

Save the Children UK

COMMENTS AND RECOMMENDATIONS

ON THE

**DRAFT DEVELOPMENT STRATEGY BiH –
POVERTY REDUCTION STRATEGY PAPER**

February 28, 2003

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ACRONYMS USED IN TEXT

BiH	Bosnia and Herzegovina
CBOs	Community-Based Organisations
CRC	United Nations Convention on the Rights of the Child
EU	European Union
FBiH	The Federation of Bosnia and Herzegovina
GDP	Gross Domestic Product
I-PRSP	Interim Poverty Reduction Strategy Paper
IDA	International Development Assistance
LSMS	Living Standards Measurement Survey
MDGs	Millennium Development Goals
MTEF	Medium Term Expenditure Framework
NPA	National Plan of Action for Children
NGOs	Non-Governmental Organisations
PRSP	Poverty Reduction Strategy Paper
PSIA	Poverty and Social Impact Analysis
RS	Republika Srpska
SC UK	Save the Children UK
SEECRAN	South-East European Child Rights Action Network
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund

NOTE : References to the Draft PRSP refer to the English language version of October 2002, downloaded from web-site:

<http://www.bih.prsp.info/knjiga/ZA-WEB/english/index2.htm>

(correct as at 14 February 2003)



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1. INTRODUCTION

- The Nature and Purpose of these Comments

The Draft Development Strategy for Bosnia-Herzegovina – Poverty Reduction Strategy Paper (henceforth Draft PRSP), published in October 2002, contains detailed analysis of the current situation regarding general economic, social and political development in BiH, as well as regarding specific sub-sectors, including social welfare, health and education. Whilst acknowledging that there are still large gaps in knowledge and in meaningful trend-based data, it examines the latest survey findings on the nature, extent, depth and causalities of poverty in BiH and makes recommendations for all spheres of policy, designed to promote sustainable development, economic growth, and poverty reduction.

Save the Children UK (SC UK) recognizes that the Draft PRSP captures many of the key issues facing contemporary Bosnian society. It is a step forward from the Interim-PRSP which tended to focus primarily on macro-economic issues, and is a carefully argued document which states the case for key policy recommendations and creates a clear space for debate and dialogue.

Save the Children UK has taken part in the debates regarding the drafting of the PRSP in a number of ways, seeking to ensure, from a rights-based perspective, that children are at the centre of thinking and action for poverty reduction. The report *Diminishing Returns: Macro-economics, Poverty and Children's Rights in Bosnia and Herzegovina* (Save the Children UK; 2002) warned that “children’s rights to education, health care, social security, and an adequate standard of living will be jeopardised if the current macro-economic policies of the government and the International Community are implemented unamended” (ibid; p. 11). In July 2002, SC UK, together with The Office of the BiH Co-ordinator for PRSP and UNICEF, co-organised a Round-table on ‘Children and Poverty (*Children and Poverty: report of the Roundtable*, September 2002) which sought to ensure the PRSP process and its subsequent content paid greater attention to children’s rights, in the context of international conventions. A series of recommendations were made in the course of this roundtable for incorporation in the PRSP.

SC UK comments on the Draft PRSP draw attention to areas in which concerns for children have been included, as well as to those that have not yet been sufficiently addressed. In the following document, we provide concrete suggestions on changes and additions to the Draft PRSP which are necessary to ensure that the critical issue of child and family poverty is given sufficient attention within the overall poverty reduction strategy. We believe this is of fundamental importance, given the risk that poor children will grow up to be poor adults and perpetuate poverty cycles.

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In particular, we urge that commitments to access to adequate health, education and social services are consistently applied throughout the document. In addition, as an organisation active in the promotion of civil society in Bosnia and Herzegovina, we also focus on the relative neglect of the role of civil society in BiH's development future and in terms of poverty reduction.

We hope that our concerns can be addressed in the forthcoming revision of the Draft PRSP to ensure a more coherent, holistic framework for addressing sustainable development and the reduction of poverty, inequality and social exclusion in BiH. In the Table below, we summarize what we see as the main strengths and weaknesses of the Draft PRSP. The following text seeks to build on the strengths in the current document, and to make recommendations to overcome the weaknesses.

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Table 1: Summary of Strengths and Weaknesses of the Draft PRSP

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> Extensive document based on up-to-date information 	<ul style="list-style-type: none"> Document not well structured, often repetitive and sometimes contradictory
<ul style="list-style-type: none"> Recognition of slow pace of reform due to complexities of BiH governance 	<ul style="list-style-type: none"> Remains too focused on macro-economic strategies at the expense of issues of governance and social rights
<ul style="list-style-type: none"> Strong commitment to rule of law and need to eradicate corruption 	<ul style="list-style-type: none"> Rights-based approaches and the MDGs appear added-on rather than fully integrated
<ul style="list-style-type: none"> Advocates for single economic space and greater political and social integration across entities 	<ul style="list-style-type: none"> Growth scenarios over-optimistic with insufficient evidence that growth will be pro-poor
<ul style="list-style-type: none"> Provides extensive and clear check-list of measures which need to be implemented 	<ul style="list-style-type: none"> Action planning insufficiently developed, particularly in terms of indicators of success
<ul style="list-style-type: none"> Clear use of latest survey data on poverty 	<ul style="list-style-type: none"> Insufficient discussion of inequality and social exclusion
<ul style="list-style-type: none"> Focuses on social issues and seeks to address the problem of lack of expenditure on social protection 	<ul style="list-style-type: none"> Social issues treated too much from a juridico-institutional perspective and not from a social rights and community perspective
<ul style="list-style-type: none"> Acknowledges family (and therefore child) poverty as a major cause for concern 	<ul style="list-style-type: none"> Insufficient analysis of family and child poverty and measures to reduce it
<ul style="list-style-type: none"> Strong policy focus on educational reform 	<ul style="list-style-type: none"> Insufficient focus on marginalised groups including children in institutional care
<ul style="list-style-type: none"> Clear situation analysis and recommendations on health care 	<ul style="list-style-type: none"> Insufficient attention to social and child impact of policies of privatisation, fiscal restraint and trade liberalisation
<ul style="list-style-type: none"> Shows commitment to continuing participatory process 	<ul style="list-style-type: none"> Role of civil society, and particularly poor and excluded groups, in PRSP process and in policies and practice to overcome poverty is not emphasised enough
<ul style="list-style-type: none"> Clear link between PRSP and European integration and EU membership 	<ul style="list-style-type: none"> Role of pre-school provision insufficiently addressed
<ul style="list-style-type: none"> Acknowledges important role of private sector in poverty alleviation 	<ul style="list-style-type: none"> Importance of access to integrated education for marginalised groups could be developed further
<ul style="list-style-type: none"> Strong emphasis on employment creation as key to poverty alleviation 	<ul style="list-style-type: none"> Employment creation does not sufficiently address gender issues nor access to employment for marginalised groups
<ul style="list-style-type: none"> Clear focus on the need for anti- 	<ul style="list-style-type: none"> Anti-discriminatory recommendations lack



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discriminatory policies and programmes	sufficient weight
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2. MACRO-ECONOMICS, GOVERNANCE AND SOCIAL RIGHTS: - Striking a Balance

General Comments:

Save the Children UK believes that any PRSP must combine existing knowledge on general policies to reduce poverty with a thorough understanding of the specificity of the particular country where the PRSP is being developed. There is, in this process, inevitably a tension between country-driven and owned strategies and the requirements and conditionalities of external agencies. In addition, there is a global, regional, and national debate about the inter-relationship between macro-economics, governance and social rights approaches. The danger that particular macro-economic frameworks would dominate the PRSP was a particular concern of SC UK in the consultation processes thus far. To an extent at least, this concern has been addressed in the Draft PRSP, which does give a greater focus to issues of governance, in particular the need to rationalize governance and administration and to strengthen more central levels of government. There is also a recognition of the need for increased attention to social issues and to improve the coverage and depth of social welfare and social protection programmes.

Issues requiring greater attention:

SC UK remains concerned however that, overall, the balance between macro-economic issues, issues of governance and of social rights, needs to be adjusted to give greater attention to issues of governance and, particularly, to social rights. Indeed, such a focus, recognizing the importance of human rights conventions, including the Convention on the Rights of the Child (CRC), would strengthen the PRSP as a document, and further question the nature of many of the macro-economic reforms considered, which remain, in many ways, the core recommendations of the PRSP. This general argument is made consistently in *Diminishing Returns* as well as in other recent texts on social development in BiH (the *UN Social Development Report 2002*; Papić, Ž (ed) (2001) *International Support Policies for SEE Countries: Lessons (Not) Learnt from BiH*), and is pursued in section 5 below. Here we seek to address a number of key points, in terms of statements of overall vision and priorities in the draft PRSP where the balance could be struck differently.

INDICATORS (CHAPTER 2)

➤ Recommendation 1:

Chapter 2: ‘Basic Economic Indicators for BiH’ should be re-titled ‘Basic Indicators for BiH’ or ‘Basic Social and Economic Indicators’.

➤ Recommendation 2:

The comparisons with other countries and regions is very useful. We would, however, suggest that *many more social indicators should be incorporated into the table* such as those presented every year in UNICEF’s Regional Monitoring Report (MONEE Project)

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database on 27 countries in Central and Eastern Europe and the Former Soviet Union. In particular, data on the following would appear to be extremely relevant in the formulation and implementation of a poverty reduction strategy:

ECONOMIC INDICATORS: Inequality (Income and Expenditure through Gini coefficient)
Average and Real Wages
Proportion of GDP on Health, Education and Social Welfare

HEALTH INDICATORS: Suicide rates (especially for young people)
Immunization rates

EDUCATIONAL INDICATORS: Enrolment in pre-school, primary, secondary and tertiary education, and the inclusion of marginalised groups of children.

SOCIAL INDICATORS: Crime rates (especially juvenile crime)
Population in residential care (children's homes, juvenile offenders' homes, old people's homes; etc)
Disability incidence

➤ Recommendation 3:

Whenever possible, figures in Chapter 2 and throughout the document should be disaggregated or broken down in terms of age; gender; disability; ethnicity; and other categories which may be relevant in terms of the issue being discussed.

➤ Recommendation 4:

Whilst some indicators on health, education and social welfare appear later in the document, it would be important to *move the majority of indicators into Chapter 2*, to show that the PRSP is not only, or even principally, concerned with crude economic indicators.

VISION OF BiH DEVELOPMENT (CHAPTER 4)

The vision of BiH development is to be welcomed. However, there is an apparent hierarchy of elements, in which economic factors *per se*, and economic growth in particular, are seen as fundamental.

➤ Recommendation 5:

The first sentence of Chapter 4 should be amended to read: "We see BiH as a society characterised by democratic pluralism, a free market economy, an active civil society, and principled adherence to social rights and social justice."

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➤ Recommendation 6:

The paragraph on poverty reduction and the development of ‘appropriate’ systems of social welfare, health and education in Chapter 4 (Paragraph 5) should also be re-written to strengthen the commitment. We suggest the following wording:

“We see BiH as a country that will significantly reduce the proportion of its citizens living in poverty, and eliminate all forms of extreme poverty. The development and sustainability of adequate social welfare, health, and educational services, accessible to all, will be an important contributor to achieving this vision. In addition, all forms of social exclusion will be taken seriously and tackled through a combination of state, civil society and private sector action.”

➤ Recommendation 7:

Commitment to supporting development of a vibrant civil society in BiH could be strengthened through insertion of a paragraph in Chapter 4 after that regarding conciliation (Paragraph 4), thus:

“More generally, we see sustainable development as built upon inclusive social mobilization, in which volunteerism, citizens’ associations, community-based and non-governmental organisations, are promoted and strengthened.”

PRIORITIES FOR DEVELOPMENT (CHAPTER 5)

We welcome the fact that the six priorities for development are of equal importance, but note that only one of the priorities, that of ‘establishing sound social, health care and education systems’ has a direct and proven link with poverty reduction.

➤ Recommendation 8:

There is a need to add precision to the priorities on the importance of ensuring that economic benefits are pro-poor and that their negative social impact will be mitigated. In particular we would suggest inserting the following text:

- Priority 1: “Establishing a Single Economic Space in BiH ***in which the conditions for pro-poor economic growth can be created.***”
- Priority 2: “Improving the business environment for domestic and foreign investors and completing the process of privatisation ***whilst taking measures to mitigate its social impact on the poor.***”

MACROECONOMIC POLICY (CHAPTER 7)

It is particularly welcome that ‘the establishment of an adequate and sustainable social welfare system’ (p. 1) is one of the three highest medium-term macro-economic policy goals alongside ‘increasing employment’ and ‘increasing exports’. However, the balance in the rest of the chapter is not completely consistent with this, focusing much more on traditional macro-economic goals and fiscal discipline. In this regard, we suggest a number of textual changes:

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➤ Recommendation 9:

We suggest some changes to the statement of the ‘key requirements’ for the ‘rapid reform scenario’ (p. 6), as follows:

- Point 3: Replace “Stricter controls on the use of public funds” by “***Clear controls on the use of public funds compatible with poverty alleviation, ...***”
- Point 5 “Reform of the labour market to promote *pro-poor* economic growth”
- Point 6: “Establishment of an ***adequately funded, sustainable*** social welfare system.”

➤ Recommendation 10:

The case needs to be made more strongly for increased spending on social welfare at all levels of government, especially in the context noted in the chapter of ‘very low spending on poverty oriented social assistance programmes’ (p 20). Spending on poverty-oriented assistance programmes is an investment in social wellbeing and, since it prevents extreme poverty and resultant health, educational and social problems, it should be seen as a contribution to economic development, rather than a cost. (*Social protection - lessons from Save the Children research*, SC UK working paper, Shaffer, P., forthcoming).

➤ Recommendation 11:

This commitment to increased spending needs to also appear in the Action Plan and to replace the ambiguous statement regarding one aspect of the Functional Allocation of Public Resources in terms of ‘Policy responses to current high spending on defence, public order, education, health care and specific social rights programmes’ (p. 35). We recommend that ***‘education, health care and social rights’ are removed from this sentence, and that these elements reappear as an additional element as follows:*** “Ensure efficient and effective public spending on health, education and social welfare compatible with commitments to poverty alleviation.”

THE MILLENNIUM DEVELOPMENT GOALS – MDGs (CHAPTER 20)

SC UK welcomes the fact that Chapter 20 on the Success Criteria for the Development Strategy seeks to integrate the Millennium Development Goals (MDGs) as a set of targets and indicators for BiH’s PRSP. We particularly welcome the statement that the MDGs need to “be integrated into the formulation, implementation, monitoring and evaluation of all policies and programmes relating to issues of sustainable development at national and local level” (page 6). It is important however to also recognise that BiH should be able to aim higher than the global MDGs, and to note that a process to adapt them to this context is currently underway in BiH.

➤ Recommendation 12:

It is important that the Final PRSP gives greater attention to the process of developing and adapting the MDGs and other broad development goals set by the UN in the

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context of BiH. These goals need to be integrated throughout the document and, in particular, in the Sections on General Vision and Priorities for Development.

➤ Recommendation 13:

More work is needed on the MDGs per se to ensure that they are capable of being integrated in a meaningful and effective way. At the moment, only Goals 1-3 are elaborated upon in terms of the PRSP.

- *Goals 4-6 need to include additional information and clarification regarding their precise meaning and relevance in the BiH context.*

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➤ Recommendation 14:

Goal 7 needs to be re-written to demonstrate how the completion of the Medium Term Expenditure Framework (MTEF), in itself, will ensure that the principles of sustainable development are integrated into country policies and programmes and reversing the loss of environmental resources. We suggest, at the very least, the need to note that the MTEF should pay close attention to social and environmental impact.

➤ Recommendation 15:

The additional Goals are welcome, but *Goals 8-11 need to be framed in terms of measurable targets, with clear indicators*, so that they resemble the MDGs.

➤ Recommendation 16:

In addition, *we would suggest adding two further goals which are as relevant, if not more so, to poverty alleviation*, alongside Goals 10 and 11. These are:

- *'Increase in the Living Standards of Children'* and
- *'the Regular Payment of Child Benefit'*.

MDGs AND UN CONVENTIONS

Chapter 20 also recognizes, rightly, that the MDGs are meant to be complementary to existing UN Conventions and Declarations. However, there is virtually no reference to these, including the UN Convention on the Rights of the Child, the UN Special Session on Children, or the World Summit on Social Development, in the PRSP. This suggests that the balance between macro-economic and social issues still needs to be considered in greater depth in the process of revising the PRSP.

➤ Recommendation 17:

As a rights-based organisation, SC UK urges that, *in the final version of the PRSP, more attention is paid to the UN Conventions to which BiH is a signatory. We would suggest that Chapter 20 includes, alongside the MDGs, a summary of the most important commitments made by BiH internationally with regard to poverty reduction.*

ADAPTATION OF THE MDGs TO THE BiH CONTEXT

As the text recognizes, the MDGs were established specifically for the poorest countries, and would need greater adaptation to BiH as a former middle-income country, still with high levels of human development, but which, because of war and its consequences, is eligible for IDA. In middle-income countries, especially those in transition, it is now widely recognized that coordinated poverty reduction needs to tackle increased levels of poverty, inequality, social exclusion and unemployment and that the approach needs to move away from traditional structural adjustment measures to include ways of strengthening social protection systems. UNICEF, in the end-decade review of children's rights, sought to develop additional indicators for industrialized countries which are

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useful as indicating some of the ways in which the MDGs could be expanded to be more relevant to countries such as BiH (UNICEF *The End-Decade Review in Industrialized Countries: additional indicators*).

➤ Recommendation 18:

We would urge more work on adapting the MDGs to the context of BiH so that targeted poverty reduction in line with UN Conventions becomes an integral part of BiH's PRSP.

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3. THE ROLE OF CIVIL SOCIETY IN POVERTY REDUCTION - Strengthening participation and accountability

General Comments:

One of the most important elements of the preparation of PRSP's is that of ensuring the participation of citizens and inclusion of their views, through the participation of organisations and groups in civil society. The BiH PRSP is no exception and, whenever there is reference to consultation and feedback processes, civil society actors, particularly local Non-Governmental Organisations (NGOs), are seen as central to this effort. This is welcome in terms of seeking to ensure that the PRSP is owned by all the citizens of BiH. In addition, there has been some success in incorporating the views of civil society into the draft PRSP.

Issues requiring greater attention:

Apart from some general comments however, the draft PRSP contains very little reference to the actual and potential role of civil society in poverty reduction. Nor is there a clear articulation that civil society, together with a free market economy and a pluralistic democratic system, is one of the three key pillars of sustainable development. Further, there is little attention to the barriers to the development of a vibrant civil society in BiH, although removing these barriers would have a major impact on social development.

➤ Recommendation 19:

The PRSP should ensure that, throughout the text, greater reference is made to the role of civil society in poverty reduction and the importance of removing barriers to civil society and active citizen's participation, including legal, financial, institutional, and attitudinal barriers.

➤ Recommendation 20:

A specific section on the role of civil society should be included in the PRSP noting how removing these barriers and liberating civil society would have a major impact on social development. A recent study for the World Bank (*Local Level Institutions and Social Capital Study*, 2002) found a large, untapped potential amongst the population of BiH to engage in voluntary and community work, and noted that "there is ample room for making more extensive and better use of collective actions and people mobilization to improve service delivery and accountability."

➤ Recommendation 21:

The PRSP should also highlight the importance of NGOs having a role beyond that of service delivery, to encompass issues of democratization and monitoring of policies, including the implementation of the PRSP recommendations.

➤ Recommendation 22:

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Each chapter and, in particular, the Sectoral Annexes, should include consideration of the current role played by civil society groups, and how that role can be increased in terms of effectiveness.

4. CHILDREN AND THE PRSP **- The Need for a Specific Focus**

General comments:

In the Round Table on Children and Poverty, the PRSP Coordinator acknowledged that “the Interim-PRSP does not have too many references to children and poverty” (p. 9). In the Draft PRSP, there is some evidence, which we welcome, of the issue of children and poverty being addressed to a greater extent than in the I-PRSP.

Issues requiring greater attention:

One of the central recommendations of the Round Table however - that the PRSP should include a separate section on children – has not been adopted. This is regrettable because it means that the recommendations regarding children in the PRSP are scattered. Further, this does not ensure attention to the critical importance of preventing/stopping intergenerational poverty cycles. (See *'Enduring poverty and the conditions of childhood. Lifecourse and inter-generational poverty transfers'*, Harper, C., et al, World Development, March 2003)

A SPECIFIC FOCUS ON CHILDREN

Whilst it could be argued that it would be wrong to single out children as one category amongst many vulnerable groups, there are a number of specificities regarding children which merit such an approach. These include the particular long-lasting effects of childhood poverty, the negative legacy it leaves for the future, and the importance of addressing the risks of inter-generational poverty that result.

A comprehensive approach to poverty reduction in BiH would consider, together:

- legislative issues concerned with children (in particular the harmonization of laws in line with the CRC);
- financial and budgetary issues (including the establishment of a children’s budget),
- practice issues concerned with protection and enhancement of children’s rights.

➤ Recommendation 23:

We urge that serious consideration is given to the need to include a separate section on children and children’s rights in the Final PRSP, based on the importance of an holistic child rights approach within the PRSP, and in the light of PRSP findings regarding the nature of child poverty in BiH, and its centrality to issues of poverty reduction in BiH. This would ensure an integrated approach to child poverty and ill-being in BiH.

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THE UNCRC AND NATIONAL PLAN OF ACTION (NPA)

Recommendations from the (Draft) National Plan of Action for Children in BiH 2002-2010, including the adapted goals from the World Summit for Children, are important in terms of setting a broad agenda for children rights in BiH. These have not been taken fully into account in the Draft PRSP.

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➤ Recommendation 24:

The priorities for children in the NPA should be included in the overall vision for development, in the section on priorities, in success criteria, and in Action Plans, in the PRSP. They should also be integrated and amplified in the rest of the text.

➤ Recommendation 25:

The Final PRSP should pay specific attention to the recommendations from the NPA regarding a Social Strategy to Reduce Poverty and Inequality. Each of these is noted in the Table below, with a general assessment of how far they have been incorporated into the PRSP thus far.

Table 2: Status of NPA Recommendations on Poverty Reduction in PRSP.

NPA RECOMMENDATION	STATUS IN DRAFT PRSP
1. Include in the Strategy to Combat Poverty, which was adopted by the Council of Ministers of Bosnia and Herzegovina in the second half of 2000, a special segment that refers to the rights of the child, which would be based upon the principle of human progress, freeing children and young people from poverty and reducing the unacceptably high level of inequality.	Not Done (see Recommendation 23 above)
2. Harmonise legal regulations between entities concerning the social policy and work out the budgets intended for children.	Limited recognition of need for inter-entity harmonisation. No indication that a children’s budget will be drawn up or that budgets will be disaggregated to indicate expenditure on children.
3. Pass the Programme on Social and Child Policy, which would at the state level ensure the minimum of social security of children, and the rights of the child, in accordance with the international conventions whose signatory/party is Bosnia and Herzegovina.	No State level programme envisaged. Commitment to improve child and social policy at entity levels.

The Dynamics and Causes of Child and Family Poverty in BiH.

Chapter 6 of the PRSP on the poverty profile in BiH is a thorough, well-written, and carefully argued section of the PRSP, which incorporates the latest information on the extent of poverty in BiH, based on the Living Standards Measurement Survey (LSMS). The chapter represents a significant improvement on the poverty profile presented in the



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Interim-PRSP. There is greater attention to child poverty; to ethnicity and poverty; and to the kinds of measures needed to overcome poverty.

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There are, however, three very different problems that can be found in the text.

THE USE OF LSMS DATA

Firstly, there is, perhaps, too much regard paid to the data from the LSMS which have only been subject to an initial analysis; contain a considerable margin for error; and can be misleading particularly in the context of the absence of clear and accurate population data. Whilst the LSMS has questioned certain assumptions about poverty in BiH, it may have been better to have placed these results alongside other available data, in particular the self-report studies from the UNDP Early Warning System which is used in other parts of the text to explain general trends.

➤ Recommendation 26:

There is a need to treat the LSMS data with greater caution in the final version of the PRSP, and to cross-reference LSMS findings with other studies, including that of the UNDP Early Warning System.

FINDINGS ON CHILD POVERTY IN BiH

The second problem is that, if the results from the LSMS are valid, then they have not influenced sufficiently the exploration and analysis in the rest of the chapter. In particular, the findings regarding children and families in poverty which differ from those in the I-PRSP, merit further discussion and analysis and could be re-phrased. The argument that “the majority of the poor in BiH are employed persons living in families with children” (p. 8) is unfortunately phrased since all the household members, including children, are poor.

The LSMS findings as described in the Draft PRSP, namely that 30% of the poor are children under 18 in BiH, and 65% of the poor live in families with children, suggest that ***child and family poverty is the greatest single issue regarding poverty in BiH, and that a successful policy to combat child and family poverty would be the most important foundation of a coherent strategy of poverty reduction in BiH.*** Whilst the discussion of ‘the Young Generation and Poverty’, particularly that concerning under-5s, is welcome, there is a need for much more work on this issue and more complete reference to the failure of child and social welfare policies to have an impact. As it stands, the conclusions from the poverty profile tend to be expressed more in terms of what was not found (any extreme poverty; clear correlation between unemployment and poverty; etc.) than what was found.

➤ Recommendation 27:

The findings on child and family poverty in BiH need to be given greater emphasis throughout the text and, in particular, in Chapter 6. There is also a need to add to the Conclusions section of Chapter 6 as follows: “Children and families represent the largest group in poverty and at risk of falling into poverty in contemporary BiH. This finding

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suggests the need for much more work to be done on the dynamics of child and family poverty and its inter-relationship with issues of ethnicity; status (unemployment; refugees; etc); location (rural/urban areas); and access to health, education and social protection.”

POVERTY PROFILE RECOMMENDATIONS

The section on Recommendations in Chapter 6 is confusing and, in a sense, superfluous given that the entire document contains recommendations all of which should be geared to, and judged on their performance in, poverty reduction. The recommendations, as they stand, may be taken as an indication of the most important issues in terms of poverty reduction in BiH, in which case, Recommendations 1 to 4 all contain a number of problems

➤ Recommendation 28:

There may be a case here to limit recommendations to the need for more data on poverty in BiH (Recommendation 5, p. 33).

➤ Recommendation 29:

Draft PRSP Recommendation 1 stresses the danger of poverty leading to social unrest and, hence, endangering economic growth. We would **suggest that this recommendation be rewritten to ensure it addresses the human consequences of poverty in BiH and, in particular, the long-lasting effects of experiencing poverty in childhood.**

➤ Recommendation 30:

Draft PRSP Recommendation 2 argues that sustainable economic growth is the guarantor of poverty reduction in the long-term. **There is a need to add that economic growth per se does not guarantee poverty alleviation, so that the growth must be pro-poor growth.**

➤ Recommendation 31:

Draft PRSP Recommendation 3 suggests that, short-term, there is a need to build the capacity of the social welfare systems. This is a welcome statement but needs to be phrased differently to ensure that its meaning is clear. **We would suggest that this recommendation (Chapter 6 p. 33) is rephrased as follows:** “The development of adequate systems of social and child welfare is an immediate priority, combining universal measures to generalized risk groups, including children and families, with targeted support to the poorest of the poor.”

➤ Recommendation 32:

Draft PRSP Recommendation 4 begins by asserting that education and public-health allocations are very high (7% of GDP for education and 8% of GDP for public health). SC UK disputes that such expenditures are very high in the context of the massive fall in

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GDP in BiH over the last 10 years. Recommendation 4 *should be revised to read:*
“Expenditures on public-health and education services need to be increased to a level consistent with achieving poverty reduction, combined with a commitment to reforms which increase efficiency, and which ensure that access for the poor is strengthened and not eroded.”

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ADDRESSING EUROPEAN PERSPECTIVES ON INEQUALITY AND SOCIAL EXCLUSION

The third problem is that the chapter is focused entirely on absolute poverty rather than on wider questions of relative poverty and the related concept of inequality, and of social exclusion. Insofar as many of the other chapters contain very useful summaries of the importance of linking recommendations to BiH's path of future accession to the European Union, it is a missed opportunity in this chapter to address the importance of the European Union's focus on social exclusion and, in particular, the need to prepare National Action Plans for Social Inclusion.

➤ Recommendation 33:

The final version of the PRSP should include a section on Inequality and Social Exclusion and should discuss this in the context of practices required of members of the European Union.

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5. THE PRSP RECOMMENDATIONS - Towards Social and Child Impact Analysis

The Value of Social and Child Impact Analysis

In *Diminishing Returns*, we noted the continued risks to children through policy documents, such as PRSPs, containing few, if any, references to the social implications of the policies advanced (p. 42), and rarely addressing the likely effects on children. The relevance of Poverty and Social Impact Analysis (PSIA) in the preparation of PRSPs in general has been increasingly recognized and, in particular, has been seen as affording the possibility of a more adequate, and inclusive, process of discussing policy options (cf. Joint NGO Briefing Paper: *PSIA – Where is the impact? Moving towards evidence-based planning for policy*, 2003). Within this, the use of ‘child impact statements’ which seek to determine the likely impact on children in general, and specific groups of children in particular, are also seen as important (cf. SEECRAN and SC UK (2000) *Rights in Crisis and Transition*; p 49).

Elements missing from BiH’s PRSP

There appears to have been no attention given to social and child impact analysis thus far in the process of drawing up a PRSP for BiH. Based on experience in BiH thus far, and from other countries, a number of policies proposed in the text are likely, if pursued in the manner proposed, to have negative social and child impacts in terms of poverty reduction. These include:

PRIVATISATION (CHAPTER 12)

The central contradiction in the PRSP’s discussion on privatisation needs to be confronted and resolved. On the one hand, there is a very clear commitment, in Chapter 12 but also throughout the document, to privatisation as a “key group of activities” stimulating “more efficient economic growth” and “essential to sustainable and democratic development” (p. 5). On the other hand, there is a recognition that “Privatisation almost invariably has negative short-term effects: social tensions, job losses, resistance to the process, and so on” (p. 9). There is little discussion of the need to strike a balance between these two positions, based upon a clear social and child impact analysis. The social effects noted, including increasing poverty, inequality and social exclusion, can be more than short-term phenomena.

➤ Recommendation 34:

There is a need for a very clear social impact analysis and an open discussion of alternatives. This would necessarily include attention to the nature, main focus, and speed of privatisation, together with the implementation of clear measures of social mitigation, through the establishment of special funds in which workers who lose their jobs in the privatisation process have access to low interest loans, employment and business advice, free training programmes, and aspects of the social protection system,



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especially the child and family welfare system and child care provision for low income families.

UTILITIES PRICING (CHAPTER 12 AND ANNEX IX)

Chapter 12 on Privatisation urges that the privatisation process be extended to a number of key sectors where it has not yet begun, including state/publicly owned telecommunications, postal services, and energy; and municipal services of gas, forests and mines. Annex IX on Energy sets out a detailed road-map for electricity and gas privatisation which involves the early setting of economic pricing mechanisms. There is no discussion in these chapters of the PRSP, nor elsewhere in the document, of the potential social and child impacts of these measures, nor is there any discussion of mitigation measures, some of which already exist, through subsidies, and so on. There is therefore no evidence presented as to how these processes will aid poverty reduction and, indeed, evidence from elsewhere in the region suggests that the impact on vulnerable groups can be particularly acute. PSIA's have been done or are in process on these issues in other countries and there may be valuable lessons that can be drawn from these experiences for BiH.

➤ Recommendation 35:

It is important to ask which groups of people at risk of poverty are most vulnerable to increased charges, if that is what is to occur, as well as which groups currently receive subsidies. It may well be that the group of working families with children, precisely a major risk group to fall into poverty, are most vulnerable here. For this reason, SC UK urges caution in pursuing these objectives in the absence of a clear impact analysis and an outline of options for social mitigation.

FOREIGN DIRECT INVESTMENT AND WORLD TRADE ORGANISATION MEMBERSHIP (CHAPTER 9)

The PRSP is clear that joining key global institutions such as the WTO, and promoting the conditions for free trade and, in particular, foreign direct investment, is crucial to the development strategy for BiH. Within this, barriers to state-led foreign trade policies need to be removed. The document is silent, however, on the danger that the creation of an 'enabling environment' for FDI, and the broader rules to which BiH as a WTO member will have to abide by, could erode the capacity for local stewardship of the economy, and could have negative social impacts, not least by increasing state subsidies to foreign investors and crowding out internal investment and entrepreneurship.

In addition, it could open BiH up to free trade in health and education which would further undermine the development of the social sector and of child-friendly policies, particularly for marginalised and disadvantaged groups. Private provision of health and education services could lead, in turn, to greater inequality in access to these key services – thus potentially fueling social tensions, as well as perpetuating poverty. It may also

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mean that BiH has to commit to certain policies irreversibly and in perpetuity (e.g. any liberalisations committed to under GATS).

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➤ Recommendation 36:

The PRSP should address a range of issues regarding the social impact of pursuing trade liberalisation, promoting foreign direct investment, and seeking to join the WTO. A range of options and measures for social mitigation of negative consequences, should be included in the PRSP discussion of these issues.

EMPLOYMENT AND THE LABOUR MARKET (CHAPTER 13)

The PRSP recognizes that the unofficial or informal sector of the economy has played a role in poverty alleviation and cautions against measures which might “jeopardise the survival strategies of poor people.” (p. 5). Overall, the recognition that there are too many small labour markets in BiH and, therefore, a need to promote flexibility and mobility of labour, combined with re-training, is welcome. However, there is no discussion of the different experience of the labour market amongst women and men, nor of the particular problems faced by disadvantaged groups, including people with disabilities, in the labour market. The PRSP argues for a clear separation between employment services and social protection services, which might mean that the ability of marginal groups to participate in meaningful and rewarding work is limited.

➤ Recommendation 37:

Discussions of employment need to focus on diverse sectors of the labour market and, in particular, address the employment needs of socially vulnerable groups. In particular, persons with disabilities, young people leaving state care, and single parents all face particular problems in terms of their access to the labour market and/or balancing work and home.

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6. SECTOR RECOMMENDATIONS: EDUCATION

– A Review (Annex II)

General Comments

Annex II of the PRSP outlining Sector Priorities for Education is a succinct statement of the existing system of education in BiH, which is fragmented, exclusionary, and often not child-friendly. It includes a clear statement of reform goals in four main areas: Reduction of Fragmentation and Enhancing Equality; Creating Funding Concepts and Budgets; Defining the Relevance of Assessment Standards and Budgets; and Establishing Data Collection and Analysis Systems.

Issues that require greater attention

EQUALITY OF ACCESS TO EDUCATION

The balance between technical objectives of system reform and wider issues of equality of access to education should be tilted towards the latter objective, with more emphasis on the importance of education for human social development and not only for productive labour. In addition, whilst completion of primary education is emphasized for all groups, there is insufficient attention to the specific issues facing Roma children as well as to the issues concerning secondary education.

➤ Recommendation 38:

There needs to be more discussion of the importance of pre-school provision, involving social as well as educational priorities, with clear targets to raise pre-school attendance from 8.5% in the FBiH (not 85% as is incorrectly stated on p. 5), and a similarly low figure in the RS.

➤ Recommendation 39:

Greater attention needs to be paid in the PRSP to the specific issues facing Roma children and the need for a comprehensive programme that increases access and completion of primary education for Roma.

➤ Recommendation 40:

Greater attention is required in the PRSP to increasing completion rates in secondary education.

➤ Recommendation 41:

The social and child impact of the introduction of market principles within education, (including the privatisation of higher education recommended in the Draft PRSP), should be the subject of a social impact analysis given the real danger that it will disadvantage young people from poorer families

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INTEGRATION, COMMUNITY LINKS AND RESOURCES

Whilst Annex II contains most of the recommendations suggested in the Roundtable on *Children and Poverty*, the report is less forthcoming on the resource implications of the commitments and of the need to ensure that primary education is free for all children. There is no reference, either, to additional resources to ensure that poor children are enabled to attend school, nor to facilitate the enrolment of Roma children, children from minority groups and refugee children. The focus on data collection and community education risk shifting attention from the needs and wishes of children with disabilities themselves. Further, the importance of closer links between schools and the community, and the importance of pupil and parental involvement in decision-making are, also, not sufficiently emphasized in the PRSP.

➤ Recommendation 42:

There needs to be a much clearer commitment in terms of resources and an Action Plan with clear targets regarding the implementation of the stated goal of integrating children with disabilities and other disadvantaged groups into mainstream education. This should ensure consultation and participation of these children and their advocates.

➤ Recommendation 43:

The emphasis on the creation of a new, more child-friendly, learning environment, whilst welcome, also stops short of *the need to commit more resources including capital expenditures, new technologies, and spending on up-to-date teaching materials.*

➤ Recommendation 44:

A separate section in Annex II is needed to address the development of closer links between schools and the community, and the importance of pupil and parental involvement in decision-making, ensuring representation of marginalised groups. This should combine positive examples from existing projects with clear proposals for increased community involvement in the future.

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7. SECTOR RECOMMENDATIONS: HEALTH – A Review (Annex IV)

General Comments

Notwithstanding the recognition that more work needs to be done on sector priorities, Annex IV of the PRSP on Health Care, like that on education, provides a very clear overview of the state of the sector, the need for reform, and existing plans for health system reform. It also provides a cursory overview of the state of health and health care in BiH, including a statistic that ‘Participation in Health Care’ was 11.7% of GDP in 1991 and only 5.5% of GDP in 2000, partly contradicting arguments elsewhere that public spending on health is too high.

Issues that require greater attention

HEALTH INDICATORS, SPENDING AND ACCESS

There is less linkage made between health indicators and systems change than might be expected, and insufficient focus on the specific health issues of children and young people. Measures incorporated in the Draft PRSP to promote access to health care and necessary medicines for the poorest sectors of society are welcomed, although the review does not address general issues of policies regarding charges for health care. The need to ensure adequate health protection for all children, including those without health insurance is also not stressed in this part of the document as strongly as it might be, although it is stated more clearly in the Annex on the Social Sector.

➤ Recommendation 45:

The issues of policies that influence children's equitable access to health care should be addressed to a greater extent in the PRSP. This would include general issues of policies regarding charges for health care, both formal charges and informal charges through the widespread use of payments to secure health care.

➤ Recommendation 46:

There is insufficient attention in the document to the needs of marginalised children and young people for health care and, in particular, the importance of youth-friendly approaches to the avoidance of risk behaviour and harm reduction. More attention could be paid in this section to ensuring adequate health protection for all children, including those without health insurance.

➤ Recommendation 47:

Figures for Infant Mortality Rates should be stated as ‘per 1000 of the population’ and not a percentage rate as expressed on p. 15 of Annex IV.



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9. SECTOR RECOMMENDATIONS: SOCIAL SECTOR - A Review (Annex III)

General Comments

In some contrast to the Annexes on Education and Health, the Annex on the Social Sector is difficult to read and contains unclear and unsequenced general recommendations. It does point out some of the key factors which impede the development of sustainable social protection systems in BiH, notably the low and uneven levels of spending, high degree of decentralisation and discretion, and distortion of priorities.

Areas that require greater attention

It is clear from the priorities outlined, many of which are welcome, that *there is still a lack of a coherent reform strategy regarding social protection in BiH*. In addition, the Annex does not address issues of social services in sufficient depth, nor does it articulate a clear social rights perspective in line with UN Conventions and the European Charter. In addition, it also neglects a number of important studies of the social sector (notably those by the Independent Bureau for Humanitarian Issues – IBHI), is silent regarding the broad priorities of a number of donors in the social sector, as well as failing to discuss adequately the role of local NGOs in the development of a new mixed model of social welfare. Issues of children’s rights, child care, and child protection, including the importance of a universal system of children’s allowances, are noted in the text but left too vague to represent clear, meaningful, and measurable commitments.

GENERAL AIMS AND EXPENDITURES ON SOCIAL WELFARE

There is no clear statement in the document of the broad aims of social welfare nor of the precise funding commitments being made. Further, there is no clear statement on the levels of centralised and entity public funding that will be committed to social welfare in BiH for the coming years. A commitment is made in the Introduction to the need to spend a proportion of GDP on social and child welfare in line with the average in the region, which would be effectively a doubling of expenditure.

➤ Recommendation 48:

We would suggest the statement in the Introduction is replaced, from the need for radical measures to create a sustainable, mixed, system of social welfare, in order to “distribute the burden of poverty more evenly in society” (Annex III, p. 5). This should be reworded, as the urgent need “*to reduce poverty rates and vulnerability to poverty throughout BiH.*”

➤ Recommendation 49:

We would urge that *there is a clear statement of the level of public spending on social welfare to be expected throughout the document, with priority accorded to a commitment to, at a minimum, doubling expenditure in the next three years.*

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LEGISLATIVE HARMONIZATION

A clear statement is made regarding the need to introduce legislative frameworks at the entity level in line with European standards, and specific mention is made of proposed Laws on Social Welfare, Child Care, and the Disabled (p. 6). The document does not, however, address the need to ensure harmonisation of legislative frameworks within BiH as a whole, nor is it clear or consistent in the documents whether the proposed laws are only for the FBiH or also for the RS.

➤ Recommendation 50:

We would urge a clear commitment to “the development of harmonised legislative systems of social welfare throughout BiH.” This would mean that a clear statement is made regarding the role and relative importance of each level of Government in terms of legislation (where the principle of centralisation should apply); funding (mixed); and practice (subsidiarity and localisation wherever possible).

➤ Recommendation 51:

In addition to the Laws indicated, there is also a clear need for a specific revision of criminal legislation provisions following international standards with respect to children in conflict with the law. This legislation needs to include not only Criminal Codes and Criminal Procedure Code (as mentioned in the PRSP Draft) in both entities, but also The Law on the Execution of Criminal Sanctions which is particularly relevant in the case of juvenile offenders. Consensus on whether criminal provisions for juveniles should be maintained in separate legal instruments (as is the current situation), or in separate specific legislation is required prior to revision and reform, and should necessarily be based on consultation with relevant policy-makers and professionals.

➤ Recommendation 52:

Legal Provisions to address all forms of exploitation of children should be more strongly introduced in the legislation in BiH. Overall, these issues are not addressed in sufficient detail within the document.

CHILD AND FAMILY WELFARE

Given the centrality of child and family poverty in BiH, the importance of coherent measures on child and family welfare is clearly a major priority for a poverty reduction strategy. The draft document hints at this in a number of places but does not provide a sufficiently rigorous overview of existing provisions (the Children’s Fund of RS is not discussed, for example), nor are sufficiently clear and bold recommendations made. Again, there is confusion as to whether proposed measures should apply to both the FBiH and the RS, and the need for harmonisation across the entities is not discussed.

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Within the ‘Measures Proposed’ (Annex II, p. 15) we would replace the first paragraph which refers only to the FBiH and is framed in terms of demographic and population policies with the following text: “Family policy measures throughout BiH should be introduced with the clear aim of recognizing the importance of the family as the basic unit of society and with the aim of ensuring an adequate standard of living for all children and families in BiH. A system of measures including child benefits, tax relief, parental and maternity allowances, and family services should be developed.”

➤ Recommendation 54:

Paragraph 3 on page 15 also needs to be clearer about the importance of a system of Children’s Allowances throughout BiH, paid at levels high enough to ensure a poverty alleviation function. We recommend replacing paragraph 3 with the following text: “Throughout BiH, a harmonised system of Children’s Allowances should be developed and paid, with a minimum level set high enough to ensure that no child is in poverty in BiH. This system should combine universal children's allowance with funds targeted to the poorest families.”

ALTERNATIVES TO INSTITUTIONAL CARE

The recommendation regarding the importance of alternatives to institutional care for children through foster care, day care and so on (p. 15) is welcome, but there needs to be a clearer outline of target groups and funding priorities for non-institutional care. The issue of children in conflict with the law should also be addressed here, together with the role of NGOs, in particular local NGOs, in providing and supporting development of alternative care resources together with the public services.

➤ Recommendation 55:

We would suggest the need to insert within paragraph 6 on page 15 a clearer statement concerning use of institutional care only as a last resort for children, with preference and commitment given to the development of alternatives to institutional care and strategies for prevention. We would suggest a clear statement of the likely reduction in institutional placements over three years for: Children without Parental Care; Children with Disabilities; and Children in Conflict With the Law.

POLICY DIRECTION, CO-ORDINATION AND DATABASE ISSUES

The document notes the difficulties of co-ordination within social policy, and the fact that there have been delays in external assistance to reform efforts in the social sector. There is also a renewed effort to develop an accurate database system regarding beneficiaries of social welfare.

➤ Recommendation 56:

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We would suggest that the need for urgency in terms of policy development be stated clearly, beyond a vague notion, in the Action Plan. This would entail replacing the current wording of the need to “Establish a new social policy in FBiH and RS in order to reduce the number of poor and to build adequate social welfare for the most vulnerable groups of the population in the area of child care” - by a clear statement of the need to “Ensure that a new Social Policy system is in place, based on clear responsibilities, channeled external assistance, and accurate information systems, designed to ensure that poverty is reduced and that social welfare is delivered to European standards.”

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10. STRATEGIES, OUTCOMES and INDICATORS

- The Need for Clarity

ACTION PLANS WITHIN THE PRSP

The development of an Action Plan within the PRSP is to be welcomed. This Action Plan lists all of the recommendations made in each of the chapters of the report and combines general themes with a list of measures to be carried out, indicating where these apply to BiH as a whole, the FBiH, and the RS. The establishment of an Action Plan is of immense importance in a PRSP enabling progress to be tracked and success, or lack thereof, in achieving objectives to be measured.

However, the Action Plan as it is currently written risks being less a strategy than a list of measures with no prioritisation, no sense of who will be responsible for what, no indicators of achievement, and no sense of the risks and barriers to achievement which need to be overcome.

➤ Recommendation 57:

We would urge that a clearer Action Plan be produced in the revised document. This should not only be a cumulative list of actions but should require a statement of the most urgent priorities; who is responsible for what; time scales; indicators of success; and risks to be overcome or assumptions which must hold. It is important that each of the Action Plans is framed in terms of general goals and specific measures to achieve those goals.

ACTIONS PLANS AND POVERTY ALLEVIATION

Throughout the document, there is a need to demonstrate how specific actions will contribute to poverty alleviation in the short-, medium- or long-term. The issue of social and child impact, noted above, also relates to this.

➤ Recommendation 58:

There is a need in the revised document to spell out a more limited set of proposals which are specifically designed to reduce poverty in BiH, with a clear set of targets to be achieved, and indicators through which they can be measured. We would urge that one set of these be concerned specifically with child poverty.

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11. PARTICIPATION AND NEXT STEPS

- Processes of Participation

General Observations

There is now widespread recognition that the process of consultation and participation with all stakeholders, and the ways in which these participatory processes influence content and policy recommendations, are key aspects of the development of a PRSP. Annex I of the Draft PRSP notes this, and covers the comments of donors, whilst comments of other groups are noted elsewhere in the document. The issue of process and participation is worthy of a separate commentary. Here we make only a small number of recommendations.

➤ Recommendation 59:

There is a need to ensure that comments from civil society groups, young people, disadvantaged groups, and poor people and their movements are actively sought, noted, and acted upon in the PRSP.

➤ Recommendation 60:

In the Revised PRSP, an Annex listing comments received should be included and, if possible, a web page established so that comments can be made available.

MONITORING IMPLEMENTATION OF THE PRSP

In many countries, civil society is playing an active role in PRSP implementation and impact monitoring.

➤ Recommendation 61:

We recommend that the poverty monitoring system for the PRSP takes into account the experiences of diverse sections of civil society. Furthermore, it should make use of qualitative data, which can be generated by civil society as well as statistical data.

Save the Children UK welcomes the opportunity to discuss these comments further, and would again like to note that great progress has been made in moving from the I-PRSP to the Draft PRSP to which these comments pertain. We hope that these comments and recommendations will assist the drafting teams in ensuring a still greater emphasis on issues affecting children in the forthcoming revision of the Draft PRSP.

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*Save the Children UK,
Bosnia and Herzegovina,
February 28, 2003*

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Save the Children
UK

Mr Zlatko Hurtic,
Coordinator,
Office of the BiH Coordinator PRSP,
Bosnia and Herzegovina

July 7, 2003

Re: **Save the Children UK Comments on the
Development Strategy BiH - PRSP Draft for Public Discussion**

Dear Mr Hurtic,

Given the opportunity for input on the Draft Development Strategy BiH – Poverty Reduction Strategy Paper, Save the Children UK provided extensive Comments and Recommendations (February 28, 2003). These were formulated on the basis of data incorporated in the PRSP highlighting the fact that children and families represent the largest group in poverty and at risk of falling into poverty in contemporary BiH. SC UK recommendations also drew on international research and analysis which has demonstrated the particular long-lasting effects of childhood poverty, the negative legacy it leaves for the future, and the risks of resulting inter-generational poverty that result. As a consequence, it remains a vital consideration in the Development and Poverty Reduction Strategies for BiH.

Some of these recommendations have, encouragingly, been incorporated to some degree in the Draft for Public Discussion, most notably in the sections concerning Social Policy, Employment and Labour Market.

Unfortunately, some themes have been missed entirely despite their evident importance in the context of the PRSP. This appears to be largely due to the lack of dedicated working groups to these "cross-cutting" themes. The result however is that a number of issues which are critical in the context of poverty reduction, and have not been adequately addressed in the revised Draft, namely:

a) children and childhood poverty

As an essential aspect in any poverty reduction or other development strategy, this needs to be given greater attention. Currently there is no specific section on children, and no commitment to addressing issues of childhood poverty in the Mid Term Goals outlined in the document.

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b) the role of civil society

Considering the progress made to date in BiH in involving civil society in the process of formulating the PRSP, it is regrettable that virtually no mention is made of the role of civil society in monitoring as well as involvement in implementing the PRSP.

c) issues of inequity and social exclusion

Attention to this critical area has been incorporated to a limited extent in the *Draft for Public Discussion*, however it remains essential so as to achieve the targets set for poverty reduction. The PRSP draft misses a number of opportunities to clarify measures which promote pro-poor policies which are required as part of the approach to poverty reduction. To note two prominent examples:

- the poverty profile recommendations and mid-term goals, as presented, do not reflect attention to pro-poor policies
- mitigating measures are not routinely considered for the most vulnerable groups in BiH. An area of particular concern is proposed privatisation of utilities where no measures are mentioned to ensure vulnerable groups are not adversely affected.

In summary, while we recognise the significant progress that has been made so far and the difficulty of including all priorities in such a document, key areas continue to require attention in this final stage to ensure that poverty reduction remains a major focus of this Development Strategy.

Attached please find a short document with specific comments prepared by Save the Children UK on the most recent Draft for Public Discussion. We hope those relevant to the current drafting groups will be taken into consideration in finalizing the PRSP.

Given that no drafting group has been tasked with specifically addressing issues for children or the role of civil society, and that recommendations from the previous consultations have not been incorporated in any form as a consequence, we would strongly urge that two additional drafting groups are constituted to ensure adequate attention is provided to issues of children and the role of civil society in the final PRSP.

Once again we welcome the opportunity to further discuss these comments and recommendations, and look forward to such critical issues as childhood poverty and pro-poor policies being appropriately reflected in the final PRSP.

Yours sincerely,

Shon Campbell,
Programme Director,
Save the Children UK,
Bosnia and Herzegovina

copied to:

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Ministry of Health and Social Welfare of the Republika Srpska,
Federation Ministry of Health,
Ministry of Education of the Republika Srpska,
Federation Ministry of Education,
BiH Council for Children,
World Bank,
UNICEF,
OHCHR,
NGO PRSP Core Group,
Canadian Embassy,
DFID/British Embassy,
Embassy of Switzerland,
Royal Netherlands Embassy

**Save the Children UK Comments
on the
*Development Strategy BiH - PRSP Draft for Public Discussion***

July 7th, 2003

As noted in the attached letter, SC UK provided comments and recommendations on the previous draft of the PRSP. A number of these have still to be addressed in the finalisation of the BiH PRSP. These are as follows,

a) LACK OF ATTENTION TO CHILDREN IN THE PRSP.

The *Development Strategy BiH - PRSP Draft for Public Discussion* (released in June, 2003) clearly highlights macroeconomic issues and the importance of children and families as the largest group in poverty and at risk of falling into poverty.

However it does not yet pay specific or adequate attention either to children or policies specifically targeting reduction in childhood poverty. PRSP recommendations in relation to children still remain scattered and without adequate attention to preventing/stopping intergenerational poverty cycles. While it is acknowledged that childhood poverty is a critical element to be addressed, this is not borne out in practice with no priorities specific to children in the Mid-term Goals (Chapter 8).

- ***The commitment to reducing childhood poverty should be articulated in the Goals of the Mid Term Poverty Reduction Strategy in BiH as a key priority (Chapter 8).***
- ***A Drafting Group should be formed to focus on children and poverty – strengthening this aspect specifically in the current document and with a specific section on children. If this cannot be managed in the time available, we would recommend that main recommendations are incorporated along with a specific action point to strengthen the document with respect to its targets for children as a first step in implementation.***
- ***A more limited proposal should be developed, focusing specifically on child poverty in BiH, with clear targets to be achieved, and indicators through which they can be measured. If this cannot be developed prior to finalisation of the document, it should be listed as one of the priority initial activities to be undertaken. (See SC UK Recommendation 58)***

We would again ask that consideration be given to our previous recommendations:

- ***A separate section is still required on children and children's rights in the Final PRSP.*** This would be based on the importance of an holistic child rights approach within the PRSP (with particular attention to issues of inequality and social exclusion), recognizing PRSP findings regarding the nature of child poverty in BiH, and its centrality to issues of poverty reduction in BiH. (Recommendation 23):

- ***The priorities developed for children in the National Plan of Action for Children should be included in the relevant sections of the PRSP, namely***
 - ***the overall vision for development,***
 - ***in the success criteria,***
 - ***and in Action Plans.***
 (Recommendation 24)
- ***Specific attention should be paid to addressing the recommendations from the NPA regarding a Social Strategy to Reduce Poverty and Inequality (i.e. to be incorporated in PRSP Chapter 35)*** (Recommendation 25):

b) LACK OF ATTENTION TO MITIGATING MEASURES IN THE CONTEXT OF IMPLEMENTATION

While it is encouraging to see some attention to the importance of social impact analysis in the current document, this is not integrated throughout the PRSP. There remains a critical need to consider social impact in the context of all macroeconomic policy development and implementation, as well as consideration of measures to mitigate its social impact on the poor and more vulnerable groups in BiH society.

- ***A mechanism applicable to all policies proposed within the PRSP is required to assess how proposed processes will aid poverty reduction and avoid negative impact on vulnerable groups.*** This should include assessment discussion on the potential social and child impacts of proposed measures, as well as mitigation measures.

More specifically, we would again ask that attention be given to our previous recommendations with regard to **PRIVATISATION OF PUBLIC UTILITIES (CHAPTER 15)**

- ***The proposed framework to be developed in relation to utility privatisation must necessarily include a clear impact analysis to assess which groups of people at risk of poverty are most vulnerable to increased charges, and an outline of options for social mitigation.*** This should further be reflected in measures of the Action Plan in the area of Privatisation, namely measures 10 and 17 (Recommendation 35)

c) LACK OF INCORPORATION OF THE ROLE OF CIVIL SOCIETY

Significant progress has been made in engaging civil society in the PRSP process so far. Recognizing the global importance given to the role of civil society in the context of sustainable development however, it is surprising that the *Development Strategy BiH - PRSP Draft for Public Discussion* contains no significant reference or commitment to the role of civil society in poverty reduction or PRSP implementation.

- ***A Drafting Group should be formed to develop a specific section on the role of civil society, noting the importance of promoting a vibrant civil society and of taking steps to remove barriers to its development.*** These include legal, financial, institutional and attitudinal barriers. (Recommendations 19 and 20).

Additionally, we would again reiterate recommendations made in our previous comments:

- ***The role that NGOs can play in monitoring of policies, including the implementation of the PRSP recommendations, should be noted and included in the specific section on the role of civil society.*** (Recommendation 21)
- ***Each Chapter and, in particular, Sectoral priorities should include consideration of the current role played by civil society groups, and how that role can be increased in terms of effectiveness.*** (Recommendation 22)

d) INSUFFICIENT ATTENTION TO ENSURING PRO-POOR POLICIES.

The current PRSP draft continues to place a great deal of attention on macroeconomic policies promoting economic growth. However the most critical indicators of success of the PRSP policies and process – past and future – will be its performance in poverty reduction. The recommendations in terms of the Poverty Profile of BiH represent an indication of the most important issues in terms of poverty reduction in BiH. As such, all should be geared to, and judged on their performance in, poverty reduction.

- ***Greater attention is needed throughout the PRSP to ensuring that growth is pro-poor growth.*** Economic growth per se does not guarantee poverty alleviation.
- ***The priority with respect to systems of social welfare should be aiming for an adequately funded sustainable system of social welfare. This should be specified in Priority 6, Chapter 8, Mid Term Goals***

With regard to the **POVERTY PROFILE OF BiH**, we are particularly concerned that without attention to these specific issues, the recommendations cannot be seen as targeting poverty reduction. In this respect, we would reiterate critical recommendations made in our previous comments.

- ***Poverty Profile Recommendation 1 should address the human consequences of poverty in BiH and, in particular, the long-lasting effects of experiencing poverty in childhood.*** (Recommendation 29)
- ***Poverty Profile Recommendation 2: should be aiming for sustainable pro-poor growth.*** The recommendation as currently phrased (i.e. aiming for economic growth per se) will not guarantee poverty reduction in the long-term. (Recommendation 30)
- ***Poverty Profile Recommendation 3 needs to consider the development of adequate systems of social and child welfare as an immediate priority, combining universal measures to generalized risk groups, including children and families, with targeted support to the poorest of the poor.*** (Recommendation 31)

- **Poverty Profile Recommendation 4 should commit to increasing expenditures on public-health and education services need to be increased to a level consistent with achieving poverty reduction, combined with a commitment to reforms which increase efficiency, and which ensure that access for the poor is strengthened and not eroded.”** (Recommendation 32)

With regard to **SPECIFIC ISSUES RELATED TO POVERTY IN BiH (POVERTY PROFILE IN BiH)**, we would again reiterate the need for specific attention to issues of Inequality and Social Exclusion, particularly since these relate to BiH's path of future accession to the European Union.

- **A section describing Inequality and Social Exclusion should be included under Specific Issues related to Poverty in BiH, and should discuss this in the context of practices required by members of the European Union.** (Recommendation 33)

e) **SECTOR RECOMMENDATIONS: EDUCATION**

It is encouraging to see the attention to issues of quality of education and to integration of children with disabilities in the revised *Draft for Public Discussion*. There remains however insufficient attention to inclusion of other marginalized groups such as Roma children, where this is also of increasing relevance in relation to European standards, and to ensuring children complete optimum levels of education.

We would again reiterate our recommendations made in our previous comments:

- **Greater attention is required in the PRSP to increasing completion rates in secondary education.** (Recommendation 40)
- **A specific set of activities/measures is required in the Education Sector Action Plan regarding the integration of children from disadvantaged/disadvantaged groups into mainstream education. This should ensure consultation and participation of these children and their advocates.** (Recommendation 42) This could be developed as something similar to Activity No. 1 which focuses on returnee children.
- **Particular attention is required to ensuring activities/measures to address the specific issues facing Roma children, and the need for a comprehensive programme that increases access and completion of primary education for Roma children.** (Recommendation 39)
- **Attention should be included to address the development of closer links between schools and the community, and the importance of pupil and parental involvement in decision-making, ensuring representation of marginalized groups.** (Recommendation 44)



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f) SECTOR RECOMMENDATIONS: HEALTH

Issues of equity of access have been mentioned in general and in relation to children under 5 years of age, but without specific reference to the wider group of children (under 18 years of age).

We would again reiterate our recommendations made in our previous comments:

- ***Policies that influence children's equitable access to health care should consider all children in the country where this is defined by the UN Convention on the Rights of the Child as up to 18 years of age.*** This would include general issues of policies regarding charges for health care – whether formal or informal charges – through the widespread use of payments to secure health care. (Recommendation 45)
- ***Greater emphasis is needed on the problems faced by marginalized children and young people for health care so as to ensure health protection for all children (up to 18 years of age as per the UNCRC definition).*** (Recommendation 46)

e) SECTOR RECOMMENDATIONS: SOCIAL SECTOR

We were encouraged to find that our comments in regard to the Social sector had been considered and incorporated by the Working Group, and to see mention of the need for development of a reform strategy regarding social protection.

- ***Development of a coherent reform strategy regarding social protection in BiH remains a critical issue which, given its critical nature with respect to poverty reduction, could be given still greater prominence in the PRSP.***

*Submitted by:
Save the Children UK,
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July 7, 2003*

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