



# How Do World Bank Social Protection Projects Include and Support Marginalized Groups?

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This report was shared with the World Bank for comment prior to publication. No comments were received.

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# Executive Summary

Bank Information Center (BIC) conducted desk research and analysis on 11 World Bank social protection projects approved before August 18, 2022, in Asia, Africa, the Middle East, and Latin America and the Caribbean. The aim of this research was to analyze how social protection project documents address: (1) the needs, risks, and barriers to project benefits for: persons with disabilities; children; and lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI+) individuals; (2) issues of intersectionality; and (3) how references to these groups, or lack thereof, compared to Bank mandates and standards. This report expands on four key trends found across all projects and, going further, provides 14 recommendations on how the Bank can approach social inclusion in social protection projects.

1. Trend One: Lack of LGBTQI+ inclusion in projects
2. Trend Two: Persons with disabilities being lumped in as a “vulnerable group”
3. Trend Three: Child protection elements not incorporated into project design
4. Trend Four: Lack of specific inclusion measures in project documents

## Introduction

Now more than ever, strong, inclusive social protection systems are vital to support and protect poor and marginalized people from the economic and social implications of COVID-19. The World Bank has recognized the urgent need to scale up social protection, doubling its portfolio and committing to working with countries to achieve Universal Social Protection (USP). In its [Social Protection Jobs Compass](#), the Bank defines USP as access to “policies and programs that help individuals and societies to manage risk and volatility, protect them from poverty and inequality, and help them to access economic opportunity.”<sup>1</sup> The new strategy highlights equity and inclusion issues, which should outline how marginalized groups who have been unable to access or benefit from social protection systems in the past can now benefit from these projects. However, the Compass doesn’t provide enough specificity on how that will be achieved in Bank projects. Over the last ten years, our work on marginalized groups has highlighted three often overlooked groups who must be prioritized in social protection projects: persons with disabilities, LGBTQI+

<sup>1</sup> World Bank Group, “Charting a Course Towards Universal Social Protection: Resilience, Equity, and Opportunity for All,” vii, World Bank Group, Washington, DC, <http://hdl.handle.net/10986/38031> (accessed August 31, 2023).

people, and children.

This report analyzes 11 World Bank social protection projects to assess if and in what capacity they address social inclusion by analyzing how persons with disabilities, LGBTQI+ individuals, and children, in all their diversity, are included in stakeholder engagement and project design. While this report identifies trends pertaining to each group, it is important to note that BIC considers intersectionality as a key focus and component of social inclusion work. Thus, the research aims to holistically speak to social inclusion within the Bank’s work as opposed to the ongoing stratification of these groups.

## Methodology

BIC reviewed the 10 most recently approved World Bank social protection projects as of August 18, 2022.<sup>2</sup> Given that none of these projects were located in Latin America or the Caribbean (LAC), the report also includes the most recently approved project located in LAC, for a total of 11 projects researched. While these 11 may not be fully representative of the World Bank’s social protection portfolio, we used those approved most recently to avoid selection bias on our part. The projects in this report satisfy the following parameters:

1. 50% or more of the sector category is classified as social protection; and
2. At least three out of the four main project documents (the PAD, ESRS, ESCP, and SEP) are published on the Bank’s website.

BIC analyzed these 11 projects by means of their Project Appraisal Document (PAD), Stakeholder Engagement Plan (SEP), Environmental and Social Review Summary (ESRS), and Environmental and Social Commitment Plan (ESCP) to assess if and in what capacity they address the social protection needs of persons with disabilities, LGBTQI+ individuals, and children. The Bank’s [Environmental and Social Framework](#) and [Disability Inclusion and Accountability Framework](#) were used as guidance where relevant. See the project list below. Projects are referred to by location name throughout this document.

<sup>2</sup> “Projects Summary - World Bank,” [https://projects.worldbank.org/en/projects-operations/projects-summary?sectorcode\\_exact=SA](https://projects.worldbank.org/en/projects-operations/projects-summary?sectorcode_exact=SA), World Bank, (accessed August 31, 2023).

## Project List

Project Name	Development Objective Per the Bank's Project Page	Location
<a href="#">Scaling-up Shock Responsive Social Protection Project</a>	To protect poor and vulnerable households' consumption in response to shocks in Zambia.	Zambia
<a href="#">Social Protection Emergency Crisis Response Project</a>	To provide safety net transfers to targeted households affected by the multiple crises facing Djibouti and strengthen adaptive social protection mechanisms to respond to future crises.	Djibouti
<a href="#">Enhancing Labor Mobility from Papua New Guinea</a>	To strengthen government systems in Papua New Guinea that support workers and their households to benefit from overseas employment opportunities, with a focus on women and disadvantaged groups.	Papua New Guinea (PNG I)
<a href="#">Pathways to Sustainable Livelihoods Project</a>	To improve the efficiency and equity of selected social assistance programs and to strengthen the livelihoods of poor and vulnerable households.	Lesotho
<a href="#">Second Additional Financing for the Shock Responsive Safety Net for Human Capital Project<sup>3</sup></a>	To provide cash transfers to targeted poor and vulnerable households and establish the key building blocks of a national shock-responsive safety net system.	Somalia
<a href="#">Liberia Women Empowerment Project</a>	To improve social and livelihood services for women and girls in targeted communities, foster positive social norms and strengthen the government's capacity to advance women and girls' empowerment.	Liberia
<a href="#">RIGHTS: Inclusion, Accessibility and Opportunities for Persons with Disabilities in Tamil Nadu</a>	To strengthen the social protection systems and capability of the State of Tamil Nadu to promote inclusion, accessibility and opportunities for persons with disabilities.	India
<a href="#">Generating Growth Opportunities and Productivity for Women Enterprises Project</a>	To increase access to entrepreneurial services that enable female entrepreneurs to grow their enterprises in targeted locations, including host and refugee communities	Uganda
<a href="#">Child Nutrition and Social Protection Project</a>	To improve utilization of priority nutrition interventions and purchasing power of first thousand-day households in selected districts.	Papua New Guinea (PNG II)
<a href="#">Gaza Emergency Support for Social Services</a>	To provide selected social services, short-term cash for services, and online employment opportunities to the most vulnerable populations in Gaza.	West Bank and Gaza
<a href="#">Additional Financing for the Social Safety Net Project<sup>4</sup></a>	To improve the equity, integration and sustainability of selected social safety net programs.	Ecuador

<sup>3</sup> For Additional Financing Projects, BIC analyzed the Project Paper.

<sup>4</sup> For Additional Financing Projects, BIC analyzed the Project Paper.

# Trends

## 1. LACK OF LGBTQI+ INCLUSION IN ALL PROJECTS

SOGIESC (sexual orientation, gender identity, gender expression, and sex characteristics) inclusion in social protection projects is vital to address the specific needs of LGBTQI+ individuals.<sup>5</sup> In BIC's analysis of 11 social protection projects, we found that the Bank rarely includes information, accommodations, or provisions with a focus on LGBTQI+ individuals in its projects. Of the 11 projects researched, only one project (India) included any mention of SOGIESC in its documents by mentioning "sexual minorities" in its PAD, ESRS, and SEP.

While *India* references "sexual minorities," the extent of this inclusion is limited. Documents provide background information on transgender individuals and identify LGBTQI+ individuals as a key stakeholder and "vulnerable group," yet they do not include any specific provisions or components to enable them to benefit from the project. Due to this project's focus on persons with disabilities, intersectionality is considered when the project identifies that sexual minorities with disabilities are particularly marginalized; yet this has no impact on project design. Given that India is the only project of the 11 researched that actually includes SOGIESC, it is apparent that the Bank's social protection projects have major gaps in LGBTQI+ inclusion.

There are two projects in the research sample where inclusion of LGBTQI+ individuals is particularly pertinent to the project's work, yet a SOGIESC component is missing. In Lesotho, the PAD provides information about the prevalence of HIV/AIDS — which disproportionately affect LGBTQI+ individuals, particularly gay and bisexual men — and its adverse effect on life expectancy and health.<sup>6</sup> Given this context, as well as the Lesotho project's commitment to strengthening the livelihood of marginalized households, information or provisions which account specifically for LGBTQI+ individuals should be included in project documents.

Similarly, *Uganda* mentions the relevance of HIV/AIDS in project outcomes in its documents. The ESRS states that "The transmission of communicable diseases, such as HIV/AIDS in affected communities, may also occur

5 The World Bank primarily uses the term SOGI (Sexual Orientation and Gender Identity) when discussing LGBTQI+ inclusion, as this is the term used in the Bank's Environmental and Social Framework. BIC uses SOGIESC (Sexual Orientation, Gender Identity, Gender Expression and Sex Characteristics) to be more inclusive.

6 Louise Victoria Monchuk, *Project Information Document - Pathways to Sustainable Livelihoods Project - P177814 (English)*, Washington D.C., World Bank Group, 2022, <http://documents.worldbank.org/curated/en/099055004092217263/P177814055a9f80d098ab0c0f30095eb10>.

because of project activities."<sup>7</sup> Identifying HIV/AIDS transmission as a project risk is particularly relevant for LGBTQI+ people, but no project document provides any mitigation measures for facilitating the protection of LGBTQI+ individuals from this risk.

Considering these findings, BIC recommends that the Bank consider project impacts on LGBTQI+ people, especially those who fall in the intersection of multiple marginalized groups, in all social protection projects. Projects that have an existing focus on gender or account for especially relevant issues such as HIV/AIDS should include SOGIESC extensively through project components and tailor its relevance towards LGBTQI+ people. They should also include an analysis of project impacts on LGBTQI+ people and a documented plan for how to mitigate these impacts.

## 2. PERSONS WITH DISABILITIES BEING LUMPED IN AS A "VULNERABLE GROUP"

At the 2018 Global Disability Summit, the World Bank committed to making 75% of its social protection projects disability-inclusive by 2025. In the Bank's [Disability Inclusion and Accountability Framework](#), last updated in 2022, the Bank identifies four entry points that Bank teams working on social protection should use to make sure that projects are disability-inclusive: Stakeholder Engagement, Disability-Inclusive Analysis, Inclusive Project Design, and Measurement of Disability Indicators.<sup>8</sup> Even with this commitment, only two projects, Lesotho and India, include persons with disabilities as primary beneficiaries, and while disability is often included in project documents, the extent of this is often limited to lumping persons with disabilities in with other "vulnerable groups."

Project documents often consider multiple "vulnerable groups" together, rather than addressing the specific needs of each group within the category. This can be seen in statements such as "The project is anticipated as having overall positive social impacts, particularly for vulnerable groups including children, women, youth, and persons with disabilities."<sup>9</sup> In particular, each project's SEP identifies persons with disabilities as a "vulnerable

7 Margarita Puerto Gomez, *Appraisal Environmental and Social Review Summary (ESRS) - Generating Growth Opportunities and Productivity for Women Enterprises (GROW) - P176747 (English)*, 12, Washington D.C., World Bank Group, 2022, <http://documents.worldbank.org/curated/en/099215105052229483/P176747028ca7d09c0922d04c8f78db4886>.

8 Charlotte Vuyiswa McClain-Nhlapo, Mari Helena Koistinen, Janet Elaine Lord, Anna Hill Martin, Trishna Rajyalaxmi Rana, *Disability Inclusion and Accountability Framework (English)*, Washington D.C., World Bank Group, 2022, <http://documents.worldbank.org/curated/en/437451528442789278/Disability-inclusion-and-accountability-framework>.

9 *West Bank and Gaza - Gaza Emergency Support for Social Services Project (English)*, 18, Washington, D.C.: World Bank Group, 2022, <http://documents.worldbank.org/curated/en/561131655815208747/West-Bank-and-Gaza-Gaza-Emergency-Support-for-Social-Services-Project>

group” and identifies “vulnerable groups” (which often also include youth, elderly, women, and others) as key stakeholders at a higher risk of exclusion from project benefits. Persons with disabilities face environmental barriers that hinder access and social barriers such as stigma and discrimination that inhibit inclusion in society. Without these barriers and risks clearly identified and mitigated for persons with disabilities, they will most likely be unable to benefit from projects. Furthermore, persons with disabilities may be part of other marginalized groups, so it is important to look at additional barriers LGBTQI+ people with disabilities, for example, face.

In accordance with these findings and the Bank’s commitment to make 75% of social protection projects disability-inclusive by 2025, BIC recommends that measures surrounding persons with disabilities be differentiated, making it easier to assess the disaggregated impact of project operations on them, and that those differentiated measures be implemented in accordance with project documents. The Bank should include specific measures to include persons with disabilities during accessible consultation processes feeding into project operations, and not limit their inclusion to that of “vulnerable groups.” Also, the feedback from consultations must influence project design, as persons with disabilities can outline how to overcome barriers and key necessary elements of project design.

For example, one measure could be providing cash transfers specifically for persons with disabilities. We see this example in Zambia: “SCT currently provides a bi-monthly transfer of ZMW [Zambian Kwacha] 400 (US\$24 equivalent, or US\$12 monthly) for an average household and double this amount for households with a disabled person... Beneficiaries are selected through categorical as well as poverty targeting to identify people that are poor and also are not able to work for reasons of age, disability, illness, or high dependency ratios.”<sup>10</sup>

In this project, it is acknowledged that persons with disabilities are particularly affected by shocks affecting *Zambia*. This knowledge is translated into project design with an actionable measure. This is the standard that the Bank should be operating under based on their commitments in the ESF and Disability Framework, and BIC hopes to see more projects attaining this standard moving forward.

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10 *Zambia - Scaling Up Shock Responsive Social Protection Project (English)*, 14, Washington, D.C. : World Bank Group, 2022, <http://documents.worldbank.org/curated/en/310951656370740341/Zambia-Scaling-Up-Shock-Responsive-Social-Protection-Project>

### 3. CHILD PROTECTION ELEMENTS NOT INCORPORATED INTO PROJECT DESIGN

Based on BIC’s research sample, seven of the 11 projects identified children as beneficiaries in some capacity:<sup>11</sup> *PNG II, Ecuador, Liberia, Gaza, Zambia, Lesotho, and India*. However, the way projects are currently designed will not necessarily lead to better outcomes for children as they lack key child protection components. Including child-sensitive measures and efforts to strengthen child protection systems in social protection projects could maximize the results of social protection projects that are purportedly designed to target the members of society most vulnerable to violence, abuse, and exploitation.

When considering how the Bank includes children in its social protection projects, it is important to assess how projects incorporate measures to protect children and uphold their rights. These measures include, but are not limited to, making service delivery accessible to children; multisectoral collaboration between ministries, schools, CSOs, and relevant organizations; child friendliness across project mechanisms; stakeholder engagement with children, parents, and child-rights focused organizations; and data collection and disaggregation.<sup>12</sup>

BIC’s key finding was that projects that did impact children often failed to realize avenues for including or strengthening the child protection system. Slight adjustments could be made to enable projects to better target the child protection system, and thus provide a greater benefit to children. For example, *Uganda* calls for building childcare facilities with the goal of allowing women to join the workforce, but project documents do not identify children as project beneficiaries. The focus of this project is women’s employment, which will result in an increased need for childcare options. Children are heavily impacted by early learning environments, and childcare facilities that are not well-equipped to handle early child care can lead to negative outcomes that hinder physical, behavioral, and cognitive development.<sup>13</sup> A way to strengthen the child protection system here, and therefore bolster the social protection system as a whole in Uganda, could be to provide training to service providers at childcare facilities on issues such as early development, basic health, nutrition, prevention of corporal punishment, early detection of signs of violence

11 “Beneficiary in some capacity” means that project documents indicate that children are an intended beneficiary of one or more project components.

12 BIC’s report “How is the World Bank considering Child Protection in its COVID-19 Social Protection Response?” highlights these five categories as key to helping build and reinforce child protection systems when integrated into projects.

13 Linda K. Smith, Tara Williams, Katherine Mercado, *From the Ground Up: Improving Child Care and Early Learning Facilities*, Bipartisan Policy Center, 2023, <https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2019/07/From-the-Ground-Up-Improving-Child-Care-and-Early-Learning-Facilities.pdf>.

against children, etc.

Even when projects provide accessible opportunities for child protection through service delivery, these opportunities are not fully taken advantage of. For instance, *Gaza* includes a component that provides psychosocial support for children affected by the war. This project funds local NGOs that have “demonstrated results working in poor and marginalized communities (proven track record) as well as with children or women” to implement project objectives.<sup>14</sup> However, it does not mention how the Bank and the implementing agency will oversee project delivery to prevent violence against children (VAC), including SEA/H. Child protection can be strengthened by requiring service providers to sign a Code of Conduct to refrain from any type of VAC and training NGOs on the best practices on dealing with child trauma.

In general, projects that did include children in some capacity did not include many key child protection components. In regards to service delivery, VAC was rarely addressed. Only one project, *Uganda*, included a special reporting process in cases of sexual violence against children. Only *Gaza* included psychosocial support for children in service delivery. Efforts to strengthen service delivery for children so they are not excluded from the social protection system, like hiring child protection specialists or training service providers on child protection, were not included in any of the projects, representing a significant missed opportunity.

Multisectoral collaboration is also not fully realized; multiple projects included ministries that could have the capacity to strengthen child protection, but don't say anything about what these ministries will do to include a child-rights approach in project design and implementation. Further, the engagement of schools is limited. Ecuador aims to improve child malnutrition, making children the primary beneficiary of the project. School personnel, such as teachers and administrators, are not engaged in project design and implementation, despite the fact that they are well placed to identify gaps in project design and implementation and support child development.

In terms of child-friendliness, only one project has a child-friendly grievance redress mechanism (GRM). *Zambia's* GRM has a hotline specifically for reporting child protection violations and also calls for complaint forms to be disseminated in schools. In all other projects, GRMs are said to be “accessible,” but the majority do not specify anything on child-friendliness. The exception

<sup>14</sup> *Stakeholder Engagement Plan (SEP) - Gaza Emergency Support for Social Services*. - P177897 (English), 7, Washington, D.C. : World Bank Group, 2022, <http://documents.worldbank.org/curated/en/099040104072210654/P177897093a1340e0be4006d9d02651731>

is *Uganda's* GRM, which takes into consideration child SEA/H. These findings highlight how the categories of child protection support each other. Since psychosocial support for children is not specified, even when there is a GRM, the referral pathway is poor due to a lack of psychosocial and legal support.

Projects targeting children or with child-specific project components disaggregate data on those components by age; however, data collection as a whole is not typically disaggregated by age or student status. Projects collect data on children only for components that identify children as beneficiaries but not other components. While it is good practice for data to be collected on project beneficiaries, components that aren't intended to impact children may have an inadvertent effect on them, thus highlighting the importance of disaggregating project data by age if children are by any means affected.

The final research finding was a lack of stakeholder engagement with children specified in project documents. Only two projects (*Lesotho and PNG II*) called for consultations directly with children in their SEPs. *PNG II* did call for child-friendly materials to inform children and consultations with child rights-focused NGOs. *Liberia and Ecuador* are two examples of projects that include components expressly designed to benefit children, but don't involve them in stakeholder engagement. *Liberia* targets women and girls and includes a component calling for school-driven community change, such as implementing education systems designed to reduce gender-based violence (GBV) and increase reproductive health. Yet, despite girls being the primary beneficiaries of this component, project documents did not detail a consultation process with them. Some projects, such as *India*, had stakeholder engagement processes that involved child-centered CSOs or schools, which is a positive practice; however, these projects still lack consultations with children themselves, denying the opportunity to hear directly from them.

#### 4. LACK OF SPECIFIC INCLUSION MEASURES IN PROJECT DOCUMENTS

While BIC analyzed four types of project documents, this section focuses on the PAD, the SEP, and the ESCP. These three documents have the most detailed information on project design, inclusion measures, stakeholder engagement approaches and activities, and also outline the specific pieces the Bank will focus on supervising.<sup>15</sup> In this section, BIC assesses each document's approach to inclusion and provides recommendations for how

<sup>15</sup> BIC's analysis of the Environmental and Social Review Summary of projects did not yield any particular trend or observation. The vast majority of the time the ESRS contained the same information as the Environmental and Social Risks section of the PAD, as well as the SEP.

each of these documents can mitigate risks and provide specific measures for including persons with disabilities and LGBTQI+ people, as well as how to benefit children by strengthening the child protection system.

### **Project Appraisal Document**

The Project Appraisal Document (PAD) is the document that details project design. It “provides a comprehensive description of project rationale, components, budget and implementation plan.”<sup>16</sup> Through analysis of each project’s PAD, BIC found that social protection projects often lack detailed action items that directly address the social protection needs of children, persons with disabilities, and LGBTQI+ people. A few of the projects researched did not include any information or provisions on children, persons with disabilities, and LGBTQI+ people, such as *Djibouti* and *PNG I*. Considering intersectionality, three projects (*Lesotho*, *India*, and *West Bank and Gaza*) mention children with disabilities; *Lesotho* and *India* include provisions to specifically benefit children with disabilities, while *West Bank and Gaza* only includes the sentence “...there is a risk that certain groups that are more vulnerable among the target groups (e.g., elderly women, children with disabilities) may not receive proper attention.”<sup>17</sup>

When analyzing projects where there was a lack of inclusive project design, BIC found that it was common for the Bank to provide important information on or identify risks faced by children and persons with disabilities, but then fail to detail any actionable measure that addresses these risks or context. For example, the PAD of *Lesotho* says, “boosting employment opportunities for young people living with disabilities is a crucial step to social inclusion.”<sup>18</sup> However, there is no follow-up provision or information that provides details on how the project is designed to boost employment opportunities for youth with disabilities, thus exhibiting a gap between analysis and project design.

Another example is in *West Bank and Gaza*, where the PAD specifies that “To further promote inclusion, service providers will also be encouraged to demonstrate how they can incorporate persons with disabilities among beneficiaries.”<sup>19</sup> While this statement is an effort to include persons with disabilities, it is not sufficiently detailed and lacks a concrete mandate to incorporate persons with disabilities among beneficiaries.

16 Katelyn Gallagher, Module 2: *The World Bank Group In Your Country*, 15, in *Tools for Activists: An Information and Advocacy Guide to the World Bank Group*, Bank Information Center, 2020, <https://bankinformationcenter.org/en-us/update/toolkit-for-activists/>

17 *West Bank and Gaza – Gaza Emergency Support for Social Services Project (English)*, 18.

18 Monchuk, *Project Information Document*, 11.

19 *West Bank and Gaza – Gaza Emergency Support for Social Services Project (English)*, 9.

Another example of a discrepancy between action items and risk identification is *West Bank and Gaza’s* effort to provide psychosocial support for children. *West Bank and Gaza’s* PAD provides detailed context on how children have a higher need for mental health and psychosocial support services in Gaza due to the disproportionate impact that political conflict has on them. Component #1 of this project addresses this issue by providing funding for “psychosocial services primarily to women and children.”<sup>20</sup> Yet, despite children being previously acknowledged as having an increased need for these services, the component description does not provide any additional information on how children *specifically* will be able to access and benefit from this component.

The PAD should consistently outline measures or components that address the inclusion of children, LGBTQI+ individuals, and persons with disabilities. These measures or components must especially be provided when PADs identify risks faced by these groups, as in the example of *West Bank and Gaza*. Lastly, as mentioned in the section above, the PAD should include at least one measure for each group that either benefits them or facilitates their participation in the project.

### **Environmental and Social Commitment Plan**

Environmental and Social Commitment Plans (ESCP) are intended to be an “accurate summary of the material measures and actions to address the potential environmental and social risks and impacts of the project in accordance with the mitigation hierarchy.”<sup>21</sup> Additionally, they are part of a project’s legally binding documentation, so it is important that measures related to the inclusion of marginalized groups be highlighted in this document so they will be adequately supervised by the Bank and implemented by the government.

A key finding from BIC’s analysis is that projects rarely have unique ESCPs specific to the project; instead, most of the project ESCPs were relatively identical. Of 11 projects, only one (*West Bank and Gaza*) mentioned persons with disabilities in its ESCP. None of the ESCPs mentioned LGBTQI+ people. Multiple projects identified social risks faced by persons with disabilities, children, or LGBTQI+ people in their ESRS, SEP, or PAD. However, measures to mitigate these risks are not represented in the ESCP in any capacity. BIC recommends that ESCPs address social risks faced by persons with disabilities, children, and LGBTQI+ people, especially risks identified in other project documents, so that these become key pieces the Bank will supervise.

20 Ibid, 33.

21 *Environmental and Social Framework*, 28, Washington D.C.: World Bank Group, 2017. <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf>.

## Stakeholder Engagement Plan

ESS10 of the Bank's ESF calls for each project to publish a SEP that describes the timing and methods of engagement with stakeholders as well as "the measures that will be used to remove obstacles to participation... Where applicable, the SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable."<sup>22</sup> ESS10 highlights the importance of open and transparent stakeholder engagement in improving project sustainability, acceptance, and design. The Bank further highlights meaningful engagement in its Disability Inclusion and Accountability Framework (DIAF). The DIAF includes stakeholder engagement that translates directly into project design as one of the four pillars of what constitutes a disability-inclusive social protection project.<sup>23</sup> Feedback from stakeholder engagement being incorporated into project design is fundamental to addressing the needs of communities who are supposed to be benefiting from these projects. The Bank has recognized the importance of meaningful engagement in helping to shape disability-inclusive project design, and it is important that the Bank recognize this for other marginalized groups, including children and LGBTQI+ people. Ultimately, the fundamental goal of consultations should be to seek input from stakeholders to incorporate this feedback into project design.

Through BIC's analysis of the SEPs in the research sample, BIC found that the published SEP did not typically call for consultations with children, persons with disabilities, and LGBTQI+ individuals. That said, these findings are based on desk review, and the actual consultation process of the projects may differ from that documented in the SEP. Nine out of 11 projects identified persons with disabilities and children as stakeholders or "vulnerable groups" in its SEP, yet most projects lacked information on how the consultation process will be accessible to them (e.g. child-friendly materials, ramps during meetings, materials in Braille, etc.). Only two projects' SEPs (*Lesotho and PNG II*) included references to consultations with children themselves, and neither project specified how consultations would be safe and accessible for them. The SEPs for other projects included mention of consultations with child-focused CSOs or parents of young children.

LGBTQI+ people were identified as stakeholders in only one project, and there was no information on how consultations would be safe and sensitive for LGBTQI+ individuals. The purpose of stakeholder engagement is to inform equitable project design, so it is critical that all affected groups are able to access and participate in the

<sup>22</sup> Ibid, 99.

<sup>23</sup> McClain-Nhlapo et al., *Disability Inclusion and Accountability Framework (English)*, 168.

stakeholder engagement process.

It is imperative that children, persons with disabilities, and LGBTQI+ people can benefit from project operations — particularly when project operations have a significant effect on them — and that project design is informed by their input. Thus, BIC recommends that the Bank has more oversight of the stakeholder engagement process so that the Borrower conducts a process that includes persons with disabilities, children, and LGBTQI+ groups for every project. Particularly when these groups are the main project beneficiaries, safe and meaningful consultations directly with them and organizations representing their interests should be the minimum starting point. The third entry point of the DIAF states that "Social protection projects should design at least one activity to address the issues already identified through the analysis and stakeholder engagement."<sup>24</sup> In order to align with this, consultations should result in the identification of at least one measure detailed in the PAD that aims to benefit persons with disabilities and facilitate their participation in each project's design. Going further, BIC urges the Bank to apply this criteria to other groups as well, particularly children and LGBTQI+ individuals. These measures should be informed by both stakeholder engagement and any other relevant historical, cultural, or social analysis. These measures must be concrete, actionable, and include specific details on how exactly this inclusion will take place.

## Recommendations

Inclusion of persons with disabilities, children, and LGBTQI+ people in project design is fundamental to designing social protection projects that benefit these groups. Informed by the Bank's Social Protection Compass, the ESF, and the Disability Framework, as well as through analysis of 11 social protection programs, BIC recommends the following:

### General Recommendations

- The Bank must adequately assess the specific barriers to project benefits for persons with disabilities and LGBTQI+ people, while also addressing how to strengthen the child protection system. Some specific groups necessitate their own measures, such as providing safe and sensitive consultations for LGBTQI+ individuals or providing accommodations or accessibility measures for persons with disabilities. Additionally, the Bank must consider individuals that fall into the intersection of multiple marginalized identities and provide measures that address their specific needs.

<sup>24</sup> Ibid.

These considerations must be taken into account in project documents so that teams fully understand how to enable inclusive project implementation.

#### ***Lack of SOGIESC Inclusion in Projects***

- The Bank must consider the specific project impacts on LGBTQI+ people in all social protection projects. Projects that have an existing focus on gender or operate in the context of especially relevant issues, such as HIV/AIDS, should include project components tailored towards LGBTQI+ people, analysis of project impacts on LGBTQI+ people, and a plan for how to mitigate these negative impacts. The Bank needs to play a leading role in LGBTQI+ inclusion, as this is an area in which many governments have little capacity, or often little desire, to design or implement projects that include LGBTQI+ people.

#### ***Persons with Disabilities being Lumped in as a “Vulnerable Group”***

- BIC recommends that the Bank avoid merely mentioning persons with disabilities among the list of “vulnerable groups,” and instead identify risks of exclusion and impacts from project operations that persons with disabilities and other marginalized groups will face. Specific measures should be highlighted and addressed in project documents and carried through in project implementation to mitigate barriers persons with disabilities face to accessing project benefits. It is also imperative to outline and mitigate any potential harm persons with disabilities might face during project implementation as a result of resettlement, exclusion, or other risks.
- Persons with disabilities know best the barriers they face in accessing project benefits, including accessibility issues and additional costs associated with having a disability, and can provide solutions for how to be fully included in project design and implementation. Therefore, persons with disabilities must be consulted, and their views should be taken on board in project design and implementation to allow for an inclusive and accessible project.

#### ***Child protection elements not incorporated into project design***

- Consider child protection in social protection projects. Social protection can help reduce drivers of child abuse, neglect, exploitation, and violence. However, not taking into account child-specific risks and needs may lead to the exacerbation of project harms or the exclusion from project benefits. In accordance with these findings, BIC recommends that the Bank recognize child protection as a core element of social protection by including child

protection components in their social protection projects that have children as main project beneficiaries or indirect beneficiaries.

- Improve child-sensitive service delivery by identifying risks of and providing anonymous and safe avenues for reporting VAC, enabling children to access psychosocial support in the case of trauma, and hiring specialists trained in child protection to engage in project design and implementation.
- Strengthen multisectoral collaboration by detailing how ministries will include a child-rights approach in project design and operations. Ministries collaborating can help to identify the needs of children and gaps in project operations.
- Include child-sensitive measures and realize avenues for child protection. All projects that have the potential to impact children should incorporate aspects of child protection, both to mitigate potential adverse effects on children and to capitalize on the opportunity to positively impact children’s health and holistic well-being.
- Improve stakeholder engagement through consultation with children, child-focused NGOs and CSOs, and schools. The meaningful consultations with these groups should include disclosing appropriate information about project goals, impacts, and benefits in a child-friendly, accessible, diversity-sensitive, age-appropriate, and culturally-adapted manner.
- GRMs should be child-friendly. As stated in BIC’s [Child Protection Report](#), this means including training for GRM responders, providing accessible locations and a variety of avenues for lodging grievances, the ability to submit anonymous or confidential complaints, and the utilization of community centers and social workers to serve as trusted adults to whom children can disclose cases of VAC or other protection related concerns. Further, they should include protocols for responding to survivors of child SEA/H by outlining clear confidentiality requirements and specific provisions to address allegations of child SEA/H that prioritize the best interest of the child and their parents/guardians.
- Project data should be disaggregated by age or child status so that the Bank can properly measure the impact of all projects on children.

#### ***Lack of Specificity in Project Documents***

- The ESCP should be tailored to each project and address the specific social risks faced by persons with disabilities, children, and LGBTQI+ people. This is key given that it is the document the Bank

supervises, and we have learned that if a group is not mentioned, they will be overlooked.

- When risks or benefits related to the social protection of children, persons with disabilities, or LGBTQI+ people are identified, there should be detailed measures that address these risks or benefits. These measures must be concrete, actionable, and include specific details on how exactly these groups will be able to participate and benefit. For example, acknowledging how persons with disabilities are relevant to project operations should be followed by the implicated action of this, e.g. a provision, an indicator focusing on persons with disabilities, etc.
- The Bank should work with governments to design and conduct a stakeholder engagement process that includes persons with disabilities, children, and LGBTQI+ people for every project. This consultation process must be accessible through child-friendly and disability-friendly consultations that are safe and sensitive. SEPs should include information about measures to make consultations accessible to target stakeholder groups, including each “disadvantaged and vulnerable” group. Consultations should result in the identification of at least one measure detailed in the PAD to benefit children, persons with disabilities, and LGBTQI+ individuals, and measures that facilitate their participation in each project’s

design and help to monitor implementation. These measures should be informed by both stakeholder engagement and any other relevant analysis.

## Conclusion

Overall, the findings of BIC’s analysis of these 11 social protection projects have outlined shortcomings in the inclusion of persons with disabilities and LGBTQI+ individuals and in the inclusion of child protection elements in project design. Some of the trends identified pertain to marginalized groups individually. However, the key shortcomings found through our research revolve around the improvement of social protection with an intersectional lens that considers all marginalized populations outside of silos. As the Bank continues to strive for equitable social protection in its projects, the focus must be on project design and implementation that is inclusive of all groups and their intersections and is informed by key stakeholders. The Bank has already made steps towards this, as exhibited by examples such as meeting the standards on inclusive cash transfers in Zambia and providing psychosocial support for children in West Bank and Gaza. Looking to the future, we urge the Bank to heed BIC’s recommendations as they consider inclusion in all social protection work.

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