



IDA20 and social protection: Comments on proposed policy commitments

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General objective: To promote IDA20 support for universal approaches and references to social protection floors rather than social safety nets.

General comment: According to the [definition agreed by ILC in June 2021](#), universal social protection means that “everyone has access to comprehensive, adequate and sustainable protection over the life cycle, in line with ILO standards”, including those in [ILO recommendation 202](#) on national floors of social protection. Moreover, in SDG target 1.3 on social protection systems, all countries have agreed to implement social protection systems, including floors. Social protection floors are a set of universal guarantees including access to essential health care and basic income security for children (providing access to nutrition, education, care and any other necessary goods and services, including for children with disabilities), persons in active age (in particular in cases of sickness, unemployment, maternity and disability) and older persons. After COVID-19 has stressed the importance of social protection and the urgency of achieving universal social protection, including floors, IDA-20 should adopt specific and bold commitments toward this end and support the creation of a Global Fund for Social Protection to protect the most vulnerable during COVID-19 and beyond.

Below, wording is suggested in the Special themes on Gender and Development and on Human Capital. However, social protection should be a cross-cutting issue, as it is relevant in all Special themes, including [Climate Change](#), [Fragility, Conflict and Violence](#), and [Jobs and Economic Transformation](#).

<p style="text-align: center;">Draft text</p> <p>Text highlighted in yellow identifies parts of longer paragraphs that the comments in third column relate to.</p>	<p style="text-align: center;">Suggested wording</p>	<p style="text-align: center;">Comments and justifications for suggestions</p>
<p><u>Special Theme: Gender and Development</u></p>		
<p>Policy commitment 1. Scaling productive economic inclusion Incorporate specific productive economic inclusion components (e.g., producer cooperatives/associations, digital finance/savings and service delivery, entrepreneurship support, social care services, regulatory frameworks, and/or links to market support) for women in at least 30 IDA social protection/jobs, agriculture, urban, and/or community development projects.</p>	<p>Policy commitment 1. Scaling productive economic inclusion Incorporate specific productive economic inclusion components (e.g., producer cooperatives/associations, digital finance/savings and service delivery, entrepreneurship support, <u>universal</u> social care services, <u>active labour market policies that counter discriminatory gender practices and barriers</u>, regulatory frameworks, and/or links to market support) for women in at least 30 IDA social protection/jobs, agriculture, urban, and/or community development projects.</p>	<p>The GCSPF welcomes the emphasis put on social services as a means to challenge the gender and economic inequalities through women’s access to the labor market. Childcare and social care services, as well as social protection floors, are indeed key tools to help recognize, reduce and redistribute care work, from poor households, and specifically poor women, to the State.</p> <p>However, Policy Commitments 1 & 2 make no mention of universality of these services. This is particularly true with child-care services mentioned in Policy Commitment 2. While the commitment mentions “quality” and “affordable” childcare, it also specifies that these will be intended for “low-income parents”. While low-income parents are obviously the ones most in need of these services, the ways in which the World Bank will determine which parents’ incomes are low enough to benefit from the service is artificial in countries where most of the population is poor (see comment below on Policy Commitment 4 of Human Capital Special Themes). As with schooling, even supposedly “low-fee” options can create affordability barriers. Instead, we call on the World Bank and its shareholders to support the creation of public, universal and affordable childcare services.</p>
<p>Policy commitment 2. Expanding childcare Support at least 15 IDA countries to expand access to quality, affordable childcare, especially for low-income parents.</p>	<p>Policy Commitment: Support at least 15 IDA countries to expand access to quality, affordable, <u>public universal</u> childcare, especially for all low-income parents.</p>	<p>Additionally, such essential services for women’s economic rights should not be bound to market logics and depend on private investment. Yet, the IDA20 policy document puts great emphasis on IFC involvement in the development of childcare services (paragraphs 22 and 23). However, research demonstrates that the inclusion of the private sector in care services, such as through public-private partnerships, does not systematically respond to the needs of women, especially the most discriminated against.</p>

		<p>It will be important to examine the needs of females across the life course. For example, in many countries, women do not have access to a pension. Therefore, building universal old age pension systems will be critically important for women’s empowerment in old age, while also giving younger women confidence that they will have secure lives in old age.</p>
<p><u>Special Theme: Human Capital</u></p>		
<p>I. INTRODUCTION para 8: <i>In social protection, IDA will help countries expand coverage of social safety nets to reach the extreme poor and vulnerable.</i> IDA20 will expand social safety nets and provide risk-management instruments to the vulnerable, particularly informal workers, which is essential to move towards a vision of universal social protection. Adaptive social protection systems can foster inclusion and strengthen resilience to a range of crises.</p>	<p><i>In social protection, IDA will help countries expand coverage of build social safety nets protection floors to reach the extreme poor and vulnerable.</i> <u>The universal basic benefits included in social protection floors is the most efficient and effective way to reach IDA20 will expand social safety nets and provide risk-management instruments to the most vulnerable, particularly including informal workers, which is essential to move towards a vision of and a first step towards the implementation of universal social protection.</u> Universal systems are adaptive social protection systems can and foster inclusion and strengthen resilience to a range of crises, including coverage of displaced persons and refugees.</p>	<p>Social protection floors are a set of universal guarantees including access to essential health care and basic income security for children (providing access to nutrition, education, care and any other necessary goods and services, including for children with disabilities), persons in active age (in particular in cases of sickness, unemployment, maternity and disability) and older persons as well as displaced persons and refugees. There is international consensus that national floors of social protection are the minimum standard (ILO202 and SDG1.3). The draft IDA-20 focus on adaptive social protection could limit the necessary scale of interventions needed on social protection. If built, social protection floors will act as adaptive, shock-responsive automatic stabilisers.</p> <p>In June 2021, ILC agreed on a definition of universal social protection: <i>Universal social protection entails actions and measures to realize the human right to social security by progressively building and maintaining nationally appropriate social protection systems, so that everyone has access to comprehensive, adequate and sustainable protection over the life cycle, in line with ILO standards.</i> In a panel discussion at HLPF in July 2021, M. Rutowski confirmed that the World Bank supports this definition.</p> <p>As the pandemic has illustrated, all individuals are potentially in need of social protection. Therefore, the basis for adaptive social protection is that countries have civil registries and administrative systems for universal or broad-based programs in place which can be scaled up easily. We would encourage the World Bank to move away from social registries – which promote poverty</p>

		<p>targeting rather than universal social protection – and help build systems that will support universal social protection.</p> <p>The World Bank should also ensure that it focuses on supporting governments to identify fiscal space for universal social protection.</p>
<p>III. THE WAY FORWARD AND PROPOSED POLICY ACTIONS, para18.</p> <p>Delivering on the emergency response as well as cohesion in the plan to build back better requires strong and complementary partnerships with our counterparts. (...) but also with counterparts such as UNESCO, UNICEF, the Global Partnership for Education and others.</p>	<p>(...) but also with counterparts such as <u>ILO</u>, UNESCO, UNICEF, the Global Partnership for Education and others.</p>	<p>As the lead organisation on social protection, ILO must be mentioned along with the other international institutions. ILO and the World Bank collaborate in USP2030 and SPIAC-B and IDA should take note of that by including ILO as a key partner</p> <p>In the International Labour Conference’s (ILC) recent resolution on social protection, ILO’s leadership role in social protection in the multilateral system and mandate to promote policy coherence is specified in para 21.</p>
<p>Policy Commitment 1: To contain the pandemic, support all IDA countries in the roll-out of COVID-19 vaccinations including broader health care system strengthening and pandemic preparedness.</p>	<p>Policy Commitment 1: To contain the pandemic, support all IDA countries in the roll-out of COVID-19 vaccinations including broader health care system strengthening and pandemic preparedness <u>ensuring availability, accessibility, acceptability and quality of health services, with the aim at achieving Universal Health Coverage.</u></p>	<p>While we welcome the recognition of the need for health system strengthening as a core element to fight pandemics, and COVID19 particularly (paragraph 27), we are deeply concerned by the strong focus put on the involvement of the private sector. The International Finance Corporation (IFC) is depicted as a key actor in ensuring a pandemic response, including through health system strengthening (paragraph 26).</p> <p>However, as research has demonstrated, private sector investment in health is not necessarily a guarantee for positive public health outcomes. Indeed, aside from conflicts of interest, which arise in having private sector finance or implement health development projects, the intervention of the private sector does not necessarily deliver on health outcomes. Therefore, the use of the private sector to deliver on human rights goals should not be a default solution.</p> <p>We therefore suggest that the brief mentions of Universal Health Coverage be enhanced (paragraphs v. and 6), and that Policy Commitment 1 be rephrased to set emphasis on the availability, accessibility, acceptability and quality of health services in development projects, as set out by International Labor Organization 202 recommendation on social protection floors.</p>

<p>Objective 3. Emergency Crisis Response: Supporting core social service delivery systems.</p> <p>Policy Commitment 3: To address gaps exacerbated by the COVID-19 crisis in at least 40 IDA countries, of which 10 are FCS, support access to core, quality, inclusive social services focused on: (i) social protection for urban informal workers, or (ii) students’ return to school and accelerated recovery of learning losses, or (iii) children’s immunizations</p>	<p>Policy Commitment 3: To address gaps exacerbated by the COVID-19 crisis in at least 40 IDA countries, of which 10 are FCS, support access to core, quality, inclusive social services focused on: (i) <u>universal social protection floors</u> for urban informal workers, or (ii) students’ return to school and accelerated recovery of learning losses, or (iii) children’s immunizations.</p>	<p>The Global Coalition for Social Protection Floors welcomes the strong focus on social protection in Policy Commitment 3, and the general reminder that the ultimate goal is universality. However, by investing time and money in creating and/or refining targeting methods and programs, the World Bank diverts precious time and resources away from setting up the first blocks of universal social protection floors in IDA countries.</p> <p>On both commitment 3 and 4 we welcome a strong focus on social protection, and a general reminder in the narrative that the ultimate goal is universality. However, the narrative around these commitments also uses terminology such as safety nets and targeting (“most vulnerable”, “poorest”, “social registries” etc). More globally, “ASP” and “social protection for urban informal workers” appear to take an impossibly long and exclusionary road to universality under the banner of progressive realisation.</p>
<p>Background text on Policy commitment 3: Para 30. Addressing the human capital gaps exacerbated by COVID-19 requires a multi-sectoral approach and the engagement of a broad set of stakeholders. IDA20 will build on the progress in IDA19 to support access to services that have been curtailed by the COVID-19 crisis.</p>		
<p>31. Continuing the focus in IDA19 on IDA countries characterized as Fragile and Conflict-affected Situations (FCS), Policy Commitment 3 addresses service delivery gaps exacerbated by the COVID-19 crisis but looks beyond IDA FCS given the important role of strengthened service delivery in all IDA countries. Informal workers in urban areas, having access neither to social safety net programs nor employment-based social insurance, have been particularly vulnerable to the economic impacts of COVID-19. The inclusion of these under-covered groups into social protection systems can help advance toward universal social protection. As countries start reopening schools, the priority is to get all children back in school –</p>		<p>Despite the mentioning of universality this text sets the ground for poverty targeted safety nets that run a high risk of becoming discriminatory (Hit and Miss: An assessment of targeting effectiveness in social protection), in a claim that the achievement of universality will be progressive.</p> <p>The draft fails to see that “informal workers (...) having access neither to social safety net programs nor employment-based social insurance” is the result of a political choice, characterized by weak social policies, prioritizing targeted social protection programs over universal social protection floors. This observation should lead to a clearer call for building social protection floors to fill these gaps, including the creation of urban public employment programmes and expanding access to social insurance for informal workers.</p>

<p>that is, to recover, and if possible, exceed pre-pandemic enrolment rates and swiftly address any emerging differences between girls and boys – and to accelerate the recovery of learning losses, including by preparing and empowering teachers through tailored, focused, practical, and ongoing professional development. The disruptions to core health services, in particular to children’s immunizations, could cause a substantial rise in cases and deaths from infectious diseases other than COVID-19. Restoring access to primary health services and delivery of the standard package of immunizations for children is critical.</p>		
<p>Objective 4: Expanding adaptive social protection and building resilience to shocks</p> <p>Policy Commitment 4: To ensure inclusive and effective response against shocks and crises, support at least 20 IDA countries’ resilience against shocks and crises by building adaptive social protection systems, including the use of digital technologies.</p>	<p>Objective 4: Expanding adaptive universal social protection floors in order to and building resilience to shocks</p> <p>Policy Commitment 4: To ensure inclusive and effective response against shocks and crises, support at least 20 IDA countries’ resilience against shocks and crises by building adaptive universal and life-cycle based social protection floors, including through the use of digital technologies civil registries based on the provision of legal identification to all residents.</p>	<p>Policy Commitment 4 revolves around the development of “Adaptive Social Protection” (ASP) which, according to the World Bank, “helps to build the resilience of poor and vulnerable households by investing in their capacity to prepare for, cope with, and adapt to shocks: protecting their wellbeing and ensuring that they do not fall into poverty or become trapped in poverty as a result of the impacts” and for which “the focus (...) is squarely on safety net programs”.</p> <p>(T. Bowen, C. del Ninno, C. Andrews, S. Coll-Black, U. Gentilini, K. Johnson, Y. Kawasoe, A. Kryeziu, B. Maher, and A. Williams, World Bank (2020). Adaptive Social Protection Building Resilience to Shocks in International Development in Focus”. Washington. p. 6-7.)</p> <p>While it is true that safety nets, or more accurately social assistance, can help challenge gender and economic inequalities in IDA countries, they are unfortunately too often too small, only temporary and conditioned to targeting criteria that creates unnecessary exclusions. In what the World Bank see as a “progressive” vision of universality, they attempt to create super-efficient adaptive systems (paragraph 33) in lieu of social protection floors, disregarding the administrative costs of these systems and the numerous pitfalls of narrow targeting methods. Like all systems based on poverty targeting, ASP can further</p>

		<p>divert time and resources away from the realization of the human right to social protection.</p> <p>Indeed, narrowly targeted ASP that is reliant on proxy-means testing and similar approaches 1, excludes many people who need, and have the right to, protection. In low and middle-income countries division between “poor” and “poorest” members of society is artificial. In most low- and middle-income countries, most people live on less than \$10 PPP per day, with highly volatile incomes. As a result, there is no fixed group of ‘the poor’ and in reality a high proportion of people move across “extreme poverty” lines over relatively short periods of time, a reality that is even truer in cases of shock and crisis.</p> <p>Civil registries based on the provision of legal identification to all residents is a precondition and necessary institutional infrastructure for the implementation of universal social protection. “Civil registries” should not be mistaken for “social registries” which are inaccurate and expensive non-universal databases which result in the exclusion of a large proportion of intended target groups (Social registries: a short history of abject failure). The World Bank is already promoting universal access to legal identification, see the 10 Principles of ID: https://id4d.worldbank.org/principles</p>
<p>Background to policy commitment 4</p> <p>Para 32. Research has shown that investments in crisis preparedness are important to resilience since they help countries prepare timely, cost-effective responses to emergencies (Idris 2018). In view of a growing risk of covariate shocks related to climate change, natural disasters, pandemic and conflict, a systemic approach allows for more sustainable, long-term solutions than ad-hoc responses. IDA20 will also...</p>		<p>A systemic approach is indeed necessary. However, the most systemic approach is to have administrative systems of universal social protection in place, that can be easily scaled up when shocks occur.</p>
<p>33. An important lesson of the COVID-19 global response has been the effectiveness of cash transfers to reach vulnerable populations</p>		<p>The statement that “countries with effective ASP systems were more prepared to respond effectively” is debatable. Research shows that countries with the most comprehensive social</p>

<p>expeditiously. Countries with effective adaptive social protection (ASP) systems were more prepared to respond effectively. Specifically, through shock responsive cash transfers and delivery systems, such as social registries and G2P (Government to People) payments, ASP systems dynamically reached larger segments of populations in need. These systems were able to adjust coverage (horizontal expansion) and benefits (vertical expansion) in response to changing needs and shocks. In confronting the limitations of existing infrastructure, the pandemic has spurred innovations, with countries implementing creative solutions using technologies to make the delivery system more robust and connected.</p>		<p>protection systems and/or social protection floors were more prepared to respond to the crisis. Conclusion of the SPACE study “Drivers of Timely and Large-Scale Cash Responses to COVID-19: what does the data say?”: “Consequently, we conclude that – although it is important to invest in preparing systems to respond to shocks by, for example, developing contingency protocols – the best place to start is by investing in the foundations of social protection.”</p> <p>IDA20 should not be used to support the construction of social registries, since they are expensive and inaccurate, and result in the exclusion of a large proportion of intended target groups. Instead, resources should be used to improve quality of civil registries and guarantee all residents’ access to legal identification. (Social registries: a short history of abject failure).</p>
<p>34. Policy Commitment 4 will extend the IDA19 commitment relating to incorporating adaptive social protection into national systems that can reduce the risks of a broad range of shocks and provide a platform for the delivery of other services to hard-to-reach individuals and groups (see Box 3.3). ASP uses digital technologies such as harnessing big data for targeting and identification, integrated social registries for inclusion and the use of mobile-money payments.</p>		<p>GCSPPF advise against a belief that technology can answer to all social needs, relying on digital technologies and big data. If technology can indeed help achieve human rights, the recourse to new technologies is here used as non-debatable solutions in lieu of nation-wide/broad coverage of the most essential services. This tends to divert policy debate from the need to expand fiscal space for services, towards more dependency on the private sector to roll-out such technological systems, while also ignoring the ethical questions around social protection benefits conditioned to massive data collection.</p> <p>Data and technology use can perpetuate lack of access, discrimination, and other issues. Development and use should be crafted and monitored in a participatory manner including dialogue with trade unions, women’s organisations, and social and community groups including those representing the marginalized.</p> <p>See comment above regarding social registries.</p>
<p>Objective 6. Resilient Inclusive Recovery: Expanding access to core services for persons with disabilities.</p>		<p>The Global Coalition for Social Protection Floors strongly welcomes Policy Commitment 6, the only commitment clearly stating universality of social protection and access to services as a goal (paragraph 38). This commitment seems to embrace a rights-based approach, and we encourage the World Bank and its</p>

<p>Policy Commitment 6: To promote inclusive societies, support at least 18 IDA countries to meet the needs of persons with disabilities by implementing the principles of universal access through projects in education, health, social protection, water, urban, digital development and/or transport.</p>	<p>No change suggested.</p>	<p>shareholders to further this approach in other IDA20 policy commitments.</p>
<p>Background to Policy Commitment 6 Para 37. More than a billion persons globally are estimated to have a disability. Persons with disabilities experience poor human capital outcomes as a direct result of limited and inequitable access to core services such as education, health, social protection, clean water and sanitation, infrastructure, and employment. The schooling deficit experienced by children with disabilities can become the most challenging impediment to earning an income and long-run financial health as adults. Persons with disabilities face higher rates of multidimensional poverty and substantially lower labor market participation resulting in estimated 3 to 7 percent of GDP loss (World Bank, 2018).</p>		<p>Persons with disabilities experience high additional costs due to their impairments which need to be addressed through access to disability-specific social protection schemes across the lifecycle. In addition, financial support should be given to those who have had to give up work to care for persons who require intensive care and support from family members.</p>
<p>38. One of the primary reasons for the lack of access to public services for persons with disabilities is that the design of programs or service delivery instruments overlook the accommodations needed for persons with disabilities, thus excluding them from participating in and contributing to society. Achieving universal access to core public services is central to the twin goals of eradicating poverty and boosting shared prosperity. The World Bank has already made ambitious commitments to making projects disability inclusive by 2025, including all education projects and 75 percent of social protection projects.</p>		<p>It is very good that the World Bank uses the concept of universal access in this way – it should be used throughout the special theme.</p> <p>It is critical for disability-specific social protection schemes to be established across the lifecycle, as it is insufficient to give persons with disabilities access only to mainstream social protection schemes.</p>

<p>39. Policy Commitment 6 aims to ensure that IDA projects in the education, health, social protection, water, urban, digital development, and transport sectors contain actions to make core services accessible to persons with disabilities. Building on existing commitments for disability inclusion, this policy commitment focuses on the concept of universal access as it pertains to the progressive realization of full physical and digital access for all.</p>		<p>It is very good that WB uses the concept of universal access in this way – it should be used throughout the special theme.</p>
<p>Objective 8. Resilient Inclusive Recovery: Leverage Adequate, Efficient Human Capital Financing.</p> <p>Policy Commitment 8: To strengthen public finance for human capital investments, support at least 20 IDA countries, of which 10 with the lowest HCI, through (i) the availability of resources and the efficiency of expenditure management and/or (ii) the efficacy of human capital investments measured through output/outcome indicators.</p>	<p>Objective 8. Resilient Inclusive Recovery: Leverage Adequate, Efficient Human Capital Financing.</p> <p>Policy Commitment 8: To strengthen public finance for human capital investments <u>by identifying and overcoming financing gaps,</u> support at least 20 IDA countries, of which 10 with the lowest HCI, through (i) the availability of resources through <u>domestic revenue mobilization measures including progressive and corporate taxation, and fighting illicit financial flows, and/or ii) mobilizing external support to immediately finance social protection floors, and/or iii) improving the efficiency of expenditure management in an equitable manner.</u></p>	<p>As emphasised in the Addis Ababa Action Agenda, there is a need to significantly increase efforts towards the mobilisation of domestic resources to enable investments in social protection. Progressive tax systems are needed to reduce inequalities, generate resources for investments, and overcome inequalities including gender. At present, illicit financial flows and tax avoidance and evasion severely undermine efforts to invest in welfare systems everywhere and more particularly in developing countries. In its COVID-19 statement, the Social Protection Inter-Agency Coordination Board of which the Bank is a part called for urgent action to “Mobilize substantial domestic and international financing to protect and enhance fiscal space for health and social protection in all countries”.</p> <p>The focus of the commitment on the expenditure side with only vague reference to “availability of resources”, and a later explanation that the aim is to overcome fiscal constraints by “how to achieve the same results at lower levels of spending” is inappropriate at the current moment. Systems are already overloaded and underfunded, with teachers, health care workers, and social workers bearing the brunt and already doing more with too little. The World Bank should commit to doing everything possible to expand the financing base for social protection, including a Global Fund and revenue measures including tackling base erosion and profit shifting, illicit financial flows, regressive taxation, and under-taxation of corporations.</p>

		<p>The input-output approach is prone to a narrowly measuring the myriad benefits of education, health, and social protection, particularly through a short-termist lens, and distracts from provision for its intrinsic value as a right.</p>
<p>Background to policy commitment 8</p> <p>42. IDA19 is focused on the sustainability of human capital financing, while under IDA20 the focus will expand to also emphasize improved adequacy and efficiency. In a context of narrowed fiscal space, there will be an increased need to mobilize, allocate, and spend public funds more efficiently and effectively to maximize investments in people. The availability of resources will need to be calibrated with needs for human capital spending and there is an opportunity to improve both the efficiency and efficacy of human capital financing, notably through a focus on performance and the use of results-oriented reforms. In addition to enhancing domestic revenue mobilization capacities, which will be supported under the Governance and Institutions Cross-Cutting Issue, IDA20 will strengthen resource and expenditure management to ensure that public spending and investments yield high-growth dividends.</p>		<p>The financing of social protection, health, and education should be a focus in Human Capital and complement the Governance and Institutions cross-cutting paper, rather than leaving the resource question to the latter paper that is broader. The specific questions of identifying and filling gaps in financing social protection should form a part of Commitment 8.</p>