



Save the Children

**Save the Children's comments on Second Draft of World Bank
Environmental and Social Framework**

March 2016

Save the Children welcomes several positive changes made to the revised Environmental and Social Framework, including more specific references to children as a vulnerable group. We are also pleased to see that the second draft has a greater focus on inclusion and non-discrimination. The growing concentration of marginalized groups among the world's poorest children means that antipoverty interventions have to focus their attention ever more on discrimination. It is positive to see that the Bank also embarks upon this task.

As the Safeguard policies of the Bank is a vital instrument in promoting the implementation of the newly adapted Sustainable Development Goals. We would like to emphasize the important role the World Bank has as a standard setting organization for other multilaterals, for governments and the private sector and urges the Bank to use this opportunity to put in place comprehensive measures that protect and support children's rights.

Despite important improvements from the first draft, there is still a lack of clarity around how the Bank will assess the indirect and direct risks to children, and how different groups of children may be affected differently. If only the direct impacts on children are assessed, the Bank will risk ignoring or overlooking a great deal of information on how a project may affect the lives and rights of children. For example, a child might lose access to school if her family is resettled, or a child might risk falling into poverty if parent's income deteriorates. Furthermore, a development project may impact a girl different than a boy, children at different age may be affected differently, and some particularly vulnerable groups of children might be of higher risk than others, such as children with disabilities, indigenous children, children from ethnic or religious minorities or refugee and displaced children.

Thus, we strongly recommend the Bank to prioritize the capacity building of the Bank's secretariat even further, with aiming at building and strengthening borrower's capacity and ownership in terms of human rights with special focus on children's needs and rights. We wish for the Bank's focus to be on an even higher extent on the leverage for children's needs and rights when the bank reviews and supports borrowers, both before and during the financing of a project. We also urge the Bank to carry out meaningful, good quality children's participation that gives children a genuine opportunity to express their views, be involved in decisions or take action.

If the Bank truly is to take account of children's rights it must put a larger emphasis on, and put into use the UN Convention on the Rights of the Child and the [Children's Rights and Business Principles \(CRBP\)](#). Save the Children, as a global civil society organization with extensive experience on implementing these two global human rights mechanisms, would willingly support the Bank in doing so.

For further information, please do not hesitate to contact:

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A handwritten signature in blue ink, appearing to be 'Fergus Drake', written over a blue horizontal line.