In advance of your first meeting today as the expert group on human rights to feed in the World Bank safeguard review we would ask you to include the needs of children in your discussions.

As you will be aware the current World Bank safeguard polices for investment lending do not include explicit references to the unique needs of children. The lack of 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 project may pose to children. 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]](#_ftn1)

It is known that “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.”[[2]](#_ftn2)

Harm to children that can result from Bank projects includes, but is by no means limited to, increased exposure to potential abusers by opening communities to external workers, forced child labour in Bank projects, adverse impacts of involuntary resettlement where children are left unprotected and an increased risk of experiencing violence, trafficking or sexual exploitation when boom towns are created around mines or construction projects.

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, under investments in children and youth are difficult to reverse later in life, and the price for society is high”[[3]](#_ftn3)] there is an urgent need for safeguards that will protect children.

Keeping Children Safe lead the international sector on developing and implementing child safeguarding standards. Following incidences of abuse by aid workers in West Africa, ten of the leading international NGOs set up a network to look at how projects implementation could be improved to not put children at risk. The organisation has grown and developed in-depth knowledge and experience on how to safeguard children. We would look for the new safeguards developed as part of the current review to include, at a minimum:

* A set of clear commitments to child safeguarding that prevents harm from to children from investment decisions
* 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
* A requirement for all funding partners to also have clear commitments to child safeguarding and that these are effectively monitored
* Processes that include the participation of children and communities in environmental and social impact assessment
* Mechanisms for monitoring and evaluating safeguarding measures to ensure both upward and downward accountability in relation to child safeguarding

It is time for the Bank’s knowledge that “quality investment in an early age generates returns to society”[[4]]](#_ftn10) to be integrated into all of its operations. 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.

We value your input into the World Bank Safeguards review and look forward to a positive outcome for the lives of children.