January 28, 2012

Dr. Jim Yong Kim

President,

The World Bank

1818 H St, NW

Washington, DC 20433

Dear Dr. Kim,

We write to you today to highlight the importance of directly and explicitly addressing the needs of

children in the World Bank safeguard policies, currently under review.

The current World Bank safeguard policies for investment lending include no explicit protections for the

unique needs of children. The lack of a requirement that borrowers specifically assess the impact that

projects may have on children, means that there is often no examination or analysis of the risks that such

projects may pose to children, amongst other groups. This results in a number of Bank funded projects

which directly, or indirectly, result in significant harm to these most vulnerable members of society.

The World Bank itself has reiterated that investing in children is the clearest path to eradicating poverty.

The Bank notes that "since capacities built during childhood and the youth period largely determine adult

outcomes, effective investments in young people provide important returns not only to the individual and

the community, but to society as a whole."[[1]](#footnote-1) In a related point the Bank has argued that providing

"[e]ducation improves the quality of people's lives in ways that transcend benefits to the individual and

the family by contributing to economic prosperity and reducing poverty and deprivation... The

development benefits of education extend well beyond work productivity and growth to include better

health, reduced fertility, an enhanced ability to adopt new technologies and/or cope with economic

shocks, more civic participation, and even more environmentally friendly behavior."[[2]](#footnote-2)

The reverse is also true as "children and adolescents are uniquely vulnerable to even short periods of

deprivation which can have lifelong and intergenerational effects. Because of the rapidity of

neurobiological, cognitive, and emotional development in early childhood, even short-term deprivations

can have long-term and potentially irreversible harmful effects!'[[3]](#footnote-3) Furthermore, "[c]hildren and youth are among the most vulnerable to crises because of their lack of agency and, more importantly, because of the sensitive developmental milestones they must achieve''[[4]](#footnote-4). And finally, "[c]ountries with low levels of education remain in a trap of technological stagnation, low growth, and low demand for education."[[5]](#footnote-5)

The World Bank's Human Development Network has made significant contributions towards improving

health outcomes, access to quality education and other social protections for children through its research

projects, its leading role in the Global Partnership for Education, and a myriad of other positive

initiatives. Yet, Bank lending in other sectors undermines gains by the Human Development Network

because the current safeguards do not require adequate screens for risks that are unique to children,

resulting in a failure to mitigate such risks and thus many bank funded projects do harm children.

Harm to children that can result from Bank projects includes, but is by no means limited to, child labor

and forced child labor, the impact of involuntary resettlement, which in many cases interrupts access to

education and other vital social services, and an increased risk of experiencing violence, trafficking or

sexual exploitation when boom towns are created around mines or construction projects. Children are also

at increased risk of harm from the negative public health consequences of mining, power plants, and other

development projects that may leach harmful chemicals into the air and water. Today's children will bear

the burden of dealing with the challenges created by climate change in the years to come. As the World

Bank's widely heralded report on the potential impacts of a 4°C rise in global temperature points out

"vulnerability toward health impacts of temperature extremes varies from different subgroups of

population ... Children and women are generally expected to be affected more severely."[[6]](#footnote-6)

Because of the demonstrated potential for development projects to have negative impacts on children,

combined with the fact that, "[g]iven the cumulative nature of human development, underinvestments in

children and youth are difficult to reverse later in life, and the price for society is high"[[7]](#footnote-7) there is an urgent

need for safeguards that will protect children.

The new safeguards developed as part of the current review must, at a minimum, **require environmental**

**and social impact assessments that specifically contain an assessment of the likely impacts of a**

**project on children**, including the.potential for violence and exploitation that can arise around a project's

implementation. Assessments of the risks to children should also consider the potential for projects to

have disparate impacts based upon gender. As a joint World Bank and UNICEF report arguing for the

need to integrate a child focus into poverty and social impact analyses notes, "at first sight reforms may

seem child neutral and not warrant additional investigation ... However, many of the effects on children

arise through a chain of processes set in motion by policy change."[[8]](#footnote-8) This is equally applicable to large

scale development projects that may have unanticipated consequences for children.

**Language requiring attention** **to the unique needs of children should be added to all relevant**

**safeguard policies**, including the involuntary resettlement policy, with particular attention paid to

uniquely vulnerable children, including girls and children with disabilities. A new labor safeguard should

be added, and the labor safeguard should clearly **prohibit child labor and require respect for**

**fundamental labor rights, as defined by the ILO, by all companies involved in the project**, as well as

their supply chains and related services. Speaking on the issue of child labor, the UN Special Envoy for

Global Education stated "[i]t is vital that heads of UN agencies and international financial institutions

must ensure that their organizations are part of the solution, and not part of the cycle of indifference that

traps so many children in exploitative employment."[[9]](#footnote-9)

It is time for the Bank's knowledge that "quality investment in an .early age generates returns to society"[[10]](#footnote-10)

to be integrated into all of its operations. This will ensure that no Bank project results in the type of "lost

opportunities for education and healthy development" that the Bank found "can be hard to recoup"

making the affected children "more likely to become poor and deprived adults and risk passing their

poverty and deprivation on to their own children."[[11]](#footnote-11)

Eradicating poverty begins with children, and including protections for their security and development in

the revised Safeguard policies is a necessary step towards achieving the Bank's goal of a world without

poverty.

Thank you for your time and attention to this crucial issue.

Sincerely,

Endorsing Organizations

CC: R. Kyle Peters, Vice President and Head of Network, Operations Policy and Country Services

Cyril Muller, Vice President, External Affairs

Paul Birmingham, Director, Operations Policy and Country Services

Rachel Kyte, Vice President and Network Head, Sustainable Development

Motoko Aizawa, Advisor, Sustainable Development Network

Stephen Lintner, Senior Technical Advisor, Operations Policy and Country, Services

The following organizations endorse the letter:

Global March Against Child Labour, International

Defence for Children International, International

Open Society Foundations, International

Oxfam International, International

Justice and International Mission Unit, Synod of Victoria and Tasmania, Uniting Church in Australia

Ganochetona Foundation, Bangladesh

Childhood Brasil

Promundo, Brasil

Self Help Group, Burundi

Trauma Healing And Reconciliation Service, Burundi

Faith in Action, Burundi

Egyptian Foundation for Advancement of the Childhood Conditions, Egypt

Halifax Initiative, Canada ·

Fondation Des Oeuvres Pour Lasolidarite Et Le Bien Etre Social/Fosbes, Democratic Republic of Congo

Solidarty In Action , Democratic Republic of Congo

Association for Human Rights in Cetnral Asia, France

Kindernothilfe e.V. Child Protection Unit, Germany

Eurasian Transition Group, Germany

Chhattisgarh Bachao Andolan, India

Sanjog India

Thana!, India

Society for National Integration through Rural Development, India

Home-Start Blanchardstown, Ireland

Terre des Hommes Italy

Community Trickle Up, Kenya

Women Educational Researchers of Kenya, Kenya

Mpe Uwezo Foundation, Kenya

Family Power International, Kenya

Methodist Church In Kenya Disability Community Centre, Kenya

Act, Kenya

Terry Child Support and Youth Resource Center, Kenya

Electroxer Kenya Ltd

The Lebanese Physical Handicapped Union (LPHU)

International Baby Food Action Network, Malaysia

SAKBE Comunicaci6n y Defensa, Mexico

Red por los derechos de Ia infancia en Mexico (REDIM)

Burma Partnership

Kachin Development Group (KDG), Myanmar

Bernard Van Leer Foundation, Netherlands

Hivos - Stop Child Labour campaign , Netherlands

International Code Documentation Centre, Netherlands

Center for Advocacy, Learning and Livelihood (CALL) Foundation of the Blind Inc., Philippines

Life Haven, Inc., Philippines

Advocates for Public interest Law, Republic of Korea

Gonggam Human Rights Law Foundation, Republic of Korea

Diakonia, Sweden

Terre Des Hommes International Federation, Switzerland

Oak Foundation, Switzerland

ChildFund International, Uganda

Child Rights Information Network, United Kingdom

Home-Start International, United Kingdom

Keeping Children Safe, United Kingdom

Mary Robinson Consultancy, United Kingdom

Anti-Slavery International, United Kingdom

Bretton Woods Project, United Kingdom

Forest Peoples Programme, United Kingdom

Bank Information Center, United States

Cotton Campaign, United States

p.h. balanced films, United States

Child Protection in Crisis Network, United States

International Labor Rights Forum, United States

Aquinas Associates, United States

Sisters of St. Francis of Philadelphia, United States

Maryknoll Office for Global Concerns, United States

Responsible Sourcing Network, United States

Sisters of St. Joseph of Springfield, MA, United States

International Initiative to End Child Labor (IIECL), United States

Child Labor Coalition, United States

National Consumers League, United States

Free the Slaves, United States

Gender Action, United States

Dignity Health, United States

Marianists International, United States

Expert Working Group, Uzbekistan

Ezgulik, Uzbekistan

The Democracy School (Children's Parliament General Secretariat), Yemen

1. Kevin Hempel and Wendy Cunningham, *Investing in your country 's children and youth today: Good policy, smart*

   *economics;* Child and Youth Development Notes, World Bank 2010. [↑](#footnote-ref-1)
2. World Bank, *Learning for All: Investing in People 's Knowledge and Skills to Promote Development,* August 2011. [↑](#footnote-ref-2)
3. World Bank and UNICEF, *Integrating a Child Focus into Poverty and Social impact Analysis,* September 2011. [↑](#footnote-ref-3)
4. Mattias Lundberg and Alice Wuermli, eds, *Children and Youth in Crisis: Protecting and Promoting Human*

   *Development in Times of Economic Shocks,* World Bank 2012. [↑](#footnote-ref-4)
5. World Bank, *Learning for All: Investing in People 's Knowledge and Skills to Promote Development,* August 2011. [↑](#footnote-ref-5)
6. World Bank, *Turn Down the Heat: Why a 4°C Warmer World Must be Avoided,* November 2012. [↑](#footnote-ref-6)
7. Kevin Hempel and Wendy Cunningham, *Investing in your country's children and youth today: Good policy, smart*

   *economics;* Child and Youth Development Notes, World Bank 2010. [↑](#footnote-ref-7)
8. World Bank and UNICEF, *Integrating a Child Focus into Poverty and Social impact Analysis,* September 2011. [↑](#footnote-ref-8)
9. Gordon Brown, *Child Labor* & *Educational Disadvantage - Breaking the Link, Building Opportunity,* Office of

   the UN Special Envoy for Global Education 2012. [↑](#footnote-ref-9)
10. Ingrid Lefebvre-Hoang and Wendy Cunningham, *Children and Youth investments in the World Bank Portfolio,*

    *2000-2010;* Child and Youth Development Notes, World Bank 2011 [↑](#footnote-ref-10)
11. World Bank and UNICEF, *integrating a Child Focus into Poverty and Social impact Analysis,* September 2011. [↑](#footnote-ref-11)