



How to Engage the World Bank around Child Rights

A tool to strengthen civil society organizations' capacity to advocate for child rights in the context of World Bank operations



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Summary

The World Bank Group (WBG) is one of the most influential development finance institutions in the world. It is made up of five branches which collectively share the mission of ending extreme poverty and promoting shared prosperity in a sustainable way. As such, its worldwide operations can have an enormous impact on child rights, both positive and negative.

While the Bank highlights its positive contributions through education, health and social protection projects and small grants, the reality is that the majority of the dollars lent are for infrastructure and other projects with potentially negative impacts on children. The Bank is willing to consider children in discussions around education projects but generally ignores the impact of large resettlement efforts on children or the ways that decisions about transport systems may negatively impact their lives, etc. Advocacy with the Bank can increase the likelihood that these projects will consider children and protect their rights (see section 1.d).

This guide aims to strengthen the capacity of civil society organizations (CSOs) to advocate for child rights in the context of World Bank operations and to hold it accountable for project related harms to children. It sets out the basics of how the Bank functions, how Bank policies consider issues related to child rights, and how to use these policies and the Bank's independent complaint mechanism to hold the Bank accountable. It also offers guidance, illustrative case studies, and useful resources to help CSOs understand how to:

- influence the Bank's lending positively for children,
- advocate for change within the framework of a specific project that might be directly or indirectly negatively affecting children, and to
- seek remedy for children when harm has occurred as a result of a Bank's project.

This guide is accompanied with three annexes:

- [Annex 1](#) lists relevant acronyms used in this document
- [Annex 2](#) provides links to useful resources for each section of this tool
- [Annex 3](#) offers a detailed summary of how the Bank considers children in its policies and guidance.

It is important to note that in order to provide a concise and user-friendly resource, the scope of this tool is limited to the public sector arm of the WBG (that is, the International Bank for Reconstruction and Development and the International Development Association),

and focuses primarily on one lending instrument (Investment Project Lending), jointly referred to as "the Bank" or "the World Bank." The private sector arm of the WBG has distinct management, environmental and social policies and processes, and advocacy targets, though some of the tools and strategies shared in this guide may also be applied to the private sector or other institutions.

Please note that the case studies highlighted here are not meant to be prescriptive or exhaustive, but are based upon experiences from different organizations including the Bank Information Center (BIC). BIC designed this toolkit to be a starting point and encourages you to explore new or different strategies depending on the local context.

This guide is aimed primarily at child-focused CSOs and other CSOs from a range of different contexts who are interested in engaging the Bank around child rights. It may also be relevant for academics, UN entities, and State authorities with an interest in the impact of the World Bank operations on child rights.

About Bank Information Center

[BIC](#) is a Washington DC-based independent, non-profit, non-governmental organization that advocates for transparency, accountability, sustainability, and inclusion in development finance. BIC partners with civil society in developing and transition countries to monitor and influence the policies and operations of the World Bank Group and other international financial institutions (IFIs). In partnership with international, regional, and local CSOs, BIC conducts [research and advocacy](#) aimed at reforming and improving IFI policy and practices.

Since its inception BIC's Child Rights Campaign work has primarily focused on large infrastructure projects funded by the World Bank that are likely to have significant negative impacts on children, particularly around child sexual exploitation, abuse, and harassment (SEA/H) and child labor in the absence of well-designed prevention and mitigation measures.

If you want to learn more about BIC, have any questions, know about a Multilateral Development Bank (MDB) project in your country or community that is causing harm and need support, and/or need any assistance in filing a complaint or developing your advocacy, visit BIC's website <https://bankinformationcenter.org/> and reach out via email to info@bankinformationcenter.org.

What is the World Bank and how does it work?

WHY IS THE WORLD BANK GROUP IMPORTANT FOR CHILD RIGHTS?

The [World Bank Group \(WBG\)](#) is a powerful institution that has significant influence with governments and private sector companies across the world. It has the potential to play a significant role in protecting and promoting the rights of children. Through its close relationships with, and funding to, national governments and the private sector, and its unique reputation as a data and knowledge producer, the WBG has the opportunity to shape the development agenda in ways both positive and negative.

However, despite explicitly stating that “the World Bank’s activities support the realization of human rights expressed in the Universal Declaration of Human Rights” and that the Bank works to “support its member countries as they strive to progressively achieve their human rights commitments,”¹ the Bank has historically fallen far short of the positive contribution it should be making. Its self-regulatory framework (see section two on the Bank’s Environmental and Social Framework) lacks any other explicit reference or requirement to respect, protect, or promote human rights. This framework is primarily a “do no harm” policy and does not mandate investment in projects that benefit communities.

Although the WBG is not itself a formal “party” to international human rights conventions, its member States are. Therefore, States are required, in principle, to comply with their obligations under human rights conventions, including the Convention on the Rights of the Child (CRC), in all of their engagement with the Bank. In fact, the Committee on the Rights of the Child (CRC Committee) has directly addressed the role of States that are a part of International Financial Institutions, such as the World Bank, in different General Comments (see [Annex 2](#)). For example, in General Comment No. 16 (para 47) the Committee concluded that States “must comply with their obligations under the Convention and the Optional Protocols thereto when acting as members of such organizations” and “not accept loans from international organizations, or agree to conditions set forth by such organizations, if these loans or policies are likely to result in violations of the rights of children.”

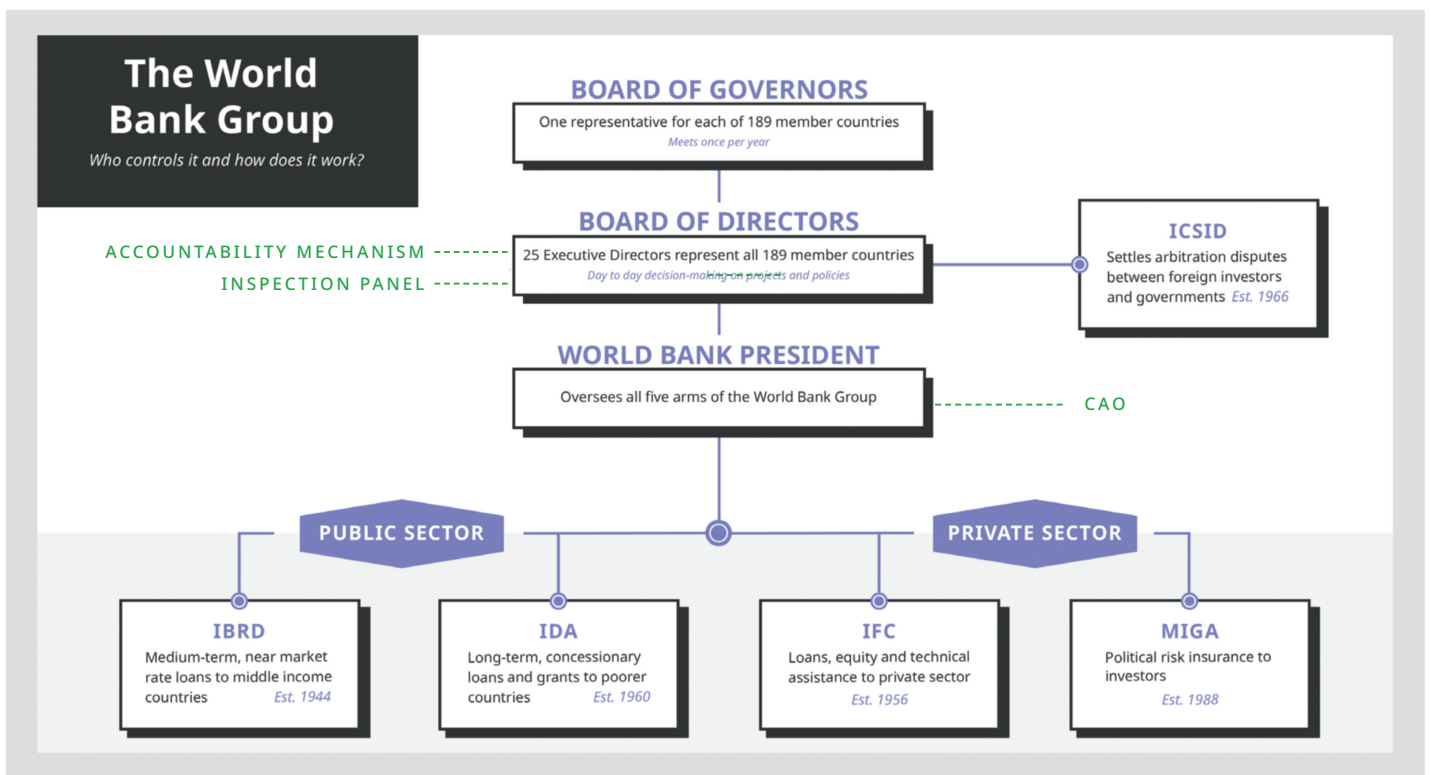
WHAT IS THE WORLD BANK GROUP?

The WBG is an international organization with the mission of ending extreme poverty and promoting shared prosperity in a sustainable way. Through the provision of loans, grants, technical assistance, and research, in both the private and public sectors, it offers developmental assistance to low and middle income countries.

Although the WBG is formally a specialized agency under the Economic and Social Council (ECOSOC) of the United Nations (UN) system, it does not share the UN decision-making structure, nor is it directly accountable to the UN.

The WBG is made up of five separate branches. Two of those branches, the International Bank for Reconstruction and Development (IBRD) and the International Development Association (IDA), primarily give loans or grants to governments and together are commonly known as the “World Bank” (or Bank, as used in this tool). IDA focuses on the world’s poorest countries, while IBRD assists middle-income countries. Two other branches, the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA), mainly work with private businesses. The fifth branch is the International Center for Settlement of Investment Disputes (ICSID), which handles disagreements between foreign investors and governments. As stated in the summary section, this tool focuses solely on the public arm of the Bank (IBRD and IDA).

1 See [World Bank Environmental and Social Framework](#), p. 1.



WHO RUNS THE WORLD BANK GROUP?

The WBG is made up of 189 [member countries](#). These member countries, or shareholders, are represented by a [Board of Governors](#), who are the ultimate policymakers. Generally, the governors are the ministers of finance or ministers of development for the member countries. They officially meet once a year at the [Annual Meetings](#) of the Boards of Governors of the WBG and the [International Monetary Fund](#) (IMF).

The governors delegate specific duties to 25 [Executive Directors](#) (ED), who work on-site at the Bank. The six largest shareholders (China, France, Germany, Japan, the United Kingdom, and the United States) have their own executive director. Other member countries are represented in groups by a single ED. Even when the decisions are taken by “consensus,” the size of each country’s share determines the weight of its vote on the Bank’s board. This “one-dollar-one-vote” structure provides richer countries greater power in the decision-making processes at the institutions leaving the poorer, borrowing countries with less influence.

The WBG operates day-to-day under the leadership and direction of its [president](#). While headquartered in Washington, D.C. there are more than 100 country offices around the world.

HOW DOES THE WORLD BANK FINANCE DEVELOPMENT?

World Bank lending commitments for the public sector rose to USD 70.8 billion in 2022.² As of late February 2023, the Bank had more than 3600 projects (including active projects and in the pipeline) all over the world.³

Although member countries pledge subscription fees to the WBG, the bulk of the capital the IBRD uses to finance projects comes from selling bonds on the international financial markets. WBG bonds are considered sound investments, enabling the institution to make a good profit. The Bank then lends to borrowing countries at a slightly higher interest rate than the rate they pay their bondholders. Borrowing countries repay their loans, enabling the Bank to pay off the investors and pocket the difference. The IBRD makes a profit every year, which it uses to finance the Bank’s administrative budget and to provide funds to its soft-loan window, IDA. Beyond these subsidies from IBRD earnings, the majority of the money that IDA provides to poorer countries comes from donor contributions, supplemented by loan repayments. The major donors to IDA, called the IDA Deputies, meet every three years to discuss new priorities for IDA and to determine new contributions. Thus, donor countries exert significant influence on IDA

² See [World Bank Projects](#).

³ See https://projects.worldbank.org/en/projects-operations/projects-list?status_exact=Active^Pipeline&os=0.

strategies and operations. To guide the development and lending priorities in a country, both for the private and public sector, the Bank and borrowing government draft a Country Partnership Framework (CPF) outlining lending and non-lending activities in a country for periods of 4-6 years. The CPF is informed by a Systematic Country Diagnostic (SCD) that is conducted by WBG staff to assess the country's most pressing challenges and

opportunities. The development of the SCD and the CPF provides a key opportunity for CSOs to engage with the Bank on how it can support the realization of child rights through investments in projects that target children. For more information around CPF and SCD and how your CSOs can engage around them, please refer to 3.b. below.

The Bank has three primary types of lending instruments for the public sector (governments):⁴

- **Investment Project Financing (IPF)**. Project lending, the most visible one. Provides financing to governments for activities that create physical/social infrastructure and develop institutional capacity for sustainable development.
- **Development Policy Lending/Financing (DPL/DPF)**, provides budget support to governments for policy and institutional reforms. This instrument does not support physical investments like roads, hospitals and schools. Instead, finances borrowing countries in exchange for their adoption of policy reforms.
- **Program for Results (P4R)**, the newest lending instrument to support government programs ranging from healthcare to education to decentralization. Disbursements are tied to verifiable results from the project.

WHY SHOULD MY ORGANIZATION CARE ABOUT ENGAGING WITH THE BANK?

Bank projects are intended to help improve people's lives and reduce poverty. However, many of the Bank's projects have negative direct and indirect impacts. As you will see throughout the tool, the Bank's projects can harm children by, for example:

- Failing to conduct meaningful consultations with children during project design and implementation.
- Not doing appropriate due diligence to prevent and respond to child labor in project sites in a country context or industry sector where child labor is pervasive.
- Failing to put in place measures to prevent and respond to cases of child SEA/H arising from the influx of labor into a community.
- Not considering the opportunity that social protection projects can have in strengthening child protection systems.
- Not addressing the specific impacts that polluting industries financed by a project or internal displacement due to project constructions can have on children.

Many CSOs have focused their efforts on raising these and other child rights issues with local or national authorities and the CRC Committee. For example, encouraging governments to carry out human and child rights impact

assessments before designing and implementing new policies. However, they may not have fully explored the potential for advocating on child rights issues with the Bank and the implementing agencies such as ministries of transport, infrastructure, etc. The same human rights strategies that work with the UN system and the child rights, child protection, gender, and welfare government agencies in your country might not be as effective when engaging with the Bank and implementing agencies. Nevertheless, it is possible to successfully advocate with the Bank around child rights issues with additional expertise, planning, and strategizing and this is explored further below.

TIP

If advocacy with the WBG or any other MDB makes sense for your organization, feel free to reach out to BIC for help in developing a strategy and review [Annex 2](#) and [Annex 3](#) of this tool for other useful resources to better understand how the Bank works.

⁴ See [Financing](#).

How does the World Bank address project-related risks to children and child rights?

HOW DOES THE BANK ASSESS PROJECT-RELATED RISKS?

The Bank's investment project lending is governed by the [Environmental and Social Framework \(ESF\)](#), a set of environmental and social standards. The current ESF became effective on October 1, 2018, and applies to all projects initiated after this date.⁵ Since the Bank has no standalone child-specific policy, it is important to understand what the self-regulatory framework of the Bank is, and where and how children and their particular rights and needs fit.

The ESF is a self-regulatory framework that consists of:

- A [Vision for Sustainable Development](#).
- The Environmental and Social Standards ([ESSs](#)), that are ten standards covering different topic areas that must be applied by the Borrower in each project.
- An [Environmental and Social Policy for Investment Project Financing \(IPF\)](#), which sets out the requirements that apply to the Bank.
- An [Environmental and Social Directive for IPF](#).
- A [Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups](#), that provides direction for the Bank's staff on identification and mitigation of increased risks to groups and individuals who might be more likely to be adversely affected by project impacts or more limited than others in their ability to take advantage of project benefits due to their particular circumstances, like children.

To guide clients and Bank staff in their use of the ESF, the Bank develops different [resources](#), including:

- [Guidance Notes](#): non-binding guidance for borrowing governments on the implementation of the ESSs, and
- [Good Practice Notes](#): non-binding notes for the Bank's staff on best practices around different issues and how to better guide the Borrower in meeting the requirements of the ESF.

The ESF is not designed or intended to require, or even encourage, the Bank to invest in any particular type of project or to promote human rights, and nothing in

⁵ See [Environmental and Social Policies](#).

the ESF currently requires the Bank as an institution and the Borrowers to do so. The role of the ESF is to set standards to protect people and the environment from risks and harms caused by a project.

CHILDREN IN THE BANK'S ESF

If you decide to engage the Bank with regard to the impacts of their projects on children's rights, the first step is to know how the ESF works, how the ESF considers children, and what language and reasoning Bank staff find compelling.

The Bank's ESF defines children as any person below the age of 18 and references children both directly and indirectly. Children are referenced directly in the Vision for Development, EES 1 on Assessment and Management of Environmental and Social Risks and Impacts, ESS 2 on Labor and Working Conditions, and ESS 7 on Indigenous Peoples.

Children are also frequently included under the category of "disadvantaged" or "vulnerable" populations. The Bank's due diligence for project-related environmental and social risks has to include an assessment of the impact on the disadvantaged or vulnerable.⁶ According to the ESF's glossary, this category "refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors."⁷

TIP

The ESF is binding and therefore the Bank and the Borrowers must follow it. For more information about how the Bank considers children in their ESF, see [Annex 3](#), and remember that when engaging the Bank around child rights, knowing the ESF and the Bank's language is key for successful advocacy.

CHILDREN IN THE BANK'S GUIDANCE

As stated before, [Guidance Notes](#) (for Borrowers) and [Good Practice Notes](#) or GPN (for Bank staff) are documents aimed at providing concrete guidance on

⁶ Ibid, p. 2.

⁷ Ibid, p. 103.

how to approach, better understand, and apply the ESS. They do not introduce new requirements but rather reflect the Bank's understanding of what applying the ESS entails in practice. Therefore, even when they are considered as non-binding, they should be taken into consideration when applying and interpreting the ESS. Each ESS has its own Guidance Note for Borrowers (targeting the same issue that each ESS focuses on), and then the Bank's staff have thematic GPN (e.g. on gender, SEA/H, etc.) to inform project design and advise Borrowers in the project implementation.

The Bank's guidance has direct and indirect references to children. For more information about how the Bank considers children in their guidance see [Annex 3](#).

How can my organization influence Bank lending and uphold child rights?

This section provides different strategies and entry points to engage the Bank around child rights. We also

include case studies as concrete examples of how BIC and other partner organizations were able to influence the Bank and make a positive contribution to child rights as well as some lessons learned and new strategies to explore. If you are concerned about how a specific Bank project is affecting children and what to do about it, or how your organization can implement any of the following strategies, BIC is available for technical support.

INTERNATIONAL LEVEL: ENGAGE IN GLOBAL ADVOCACY WITH THE BANK AROUND CHILD RIGHTS

Annual Meetings and Spring Meetings

Every year, CSOs gather around the International Monetary Fund and the World Bank Group [Annual Meetings](#) (in October) and [Spring Meetings](#) (in April) at the Civil Society Policy Forum (CSPE) to share research and experiences they believe will be valuable for these institutions to consider when setting their development priorities. Any CSO can register to participate in these meetings and can submit a session proposal to CSPE.

CASE STUDY: Using the Annual Meetings to advocate for child SEA/H prevention and response

In 2022, BIC, [CPC Learning Network](#), and [TPO Alliance](#) sponsored a [session](#) at the Annual Meeting on *Protecting children in Multilateral Development Bank projects: progress, challenges, and opportunities* which included both the United States Executive Director and the World Bank's Global Director for the World Bank's Environmental and Social Framework. As a result of BIC's work and advocacy around in the Uganda case (see section 3.d. for more information) and by setting up this session, BIC and CPC were able to put pressure on the Bank who released the updated GPN on addressing [SEA/H in Investment Project Financing involving Major Civil Works](#) and shared [key messages](#) that will help CSOs working on child SEA/H to push the Bank to move from policy to practice.

Policy Review

The Bank undertakes reviews of its policies very sporadically, however, these reviews can be a good advocacy opportunity for CSO to bring up a discussion around what else should be done and how to enhance child rights in development finance.⁸

⁸ As of the writing of this tool, the Asian Development Bank (ADB) and African Development Bank (AfDB) are currently going through independent safeguarding review processes. To learn more about these processes see [Safeguard Policy Review | Asian Development Bank](#) and [Review of the AfDB's Procurement Policy and Procedures](#). Civil society is encouraged to participate in these processes through meaningful consultation, information sharing, or other advocacy means (e.g. sign on letters) so that the new safeguarding policies help promote the wellbeing, safety, and advancement of children impacted

In 2012 the Bank started an extensive five year review process to update the original safeguards that had been put together piecemeal over the preceding decades.⁹ The revised policies were completed in 2016 and the current ESF became effective for projects developed on or after October 1, 2018.

by development projects. Here are BIC's recommendations on how ADB should consider children and what AfDB should do to improve its policy:

[How can the ADB better protect child rights and strengthen child protections in its Safeguard Policy Statement?](#), and [What does civil society hope to see in the AfDB's updated Integrated Safeguards System? | Bank Information Center](#).

⁹ For a list of submissions from CSOs (BIC and Save the Children included) and the UN system, see: [Review and Update of the World Bank Safeguard Policies](#).

To inform this policy review, BIC conducted 15 workshops with children around the globe. The study box below summarizes the process and serves as an

example on how to uphold child rights to be heard in the development process.

CASE STUDY: Child participation in the World Bank's policy review process

The problem:

The Bank's previous safeguard policies for investment lending did not include explicit protections for the unique needs of children, meaning that often there was no examination or analysis of project's risks and negative impact on children, resulting in direct or indirect harm to them. The Bank consulted a wide range of stakeholders during their consultative process, but did not include children at any stage.

What did we do?

As part of a broader program of advocacy, BIC conducted two rounds of consultations with children in multiple World Bank borrowing countries on the Bank's proposed safeguards in an effort to elicit their perspectives on this landmark policy review. After each round of consultations, BIC hosted a delegation of children from several of these countries. The children were invited to Washington, DC to share some of their recommendations on the Bank's proposed safeguards policies.

The outcomes:

Unfortunately the Bank was not responsive to these efforts and was not willing to even hear the recommendations from children or consider them seriously. However, the workshops and inputs from children did influence BIC's submissions as part of the review process.

For more information around the consultation process and children's recommendations to the Bank see: <https://tinyurl.com/WorldBankSafeguardsChildRights> and <https://tinyurl.com/WorldBankDelegationChildRights>.

NATIONAL LEVEL: PARTICIPATE IN IN-COUNTRY CONSULTATIONS FOR SCD AND CPF

The WBG development of [Systematic Country Diagnostic](#) (SCD) and the [Country Partnership Framework](#) (CPF) provides a key opportunity for CSOs to engage with the Bank on how it can support the realization of child rights through investments in projects that target children. However, it is important to note there is no binding requirement for the Bank to consult with children and the Bank has historically not consulted with children around the CPF/SCD. Nonetheless, CSOs can generate child-friendly materials and either press the WBG to include children in the process or to hold their own consultations with children and use that to inform their own input into the process.

SCD reports are prepared by WBG staff in close consultation with national authorities and other stakeholders and are aimed at identifying key challenges and opportunities for a country to accelerate progress towards development. CPF is a four-to-six year strategy that the WBG develops jointly with the borrowing country's government to guide its operational activities

in that country. The CPF identifies a select set of objectives and/or sectors for the Bank's work. Key inputs to the CPF include: the SCD; the government's development plan; other donors' plans; and stakeholder consultations.

According to the WBG's [Directive on Country Engagement](#), the SCD and CPF should be developed in consultation with stakeholders to better inform the documents. This provides a useful opportunity to influence the debate about development priorities and shape the Bank's interventions in your country. These documents are supposed to bring together and look at existing evidence and analysis. In theory, this should include a human rights analysis, taking into account recommendations and standards arising from the CRC Committee's General Comments and Concluding Observations, the Universal Periodic Review, as well as recommendations from UN Mandate Holders and other Treaty Bodies. In practice, they have a narrow focus on more traditional development, poverty metrics, and economic analysis. CSOs could play a key role by engaging and bringing human rights issues and concerns to the table, and linking them to country and child-specific human rights concerns.

The quality and scope of consultations can vary significantly between countries. In some cases (see Case Study box below), civil society have successfully pushed for consultations to be expanded or made more inclusive. However, CSOs have often found engaging in SCD/CPF processes to be time intensive and the results to be limited.

To engage around the SCD and/or the CPF, as an initial step, go to the World Bank's [Country Engagement website](#) to see when the SCD and CPF were most recently updated for that country and the timeline for an upcoming review process, if available. Information can also be found on the World Bank's [country page](#), and on

the [consultation hub](#). Next, if there is an upcoming SCD or CPF that you or your organization wants to engage in, it is important to contact the WBG country office to better understand the timeline and potential venues of participation (e.g. if and when consultations are happening).

Although the following case study is not child-specific, it demonstrates how BIC and local partners have been able to successfully engage the Bank around pressing issues for local CSOs. If your organization is interested in this advocacy strategy, BIC can support in understanding how to engage in this process to uphold child rights.

CASE STUDY: Lessons learned from Egypt and Tunisia on consultations around CPF

The opportunity

In 2014 the Bank launched a new approach to its engagement in borrowing countries. Egypt and Tunisia were two of the first countries to develop strategies under the new guidelines. BIC partnered with national and local groups to push for transparency and civil society engagement in this process.

What did we do?

BIC partnered with local CSOs in Egypt and Tunisia and, through a series of workshops, helped them make public CSO priorities for the development of their countries.

The outcomes

In both countries the main outcome of the advocacy process was to secure more meaningful and inclusive consultations. In Egypt, a multi-phase consultation process was conducted in several regions of the country and themes that civil society raised were included (e.g. issues related to water and conversion of agricultural land). In Tunisia, the advocacy campaign resulted in the addition of six more consultations on the CPF throughout the country and a comprehensive CPF information portal on the Bank website. It also helped to bring together and consolidate a group of CSOs to push the Bank to be more accountable.

PROJECT LEVEL: ENGAGE WITH IN-COUNTRY BANK STAFF AND COUNTRY REPRESENTATIVES AROUND A SPECIFIC PROJECT

In this section we offer key steps to engage the Bank around child rights at project level. This section is helpful if your organization is aware of a Bank-funded project that is pending approval or already being implemented and you want to better understand how the project is planning to uphold child rights. It may also be the case that your organization is concerned about the negative impacts a project can cause and you want to closely monitor it. Additionally your organization may want to keep track of what the Bank is funding and where by monitoring the Bank's [project page](#).

Step 1: Review project documents

Begin by reviewing the project documents in order to have a better understanding of the goals and parameters of the project, and identify any specific provisions pertaining to children (e.g. to prevent and respond to child SEA/H, child labor, or other child protection concerns, including but not limited to project grievance redress mechanisms). At this point it may also be helpful to reach out to BIC, or another organization with expertise on the Bank for support in understanding project documents and determining next steps.

Check [BIC's toolkit for Activists, module 2](#) (pp. 6, 11, 14) to learn more about:

- Which are the key project documents, where to find them, and what are their purposes.
- The Bank's project cycle.
- Who to engage with in which stage of the project.

Step 2: Engage affected communities and understand the impacts of the project

If you have not learned about concerns directly from a community that is affected by a Bank-funded project, it is important to directly engage with them, including children themselves, to understand their concerns about project impacts. Should you wish to monitor actual or anticipated project impacts, this can only be done in cooperation with affected communities.

Step 3: Reach out to the implementing agency

Reaching out to the implementing agency (that is, the government agency that is implementing the project) is also useful to better understand how the project is being implemented and to raise any concerns you may have. Often key stakeholders are left out and not consulted during project design and implementation, and reaching out to the borrower and encouraging them to consider children in the project can sometimes improve the project.

It is important to note that the level of responsiveness of the implementing agency can be different in each country. When directly reaching out to the borrower does not work, asking the Bank to support you in engaging with the government can be helpful. Strategies for best engaging with governments vary by country and even by locality within a country, and are outside BIC's area of expertise. Thus this guide primarily focuses on engagement with the Bank and how to connect with World Bank representatives to place pressure on the project implementing agency. Your organization, at the local level, is better equipped to understand who to contact at local level, why, and how to influence them.

Step 4: Reach out to Bank staff responsible for the particular project

Once you are sure you understand the project requirements found in the project documents, and you have connected with affected communities, you may wish to reach out to Bank representatives to gain more clarity on the project or to advocate for changes on a project. To find the right representative you can reach out to the Bank's country office, look for names of Bank staff responsible for a particular project on the Bank's project page on its website, or reach out to BIC for assistance.

The case study below offers an example of how to advocate for change in a project through actively monitoring it in the field and engaging with the Task Team Leader/s (TTLs), the Bank staff in charge of the specific project, bringing the Bank concrete proposals and action points.

CASE STUDY: Eradicating child labor in an irrigation project in Nepal

The project:

The Nepal Modernization of Rani Jamara Kulariya Irrigation Scheme (MoRJK) Phase 2 is a World Bank-funded large-scale infrastructure project that aims to improve irrigation services and promote improved farming practices for farmers in three municipalities in the Terai Plain region of Nepal.

The problem:

BIC partnered with TPO Alliance to monitor this project. Early project monitoring findings showed the majority of community members interviewed were satisfied with the project. However, there were cases of child labor in the project site, a limited understanding in the community around what constitutes child labor, accounts of girls being harassed by project workers using sexually explicit language, one case of a child sexually assaulted by a driver on the project, and risk of children falling into the canals due to a lack of safety railings in populated areas. Project monitoring work also revealed the need for providing safe access to drinking water, hiring local people for project-related work, addressing the gender pay gap, involving the Ward Chairman in monitoring of project works, and taking action to prevent flooding in Simreni area.

The outcomes:

After conducting field work, the BIC and TPO Alliance shared project monitoring findings and concerns with the implementing agencies and the Bank. As a direct result of BIC and TPO Alliance recommendations, the Bank and the Government of Nepal developed an action plan to address the issues listed above. Monitoring started in 2019 and continued throughout 2022. During the last field visit in December 2022, TPO Alliance observed significant progress in the commitments stated in the action plan with no child labor cases found.

For more information around BIC's advocacy around this project see:

[Modernization of Rani Jamara Kulariya Irrigation Scheme - Phase 2 | Bank Information Center.](#)

Step 5: Outreach to Bank's EDs

If you have serious concerns about a project that is in the pipeline or being implemented and you are not hearing back from the Bank staff despite multiple efforts, you can reach out to the [Bank's Executive Directors \(ED\)](#).

EDs can raise questions on projects before a Board vote and can bring attention to particular issues that might be overlooked in project design. For example, BIC worked with the US ED's office to develop an Inclusive Education Checklist to help raise the profile of inclusive education issues and particular components of projects that could better support the needs of children and youth with disabilities. This Checklist outlines key components of an inclusive education project and highlights fundamental elements of an education project for children with disabilities, among others.¹⁰

If your organization wants to know more about how to engage with EDs, which ED you should contact, how to better prepare for the engagement, as well as potential challenges arising from it, please refer to BIC's ED Advocacy Tool and other resources listed in [Annex 2](#).

There are many reasons why you may want to monitor a Bank project, and you could include it in your regular national advocacy strategy or pitch it to your funders. If you are interested in monitoring a particular project, BIC is available to support your organization with technical capacity.

PROJECT LEVEL: FILE A COMPLAINT FOR ACCESS TO REMEDY

When concerns about harms resulting from a Bank project have been raised and have not been resolved by the Bank's staff it is possible to file a complaint before the [Inspection Panel](#) (the Panel).¹¹ General complaints,

¹⁰ See [What are key elements of an inclusive World Bank education project?](#)

¹¹ In the event of projects financed by the private arm of the WBG, the IFC and the MIGA, the applicable Grievance Mechanisms is the [Compliance Advisor/Ombudsman](#) (Compliance Advisor Ombudsman).

stating the reasons why a CSO considers that the Bank failed to fulfill its mission of poverty reduction and sustainable development, are not sufficient to satisfy the harm requirement. The complaint must demonstrate harm has been caused or is likely to happen as a result of a violation of the ESF or another Bank policy. Complaints must be filed by two or more people, which can include children themselves who have been harmed, or believe they will be harmed as a result of a Bank-supported project.¹² This means that complaints are not filed by CSOs or NGOs but rather by project-affected communities, although they are often filed with the support of CSOs and NGOs, including NGOs like BIC that have experience with the Inspection Panel.

Complaints should include information about the complainant and any appointed representatives; the Bank project-related to the complaint; the harm experienced (or likely to be experienced); how the complainant believes the Bank has failed to follow its policies (the complaint does not need to list specific policies);¹³ and the complainant's past attempts to inform the Bank's management about the harmful impacts and why the complainant is not satisfied with the response. The complaint may include any resolution that the complainant would like to see. It is useful to submit as many details as possible, but complainants may provide additional information and evidence of harm during the course of the complaint process.¹⁴

There are some common challenges around filing a complaint that include, most notably, risks of retaliation. While complainants may request that the Panel keep their identities confidential throughout the process, it may be possible for Bank management, governments, or other parties to deduce the identities of complainants.

¹² For more information about how the IP works see: [Frequently Asked Questions](#).

¹³ A summary of where and how children are referred to in Bank policies is available in [Annex 3](#).

¹⁴ For more information about how to file a complaint before the IP and what to expect see: [Module 5](#).

Case studies below highlight BIC's work supporting communities in seeking remedy via a Panel process. This can be a lengthy process, with at least a year between the filing of the initial complaint and the conclusion of the process. Filing an effective complaint requires some

degree of expertise on Bank policies and accountability. Organizations and communities are highly advised to seek support from BIC or another organization with expertise in the Panel's complaints process if they wish to consider filing a complaint.

CASE STUDY: Access to remedy after child SEA/H cases in a roads project in Uganda

The project:

In 2009 the Bank approved the [Transport Sector Development Project](#) for Uganda with the overall goal to improve the connectivity and efficiency of the transport sector through: (i) improved condition of national road network; (ii) improved capacity for road safety management; and (iii) improved transport sector and national road management.

The problem:

The road construction led to a large influx of construction workers moving to an isolated and rural community. These project workers sexually harassed and assaulted teenage girls, resulting in a significant increase in rates of teenage pregnancy, HIV/AIDS, and girls dropping out of school. A local organization, Joy for Children Uganda, first uncovered these issues in early 2014 and assisted the community in its multi-year effort to seek redress for the harm caused by this project. These issues were brought to the attention of the Ugandan government, the roads contractor, and the Bank management who refused to investigate and take responsibility for the cases.

What did we do?

In 2015, the communities filed a complaint before the Inspection Panel. The request contained allegations relating to road safety, compensation for land acquisition, road workers' sexual exploitation of minor girls, and sexual harassment of female employees.

The outcomes:

It was the filing of the Panel case that got the Bank to finally take the case seriously. The Bank suspended financing for the project, and then ultimately canceled the project.

The overall response from the Bank was unprecedented. The management response admitted serious policy violations and took proactive steps to provide remedy including hiring several CSOs to provide services to survivors and get children back into school before the investigation concluded. Upon completion of the investigation, additional measures were taken, including allocating funds to enhance child protection in the project's region. The Bank also took several steps to address systemic failures. These included:

- publishing an examination report of the Bank failures that led to SEA/H cases, called "[Lessons Learned and Agenda for Action](#);"
- developing a [guidance note](#) for addressing risks relating to influxes of workers surrounding construction projects; and
- creating a Gender-Based Violence Task Force made of high-level experts from UN bodies and NGOs and Bank management. This task force issued its [recommendations](#) in late 2017 and the Bank has fully [committed to implementing](#) all recommendations.

As a direct result of BIC's work and advocacy, two new GPN were released in 2022 addressing child SEA/H risks in different types of projects.

For more information around this case see:

[Uganda Transport Sector Development Project \(TSDP\) | Bank Information Center](#) and <https://tinyurl.com/accountabilityresearchJune2018>.

CASE STUDY: Access to remedy and child labor in the Uzbekistan cotton sector

The project:

In June 2008 the Bank approved the [Rural Enterprise Support Project, Phase II](#) for Uzbekistan. The project's objective was "to increase the productivity and financial and environmental sustainability of agriculture and the profitability of agribusiness in the project area."

The problem:

Among other issues, the project documents did not discuss existing forced child labor in the agriculture sector, no mention of the fact that child labor in Uzbekistan was orchestrated by the government and no reference to how the Bank would verify no forced child labor was used in the project.

What did we do?

In 2013, local CSOs (Human Rights in Central Asia, Human Rights Society of Uzbekistan "Ezgulik" and Uzbek-German Forum for Human Rights) filed a complaint before the Inspection Panel. BIC served as a liaison between these complainants and the Panel. BIC helped them write the complaint, joined meetings, talked to members of the Inspection Panel, etc.

The outcome:

As a result of this complaint, the Bank acted to address child labor and forced labor in the project. Among other things, the Bank and the International Labour Organization (ILO) signed a Memorandum of Understanding for ILO to carry out Third Party Monitoring (TPM) of both child and forced labor in Bank-financed projects in Uzbekistan starting 2015 for an initial period of two years. The Bank also included labor issues as part of the Bank's ongoing dialogue with the government on agricultural issues. As of today, child labor and forced labor has dramatically dropped in the cotton sector in Uzbekistan.

For more information around this case see:

[Uzbekistan Rural Enterprise Support Project](#) | [Bank Information Center](#) and [Uzbekistan — Cotton Campaign](#).

EXPLORE OTHER STRATEGIES

The case studies featured in this tool are based on BIC's experience and are examples of where we were able to demonstrate significant change or lessons learned. However, there are many other child rights issues (like education, health, etc.) and strategies to influence the Bank worth exploring.

Below we share two of the recent strategies BIC is working on:

1. Using the human rights system to put pressure on the role of the Bank

BIC participated in the drafting process of the CRC Committee General Comment no. 16 on state obligations regarding the impact of the business sector on children's rights and contributed to clarifying that Multilateral Development Banks (MDBs) such as the World Bank have an important role to play. Currently, BIC is engaging in development of the CRC Committee GC 26 on child rights and the environment, with particular focus on

climate change. BIC published an [update](#), responded to the [online questionnaire](#), participated in the in-person consultation in Buenos Aires, Argentina, in 2022, and [submitted feedback](#) to the first draft. Additionally, BIC and the Care and Protection of Children (CPC) Learning Network at Columbia University sent a [submission](#) to the Special Rapporteur on the sale and sexual exploitation of children, including child prostitution, child pornography and other child sexual abuse material, on the role of MDBs in addressing this issue.

2. Advocating for the Bank to strengthen child protection systems in its social protection projects

By monitoring projects in [Tanzania](#) and [Guinea](#), and developing a [report](#) on how the Bank is incorporating child protection service delivery in its COVID-19 social protection projects, BIC is currently advocating for the Bank to help strengthen child protection across the Bank's lending and to uphold child rights more broadly. Results of these advocacy efforts on the day-to-day

functioning of the Bank are yet to be seen, but if taken into consideration, language around the role of MDBs in the GC 26 and incorporating child rights considerations and child protection strengthening in social protection projects could support child rights CSOs in triggering change.

Conclusions and recommendations

Children deserve special attention in the design and implementation of Bank-funded projects. This tool aimed to provide an overview of the Bank's functioning and policies, as well as examples on how to advocate for child rights before the Bank in an effort to support CSOs working on child rights issues.

In this tool we focused solely on the Bank's public arm

and projects financed via Investment Project Lending. The Bank also channels a great deal of its financing through DPF and P4R lending. Additionally, the WBG finances many projects through its private sector arms, the IFC and MIGA. To learn more about these alternate means of financing see [BIC's tool for activists](#).

BIC also conducts advocacy and supports communities in advocating for child rights and accessing remedy at the African Development Bank, the Asian Development Bank, the Inter-American Development Bank, and the U.S. Development Finance Corporation.

If you or your organization have any further questions or need support in monitoring a project, setting an advocacy strategy, or otherwise engaging with an MDB, feel free to reach out to info@bankinformationcenter.org.

To keep in mind

- Bank advocacy is a long term process, requiring many years of effort to see results. Whether that advocacy is effective will depend on a cumulative set of factors.
- Space for direct child participation is not easily found so CSO support and advocacy is vital.
- If presented in a complete and compelling manner, filing a complaint to seek remedy can be effective.
- In this tool we focused solely on the Bank's public arm and projects financed via Investment Project Lending. The Bank also channels a great deal of its financing through DPF and P4R lending. Additionally, the WBG finances many projects through its private sector arms, the IFC and MIGA. To learn more about these alternate means of financing see [BIC's tool for activists](#).

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The views and conclusions expressed in this publication are those of Bank Information Center alone and do not necessarily reflect the opinions of other individuals and organizations that have participated in the work or of BIC's sponsors or supporters.

The HOW TO CHILD RIGHTS is a series of practical, high quality, tried and tested tools initiated by Save the Children in collaboration with a broad range of trusted partners to support effective and innovative programming for children's rights across the sector.

If you want to know more about the How to Child Rights Series please contact:

howtochildrights@rb.se

For more tools, please visit:

<https://resourcecentre.savethechildren.net/article/how-to-child-rights/>

If you want to provide feedback on this tool please contact:

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Annex 1

RELEVANT ACRONYMS

World Bank Group structure

WBG - World Bank Group

The Bank - World Bank (refers to the public sector, including IBRD and IDA)

IBRD - International Bank for Reconstruction and Development

IDA - International Development Association

IFC - International Finance Corporation

MIGA - Multilateral Investment Guarantee Agency

ICSID - International Center for Settlement of Investment Disputes

SOGI - Sexual Orientation and Gender Identity

TPM - Third Party Monitoring

UN - United Nations

Other Acronyms

ADB - Asian Development Bank

AfDB - African Development Bank

BIC - Bank Information Center

CPF - Country Partnership Framework

CRC - Convention on the Rights of the Child

CRC Committee - Committee on the Rights of the Child

CSO - Civil Society Organizations

CSPF - Civil Society Policy Forum

DPL/DPF - Development Policy Lending/Financing

ECOSOC - Economic and Social Council

ED - Executive Director

ESF - Environmental and Social Framework

ESP - Environmental and Social Policy

ESS - Environmental and Social Standards

GBV - Gender-Based Violence

GC - General Comment

GPN - Good Practice Note

IFI - International Financial Institution

ILO - International Labour Organization

IMF - International Monetary Fund

IPF - Investment Project Financing

MDB - Multilateral Developmental Bank

P4R - Program for Results

SCD - Systematic Country Diagnostic

SEA/H - sexual exploitation, abuse and harassment

Annex 2

USEFUL RESOURCES

Useful resources to better understand what the World Bank is and how it works

- World Bank Group
 - Website: <https://www.worldbank.org/en/home>
 - 2022 Organizational Chart: <https://thedocs.worldbank.org/en/doc/404071412346998230-0090022021/original/TheWorldBankGroupOrganizationalChart.English.pdf>
 - Policies and guidance
 - Bank's Environmental and Social Framework (ESF): <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>
 - Bank's guidance for Borrowers and Bank staff: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources>
- Bank Information Center toolkit for Activists, module 1, "World Bank Group Basics" and module 4, "Protecting your rights": <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>

Useful resources to influence Bank lending and uphold child rights

- International level - key global advocacy momentums
 - Annual Meetings: <https://www.worldbank.org/en/meetings/splash/annual>
 - Spring Meetings: <https://www.worldbank.org/en/meetings/splash/spring>
 - Civil Society Policy Forum (CSPF): <https://www.worldbank.org/en/events/2022/06/16/civil-society-policy-forum-annual-meetings-2022#3>
- National level
 - Directive on Country Engagement: <https://web.worldbank.org/archive/website01541/WEB/IMAGES/DIRECTIV.PDF>
 - Systematic Country Diagnostic: <https://openknowledge.worldbank.org/collections/51faed2a-0a03-5122-8e91-7d9e28a0a3f6>

- Country Partnership Framework: <https://www.worldbank.org/en/projects-operations/country-strategies>
 - Country Engagement website: <https://www.worldbank.org/en/projects-operations/country-strategies>
 - Country page: <https://www.worldbank.org/en/where-we-work>
 - Consultation hub: <https://consultations.worldbank.org>
 - BIC's toolkit for Activists, module 2, "The World Bank Group in your Country": <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>
- Project level
 - List of World Bank projects: <https://projects.worldbank.org/en/projects-operations/projects-home>
 - Bank's Executive Directors (ED) page: <https://www.worldbank.org/en/about/leadership/directors>
 - ED's working calendar: <https://www.worldbank.org/en/about/leadership/directors/boards-calendar>
 - BIC's Executive Director Advocacy tool. *A guide to influencing the World Bank Board of Directors* (2010): https://prismic-io.s3.amazonaws.com/bankinformationcenter%2Ff167b2e1-d6aa-4038-a76b-6c1d86833eba_ed%2Badvocacy%2Bfinal.pdf
 - BIC's toolkit for Activists, module 3, "Access to information at the World Bank Group": <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>
 - Filing a complaint
 - OHCHR, Remedy in Development Finance. Guidance and Practice (2022): <https://www.ohchr.org/sites/default/files/2022-03/Remedy-in-Development.pdf>
 - The Bank's Inspection Panel website and resources: <https://www.inspectionpanel.org>
 - Accountability Counsel's *Accountability Resource Guide*: <https://www.accountabilitycounsel.org/accountability-resources/guides/>

- BIC's tool for Activists, module 5, "When rights are violated: holding the World Bank Group Accountable": <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>
- Examples of new strategies BIC is currently pursuing
 - Using the UN system to put pressure on the role of the Bank
 - CRC Committee GC 26 on child rights and environment, with particular focus on climate change
 - BIC's web update: <https://bankinformationcenter.org/en-us/update/general-comment-on-child-rights-and-the-environment>
 - BIC's input for the first round of consultations: https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/413eaa0f-735e-47c3-9be5-3148ba1dd3ed_GC+No.+26+Questionnaire+Responses+%281%29.pdf
 - BIC's input for the second round of consultations: [https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/1888140e-55e6-43b0-b0a3-4558ebef9400_BIC+Submission+for+CRC+GC+No.+26+\(ENG\).pdf](https://bankinformationcenter.cdn.prismic.io/bankinformationcenter/1888140e-55e6-43b0-b0a3-4558ebef9400_BIC+Submission+for+CRC+GC+No.+26+(ENG).pdf)
 - Submission to the Special Rapporteur on the sale and sexual exploitation of children, including child prostitution, child pornography and other child sexual abuse material (SR), on the role of MDBs in addressing this issue <https://bankinformationcenter.org/en-us/update/what-is-the-role-of-multilateral-development-banks>. The submission was jointly prepared with CPC Learning Network: <http://www.cpcnetwork.org>.

References to the World Bank in General Comments issued by the Committee on the Rights of the Child

The Committee on the Rights of the Child (CRC Committee) has addressed the role of the World Bank in different General Comments, for example:

GC 5 (2003) on general measures of implementation (art. 4)

Section: VI. Administrative and other measures - International cooperation

64. In their promotion of international cooperation and technical assistance, all United Nations and United Nations-related agencies should be guided by the Convention and should mainstream children's rights throughout their activities. They should seek to ensure within their influence that international cooperation is targeted at supporting States to fulfill their obligations under the Convention. Similarly the World Bank Group, the International Monetary Fund and World Trade Organization should ensure that their activities related to international cooperation and economic development give primary consideration to the best interests of children and promote full implementation of the Convention.

GC 7 (2005) - Implementing child rights in early childhood

Section: VII. Capacity-building for early childhood

42. International assistance. Acknowledging the resource constraints affecting many States parties seeking to implement the comprehensive provisions outlined in this general comment, the Committee recommends that donor institutions, including the World Bank, other United Nations bodies and bilateral donors support early childhood development programmes financially and technically, and that it be one of their main targets in assisting sustainable development in countries receiving international assistance. Effective international cooperation can also strengthen capacity-building for early childhood, in terms of policy development, programme development, research and professional training.

GC 15 (2013) on the right of the child to the enjoyment of the highest attainable standard of health (art. 24)

Section: IV. Obligations and responsibilities - A. State parties' obligations to respect, protect and fulfill

77. The Committee calls on all non-State actors engaged in health promotion and services, especially the private sector, including the pharmaceutical and health-technology industry as well as the mass media and health service providers, to act in compliance with the provisions of the Convention and to ensure compliance by any partners who deliver services on their behalf. Such partners include international organizations, banks, regional financial institutions, global partnerships, the private sector (private foundations and funds), donors and any other entities providing services or financial support to children's health, particularly in humanitarian emergencies or politically unstable situations.

GC 16 (2013) on State obligations regarding the impact of the business sector on children's rights

Section: V. State obligations in specific contexts - International organizations

47. All States are called upon, under article 4 of the Convention, to cooperate directly in the realization of the rights in the Convention through international cooperation and through their membership in international organizations. In the context of business activities, these international organizations include international development, finance and trade institutions, such as the World Bank Group, the International Monetary Fund and the World Trade Organization, and others of a regional scope, in which States act collectively. States must comply with their obligations under the Convention and the Optional Protocols thereto when acting as members of such organizations and they should not accept loans from international organizations, or agree to conditions set forth by such organizations, if these loans or policies are likely to result in violations of the rights of children. States also retain their obligations in the field of development cooperation and should ensure that cooperation policies and programmes are designed and implemented in compliance with the Convention and the Optional Protocols thereto.

48. A State engaged with international development, finance and trade organizations must take all reasonable actions and measures to ensure that such organizations act in accordance with the Convention and the Optional Protocols thereto in their decisionmaking and operations, as well as when entering into agreements or establishing guidelines relevant to the business sector. Such actions and measures should go beyond the eradication of child labour and include the full realization of all children's rights. International organizations should have standards and procedures to assess the risk of harm to children in conjunction with new projects and to take measures to mitigate risks of such harm. These organizations should put in place procedures and mechanisms to identify, address and remedy violations of children's rights in accordance with existing international standards, including when they are committed by or result from activities of businesses linked to or funded by them.

GC 19 (2016) on public budgeting for the realization of children's rights (art. 4)

Section: II. Legal analysis of article 4 in relation to public budgets - C. "for the implementation of the rights recognized in the present Convention"

27. In terms of budgets, "implementing children's rights" means that States parties are obliged to mobilize, allocate and spend public resources in a manner that adheres to their obligations of implementation. States parties shall respect, protect and fulfill all the rights of the child, as follows:

(b) "Protect" means that States parties shall prevent third parties from interfering with rights guaranteed under the Convention and the Optional Protocols. In terms of public budgets, examples of possible such third parties are the business sector and regional or international financial institutions that might play a role in the different stages of the public budget process. The obligation to protect implies that States parties should seek to ensure that their revenue mobilization, budget allocation and expenditures are not interfered with or undermined by third parties. This will require States parties to regulate the role of such third parties, set up complaints mechanisms and systematically intervene in cases of infringement by them.

Child rights and MDBs

- For a full list of projects and topics BIC is currently monitoring and advocating around, visit: <https://bankinformationcenter.org/en-us/campaign/child-rights>
- To have a quick overview of reference to child rights in other MDBs we suggest reading Professor Türkelli's piece, "Children's Rights when Financing Development through Multilateral Development Banks: Mapping the Field and Looking Forward" (https://brill.com/view/journals/chil/29/1/article-p199_199.xml?language=en&ebody=abstract%2Fexcerpt)

Contact BIC's Child Rights Campaign

- BIC's website: <https://bankinformationcenter.org/>
- BIC's e-mail: info@bankinformationcenter.org
- BIC's address: 1023 15th St NW, Washington DC, 20005, United States.

Annex 3

CHILDREN IN THE BANK'S ESF AND GUIDANCE

As stated in the tool, if you decide to engage the Bank with regard to the impacts of their projects on children's rights, the first step is to know how the ESF works, how the ESF considers children, and what language and reasoning Bank staff find compelling. Additionally, it might be important to understand how children are considered in Bank's guidance, that is Bank's Guidance Notes (for Borrowers) and Good Practice Notes (for staff). Below we offer a summary of how and where children are considered in Bank's ESF and guidance.

Specific references to children in the ESF

The Bank's "Vision for Sustainable Development" expressly mentions children by stating that equality and development is linked to "embrac[ing] action to remove barriers against those who are often excluded from the development process, such as (...) children,"¹ and considers them as "individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable."²

ESS 1 on Assessment and Management of Environmental and Social Risks and Impacts include "minors" in the category of disadvantaged or vulnerable groups and calls for Borrower to take "age" into consideration and put in place specific measures and/or assistance to enable "minors" to participate in consultations to assess environmental and social risks.³ ESS 1 also has several references to vulnerable groups to which children-specific needs can be linked to when doing advocacy.

ESS 2 on Labor and Working Conditions sets provisions to prevent all forms of child labor and protect children of working age (14 years or older, unless national law specifies a higher age) in non-hazardous working conditions. It clarifies that work of children over the minimum age and under the age of 18 must not interfere with the child's education, wellbeing and development, and calls the Borrower to take preventive measures.

ESS 7 on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities is only relevant to the Bank's engagement with Indigenous Peoples, but it acknowledges "that the

roles of men and women in indigenous cultures are often different from those in the mainstream groups, and that women and children have frequently been marginalized both within their own communities and as a result of external developments, and may have specific needs" (para. 3).

Indirect references to children as part of the "disadvantaged or vulnerable individuals or groups"

ESS 4 on Community Health and Safety "addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable" (para. 2).

ESS 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement calls Borrowers to assess information on vulnerable groups or persons for whom special provisions may have to be made.

ESS 10 on Stakeholder Engagement and Information Disclosure calls the Borrower to identify project-affected people that, because of their particular circumstances, may be disadvantaged or vulnerable, and include them in the stakeholder identification and analysis (para. 11). It also states that the Borrower should set "dedicated approaches" and "describe the measures that will be used to remove obstacles to participation" (para. 16).

Children in Guidance Notes for Borrowers

Guidance Note for ESS 1 on Assessment and Management of Environmental and Social Risks and Impacts

Sets forth the requirements of the environmental and social assessment. Although it does not specifically list children as part of potential project-affected individuals, it states that "Borrowers should design projects on an inclusive basis, so that all project-affected parties benefit in an equitable manner from the project" (p. 13). Lists the UN Convention on the Rights of the Child as part of the "resources that may be useful to a Borrower in addressing the application of the ESF" (p. 28).

Guidance Note for ESS 2 on Labor and Working Conditions

Provides concrete guidance on how to conduct a risk assessment for child labor, verify age, and respond to

1 See <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=15&zoom=80>, p. 1.

2 Ibid, p. 1 and 4

3 Ibid, p. 19, footnote number 28.

cases of child labor responsibly. It also sets provisions on how to monitor the situation of children over the minimum age and under 18, calling Borrowers to keep track of details of their enrollment in school or vocational training programs, as well as health and working conditions.

Guidance Note for ESS 4 on Community Health and Safety

This guidance note provides specific detail on understanding and addressing project related risks to community health and safety. There are specific references to possible risks for Gender-Based Violence (GBV) or SEA/H of children due to interactions between project workers and community members, and the fact that prevention and response measures can be combined with awareness raising and training around these issues.

Guidance Note for ESS 5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Provides guidance on addressing land acquisition, land use, and involuntary resettlement. It calls Borrowers to assess specific needs of those being resettled or losing land (e.g. education, food, etc.) and provide them with appropriate assistance. It specifically mentions female- and child-headed households among people the Borrower may need to support depending on the project context (p. 11).

Guidance Note for ESS 7 on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This guidance note, relevant to the Bank's engagement with Indigenous Peoples, recognizes "children have frequently been marginalized both within their own communities" but lacks references on how to overcome this challenge.

Guidance Note for ESS10 on Stakeholder Engagement and Information Disclosure

Explains how Borrowers will engage with stakeholders and concludes that inclusive engagement should empower all relevant stakeholders, which includes children and youth. It specifically mentions the need to consider children as a special or separate stakeholder group and recommends bringing in third-party specialists to assist the Borrower in stakeholder identification and analysis (this could include, for example, child rights CSOs).

Children in Good Practice Notes for Bank staff

Updated Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/H) in Investment Project Financing Involving Major Civil Works (2022)

Mainstreams children throughout and requires Bank staff to conduct risk assessments paying particular attention to the unique risks to children and to consider the specific needs of children in service provision and access to remedy. The document provides examples on how to assess, prevent, and respond to child SEA/H, and includes concrete models on how to do so. Taking a survivor-centered approach and considering the best interest of the child are overarching goals in this GPN.

Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/H) in Human Development Operations (2022)⁴

Addresses a wide variety of intersectionalities and acknowledges that women, children, and LGBTI population are particularly vulnerable to SEA/H, and calls the Borrower to include children in stakeholder engagement processes. It provides examples of child SEA/H and how to act in the best interests of a child who has experienced SEA/H (p. 12), as well as examples of key mitigation measures. The value of this GPN resides in the fact that historically the Bank only checked child SEA/H issues in large infrastructure projects, but now staff will also have to address this in human development projects (that includes projects on education, health, social protection and jobs, and gender equality).

Gender (2019)

Aims at explaining how the gender perspective should be considered across all the ESF and at project level, to "close the gaps between men and women, girls and boys and enhance women's leadership and voice." It offers some examples of mitigation measures to anticipate and avoid risk to women and children.

Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx (2021)

Acknowledges that labor influx already may lead to negative impacts on the local community, including child SEA/H, child labor, and school drop out risks, and calls for a risk assessment to be conducted considering the country and regional context and for children to be considered in stakeholder engagement processes

⁴ Human Development Operations cover issues such as gender, disease control, health systems and policies, demographics and aging, education, labor market, and nutrition and food security.

throughout the life of the project.

Non-Discrimination: Sexual Orientation and Gender Identity (SOGI) (2019)

Mentions the need of making stakeholder engagement inclusive, including for children of different SOGI and paying attention to the country's legal framework, judicial decisions, and practices that put people of different SOGI at risk.

Non-Discrimination and Disability (2018)

Offers examples on how to anticipate and respond to project risks and impacts on children with disabilities and how to assess and respond to challenges children with disabilities and their families face when trying to engage in project consultations and access project benefits.

Animal Health and Related Risks (2020)

Calls on assessing and managing health related risks for children in projects involving live animals.

Road Safety (2019)

Provides guidance around improving road safety, providing technical assistance to borrowers on improving road safety regulations; school based children education around road safety; and preventing risks for children that cross a construction road to go to school.

Third-Party Monitoring (2018)

Mentions the Bank may choose to contract a Third-Party Monitoring (TPM) where Borrower capacity to implement and monitor is limited or where a very specific skill set is needed that the Bank cannot provide. "Case study: Access to remedy and child labor in the Uzbekistan cotton sector" provides an example where the ILO was engaged to conduct TPM in relation to child labor.