



# Pride and Prejudice: Barriers to LGBTQI+ Inclusion in World Bank Operations

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## Introduction

Many Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex (LGBTQI+) people in the World Bank's client countries face a variety of social, political, and legal barriers that prevent them from accessing economic opportunities.<sup>1</sup> These barriers exclude LGBTQI+ people from some government-funded programs, including social protection and health services. The World Bank's Gender Strategy, approved in 2024, acknowledges that sexual and gender minorities "tend to face stigma, violence, and discriminatory laws, policies, and practices" and often "struggle to access essential services including education, healthcare, social protection, and housing."<sup>2</sup> Exclusion from these essential services, whether due to explicit legal discrimination or stigma at the community level, can exacerbate the economic and social inequality

faced by LGBTQI+ people. As a significant funder of government services that have the potential to have a positive impact on LGBTQI+ people, the World Bank can play an important role in addressing these barriers. However, without inclusive policies and practices, the World Bank risks the exclusion of LGBTQI+ individuals from its projects and the reinforcement of inequalities in its client countries.

The World Bank's Environmental and Social Framework (ESF) requires projects to be implemented to "anticipate and avoid risks and impacts" and "adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged and vulnerable."<sup>3</sup> The Bank's Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups (Directive) requires the Bank project task

teams to verify whether the borrower's environmental and social assessments address the "risk of prejudice or discrimination towards individuals or groups in providing access to development resources and project benefits" and monitor the implementation of the "Borrower's obligations with respect to disadvantaged or vulnerable individuals or groups."<sup>4</sup> Though the World Bank's ESF and the Directive require projects to be implemented with consideration of the barriers to LGBTQI+ people's access to project benefits, previous research from Bank Information Center (BIC) has shown that the Bank rarely includes any information in project documents that specifically addresses the potential risks of discrimination or exclusion of LGBTQI+ people from its projects.<sup>5</sup>

This policy brief documents the lack of LGBTQI+ inclusion within the design of projects in seven countries, presents trends on the gaps and missed opportunities in the design and implementation across these projects, and provides recommendations to improve the LGBTQI+ inclusivity in the implementation of the Bank's policies and operations.<sup>6</sup>

## Methodology

To analyze LGBTQI+ inclusion within World Bank projects that directly impact LGBTQI+ people, BIC, in partnership with Hivos under the Free to Be Me Program, worked with groups of partners in seven countries: the Philippines, Kenya, Uganda, Mozambique, Indonesia, Ghana, and Nigeria. These countries were selected to capture a broad picture of the various legal, social, and political contexts LGBTQI+ people experience. Five of the countries have laws that explicitly discriminate based on sexual orientation and/or gender identity: Kenya, Uganda, Indonesia, Ghana, and Nigeria. Two of the countries, the Philippines and Mozambique, do not have explicitly discriminatory laws. However, there is still a lack of national-level legal protection for LGBTQI+ people in these countries, leaving many LGBTQI+ people vulnerable. LGBTQI+ people in all of the sampled countries continue to face various forms of social and economic discrimination.

BIC and Hivos worked with local partners in each country to identify a World Bank project that could have a significant positive impact on economic inclusion for LGBTQI+ people in their respective countries. Six of the selected projects were social protection projects due to their direct focus on promoting economic inclusion. The partners in Mozambique focused on a health project due to the tendency for disparities in healthcare to reduce the economic productivity and labor participation rate of LGBTQI+ people.<sup>7</sup> While this sample is not representative

of the World Bank's entire portfolio, it highlights how LGBTQI+ inclusion is addressed in several Bank operations.

First, BIC and the groups of partners analyzed the following relevant project documents to assess the inclusion of LGBTQI+ people in project design: Project Appraisal Document (PAD), Stakeholder Engagement Plan (SEP), Environmental and Review Summary (ESRS), and Environmental and Social Commitment Plan (ESCP). Each group of partners then sought engagements with their country's World Bank office and relevant task team leaders to better understand how the World Bank is considering the risk of exclusion and discrimination against LGBTQI+ people in the particular project and within the broader country portfolio. The partners also used these meetings to share their own recommendations on best practices for LGBTQI+ inclusion in project design and implementation. To inform their recommendations, the partners also engaged the broader LGBTQI+ communities in their respective countries on the experiences and concerns with engaging the government services supported by their project of focus. Their outreach methods included community consultations, focus group discussions, and surveys.

Analyzed World Bank Projects				
Project Name	Development Object per the Bank's Project Page	Project approval date	Project closing date	Country
<a href="#">Second Kenya Social and Economic Inclusion Project<sup>8</sup></a>	To promote economic resilience of poor and vulnerable households and strengthen the adaptive social protection system	June 17, 2025	December 31, 2030	Kenya
<a href="#">Ghana Jobs and Skills Project</a>	The objective of the project is to support skills development and job creation	June 29, 2020	June 30, 2026	Ghana
<a href="#">District and Community Health Services Revitalization Operation</a>	To improve utilization and effectiveness of essential primary health care and nutrition services at the district level with a focus on vulnerable populations	February 29, 2024	December 31, 2028	Mozambique
<a href="#">Beneficiary FIRST Social Protection Project</a>	To mitigate the impacts of COVID-19 on the welfare of low income households and strengthen DSWD's social protection delivery systems to be adaptive and efficient.	September 28, 2020	June 30, 2026	Philippines
<a href="#">Labor Market Information and Skills System Transformation for Labor Market Flexibility</a>	To improve access to and effectiveness of skills development and employment services for the working-age population	January 18, 2024	December 31, 2027	Indonesia
<a href="#">Nigeria for Women Program Scale Up Project</a>	To institutionalize Women Affinity Groups (WAGs) and other platforms for women's economic empowerment and enhance the economic opportunities of unbanked women.	June 22, 2023	December 31, 2028	Nigeria
<a href="#">Generating Growth Opportunities and Productivity for Women Enterprises Project</a>	To increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises	June 17, 2022	December 31, 2027	Uganda



## Background of LGBTQI+ Inclusion in Surveyed Countries

Many of the presented countries have discriminatory legal and social environments for LGBTQI+ people. In Uganda, LGBTQI+ individuals and organizations have been facing increased violence and discrimination since the 2023 passage of the Anti-Homosexuality Act, which created more punitive penalties for same-sex sexual acts. In Nigeria, the Criminal Code Act criminalizes same-sex relations, and the Same Sex Marriage (Prohibition) Act (SSMPA) of 2013 introduced new criminal penalties, including for participation in LGBTQI+ organizations.<sup>10</sup>

<sup>11</sup> Though the Federal High Court of Nigeria later struck down the section of the SSMPA that criminalized participation in LGBTQI+ associations, these laws continue to foster an environment where discrimination is pervasive.<sup>12 13</sup> In Indonesia, the 2008 anti-pornography law has been used to arrest and prosecute LGBTQI+ people, and the new Penal Code, passed in 2023, criminalizes sex outside of marriage.<sup>14 15</sup> Furthermore, the recently passed amendments to Indonesia's armed forces law have created new concerns with civic space, including for LGBTQI+ individuals and organizations.<sup>16</sup>

Other groups of partners are facing further deterioration in their countries' legal environments for LGBTQI+ people. In Kenya, where same-sex sexual activity is already prohibited under Penal Code of 1930, the LGBTQI+ community is concerned with the potential passage of the Family Protection Act, which would introduce criminal penalties for those who promote LGBTQI+ activity or fail to report people in violation of the law.<sup>17 18</sup> Likewise, in Ghana, where same-sex sexual activity is criminalized under the Penal Law of 1960, there are concerns with the potential passage of the The Human Sexual Rights and Ghanaian Family Values Bill, which would increase criminal penalties for same-sex relations and expand criminalization to those who identify as LGBTQI+, advocate for LGBTQI+ rights, or discuss LGBTQI+ issues in public.<sup>19 20</sup> If passed, these bills would further exacerbate the systemic discrimination faced by LGBTQI+ people in Ghana and Kenya.

There are no current laws that explicitly discriminate against LGBTQI+ people in Mozambique and the Philippines. In Mozambique, while the Criminal Code that went into effect in June 2015 decriminalized same-sex sexual activity, LGBTQI+ people still face exclusion from education and employment opportunities, and transgender and gender nonconforming people still lack a path to legal gender recognition.<sup>21</sup> In the Philippines, while the national government in recent years has introduced Executive Orders (EOs) meant to promote

LGBTQI+ inclusion, their impact has been limited.<sup>22</sup> Furthermore, there has been a recent surge of anti-LGBTQI+ rhetoric along with growing political opposition to Comprehensive Sexuality Education (CSE) and the SOGIE Equality Bill, a proposed law which would prohibit discrimination based on Sexual Orientation, Gender Identity, Gender Expression and Sex Characteristics (SOGIESC).

## Concerns with Project Design

Overall, BIC and partners found a lack of LGBTQI+ inclusion in the design of examined projects. The following section documents gaps in project design that could lead to the exclusion of LGBTQI+ people from project benefits and missed opportunities for the Bank to mainstream LGBTQI+ inclusivity within its project design.

In **Kenya**, the partners were concerned that the Second Kenya Social and Economic Inclusion Project (KSIEP-2) failed to consider and mitigate the existing barriers to LGBTQI+ people's access to the government social protection programs the KSIEP-2 supports. For example, while the project requires implementing agencies to develop training plans for the capacity building of national and county-level staff, there is no focus on training agency staff on preventing discrimination based on SOGIESC.<sup>23</sup> Likewise, though the SEP acknowledges that there may be barriers to access project benefits due to "cultural beliefs that disadvantaged/vulnerable individuals or groups are not able to participate or benefit from economic activities or have limited productive roles in society," in the classification of "vulnerable groups" there is no consideration of the possible discrimination towards LGBTQI+ people.<sup>24</sup> To illustrate how the ongoing marginalization of LGBTQI+ people in Kenya creates the risk of exclusion from World Bank-supported social protection programs, partners highlighted reports of invasive questions, harassment, and feelings of lack of safety from the 215 LGBTQI+ Kenyans they surveyed on their experiences engaging government services such as those supported by the first Kenya Social and Economic Inclusion Project.

In **Nigeria**, the partners wanted the World Bank to recognize and mitigate the risk of exclusion of lesbian, bisexual, and queer (LBQ) women from the Women Affinity Groups (WAGs), community-based women-only groups that act as platforms for multiple development interventions supported through the Nigeria for Women Program Scale Up Project.<sup>25</sup> LBQ women are often reluctant to join community-based organizations due to social and cultural stigma. Furthermore, since WAGs operate under principles of self-selection, LBQ women

who did seek membership in existing WAGs may face exclusion due to ingrained societal biases. Since the project also supports Community Investment Funds (CIFs) disbursed through WAGs, discrimination in access to WAGs and within WAGs could lead to further exclusion from the rest of the project's benefits, as there are no alternative platforms to disburse these funds for LBQ women who are excluded due to stigma or self-selection barriers.

In **Ghana**, the partners underscored the lack of measures to sensitize the service providers implementing the training programs funded by the Ghana Jobs and Skills Project. Though the PAD describes activities for the sensitization of “associated employers and trade associations, and cooperatives, master craft persons, and staff of public and private training institutes, including on gender-based violence (GBV) and sexual exploitation and abuse”, within the project documents, there is no consideration or activities to sensitize service providers on LGBTQI+ inclusion.<sup>26</sup> The partners also highlighted that the lack of sensitivity training for those working in the Grievance Redress Mechanism's (GRM) field-level complaint collections and the lack of SOGI focal points within the GRM could limit the GRM's efficacy in responding to cases of exclusion or harassment due to SOGIESC. Though complaints may be escalated through various government bodies up to the judicial system, the partners noted that the judicial system has demonstrated bias against LGBTQI+ individuals, and many of the Ministers on the Inter-Ministerial Oversight Committee, which has “overall responsibility for entire project implementation,” have publicly expressed anti-LGBTQI+ sentiments.<sup>27</sup>

In **Indonesia**, the partners analyzed the Labor Information and Skills Transformation for Labor Market Flexibility program. The project focuses on upgrading and socializing a labor market information system (LMIS), building and improving training centers, and building the institutional capacity of the implementing agency. The project documents discuss an outreach mechanism towards women and persons with disabilities “to support the development of an inclusive LMIS”, yet there is no mention of targeted outreach to LGBTQI+ people.<sup>28</sup>

In **Mozambique**, the partners wanted community health workers supported through the District and Community Health Services Revitalization to receive training on LGBTQI+ non-discrimination. As the community health workers are supposed to deliver various community health services, including the encouragement of HIV-related services through community interventions and health promotion activities, the partners were concerned that the ingrained social biases of the

community health workers and their lack of training on LGBTQI+ non-discrimination could limit their ability to provide inclusive healthcare for LGBTQI+ people.<sup>29</sup> More broadly, since the project focuses on expanding health services to “vulnerable groups” and enhancing feedback mechanisms for marginalized groups, the partners considered the lack of identification of LGBTQI+ people as a “vulnerable population” to be a missed opportunity to address the existing barriers to LGBTQI+ people's access to health services.

In **the Philippines**, the partners engaged on the Beneficiary FIRST Social Protection project, a program meant to improve the social protection services provided by the Department of Social Welfare and Development (DSWD). Though the project recognizes “potential gender disparities in the access to social assistance programs” and includes activities focused on “targeted social mobilization and awareness” to women, the partners wanted the implementing agency to engage in targeted outreach with LGBTQI+ people to inform project design and implementation.<sup>30</sup> Likewise, the partners sought explicit inclusion of LGBTQI+ people in DWSD's data collection activities and inclusion surveys funded through the program to support the mainstreaming of LGBTQI+ inclusion in the agency's programs.

In **Uganda**, the partners reported that the eligibility requirements to access the economic and social systems supported by the Generating Growth Opportunities and Productivity for Women Enterprises Project (GROW) implicitly marginalize lesbian, bisexual, transgender, and queer (LBTQ) women.<sup>31</sup> As a significant proportion of LBTQ women operate informal or home-based businesses and lack access to collateral, national ID documents, and formal credit histories, LBTQ women are less likely to meet criteria that require business registration, formal addresses, and spouse references. The partners were also concerned that the project's reliance on local leaders and formal women's groups to mobilize beneficiaries sidelines LBTQ women due to prevailing stigma and criminalization, which makes mainstream women's networks and physical gatherings inaccessible for many LBTQ women.

## Trends

### Lack of differentiated measures to prevent discrimination against LGBTQI+ people

Though many of the projects had a focus on “vulnerable” and marginalized communities, there was no identification of LGBTQI+ people as a potentially marginalized group

or specific consideration of the barriers to LGBTQI+ people's access to project benefits. Furthermore, when the partners met with the relevant project Task Teams on their concerns with the lack of specific measures to prevent discrimination, they generally received little to no information on measures being taken to actively prevent discrimination. Rather, project teams generally advised partners to gather more information on specific cases of exclusion from project benefits.

### **Concerns engaging the project level government grievance redress mechanism**

The partners in countries with legal discrimination against LGBTQI+ people were concerned with the efficacy and safety of the government-led GRMs due to their governments' active roles in marginalizing LGBTQI+ people. Partners highlighted that complaints focused on discrimination based on SOGIESC may not receive fair consideration and could even put complainants at risk of identification and reprisal by the authorities. Furthermore, with the social stigma brought by legal and political discrimination, potential complainants who experience discrimination may not trust the project-level GRM and then give up on seeking recourse due to a lack of knowledge on the World Bank's grievance mechanisms, including the World Bank's Grievance Redress Service (GRS) and the Inspection Panel. Exacerbating these issues is the lack of knowledge on the function of the project-level GRMs. In initial discussions with partners, many of the groups were unaware of the government's full involvement in the operation of the GRMs. Following these discussions, the partners were concerned that community members would attempt to access GRMs without a complete understanding of the government's role in implementing the mechanism, potentially leaving them vulnerable to retaliation, discrimination, or compromised confidentiality.

### **Concerns on engaging the government on project design and implementation**

The partners in countries with legal discrimination against LGBTQI+ people generally feared engaging their government on their concerns with inclusion within project design and implementation. Many of the partners already operate in fear of government crackdowns on their organizations, so engaging the government on issues with LGBTQI+ inclusion on a World Bank project could open them to reprisal, even if the World Bank mediated the meeting.

However, this was not the case in countries without explicit legal discrimination. In Mozambique and the

Philippines, the partners viewed the implementing agencies as potential allies in addressing barriers to the inclusion of LGBTQI+ people in government programs, and they saw the Bank as a valuable access point to facilitate greater collaboration between LGBTQI+ civil society and the implementing agencies.

### **Lack of LGBTQI+ stakeholder engagement throughout the project lifecycle**

None of the stakeholder engagement plan documents in any of the projects in countries with criminalization laws included references to outreach to LGBTQI+ groups or classified LGBTQI+ people as a "vulnerable group." Without being included in stakeholder engagement plans, LGBTQI+ organizations and individuals lacked a structured mechanism for sharing their concerns and recommendations for implementing the projects. But engaging through government-led consultations could potentially put LGBTQI+ individuals and the broader community at risk of retaliation. Ultimately, there is no clear path for LGBTQI+ people's meaningful engagement on projects from design through implementation.

There was also no explicit focus on LGBTQI+ inclusion in stakeholder engagement plans in Mozambique and the Philippines. Despite the more favorable legal environments for LGBTQI+ people in these countries, LGBTQI+ people still face various forms of discrimination, many of which could exclude them from project benefits. Partners in these countries generally saw opportunities to mainstream LGBTQI+ inclusion in the relevant implementing agencies' practices and wanted the Bank to push project implementers to specifically include LGBTQI+ individuals and organizations in stakeholder engagement activities in order to facilitate greater collaboration between LGBTQI+ groups and the implementing agencies.

## **Recommendations to the Bank**

### **Support the design of projects to preemptively mitigate against the risk of discrimination in access to project benefits and actively supervise these measures during implementation**

In situations where security concerns caused by legal and political discrimination prevent explicit mention of LGBTQI+ people in project documents, the Bank should actively support the implementation of measures to prevent discrimination in LGBTQI+ people's access to

project benefits. These measures should be designed in meaningful consultation with LGBTQI+ organizations. During implementation, the Bank itself should monitor the efficacy of mitigation measures and proactively consult with LGBTQI+ groups on said evaluations. While many of the partners in countries with legal discrimination against LGBTQI+ people did understand the security concerns with the explicit mention of LGBTQI+ project documents, they still wanted the projects to have specific measures to prevent discrimination. Though the Directive has an exception in its application when identification of “disadvantaged or vulnerable individuals or groups” could create risk of harm, the task team is supposed to coordinate with the Operations Environmental and Social Review Committee in complying with the Directive as advised and document its efforts to implement the Directive. The partners’ concerns with discrimination brought by hostile legal and political environments underscore the need for the Bank to take a more active role in assessing, documenting, and mitigating the risk of discrimination.

In countries without explicit legal discrimination, the Bank should take a more active role in pushing for the specific consideration of LGBTQI+ people in project design and implementation. LGBTQI+ people still face various forms of discrimination, and these projects could be opportunities to address barriers to accessing project benefits and mainstream LGBTQI+ inclusion in the implementing agencies’ work.

### **Better socialize the availability of alternatives to government-led grievance mechanisms**

In countries where there is legal discrimination, the Bank should put greater effort in socializing alternatives to the government-led grievance mechanisms. While project-affected communities have access to the Bank’s GRS and the Inspection Panel, there was little information disseminated to communities. As there is a lack of community trust in government mechanisms due to active and political discrimination in countries with hostile legal environments, the Bank should place a greater focus on leveraging its internal and independent grievance mechanisms to give LGBTQI+ people a safe outlet to report complaints. This should include greater socialization of the existing mechanisms and the allocation of greater resources to improve the Bank’s capacity to monitor and respond to complaints. Furthermore, to prevent potential complainants from accidentally outing themselves to government agencies, the World Bank should push the implementers of GRMs to better socialize communities on how the information

sent to the project-level GRMs is shared and used.

### **Design stakeholder engagement to account for the country’s context of risk of discrimination against LGBTQI+ stakeholders**

In countries with legal and political discrimination, the Bank should take a more active role in consulting with LGBTQI+ organizations and individuals. LGBTQI+ organizations and individuals should not be forced to engage the government to be able to share input on the design and implementation of projects since many of their concerns revolve around discrimination caused by the government. In these countries, the Bank should organize consultations with LGBTQI+ communities who stand to benefit from Bank projects. These consultations should begin during project design and continue throughout project implementation to create ongoing opportunities for LGBTQI+ organizations and individuals to provide input on the design and effectiveness of inclusion measures. When the Bank engages with implementing agencies on the findings from consultations or other engagements with civil society, the Bank should protect the identities of those consulted to prevent potential reprisals and discrimination from the government.

In countries where there is not legal discrimination or overt political hostility, the Bank should push the borrower for the inclusion of LGBTQI+ people in Stakeholder Engagement Plans. Under ESS 10, the borrower has an obligation to identify “disadvantaged or vulnerable” communities who may be excluded from the consultation processes and take measures to remove barriers to participation.<sup>32</sup> Despite the various forms of discrimination LGBTQI+ people in Mozambique and the Philippines still face, there were no measures to specifically include LGBTQI+ people in consultations. As stakeholder engagement can improve project design by leveraging communities’ lived experience of discrimination, the Bank should push the borrower to proactively consider the risk of exclusion of LGBTQI+ people and design consultations to prevent potential exclusion. These consultations should be used to inform project design and implementation.

## **Conclusion**

The findings of this research highlight the Bank’s shortcomings in considering and mitigating the barriers to LGBTQI+ people’s access to project benefits. None of the projects’ designs or stakeholder activities included a focus on assessing or addressing the risk of discrimination

based on SOGIESC. Furthermore, the reliance on borrowing governments' mechanisms for stakeholder engagement and grievance management in countries with discriminatory laws makes it more likely for LGBTQI+ people's concerns with projects to go unaddressed. In these countries, the Bank should take a more active role in stakeholder engagement and grievance management where there is explicit legal and political discrimination. Additionally, LGBTQI+ people in countries without legal discrimination still face various forms of marginalization, so the Bank should also do more to push its borrowers to consider and mitigate the risk of discrimination based on SOGIESC during project design and implementation. We urge the Bank to implement BIC's recommendations to address the risk of exclusion of LGBTQI+ people from its projects and improve the LGBTQI+ inclusivity of its operations.



## Endnotes

- <sup>1</sup> This report generally uses the LGBTQI+ acronym. Truncated acronyms are used when partners focused their engagement on the barriers to specific groups.
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