

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."<sup>1</sup> 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."<sup>2</sup>

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!"<sup>3</sup> 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"<sup>4</sup>. And finally, "[c]ountries with low levels of education remain in a trap of technological stagnation, low growth, and low demand for education."<sup>5</sup>

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.

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<sup>1</sup> 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.

<sup>2</sup> World Bank, *Learning for All: Investing in People 's Knowledge and Skills to Promote Development*, August 2011.

<sup>3</sup> World Bank and UNICEF, *Integrating a Child Focus into Poverty and Social Impact Analysis*, September 2011.

<sup>4</sup> Mattias Lundberg and Alice Wuerml, eds, *Children and Youth in Crisis: Protecting and Promoting Human Development in Times of Economic Shocks*, World Bank 2012.

<sup>5</sup> World Bank, *Learning for All: Investing in People 's Knowledge and Skills to Promote Development*, August 2011.

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."<sup>6</sup>

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"<sup>7</sup> 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."<sup>8</sup> 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."<sup>9</sup>

It is time for the Bank's knowledge that "quality investment in an early age generates returns to society"<sup>10</sup> 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."<sup>11</sup>

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<sup>6</sup> World Bank, *Turn Down the Heat: Why a 4°C Warmer World Must be Avoided*, November 2012.

<sup>7</sup> 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.

<sup>8</sup> World Bank and UNICEF, *Integrating a Child Focus into Poverty and Social Impact Analysis*, September 2011.

<sup>9</sup> Gordon Brown, *Child Labor & Educational Disadvantage - Breaking the Link, Building Opportunity*, Office of the UN Special Envoy for Global Education 2012.

<sup>10</sup> 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

<sup>11</sup> World Bank and UNICEF, *Integrating a Child Focus into Poverty and Social Impact Analysis*, September 2011.

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  
Electroxxer Kenya Ltd  
The Lebanese Physical Handicapped Union (LPHU)  
International Baby Food Action Network, Malaysia  
SAKBE Comunicaci6n y Defensa, Mexico  
Red por los derechos de la 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