Written Feedback for the World Bank Group Draft Strategy on Fragility, Conflict, and Violence
Submitted by Search for Common Ground

The emphasis which the World Bank Group’s FCV strategy places on preventing violent conflicts through addressing their root drivers is critical and welcomed. The mandate to tailor projects to specific contextual needs, shift internal organizational culture and personnel management practices, and increase funds devoted to FCV will all contribute directly to the WBG’s mission of ending extreme poverty and building shared prosperity. As a leading peacebuilding NGO with nearly 40 years of experience, and currently operating across more than 30 countries, Search for Common Ground applauds this strategy and is grateful for the opportunity to provide additional feedback.

Our recommendations draw on the analysis of our experts, the evaluations and learning from our programs in many fragile and conflict-affected situations (FCS), and our experience implementing over 2,000 projects, including in partnership with the WBG in the DRC, Libya, and Nigeria, among other countries. Our recommendations to further strengthen the strategy revolve around four themes: partnerships and inclusivity, the role of youth, standards for the private sector, and creating enduring change. Specifically, we suggest the following:

1. Clarify how inclusion of civil society and people affected by conflict will be operationalized through partnerships. As one of the “4 Ps,” partnerships constitute a key component of the draft strategy. The draft adopts “scale up engagement with civil society organizations” as one of the 23 measures for operationalization, yet most of the analysis on partnerships focuses on governmental actors such as UN agencies, and project teams are merely “encouraged” to engage civil society through “participatory approaches” (Para. 155 - 166). Moreover, the draft strategy supports the inclusion of intended beneficiaries in consultations and M&E (Para. 77, 137), but there is little guidance on how the voices of civil society and people affected by conflict will be meaningfully incorporated into programs.

   - **Recommendation:** Consult with all stakeholders at the strategic, priority-setting phase. The decision-making process on how to allocate WBG resources between and within country programs should be inclusive of the voices of people affected by FCV. Doing so helps ensure that WBG country or regional portfolios mirror realities on the ground and do not exclude key constituencies. Subsequent decision-making at the project level should also be inclusive, such as through a co-design approach with intended beneficiaries or iterative conflict scans led by local actors who know the language and context.

   - **Recommendation:** Open more funding for operational civil society actors. Civil society in FCS, especially in the field of peacebuilding, often offer strategic value-adds: access and trust with local communities, ability to mobilize diverse actors, and expertise in conducting regular contextual analysis. Funding can take a range of forms, including contracts, grants, and/or results-based funding. However, these partners should not be unduly burdened with complex administrative and financial hurdles, which some lack the capacity to manage.

   - **Recommendation:** Engage more regularly with operational civil society actors, at the country- and HQ-level, through knowledge exchanges. Civil society should share key lessons-learned from
their implementation experience, while the WBG should commit to disseminating its findings to existing communities of practice, subject to privacy and “do no harm” considerations. Topics for discussion could include M&E techniques in FCS or good donor practices.

The strategy rightly emphasizes diverse partnerships, including with those who are not the typical development actors, such as humanitarian and security actors (Para. 99, 117).

- **Recommendation:** Similar attention should be paid to engaging those who are not the “usual suspects” of civil society. Country programs should carefully identify and engage key national- and local-level civil society. Moreover, partnerships should also be extended to groups or individuals who operate with a less formal organizational structure and non-traditional yet influential actors, including youth groups, artists, media, and religious actors. These partners can often foster significant attitudinal and behavioral changes in favor of peaceful methods to resolve conflicts.

2. **Prioritize youth engagement and mainstream youth issues across all policies and programs.** The strategy acknowledges the potential of youth to be active agents of change and the need to mainstream youth issues (Para. 50). However, this encouraging analysis of youth as more than a passive demographic is lost amidst the the draft’s frequent portrayal of youth as a “vulnerable group” who are mere recipients of development assistance (Para. 70, 76, 100, 101). The strategy should debunk harmful and oversimplified stereotypes around youth and recognize the harmful “violence of exclusion” felt by youth in FCV settings. Young people compose well over 50% of the population in many fragile states, and positive youth engagement is critical to any successful FCV strategy.

- **Recommendation:** List mainstreaming and targeting youth issues as a high-level priority in the Executive Summary. Paragraph ix already claims that gender issues will be mainstreamed across the WBG’s six priority issues; adding the mainstreaming of youth issues is a logical and feasible complementary step.

- **Recommendation:** Articulate more explicitly how the WBG intends to involve young people in project design and other decision-making processes. Special attention should be paid to involving youth in political and governance processes, in addition to the “education, health, and employment” issues that fall under the “human and social capital” rubric (Para. 100).

3. **Coordinate the design of appropriate standards for private sector activity in FCV countries.** We welcome the strategy’s recognition that investment projects must be conflict-sensitive and that analysis will require unique project-level tools specifically designed for FCV (Para. 59, 143 - 144). However, at the policy level, the strategy’s FCS-specific standards appear to be based primarily on increasing IFC/MIGA’s risk tolerance: paragraph 131 extends the environmental, social, and corporate governance (ESG) compliance deadline for IFC/MIGA clients operating in FCS, while paragraph 132 allows for occasional derogation of clients’ responsibility to meet certain provisions of the IFC Performance Standards. Instead, more effort should be put into developing indicators and norms on FCV that companies can internalize.
- **Recommendation:** Convene forums for government, private, and civil society actors to co-determine FCS-specific ESG standards. Most sectors currently lack standardized norms on how companies can contribute to stability and violence prevention in FCS. The WBG can leverage its convening power (Para. 96) to bring together diverse stakeholders to ensure that the unique challenges, consequences, and opportunities of doing business in a conflict-sensitive manner are reflected in company performance indicators and norms.

- **Recommendation:** Employ a “Do More Good” framework. The strategy recognizes the ability of private sector and development investments to help countries transition out of fragility. A “Do More Good” framework builds on the “Do No Harm” model but looks at opportunities to integrate peacebuilding as a way to enhance investment potential to transform conflict dynamics. The IFC should play a leadership role in linking companies with multi-stakeholder partnerships to promote the positive returns of investment on FCV issues. The proposed ESG advisory board, with the inclusion of FCV experts, could lead this initiative.

4. **Focus on creating positive and enduring change for the long-run.** The strategy acknowledges that effective engagement in FCS requires long-term sustained commitment and tailored solutions (Para. 38, 42). Extending this line of thinking, the WBG should aim to ensure that reductions in poverty can endure even without WBG or other third-party funding. Metrics for success should incorporate the self-sustainability of positive change as an important measure.

- **Recommendation:** Target changes in institutions, markets, and social norms. Enduring change occurs when all three components are achieved. The strategy emphasizes institution-building/reforms and private sector solutions as key approaches. WBG projects should also aim to shift social norms to reduce FCV. This could be achieved directly (e.g. through citizen engagement), or indirectly through institutional and market changes that shift social norms.

- **Recommendation:** Ensure that the use of streamlined projects does not compromise the effectiveness of programs. Because FCV settings are often very fluid, the strategy puts forth “simplicity” as a way for projects and policies to adapt to short-term shocks (Para. 22, 148, 152). While streamlined responses can be valuable, the strategy should ensure that they do not impede the WBG’s mandate to use long-term, sustained, and tailored responses.

- **Recommendation:** FCV issues are not bound by national borders. The WBG should consider the borders of the conflict system, not just the country. In these settings, there should be close collaboration and coordination between country programs within the “conflict geography” to mitigate cross-border FCV challenges such as climate change, violent extremism, and migration.

- **Recommendation:** Centralize and disseminate knowledge and expertise on conflict sensitivity, “Do More Good” approaches, and creating long-term change. WBG staff can benefit tremendously from training and capacity building for implementing enduring change programs, while local partners can in turn use these resources to continue supporting positive change after the end of third-party interventions.