women)
- Economic Resilience Initiative: how to mobilise finance to build economic resilience, part focus women

Selection of activities Jordan



- Set up Mashreq Facility: aims at enhancing women's economic empowerment as a catalyst for more inclusive, sustainable, and peaceful societies
- Emergency Services and Social Resilience Project helped 16 municipalities, funded goods, works and basic services reaching 2,000,000 Jordanians and close to 250,000 Syrian refugees of which at least 45% were women.
- MSME Development for Inclusive Growth project: 2,000 private sector jobs - 85% Women-owned enterprises
- Access to Justice Project: improved legal services to vulnerable communities with Justice Center for Legal Aid
- Promoting Financial Inclusion Policies Project
- Publication "Soft Skills or Hard Cash? What works for Female Employment in Jordan?" (2012)



- Fostering Women's Economic Empowerment Through Special Economic Zones Comparative Analysis of Eight Countries and Implications for Governments, Zone Authorities and Businesses
- Inclusive Microinsurance for Women: clients by default are 90% women
- Ring Bell for Gender Equality" initiative hosted by the Amman Stock Exchange (ASE) and IFC Bank Group



- Program for Jordan contains a range of measures to reduce child-care costs, including publicly-subsidized nurseries for low-income employees in small and medium size enterprises.
- In 2015, the Fund adopted a more systematic approach on gender issues, integrating analysis of gender equality into its regular consultations with member country authorities



- US\$ 4 million in local currency, to the Microfund for Women (MFW)
- Women Entrepreneurs' Access to Justice in Egypt and Jordan
- Policy dialogue with the governments of Egypt and Jordan to support women entrepreneurs in dispute resolution



- Partnership with Microfund for Women to improve women's access to finance in Jordan
- EIB and EBRD's complaints mechanism teams co-hosted an outreach event on accountability within international financial institutions (IFIs) in Amman (Jordan) on 24 May 2017

Selection of IFI activities Tunisia



- PLR and DPF (\$500m) went to Board on May 22, 2018
- EmpowerHer : Using Technology to Help Women and Young People in Tunisia
- Empowering Women by Balancing the Law: an initiative that seeks to provide analytical and technical know-how to pilot countries in assessing and reforming laws that impede women's economic and social progress
- New US\$130 Million Support for Ongoing Empowerment of Local Communities in Tunisia.



- Providing financial and non financial services that cater to women's needs through partnership with BH - Banking On Women Program: IFC's Banking on Women program is playing a catalyzing role for partners and financial institutions to help them serve women-owned businesses profitably and sustainably.



- Under the IMF Tunisia program, social spending is defined as capital expenditures on education; health; social transfers to low-income families, employment training programs, family allocation as well as development expenditures of the Ministries of Women and Family Affairs, Youth and Sports and Social Affairs



- Women in Business mentoring program. Promoting economic inclusion for women, young people and populations living in remote areas through private sector engagement.
- In the frame of the Gender Strategy, the EBRD is trying to find new inclusion topics to be added, such as transport, agriculture, energy, corporate, to support the level of employment of women in this areas



- EIB Investing in women as agents of change: The Women Political Leaders Global Forum (WPL) is the global network of female politicians whose mission is to increase both the number and the influence of women in political leadership positions



Oum Nour received support from Lebanese Council to Resist Violence Against Women (LECORVAW). Photo: Christopher Herwig

The Kvinna till Kvinna Foundation strengthens women in conflict-affected regions.
Visit kvinnatillkvinna.org to find out more about our work.